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Assessment of the progress of the Republic of Moldova in implementing the European Commission's recommendations on the Fundamentals Cluster in the context of EU accession

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Abbreviations

ADA	Austrian Agency for Development
CEC	Central Electoral Commission
CPA	Central Public Administration
CEDA	Centre for Entrepreneurial Education and Business Support
CARM	Court Accounts of the Republic of Moldova
CSA	Cyber Security Agency
EU	European Union
FDI	Foreign Direct Investment
GD	Government Decision
ICT	Information and Communication Technology
ICSP	Interministerial Committee for Strategic Planning
ILO	International Labour Organisation
INTOSAI	International Organisation of Supreme Audit Institutions
ITCSS	Information Technology and Cyber Security Service
LPA	Local Public Authority
MEDD	Ministry of Economic Development and Digitalisation
MIA	Ministry of Internal Affairs
MLSP	Ministry of Labour and Social Protection
MRBF	Medium Term Budgetary Framework
MRC	Moldovan Railways Company
NAPCVWDV	National Agency for Preventing and Combating Violence against Women and Domestic Violence
NARE	National Agency for Energy Regulation
NBM	National Bank of Moldova
NBS	National Bureau of Statistics
NCCCB	National Commission for Consultation and Collective Bargaining
NCEM	National Confederation of Employers of Moldova
NEAM	National Employment Agency of the Republic of Moldova
NIEL	National Institute for Education and Leadership
NPIAEP	National Programme for Investment Attraction and Export Promotion
NTUCM	National Trade Unions Confederation of Moldova
OHL	Overhead Power Line
OLAF	European Anti-Fraud Office
PPA	Public Procurement Agency
PPP	Public Private Partnership
RM	Republic of Moldova
SHW	Safety and Health at Work
SFCI	State Financial Control Inspectorate
SIA RSAP	Automated Information System "*State Register of Public Procurement*"
SIGMA	Support for Improvement in Governance and Management
SI RPIC	Information System "*Register of Capital Investment Projects*"
SLI	State Labour Inspectorate
SMEs	Small and Medium-Sized Enterprises
SRA	State Road Administration
UN	United Nations Organisation
UNDP	United Nations Development Programme
VAT	Value Added Tax

Methodology

As the Republic of Moldova is a candidate country for membership of the European Union, the European Commission publishes annually a comprehensive report[1] assessing the country's state of preparedness for accession and the progress made towards it. These reports assess the state of readiness for all chapters of the EU Acquis to be negotiated by Chisinau and Brussels, and provide specific recommendations for each chapter, which stem from the main challenges identified by the Commission.

This Report is in its second edition (the first was published in 2024[2]) and assesses how the authorities of the Republic of Moldova have implemented the Commission's recommendations under the chapters of the "Fundamentals" cluster of the accession process. The purpose of the Report is to assess the dynamics of the reforms carried out by the Moldovan government in implementing the fundamental chapters of the accession process and, at the same time, to contribute to the preparation of the first European Commission Enlargement Report for the Republic of Moldova, to be published in autumn this year. Accordingly, the monitoring period is 1 July 2024 to 31 May 2025 (however, to keep it up-to-date, the report also includes the most important developments recorded up to and including 10 July 2025, when the last session of the current legislature took place). The topics and chapters monitored in this Report are as following (according to the Commission's November 2024 Report):

- Democracy
- Public Administration Reform
- Justice System Reform
- Fight against Corruption
- Fundamental Rights
- Freedom of Expression
- Security
- The existence of a functioning market economy
- Public procurement
- Statistics
- Financial control
- Social and employment policies

Progress on the implementation of each recommendation made in the European Commission's November 2024 Report will be assessed according to the following scale:

Degree of achievement	Score	Significance
Implemented flawlessly	**5**	The recommendation was implemented in accordance with the legal provisions on legislative procedure and transparency in decision-making. The content of the legal act adopted or action taken is in line with the spirit or purpose of the action.
Implemented with some reservations	**4**	The recommendation was implemented with some insignificant reservations related to deviations from the legal provisions on legislative procedure and transparency in decision-making.
Initiated and in the process of implementation	**3**	Implementation of the recommendation was initiated and some visible progress has been achieved.
Initiated but no visible progress	**2**	Implementation of the recommendation was initiated but no visible progress was observed.
Not initiated, although some commitments were made	**1**	Implementation of the recommendation was not initiated, but some public discussions took place, some public commitments were made or implementation was planned for the near future.
Total lack of action	0	No measures were initiated to implement the recommendation.

[1] https://enlargement.ec.europa.eu/moldova-report-2024_en
[2] https://www.euromonitor.md/raportul-de-monitorizare-independenta-nr-1-evaluarea-progresului-republicii-moldova-privind-implementarea-recomandarilor-comisiei-europene-in-contextul-procesului-de-aderare-la-uniunea-europeana/

Executive Summary

This Report provides an independent assessment of the Republic of Moldova's progress in implementing the European Commission's recommendations included in the group of chapters on the Fundamentals essential for the opening and conduct of EU accession negotiations. The assessment covers the period July 2024 - May 2025 and is carried out by a consortium of civil society organisations, based on a qualitative and quantitative methodology that looks at the consistency, sustainability, and impact of reforms.

The estimated average score for the implementation of the European Commission's recommendations pertaining to the Fundamentals cluster group of chapters is estimated at 3.2 points out of a maximum of 5. This score reflects the level: *"Implementation of the recommendation was initiated and some visible progress was achieved"*. Thus, as in the previous report, on the one hand, we welcome the fact that implementation of the recommendations is underway, albeit at variable speed, and on the other hand, we caution on the need to give momentum to the implementation of the recommendations and to ensure continuity of the key reforms that are part of the building blocks.

While good progress has been made in most areas, implementation remains uneven and a number of structural, administrative and political constraints persist. The EU integration process has been supported by the adoption of the National Accession Programme 2025-2029.

Below, we present the main developments, constraints, and priorities in the key areas covered by the "Fundamentals" cluster of chapters.

1. Democracy. Moldova has made some notable progress in strengthening the legal framework for the prevention of electoral corruption with the adoption of draft Law nr. 381/2024. Amendments to the Criminal Code, the Electoral Code and the Law on Political Parties introduced tougher sanctions for vote buying and other forms of electoral corruption. However, the fact that the Venice Commission was not consulted on these amendments raises concerns about their compliance with European standards. Ensuring a transparent and participatory legislative process for all electoral amendments remains an urgent priority. Supervision of political party financing by the Central Electoral Commission (CEC) has intensified, but the practice of fictitious donors persists, which was also observed in the context of the 2024 presidential elections and referendum. With respect to transparency the operational capacity of electoral bodies, including at the local level, is essential to prevent these phenomena. On the dimension of transparency in decision-making, although new rules have been adopted (Law 174/2024), implementation remains insufficient. The abuse of urgency procedures undermines public participation, while the stagnation of the reform of the Parliament's Rules of Procedure perpetuates the opacity of the legislative process. Although some structural mechanisms have been implemented, consultations often remain formalised. The key priority is to consistently enforce existing rules and penalise deviations.

2. Public administration reform. Also, in this area some progress has been made over the period analysed, but implementation remains fragmented and with significant challenges. The reform strategy has been supported by the approval of a Roadmap and the launch of the first voluntary amalgamations of administrative-territorial units (ATUs). However, the lack of examples of finalised amalgamations limits the scale of the process. Immediate priorities include supporting ATUs active in amalgamation and strengthening the regulatory framework, in particular with a view to operationalising reforms at local level. In parallel, there have been developments in the reform of central public institutions. The Law on Public Institutions was approved in first reading and a detailed roadmap for implementation is under preparation. The framework for the professionalisation of the civil service has been improved, but constraints remain in filling posts. Strengthening the capacity of the State Chancellery is essential in this process. As regards budget management, there has been no visible progress in respecting the legal timetable. Delays persist in all key steps, including the approval of the Medium-Term Budget Framework and the annual budget law.

Revision of the budget calendar and a structured dialogue between the Ministry of Finance and central and local public authorities are urgent priorities to ensure realistic and transparent planning.

3. Justice reform. Over the period 2024-2025, the justice reform process has seen mixed developments. The completion of the Superior Council of the Magistracy (SCM) and the Superior Council of Prosecutors (SCP) with members who have passed the extraordinary evaluation was a major achievement, marking a crucial step towards strengthening the integrity of judicial governance. The process of evaluation of judges at the Supreme Court of Justice and Courts of Appeal has also continued, but the wave of voluntary resignations has affected the stability of the system. The extraordinary evaluation of prosecutors is progressing, but the pace is slow. Progress has been made in modernising initial training at the National Institute of Justice (NIJ) by updating the curriculum and balancing the composition of admission commissions. The reorganisation of the courts and harmonisation with the new prosecutors' map, as well as the development of human resources strategies by the SCM and the SCP, are important steps towards making the system more efficient. However, the shortage of chief prosecutors on the ground and the lack of a functioning inter-institutional coordination mechanism to follow up the recommendations the Technical Assistance and Information Exchange Instrument (TAIEX) remain significant constraints. The performance of the lower courts has improved, in particular the Chisinau Court, including in corruption cases, due to the specialisation of the panels. In contrast, the higher courts suffer from understaffing and prolonged interim in leadership positions. Priorities include insuring adequate salaries in the judicial and prosecutorial system, decongesting the courts and solving the backlog issues, rapidly organising competitions for vacant positions, and ensuring coherent and stable institutional governance.

4. Fight against corruption. In 2024, the Anti-Corruption Prosecutor's Office (APO) made significant progress in investigating high-level corruption, based on the new competences provided by Law No 365/2023. The number of criminal cases brought to court has increased, including cases against political figures. Investigations into illegal party financing and voter corruption were also launched. However, the performance of the APO is constrained by a severe staff shortage, resignations due to the vetting process, lack of adequate premises and chronic under-funding. The application of the new delimitation of competences between the APO and the National Anti-Corruption Centre (NAC) has led to confusion and delays. The internal reorganisation of the APO and the NAC, the approval of a new staffing structure and the expansion of the prosecution teams are important steps, but the effects are mitigated by the low occupancy rate of key functions. Controversial draft legislation, such as the PACCO initiative, creates regulatory instability and undermines the coherence of reforms. Filling vacancies, clarifying competences and ensuring a stable and well-funded institutional framework are essential. An important step forward is the finalisation of the fourth GRECO round with a satisfactory level of implementation of recommendations. The National Integrity Agency (NIA) has expanded its tasks through a new regulatory framework, but remains constrained by staff shortages, slow digitisation and interoperability difficulties. Strengthening NIA's operational and financial capacity is a priority.

5. Fundamental human rights. During the analyzed period, progress was recorded in promoting fundamental rights, particularly in combating violence against women and in gender representation in Parliament. The national program for preventing domestic violence is 93% implemented, and the ANPCV (National Agency for Preventing and Combating Violence against Women and Domestic Violence) is functional. However, ensuring victim protection remains a challenge. According to statistical data from the INP's annual report, which reflects the electronic monitoring cases applied to domestic aggressors, the violation rate for protection orders is 8.9% (out of a total of 1,024 monitored subjects). With regard to gender equality, the approval of family policies, the ratification of international instruments on the prevention and elimination of violence and harassment in the workplace, and the increase in women's representation in Parliament (over 40%) represent significant steps forward. Nevertheless, economic inequalities persist, such as the 38% gender pay gap in the IT sector and ongoing difficulties in accessing care services and financial resources for women entrepreneurs. Policies on Roma inclusion remain the most deficient. Although official data appear optimistic, only 43% of Roma children are effectively integrated into

the education system. Sustainable funding and adaptation of interventions to realities on the ground are needed. In the prison system, strategic reforms such as the 2024–2027 PNDO and new dietary standards have been adopted, but these have not led to systemic changes. Violence, overcrowding, and staff shortages persist, and the reform process is stalled by a government hiring freeze. Conditions for detained minors are particularly alarming. Human rights institutions – the Office of the People's Advocate and the Equality Council – are active, but underfunded. Their reliance on external funding undermines their sustainability and independence. Between 2022 and 2025, the OPA's budget was supplemented annually by approximately 25% from development partners. Ensuring predictable multi-annual public funding is essential.

6. Freedom of expression. Press freedom continues to be affected by structural vulnerabilities despite recent legislative and policy initiatives. Although a new draft Press Law was developed in 2024, which contains important provisions on transparency of media ownership and regulatory mechanisms, it has not yet been adopted. The delayed transposition of these provisions maintains an opaque legal framework, especially for print and online media, while editorial dependence on non-transparent funding limits pluralism. The lack of a functioning system of self-regulation, as well as the non-consolidation of the Press Council, seriously affects the application of ethical and deontological rules in journalism. Although a draft law on the independence of public service broadcasting and the audio-visual authority was prepared during the reporting period and was adopted in July 2025, a particularly problematic issue remains the legal framework which allows the suspension of broadcasting licences by extra-judicial decisions invoking national security. This practice is contrary to European case law on freedom of expression. Priorities are to adopt a new press law, review licence suspension mechanisms in line with the rule of law, strengthen the Press Council and guarantee the independence of public and regulatory media institutions.

7. Security. During the period under review, the Republic of Moldova has made important progress in strengthening the legislative framework in the field of security, in particular with the entry into force on 1 January 2025 of Law No. 48/2023 on Cyber Security. It defines institutional competences and introduces essential mechanisms for cyber crisis prevention and management. However, the major challenge lies in effectively operationalising the National Cyber Security Agency and strengthening institutional cooperation, including with Information Technology and Cyber Security Service (ITCSS), Security and Information Service (SIS) and other relevant authorities. Investments in technical capacity and human resources remain a prerequisite for the effective functioning of the new regulatory framework. Progress has been made on the dimension of the fight against organised crime and cross-border risks with the approval in December 2024 of the new Regulation on the functioning of the Joint Risk Analysis Group. It has been expanded by including the Operation Management Inspectorate of the Ministry of Interior (IMO) and Office for the Prevention and Combating of Money Laundering (OPCSB) and emphasises thematic risk analysis. A SOCTA assessment on serious and organised crime in 2022-2023 has also been developed with input from key institutions in the criminal justice system. However, the mid-term evaluation of the Crime Programme 2022-2025 found partial implementation – only 50 percent of the overall objectives and 45 percent of the expected results were achieved. Thus, strengthening the legislative framework for crisis management and countering hybrid threats, as well as intensifying the implementation of strategic security programmes with adequate allocation of resources, remain priorities.

8. Functioning market economy. In the area of public investment, important steps have been taken to institutionalise the planning and monitoring processes. The Ministry of Finance set up the Working Group for Capital Investment, updated the portfolio for the period 2021-2026 and finalised the development of the Information System "Register of Capital Investment Projects". Although the central authorities have been trained on the use of the system, the national integrated appraisal and monitoring mechanism remains unimplemented. Priorities include the publication of feasibility studies and the establishment of a post-implementation reporting system. State-owned enterprise reform is proceeding slowly. Although competitions for independent board members have been launched and some reorganisations have been initiated, problems of transparency, corporate governance and politicisation of processes persist. Also,

contrary to the legal provisions, the government's report on public property management has not been presented to Parliament. Urgent measures are needed to professionalise management, accelerate privatisation and extend the economic development strategy to state-owned companies. In parallel, the reform of the Labour Inspectorate and the launch of the Undeclared Work Reduction Programme have generated tangible results, but barriers such as low tax education and costly compliance persist. In education, progress has been made in modernising curricula, developing dual education and fair pay, but gaps persist in teacher training, materials development, and labour market connectivity. Economic governance is affected by regional instability and electoral pressures. The budget deficit widens to 5.2 per cent of GDP in 2025, despite some fiscal consolidation efforts. Reforms need to accelerate to streamline expenditure and boost sustainable revenues.

9. Public procurement. The process of harmonisation with the EU acquis continued with the preparation of relevant draft legislation. Key draft laws have been developed, including the new Public Procurement Law and the Law on Defence and Security Procurement, as well as adoption of the new law on Concessions of works and services. Model specifications for some types of procurement were also developed. However, some of the planned activities have been excluded, postponed or delayed, before adopting changes to the National Programme on the development of the public procurement system for 2023-2026. Significant progress has been made with the signing of a grant for the development of the new e-procurement system, but its implementation is behind schedule. The lack of clear indicators on transparency and efficiency, especially for low-value procurement, limits monitoring. The Public Procurement Agency continues to carry out oversight activities, but its capacity is hampered by understaffing and the low rate of implementation of the requirements issued. Although the framework for Public Private Partnerships (PPPs) and concessions has been updated, it is not yet aligned with the EU acquis. Problems such as lack of transparency, limited competition and administrative barriers persist. A review of PPPs legislation, the integration of concessions into a single framework and full transparency of processes are needed to attract investment and protect the public interest.

10. Statistics. There has been some progress in strengthening the institutional capacity of the National Bureau of Statistics (NBS), in particular by allocating funds for maintaining and modernising the IT infrastructure, partially covering the costs of three new household surveys and increasing the budget for staff training. Some categories of staff also received salary increases. However, chronic under-funding persists – budget increases (except for the census) remain below the inflation rate and 20 per cent of NBS posts remain vacant due to competition with the private sector for data specialists. Reviewing the salary system, increase of real budget allocation and supporting the training of young statisticians are immediate priorities. On the dimension of alignment with EU standards, the NBS has made relevant progress by integrating administrative and private sources in the production of official statistics, developing and updating statistical methodologies and submitting new data sets to Eurostat. The final detailed results of the 2024 Census of Population and Housing will be published in early 2026. For the coming period, priorities are to expand inter-institutional co-operation (including through signing a memorandum of understanding between the NBS, the NBM, and the Ministry of Finance), to develop statistics on public finances and excessive deficit, and to improve the collection of disaggregated data for evidence-based policy.

11. Financial control. The Court of Accounts has made significant progress in the implementation of its Development Strategy, executing about 96 percent of the planned actions, including improving the regulatory and methodological framework, ensuring audit quality, and increasing audit impact. The Audit Strategy 2025-2027 has been approved. However, the institution faces important constraints: staff shortages, low rate of implementation of audit recommendations, communication difficulties with auditees and insufficient financial autonomy. Priorities include strengthening human resources capacity, digitisation of processes, development of performance audit and IT, and improving the visibility of the institution. With regard to the independence of the Court of Accounts, progress has been made, such as obtaining the right to autonomously approve its staffing structure and advancing a legislative initiative under which the institution’s budget will be adopted directly by Parliament. However, constraints in attracting experts,

political interference in audit planning, and mandate limitations undermine the institution's independence. Additional legislative measures are needed to ensure the full independence and functional effectiveness of the Court of Accounts. Also, in 2024, the Law on Accession to the International Convention for the Suppression of Counterfeiting Currency was adopted and a Central National Office for Combating Currency Counterfeiting is to be established within the Ministry of Internal Affairs. However, implementation is limited by weak institutional capacities therefore budgetary investments and enhanced international co-operation are needed. In the area of anti-fraud, some institutional progress has been made, including the designation of the national contact point with the European Anti-Fraud Office, the creation of the framework for the functioning of the anti-fraud network and the initiation of legislative amendments to include external funds in the coverage area of external public financial control. However, the national anti-fraud system remains non-functional and requires adjustments due to the incomplete legal framework and insufficient human resources.

12. Social policies and employment. During the period under review, important progress has been made in the area of employment and social protection. The National Employment Agency (NEA) recorded a significant increase in the number of people employed – from 11,000 in 2023 to 16,700 in 2024 2– and in the occupancy rate of vacancies managed, at 80.9 percent. However, a significant mismatch between labour supply and demand persists, both territorially and occupationally, with 60 percent of the registered unemployed having no professional qualifications. The "Restart" reform led, in April 2025, to a more than ten-fold increase in the caseload managed by social assistance structures, in parallel with the launch of the "eSocial" Information System, designed to integrate data on social service beneficiaries and providers. However, under-funding and lack of adequate staffing in social assistance remain major constraints. In the area of labour, the powers of inspectors on prevention of discrimination and sexual harassment have been extended and the launch of www.lucrezlegal.md is a new tool for reporting undeclared work. Promotion and capacity building campaigns for the State Labour Inspectorate are needed. The Decent Work Country Programme 2025-2027 has also been launched with a focus on strengthening social dialogue. It is recommended to strengthen the capacity of the National Commission for Consultations and Collective Bargaining and to urgently adopt the Action Plan for the extension of collective bargaining.

Democracy

Average score:	3.2 out of 5 points

Recommendation: ***Moldova should continue to engage with the Venice Commission and the OSCE/ODIHR on any potential changes to the Electoral Code and other relevant legislation or action affecting the electoral process.***

Score:	4 out of 5 points

Main developments

On 8 November 2024, the Central Election Commission (CEC) held a consultation and review event on the preliminary comments and findings of the ODIHR Mission on the conduct of the Presidential Elections and the Republican Referendum on EU Accession in order to provide further clarity for the preparation of the final ODIHR report[3] for the Presidential Elections and Referendum on 20 October. The discussions focused in particular on issues related to the work of electoral bodies, the publication of preliminary election results, the determination of the results of the referendum vote, the organisation of the election campaign for the second round of the presidential election and the examination of appeals.

On 17 April 2025, CEC members had an online discussion with the Venice Commission representatives. The discussion focused on aspects of electoral legislation in the context of the 2025 parliamentary elections, analysing proposals to amend the Electoral Code in order to bring national legislation in line with international standards and best practices in the electoral field.

On this dimension, in the framework of a pre-electoral workshop held on 25 May 2025, the CEC consulted the representatives of the Venice Commission on the proposed amendments to the Electoral Code. The main issues discussed centred on the fight against electoral corruption, illegal financing of political parties and electoral campaigns, the implementation of postal voting, as well as the examination and settlement of electoral disputes and election campaign monitoring.

On 13 June 2025, the Parliament adopted the draft law nr. 381/2024[4] on the amendment of some normative acts on effective fight against electoral corruption and related issues. This bill amended the Criminal Code, the Electoral Code and Law No 294/2007 on political parties, introducing tougher sanctions for electoral fraud and electoral corruption.

The main changes introduced by the bill include a revision of the notion of "electoral corruption" and tougher penalties for the offence of vote buying, with high fines or even deprivation of liberty of up to 15 years. The law also establishes penalties for people paid to take part in protests or public gatherings, as well as for organisers of paid demonstrations aimed at destabilising the democratic order. Other regulations include (1) a ban on the publicising of charitable actions by electoral contestants, including elected representatives in the governing bodies of political parties, (2) a ban on the establishment of a political party that takes over the leadership and infrastructure of a party previously declared unconstitutional, and (3) the establishment of time limits for the examination of cases of electoral corruption.

[3] OSCE/ODIHR Observation Report on the Presidential Elections and Constitutional Referendum in the Republic of Moldova, 2024, https://www.osce.org/files/f/documents/3/9/587451_0.pdf.
[4] https://www.parlament.md/material-details-md.nspx?param=1af90413-ce41-4a9d-8b28-9c26889861f6.

The provisions of draft law No. 381/2024 were consulted with representatives of the OSCE/ODIHR, who also submitted an urgent opinion in this regard[5]. Other draft laws, such as draft law No. 152/2025 amending certain legislative acts (the Electoral Code and the Law on Political Parties)[6], did not receive opinions from the Venice Commission and the OSCE/ODIHR.

Constraints

Although the consultation mechanism of the Venice Commission and OSCE/ODIHR in the context of the amendments to the Electoral Code has been extended, the Parliament failed to consult and obtain the opinion of the Venice Commission on the amendments to the Electoral Code in recent months, in particular on the dimension of draft laws nr. 381/2024 and nr. 152/2025. In this regard, one of the current challenges remains to ensure an inclusive process of public consultations on draft laws affecting electoral processes and the Venice Commission's endorsement of these amendments.

Priorities

1. Effective implementation of the provisions of draft laws No. 381/2024 and No. 152/2025 for the prevention of large-scale electoral corruption in the context of the parliamentary elections on 28 September 2025.
2. Ensure a broader, more transparent and inclusive public consultation process for draft laws targeting electoral processes, aimed at transposing the recommendations of the Venice Commission and OSCE/ODIHR.

[5] https://www.osce.org/files/f/documents/4/9/593486.pdf.
[6] https://www.parlament.md/material-details-md.nspx?param=f8c61b24-ead3-44f3-9085-a7b012bf4a0d.

Recommendation: ***Moldova should further strive to align its electoral processes with the highest democratic standards, such as the ones highlighted in Commission Recommendation on inclusive and resilient electoral processes (Commission Recommendation (EU) 2023/2829 of 12 December 2023), including by strengthening the rules on transparency of political party financing and accountability of campaign financing.***

Score:	**4 out of 5 points**

Main developments

In August 2024, the CEC made some amendments to the Regulation on the Financing of Political Parties' Activity,[7] introducing new provisions on the possibility for political parties to receive donations and contributions through POS terminals interconnected to their bank account, as well as the prohibition of donations to political parties if the donor has not received any income for the previous calendar year.

At the end of 2024, the CEC organised the public consultation on the draft "Methodology for auditing political parties on the basis of agreed procedures".[8] The document sets out the mechanism for carrying out the audit of political parties, including the procedures carried out during the audit, and the reporting of audit results. So far, the draft decision on the methodology has not been approved by the CEC.

In May–June 2025, the Parliament approved draft laws nr. 381 amending certain legislative acts (on combating electoral corruption and related elements)[9] and nr. 152 amending other legislative acts (the Electoral Code and the Law on Political Parties)[10]. In this context, penalties for the illegal financing of political parties or electoral competitors were tightened, introducing prison sentences ranging from 3 to 15 years and fines from 80 to 20,000 conventional units.

In accordance with the legal powers of the CEC in the area of supervision and control of the financing of political parties, the electoral body carried out three comprehensive audit missions on the finances of political parties or electoral contestants. In this regard, the financial management of the "Chance" Party, the Party of Regions, the "Victory" Political Party, the Alternative and Salvation Force of Moldova, and the independent candidate Victoria Furtuna were scrutinised.

At the same time, within the framework of the supervision and control of the finances of political parties for 2024, the CEC ordered (1) to warn 43 political parties on the need for additional financial reporting, (2) to initiate 33 infringement proceedings against 17 political parties that failed to submit financial reports within the deadline and in the format required by law, (3) to verify the correct use of state budget allocations by four political parties, (4) referral of eight political parties to the Ministry of Justice in order to remedy the violations in the political financing process and application of sanctions to restrict their activity.[11]

Constraints

Verifying and penalising illegal practices of collecting financial contributions from fictitious donors remains one of the major current challenges for electoral authorities. The cases recorded during the last presidential election campaign and the republican referendum, where persons who were unaware of the fact were included on the donor lists of some electoral contestants, demonstrate that this phenomenon still persists. According to the Promo-LEX report on the financing of political parties in the Republic of Moldova in 2024,[12]

[7] https://a.cec.md/ro/pentru-aprobarea-regulamentului-privind-finantarea-activitatii-partidelor-politi-2751_106570.html.
[8] https://a.cec.md/storage/ckfinder/files/Proiectul%20metodologiei%20.pdf.
[9] https://www.parlament.md/material-details-md.nspx?param=1af90413-ce41-4a9d-8b28-9c26889861f6.
[10] https://www.parlament.md/material-details-md.nspx?param=f8c61b24-ead3-44f3-9085-a7b012bf4a0d.
[11] CEC Decision No 358 on the Approval of the 2024 Report on the Financing of Political Parties, Election Campaigns and Initiative Groups, https://a.cec.md/index.php/ro/cu-privire-la-aprobarea-raportului-pentru-anul-2024-privind-finantarea-2751_112888.html.
[12] https://promolex.md/wp-content/uploads/2025/06/raport-finantare-partide-politice-2024-1.pdf.

74 percent of the financial donations made by individuals were less than three average salaries per economy. Respectively, according to the legislation, CEC is entitled to verify the origin of sources of income only for 26 percent of donors – those, whose donations exceed the threshold of three average national wages. Thus, there is a risk that some illegal practices will not be identified and properly punished.

Although the technical solution of the "Financial Control" Information Subsystem has been improved and updated to automate processes related to the verification, approval, and publication of financial reports, there are still shortcomings in its use by political parties and in the accessibility of public interest data related to political party financing. This creates certain technical obstacles that need to be addressed in order to facilitate transparency in the reporting process of political party funding.

Priorities

1. Strengthen capacities and fully involve local election officials in the process of data collection, monitoring, verification and evaluation of political party and campaign financing.
2. Improve the technical ISS solution “Financial Control” to facilitate financial reporting of political parties.
3. Revision of the public funding mechanism for political parties and encouragement of increased membership fees and donations from private sources to finance political and electoral activities.
4. Lowering the threshold of three average national salaries for which the verification of income sources of donors to political parties can be initiated.

Recommendation: ***Building on recent positive steps, action should continue to provide longer consultation deadlines and advance publication of draft laws and accompanying documents***

Score:	**2 out of 5 points**

Main developments

During the monitoring period, the authorities of the Republic of Moldova have taken a number of steps, which demonstrate a recognition of the importance of transparency in the legislative process, aligning on paper with the European Commission's recommendation in this respect. These developments have created an institutional and legal architecture designed to support a more open decision-making process, even if its practical application remains weak.

In terms of legislation, the most notable development is the amendment of Law No 100/2017 on regulatory acts by Law No 174 of 11 July 2024, which entered into force on 2 August 2024.[13] This amendment introduced new concepts such as "normative act with EU relevance", defining it as an act that transposes EU legislation or creates the legal framework for its implementation. While not directly extending consultation deadlines, this measure has the potential to increase the rigour and attention given to projects that are essential for the European journey, signalling the need for special treatment and thus more in-depth analysis.

At the strategic level, the Government's commitment to the Open Government Partnership (OGP) is a major positive development. The Action Plan for 2023-2025 includes promising commitments, with substantial potential for results, which directly address the essence of the Commission's recommendation. These include the implementation of the new Law No. 148/2023 on access to information of public interest and, crucially, the improvement of public consultation mechanisms in the decision-making process. Similarly, the Plan sets ambitious targets, such as achieving a 90 per cent publication rate of draft legislation for consultation and ensuring 100 per cent publication of the results of these consultations, which demonstrates a clear intention to remedy existing shortcomings.[14]

Working with international partners has reinforced this formal framework. An eloquent example is the adoption of the Council of Europe's Action Plan for the Republic of Moldova for 2025-2028, developed in consultation with civil society. It includes, as a new area of co-operation, "increased involvement of civil society and participation of young people in democratic decision-making", thus directly aligning with the objective of the recommendation.[15] Furthermore, the publication by the Government of the "National Regulatory Plan 2025"[16] contributes to the predictability of the legislative process, allowing stakeholders to anticipate future initiatives.

Overall, these actions have created a set of tools and commitments that, in theory, should ensure greater transparency. Authorities have built a façade of compliance, with updated laws, detailed action plans and strategic partnerships. The fundamental problem, however, is not the absence of rules, but the inconsistency and selectivity in their application – a reality that undermines progress on paper.

Constraints

[13] LP100/2017 - Legis.md, accessed 25 June 2025, https://www.legis.md/cautare/getResults?lang=ro&doc_id=144467.

[14] Open Government Partnership, Independent Reporting Mechanism. *Independent Reporting Mechanism Action Plan Review: Republic of Moldova 2023-2025*. April 2024. Accessed 25 June 2025, https://www.opengovpartnership.org/wp-content/uploads/2024/04/Moldova_Action-Plan-Review_2023-2025_EN_for-public-comment.pdf. https://www.opengovpartnership.org/wp-content/uploads/2024/04/Moldova_Action-Plan-Review_2023-2025_EN_for-public-comment.pdf.

[15] Council of Europe Action Plan for the Republic of Moldova 2025-2028, accessed 25 June 2025, https://www.coe.int/en/web/chisinau/action-plan.

[16] Plan - Legis.md, accessed 25 June 2025, https://www.legis.md/UserFiles/Image/RO/2024/mo%20564-568%20ro/Plan%20na%C8%9Bional_841%20ro.docx.

Despite the positive developments at the formal level, legislative practice during the monitoring period reveals a number of systemic constraints that run directly counter to the spirit and letter of the European Commission's recommendation. A dual reality emerges, in which the architecture of transparency is frequently circumvented by mechanisms that prioritise speed to the detriment of the quality and democratic legitimacy of the legislative process.

The main constraint remains the persistent gap between law and practice, manifested by the excessive and often unjustified use of urgency procedures. This approach cancels any possibility for real public consultation, omitting the deadlines provided for by Law No 239/2008 and Law No 100/2017. Civil society monitoring reports confirm that this problem is systemic. Promo-LEX found that, between August 2023 and July 2024, at least nine draft legislative acts were adopted without the mandatory opinions from the General Legal Directorate of the Parliament and the Government or without the anti-corruption expertise of the National Anti-Corruption Centre (NAC).[17] Moreover, even when consultations formally take place, the recommendations received are often ignored without justification, with Promo-LEX identifying at least 62 such cases in the same timeframe.

A case study revealing these shortcomings is the amendment of the Law on the State Budget for 2025 (draft no. 103). The timing of the adoption of this major piece of legislation demonstrates an ignorance of the principles of transparency. The draft was approved by the Government on 3 April 2025,[18] while the public consultation notice was published on the same day.[19] Parliament registered it as "Urgent",[20] approving it in first reading on 7 April[21] and in final reading on 17 April 2025.[22] This accelerated timetable made meaningful public participation impossible, a fact vehemently criticised by the Expert-Grup and CPR Moldova NGOs.[23] Even the NAC's opinion on the draft expressly stated that "the requirements for ensuring transparency in decision-making have not been respected".[24] The absence of a detailed rationale justifying the urgency in the public documents[25] suggests that the urgency procedure was not an objective necessity but a choice.

This approach is not an administrative accident and rather appears to be a government strategy aimed at maximising legislative output and minimising opposition or delays, especially in the case of politically sensitive acts or acts with major budgetary impact. A predictable and fundamental law such as the budget rectification was treated as an unforeseen crisis. This approach turns transparency from an instrument of good governance into a procedural hurdle that must be overcome quickly.

The final plenary session of the 11th Parliament, held on July 10, 2025, serves as a relevant case study regarding the adoption of a large number of normative acts in violation of legal procedures and

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[17] *Report: Monitoring the activity of the Parliament of the 11th legislature (August 2023 - July 2024)*. Chisinau: Promo-LEX, December 2024. Accessed 25 June 2025, https://promolex.md/wp-content/uploads/2024/12/sumar-promo-lex_monitorizarea-activitatii-parlamentul-in-perioada-2023-2024-1.pdf. https://promolex.md/wp-content/uploads/2024/12/sumar-promo-lex_monitorizarea-activitatii-parlamentul-in-perioada-2023-2024-1.pdf.

[18] Government approved amendments to the state budget for 2025 | Ministry of Finance, accessed 25 June 2025, https://www.mf.gov.md/ro/content/guvernul-aprobat-modific%C4%83ri-la-bugetul-de-stat-pentru-anul-2025.

[19] Position paper on the draft amendments to the 2025 State Budget Law (Budget Plus Programme) - Expert-Grup, accessed 25 June 2025, https://www.expert-grup.org/ro/biblioteca/item/2941-not%C4%83-de-pozi%C8%9Bie-privind-proiectul-de-modificare-a-legii-bugetului-de-stat-pentru-anul-2025-programul-%E2%80%9Ebugetul-plus%E2%80%9D.

[20] Draft law on amending the Law on the State Budget for 2025 No. 310/2024 (Articles 1, 2, 3, etc.) - Parlament.md, accessed 25 June 2025, https://www.parlament.md/material-details-md.nspx?param=ec25f5b1-5751-43bc-80ad-1c8f50869ec9.

[21] Details of the sitting - Parliament of the Republic of Moldova, accessed 25 June 2025, https://www.parlament.md/sitting-details-md.nspx?sittingId=8cd196bc-3885-4830-9677-da4d852bf788.

[22] Summary of the plenary session of the Parliament on 17 April 2025 - Parlament.md, accessed on 25 June 2025, https://www.parlament.md/ns-newsarticle-Sinteza-edinei-plenare-a-Parlamentului-din-data-de-17-aprilie-2025.nspx.

[23] Position paper on the draft amendments to the 2025 State Budget Law (Budget Plus Programme) - Expert-Grup, accessed 25 June 2025, https://www.expert-grup.org/ro/biblioteca/item/2941-not%C4%83-de-pozi%C8%9Bie-privind-proiectul-de-modificare-a-legii-bugetului-de-stat-pentru-anul-2025-programul-%E2%80%9Ebugetul-plus%E2%80%9D.

[24] Statement: Amendment of the 2025 State Budget Law must be made in compliance with the rules of transparency and public participation - cpr.md, accessed 25 June 2025, https://cpr.md/2025/04/08/declaratie-modificarea-legii-bugetului-de-stat-2025-trebuie-sa-fie-facuta-cu-respectarea-regulilor-de-transparenta-si-participare-publica/.

[25] Draft law on the amendment of the 2025 State Budget Law No. 310/2024 (art.1, 2, 3, etc.) - Parlament.md, accessed 25 June 2025, https://www.parlament.md/material-details-md.nspx?param=ec25f5b1-5751-43bc-80ad-1c8f50869ec9.

transparency standards.[26] During the session, 67 draft laws and 12 draft decisions were put to a vote, with the process marked by irregularities — from the arbitrary modification of the agenda to the unjustified acceleration of the legislative process, with seven draft laws adopted in both readings on the same day.

The most serious issue concerned the lack of decision-making transparency, which affected 38 draft laws, representing 56 percent of the total adopted. According to an analysis by Promo-LEX Association, for 33 of these draft laws, key documents were not published — including final versions of the texts (28), legal opinions of the General Legal Directorate (4), or anti-corruption assessments (1). Furthermore, in the case of 11 draft laws, the legal deadline for public consultation and submission of civil society recommendations was not respected

The problem goes beyond the legislative framework and undermines trust in fundamental democratic processes. The public appeal of June 2025, signed by organisations such as IPRE, CPR and Promo-LEX, which criticised the lack of transparency in the process of appointing judges to the Constitutional Court,[27] demonstrates that this culture of opacity extends to decisions crucial to the rule of law. This mistrust is also confirmed by OGP's assessment which notes that although a legal framework is in place, "adherence to legal provisions remains inconsistent", while public interest in the official consultation platform participl.gov.md is low, indicating a lack of trust in the effectiveness of the process.[28]

Priorities

1. Strengthen monitoring and foster a culture of transparency. It is recommended to use the OGP 2023-2025 Action Plan performance indicators (e.g. publication of 90 percent of drafts for consultations) as a tool to guide and assess the progress of public institutions. It would also be beneficial to strengthen the role of the State Chancellery to provide methodological assistance and guidance to the authorities, helping them to correctly and consistently implement transparency procedures and prevent deviations, not just note them.
2. Improve the quality of the legislative process through effective public consultation. The regulatory framework should be analysed in order to clarify and define in a more restrictive way the exceptional conditions under which the urgency procedure can be used. It is suggested that reasonable and predictable consultation periods (e.g. 20-30 working days) be set, in particular for draft laws with a major socio-economic impact. Also, the participl.gov.md platform could become a more robust tool for dialogue if authorities were encouraged to systematically publish summaries of the proposals received and to explain in an accessible manner the reasoning behind final decisions.
3. Increasing accountability through constructive control mechanisms. To enhance public confidence, it would be useful to explore additional oversight mechanisms. For example, a parliamentary mechanism could be created for ex-post evaluation of how the urgency procedure has been used. The Ombudsman's recommendations could also be given greater impact through the establishment of a formal dialogue, where the institutions concerned are invited to present publicly an action plan to remedy the problems raised. This shifts the focus from sanctions to prevention and continuous improvement.

[26] Promo-LEX Association, Monitoring Report on the Plenary Session of the Parliament of 10 July 2025 (analysis, Chișinău, 15 July 2025), https://promolex.md/rapoarte/monitorizare-parlament-sedinta-10072025/

[27] DOC/ CRJM and other NGOs call for transparency in the appointments of judges to the Constitutional Court: 'Public trust is at stake' - Voice of Bessarabia, accessed 25 June 2025, https://voceabasarabiei.md/doc-crjm-si-alte-ong-uri-cer-transparenta-la-numirile-judecatorilor-la-curtea-constitutionala-e-in-joc-increderea-publica/.

[28] Independent Reporting Mechanism Action Plan Review: Republic of Moldova 2023-2025, accessed 25 June 2025, https://www.opengovpartnership.org/wp-content/uploads/2024/04/Moldova_Action-Plan-Review_2023-2025_EN_for-public-comment.pdf.

Recommendation: ***The process of amending Parliament's Rules of Procedures should be accelerated.***

Score:	**2 out of 5 points**

Main developments

In spite of the urgency signalled by the European Commission, the monitoring period revealed a lack of direct action to amend Parliament's Rules of Procedure. A rigorous analysis of the official sources for the period 1 July 2024 - 31 May 2025 did not identify any adopted law or any significant registered draft law aiming at a comprehensive revision of the Parliament's Rules of Procedure (Law No 797/1996).[29] While laws have been adopted in other areas related to harmonisation with the EU acquis, fundamental reform of parliamentary procedures has been missing from the legislative agenda.

At the strategic level, public policy documents such as the National Accession Plan (NAP) recognise the importance of the functioning of the Parliament, but this commitment remains at a general level without being translated into an operational roadmap.[30] This approach contrasts with the specific priorities publicly articulated by the Parliament's leadership for the 2025 spring session, which focussed on objectives with immediate impact and high visibility: opening negotiations on the first cluster, joining the Single Euro Payments Area (SEPA) and abolishing roaming charges.[31] This prioritisation, in the context of a pre-electoral year,[32] has sidelined the internal institutional reform.

In the absence of a *de jure* reform*, de facto* parliamentary practice has demonstrated the persistence of the systemic problems underlying the Commission's recommendation. Civil society reports point to low transparency (only 16 percent of draft laws are subject to real public consultation), procedural formalism, excessive use of fast-track procedures and marginalisation of opposition initiatives.[33] This demonstrates that the current Regulation is either insufficiently robust or deliberately ignored, i.e. reinforcing the urgency of the reform argument.

Constraints

- The lack of progress in amending Parliament's Rules of Procedure is the result of a combination of political, procedural, and technical factors.
- The amendment of the Rules of Procedure is seen by society as an internal matter for the political class, as opposed to high-profile public issues such as justice reform,[34] which reduces public pressure for action and reform on the Parliament.

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[29] Official Monitor of the Republic of Moldova, accessed 25 June 2025, https://monitorul.gov.md/.

[30] National Action Plan for the Accession of the Republic of Moldova to the European Union for the years 2024-2027, accessed 25 June 2025, https://www.legis.md/cautare/getResults?doc_id=148774&lang=ro

[31] Parliament of the Republic of Moldova, Communication and Public Relations Department. "Priorities of the 2025 Spring Parliamentary Session, stated by the President of the Parliament, Igor Grosu: 'A peaceful, prosperous and free Moldova in the great European family'." *Parlament.md*, 6 February 2025. Accessed 25 June 2025, https://parlament.md/ns-newsarticle-Prioritile-sesiunii-parlamentare-de-primvar-2025-enunate-de-Preedintele-Parlamentului-Igor-Grosu-O-Moldov-panic-prosper-i-liber-n-marea-familie-european.nspx. https://parlament.md/ns-newsarticle-Prioritile-sesiunii-parlamentare-de-primvar-2025-enunate-de-Preedintele-Parlamentului-Igor-Grosu-O-Moldov-panic-prosper-i-liber-n-marea-familie-european.nspx.

[32] Gorbatovschi, Marina. "FORECASTS/ Main events that will mark the year 2025 in Moldova and the world". *Ziarul de Gardă*, 9 January 2025. Accessed 25 June 2025, https://www.zdg.md/stiri/previziuni-principalele-evenimente-care-vor-marca-anul-2025-in-r-moldova-si-in-lume/. https://www.zdg.md/stiri/previziuni-principalele-evenimente-care-vor-marca-anul-2025-in-r-moldova-si-in-lume/.

[33] Promo-LEX Association. *Report: Monitoring the activity of the Parliament of the 11th legislature (August 2023 - July 2024)*. Promo-LEX, December 2024. Accessed 25 June 2025, https://promolex.md/wp-content/uploads/2024/12/raport_monitorizarea-activitatii-parlamentului_august-2023-iulie-2024.pdf. https://promolex.md/wp-content/uploads/2024/12/raport_monitorizarea-activitatii-parlamentului_august-2023-iulie-2024.pdf.

[34] Administrative-territorial reform a priority in the next legislative session. Bolea: "It is one of the big issues". *TV8.md*, 14 May 2025. Accessed 25 June 2025, https://tv8.md/2025/05/14/video-reforma-administrativ-teritoriala-o-prioritate-in-urmatoarea-sesiune-legislativa-bolea-e-una-dintre-marile-probleme/28155.6. https://tv8.md/2025/05/14/video-reforma-administrativ-teritoriala-o-prioritate-in-urmatoarea-sesiune-legislativa-bolea-e-una-dintre-marile-probleme/28155.6.

- The polarised political climate makes it difficult to reach a consensus for a reform that should strengthen the rights of all MPs, including the opposition.
- Electoral year 2025 encourages immediate visible action at the expense of complex, technical and less visible to the general public institutional reforms.
- Current practices reflect a desire by the ruling political class to move quickly towards European integration, but this is done by undermining public consultation procedures anf quality of the legislative act. These shortcomings, widely documented by civil society, are manifested in an often formal and rushed consultation process, with late publication of documents, making an informed reaction impossible; a tendency to ignore technical and legal opinions (from the Legal Directorate, NAC, etc.) in order to speed up the adoption of laws; the frequent, often unjustified use of the urgency regime, which has become the norm rather than the exception.

Technical and capacity challenges. Although in the past the Parliament's website faced certain challenges regarding accessibility and technical stability, these issues were directly addressed through the launch of a new portal in 2024, as part of the e-Parliament Information System. The workload generated by the EU accession process calls into question whether sufficient human and technical resources are available to manage such a complex reform in parallel.[35]

Priorities

Immediate legislative and procedural

1. The finalization and adoption of a new legislative framework for the organization and functioning of Parliament is an absolute priority for strengthening parliamentary democracy. It is imperative that this process builds on the efforts already undertaken and continues in an inclusive working format that ensures constructive dialogue between ruling and opposition MPs, with the active involvement of civil society. The final draft must be fully aligned with the recommendations of the Venice Commission and provide concrete solutions to the documented shortcomings. To guarantee legitimacy, full transparency must be ensured through broad public consultations on the draft text, followed by an inclusive debate on the proposals. The adoption of this reformed regulation cannot be delayed, as it is a fundamental step towards increasing the efficiency of legislative work and restoring public trust.
2. Establish a legal obligation to publish summaries of amendments received and the reasoning for their acceptance or rejection.
3. Strengthen quality filters (mandatory opinions before voting).
4. Establish clear conditions and strict limits on the conditions allowed for the application of the urgency procedure in voting on draft legislative acts, with derogation from the basic rule.

Institutional and political

1. Revitalise control mechanisms (hearings, motions, inquiry committees) and guarantee a more active role for the opposition in their use.
2. Include the reform of the Parliament, including by amending its Rules of Procedure, as a strategic priority, indispensable for the EU accession negotiations.
3. Improve and respect the annual legislative programme in order to increase predictability and reduce the temptation of accelerated procedures.
4. Create a structured and permanent dialogue mechanism between Parliament and civil society, going beyond ad hoc consultations. A modern, intuitive and open-data-standards compliant Parliament website should be launched as a precondition for real transparency of parliamentary work.

[35] Secretariat of the Parliament of the Republic of Moldova. *2024 Activity Report*. Accessed 25 June 2025, https://www.parlament.md/content/content/SP-Raport-activitate-2024.pdf. https://www.parlament.md/content/content/SP-Raport-activitate-2024.pdf.

Recommendation: ***The government needs to further strengthen the capacity of its EU coordination structures and engage in stronger public communication on the EU accession process*.**

Score:	**4 out of 5 points**

Main developments

The main developments in the monitored period include the revision of the National Strategic Planning Framework by giving a central role to the National Accession Programme within the overall strategic planning ecosystem of the Government.[36] The priorities set out in the National Programme of Accession of the Republic of Moldova to the European Union for the years 2025-2029, approved on 25 May 2025,[37] became the basis for the elaboration of the National Development Plan and the National Regulatory Plan.

In addition, in order to ensure stability in the promotion of European integration policies, the post of Deputy Secretary General of the Government, responsible for European integration, was created within the State Chancellery, following the liquidation of the post of Secretary of State. This change aims at strengthening the institutional memory and ensuring continuity of public policies in the field of European integration.

It should be also be mentioned in this context the implementation of the training programme *#Natolin4MoldovainEU* by the Institute for European Policy and Reform (IPRE) in partnership with the College of Europe in Natolin, the first edition of which was carried out in February-May 2024, and the second – in September-December 2024. More than 150 civil servants, experts from civil society and business associations were trained on the EU accession negotiation process.

Also, in order to enhance public communication on the EU accession process, several information campaigns on the role of the European Union were launched during the reporting period, including the *EU Caravan in Moldova*, which was held in different regions of the country, providing information on the European integration process through interactive events, cultural activities and humour. In addition, the Government has launched the *European Moldova* campaign, aimed at highlighting the benefits of the strategic partnership with the EU, complemented by the *Moldova Can do It* campaign, which includes public activities all over the country, aimed at presenting the results achieved thanks to the EU support. The Government has also launched the *Government Builds*[38] page, which presents all the projects realised by the Government, including those carried out with the support of the European Union.

Constraints

With regard to the recommendation on the continued strengthening of the capacity of its EU coordination structures, it is necessary to mention the lack of correlation between the mechanism for coordinating the process of Moldova's accession to the European Union and the way in which the negotiating team is organised and functions, approved by Government Decision No 180/2024, and the recent changes in the status of the person assisting the Deputy Prime Minister for European Integration in the exercise of her mandate of national coordination of the integration process. The establishment of the post of Deputy Secretary General of the Government with responsibilities in the field of European integration, as well as the liquidation of the post of Secretary of State responsible for this field, were not adequately reflected in Government Decision No 180/2024.

In addition– although not directly related to the reporting period, but relevant for future work – the full implementation of the commitments undertaken towards the European Union, in particular those set out

[36] https://www.legis.md/cautare/getResults?doc_id=147314&lang=ro#.
[37] https://gov.md/sites/default/files/media/documents/sedinte-de-guvern/2025-05/02-NU-84-CS-2025%20%281%29_0.pdf.
[38] https://old.gov.md/ro/guvernul-construieste?fbclid=IwY2xjawKs2MlleHRuA2FlbQIxMABicmlkETFURGxST3RQOGpGRHB0TnZzAR7PfHft3-EOcVwwOtXENF9RPX0zI93iaUQfWDmoFxtAlBwRegzMhgdiVCsihw_aem_C7KaQhsJ9sx47cjP2pl9dA.

in the National Accession Programme for 2025-2029, represents a major challenge for the public administration. This will require additional efforts, oriented towards strengthening the institutional capacities of the authorities involved in the process.

Regarding the component on strengthening public communication on the EU accession process, although the Government has made efforts to promote the benefits of European integration and the progress achieved by the Republic of Moldova along the way, the result of the referendum in autumn 2024 indicates that the communication tools used were not fully effective. In this context, a thorough assessment of the current communication approach and the impact generated by it is needed to optimise information and public mobilisation strategies.

Priorities

1. Revise the coordination mechanism for the Republic of Moldova's EU accession process and the organisation and functioning of the negotiating team, approved by Government Decision No 180/2024, to reflect recent institutional changes (e.g. establishment of the post of Deputy Secretary General of the Government responsible for European integration).
2. Strengthen the administrative capacity of the public authorities involved in the implementation of the National Accession Programme 2025-2029, by allocating the necessary resources, including financial resources.
3. Evaluate the effectiveness of current public communication tools on European integration, including analysing the impact of campaigns carried out in the previous period, in order to identify existing strengths and gaps, and to inform decisions on possible adjustments in the approach to communication with the public.

Recommendation*: Overall, the transparency of the decision-making process and the involvement of civil society organisations have improved, but further efforts are needed to increase meaningful participation.*

Score:	**3 out of 5 points**

Main developments

In January 2025, the State Chancellery launched the process of revising the legal framework on transparency in decision-making – Law No. 239/2008 and GD No. 967/2016. The reform comes in response to the need to update the law in the context of new governance requirements and the EU accession process. The initiative is based including on a study conducted with the support of the Council of Europe, which identified systemic weaknesses such as lack of resources and overly bureaucratic procedures.

In order to ensure an inclusive process, a joint working group was set up to include 35 civil society representatives and 21 representatives of public institutions.[39] This participatory approach is aligned with the commitments of the Open Government Action Plan 2023-2025 and the GRECO and SIGMA recommendations,[40] marking a clear convergence with European standards.

In parallel, progress has been made in digitising legislative transparency. The Parliament launched a new website under the e-Parliament system, with an e-Voting module displaying in real time the attendance at the plenary sitting and the votes of the Members.[41] Live broadcasting of plenary sittings and the Viber channel for CSOs to be quickly informed were recognised as good practices. Several ministries (e.g., Ministry of Economic Development and Digitalization (MEDD), Ministry of Infrastructure and Regional Development (MIRD)) maintain dedicated transparency sections where they publish reports and useful information for stakeholders.[42]

The EU accession process has stimulated civil society involvement: 33 of the 35 sectoral working groups for screening legal compliance with the acquis communautaire include CSO representatives.[43] Thematic consultative platforms at ministerial level also operate with varying effectiveness.

Data from the Parliament's Transparency Report (2024) indicate 168 consultative events and 111 written contributions from civil society, of which 49 percent were taken up in full or in part.[44] These figures confirm the functioning of the formal dialogue mechanisms, but the quality of participation still needs to be

[39] "Moldova: Government launches review of legislation on transparent decision-making through new working group." *CSO Meter*, 3 March 2025. Accessed 25 June 2025, https://csometer.info/updates/moldova-government-launches-review-legislation-transparent-decision-making-through-new. https://csometer.info/updates/moldova-government-launches-review-legislation-transparent-decision-making-through-new.

[40] State Chancellery. "Announcement on the initiation of the amendment of the regulatory framework on transparency in decision-making and public consultation (Law No. 239/2008 on transparency in decision-making and Government Decision No. 967/2016 on the mechanism of public consultation with civil society in decision-making)." *Particip.gov.md*, 24 January 2025. Accessed 25 June 2025, 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-procesuldecizional/13845. 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-procesuldecizional/13845.

[41] *Report on Transparency in Decision-Making in the Parliament of the Republic of Moldova for 2024*. Accessed 25 June 2025, https://www.parlament.md/content/SPRM2025/DSP/Raport%20transparenta%202024.pdf. https://www.parlament.md/content/SPRM2025/DSP/Raport%20transparenta%202024.pdf.

[42] Ministry of Infrastructure and Regional Development of the Republic of Moldova. *Narrative Report on Ensuring Transparency in Decision-Making for the Year 2024*. Chisinau, 2025. Accessed 25 June 2025, https://midr.gov.md/files/shares/Raport_2024_Transparenta_narativ-2025.pdf. https://midr.gov.md/files/shares/Raport_2024_Transparenta_narativ-2025.pdf.

[43] *CSO Meter: Moldova Country Report 2024*. European Centre for Not-for-Profit Law (ECNL), January 2025. Accessed 25 June 2025, https://csometer.info/sites/default/files/2025-01/RO%20Moldova%202024%20CSO%20Meter%20Country%20Report_0.pdf. https://csometer.info/sites/default/files/2025-01/RO%20Moldova%202024%20CSO%20Meter%20Country%20Report_0.pdf.

[44] Parliament of the Republic of Moldova. *2024 Report on Transparency in Decision-Making in the Parliament of the Republic of Moldova*. Accessed 25 June 2025, https://www.parlament.md/content/SPRM2025/DSP/Raport%20transparenta%202024.pdf. https://www.parlament.md/content/SPRM2025/DSP/Raport%20transparenta%202024.pdf.

strengthened.

The Council of Europe's Action Plan for the Republic of Moldova 2025-2028, a strategic document for reforms, was developed in direct consultation with civil society organisations.[45] The European Parliament resolution of 18 June 2025 welcomes Moldova's progress, but reiterates the critical importance of meaningful involvement of CSOs in monitoring accession-related reforms, considering the non-governmental sector as a pillar of democracy.[46]

Financial support provided to civil society initiatives plays an important role in ensuring their work. In March 2025, the EU Delegation to the Republic of Moldova launched a EUR6 million call for proposals for CSOs. One of the lots of this call is specifically aimed at strengthening civil society's capacity to participate in and monitor the EU accession process. This direct investment is a recognition of the vital role that CSOs play and a concrete measure to enhance their capacity to make a *meaningful*, not just formal, contribution.

These developments demonstrate that the Moldovan authorities are taking some declarative and structural steps to respond to the European Commission's recommendation. The initiation of legislative reform, the modernisation of digital tools and the formalisation of dialogue in the context of the European agenda are undeniable steps forward. However, there is a clear dependence of this progress on external momentum and monitoring. Actions appear to be largely reactive responses to conditionalities and recommendations from development partners, in particular from the European Union. This raises questions about the long-term sustainability of reforms and the degree of internalisation of good governance principles into the domestic administrative and political culture.

Constraints

Despite documented progress, the monitoring period was marked by significant constraints and deviations that undermine the very essence of the European Commission's recommendation. The analysis reveals a worrying discrepancy between pro-transparency rhetoric and decision-making practice, particularly in cases with high political and economic stakes. The principles of transparency and public participation are frequently sacrificed in favour of speed and political control, revealing a fundamental fragility in the commitment of the ruling powers to open government.

The behaviour of the authorities during the reference period suggests the existence of a dual model of governance: transparency in technical areas and low visibility in strategic decisions, where political control is considered a priority. Two case studies presented below from the monitoring period eloquently illustrate this pattern.

Case study 1: Amendment of the 2025 State Budget Law ("Budget +PLUS") In April 2025, the Government promoted a major budget amendment package as a matter of urgency, which included allocations of about eight billion MDL.[47] The draft was approved by the Government and registered in Parliament on the same day, April 3rd. It was published for public consultation only the following day, April 4th, with an unrealistic deadline of April 8th, which included two weekend days. Ignoring any possibility of real feedback, the draft was voted through its first reading in Parliament on April 7th, one day before the formal consultation deadline. This procedure was a flagrant violation of Law 239/2008 and Law on Public Finance and Budgetary-

[45] Council of Europe. *Council of Europe Action Plan for the Republic of Moldova 2025-2028*. Accessed 25 June 2025, https://rm.coe.int/ap-rm-ro-2025-2028/1680b477f1. https://rm.coe.int/ap-rm-ro-2025-2028/1680b477f1.

[46] European Parliament."2023 and 2024 reports on Moldova." European Parliament resolution of 18 June 2025 on the 2023 and 2024 reports on Moldova. Accessed 25 June 2025, https://www.europarl.europa.eu/doceo/document/TA-10-2025-0131_EN.html. https://www.europarl.europa.eu/doceo/document/TA-10-2025-0131_EN.html.

[47] Ministry of Finance. "Government approved amendments to the 2025 state budget." *Ministry of Finance*, 3 April 2025. Accessed 25 June 2025, https://www.mf.gov.md/ro/content/guvernul-aprobat-modificări-la-bugetul-de-stat-pentru-anul-2025. https://www.mf.gov.md/ro/content/guvernul-aprobat-modificări-la-bugetul-de-stat-pentru-anul-2025.

Fiscal Responsibility, which stipulates that public consultation is mandatory for such acts. Centre for Policy and Reforms *(CPR.md),* Expert-Grup and other civil society organisations have strongly condemned this approach, describing it as a simulation of transparency and a disregard for the role of citizens and independent experts. The fact that the NAC's own anti-corruption expert recognised that requirements for ensuring the transparency of decision-making were not met" confirms the seriousness of the misconduct.

Case study 2: Appointment of Constitutional Court judges (June 2025). The process of renewing the composition of the Constitutional Court, a fundamental institution for the rule of law, was another example of undermining transparency. Instead of organising a public, open and merit-based competition, the Parliament and the Government opted for the direct appointment of candidates, some of them prominent political figures. This approach provoked a swift reaction from civil society. On 23 June 2025, a broad coalition of CSOs issued a public appeal calling for a resumption of the process and for minimum standards of transparency: launching public selection procedures, publishing the candidates' files, holding public hearings and justifying the appointment decisions. The appeal emphasised that the practice of political appointments is in direct contradiction with the recommendations of the Venice Commission and lowers the standards of transparency set by the authorities themselves in previous years. Ignoring these appeals has deeply damaged public confidence and created the perception of a politically controlled judiciary.

These two cases demonstrate that when the stakes are considered high enough, commitment to good governance becomes secondary. This *à la carte* approach to transparency is extremely dangerous. Not only does it violate the spirit of the European Commission's recommendation, but it also sets a precedent whereby democratic principles are considered negotiable, undermining the predictability of the decision-making process and long-term trust in state institutions.

Even when consultation procedures are formally respected, their quality remains a major problem. The Promo-LEX association, in its parliamentary monitoring reports, has consistently characterised public consultations as a "weak link" in the legislative process.[48] Thus, a December 2024 analysis showed that only 16 per cent of draft laws are subject to real public consultations, while crucially important laws, such as those amending the Electoral Code, are adopted without adequate debate.

Freedom House's *Nations in Transit 2024* report corroborates these findings, noting that the legislative process in parliament is unpredictable, with plenary agendas frequently changed radically and without notice.[49] Moreover, binding opinions from the Parliament's directorates or the NAC are sometimes published during or even after the vote on draft laws. These practices make *meaningful* participation impossible, as civil society lacks the time and information to make informed recommendations. Even when consultations are organised, there is no robust mechanism for authorities to publicly justify their rejection of CSO proposals, which makes it easy to ignore civil society input that does not align with the political agenda.

The repeated prolongation of the state of emergency, although initially justified by the regional security context, has created a framework that has allowed the government to frequently bypass standard transparency and public consultation procedures. This practice, intended to be exceptional, has led to deviations from good governance and the normalisation of a state of exception in decision-making. Promo-LEX has repeatedly warned that the adoption of draft laws as a matter of urgency, without adequate debate, not only diminishes the quality of normative acts, but also erodes citizens' trust in Parliament.

In addition to problems of political will, structural weaknesses persist. The above-mentioned study

[48] Promo-LEX Association."Compliance with the legislative procedure in the Republic of Moldova: a call for transparency and efficiency." *Promo-LEX*, 12 December 2024. Accessed 25 June 2025, https://promolex.md/respectarea-procedurii-legislative-in-republica-moldova-un-apel-pentru-transparenta-si-eficienta/. https://promolex.md/respectarea-procedurii-legislative-in-republica-moldova-un-apel-pentru-transparenta-si-eficienta/.

[49] Freedom House. "Moldova: Nations in Transit 2024 Country Report." *Freedom House*, 2024. Accessed 25 June 2025, https://freedomhouse.org/country/moldova/nations-transit/2024. https://freedomhouse.org/country/moldova/nations-transit/2024.

identified the lack of qualified staff and of adequate digital tools in public administration as a major challenge in ensuring transparency, especially at local level. This inconsistent approach to transparency has a direct impact on public trust. An opinion poll conducted by IMAS in April 2025 found that 73 percent of respondents believe that the current government is pursuing its own interests rather than those of citizens.[50] Although trust in external partners such as the European Union remains at a high level (over 60 per cent),[51] trust in key domestic institutions such as the Government and Parliament is significantly lower and on a downward trend according to historical Public Opinion Barometer data.[52]

Priorities

1. **Promote a genuine commitment to transparency.** It is essential that the commitment to transparency go beyond simply ticking formal requirements and become a fundamental principle of governance. It is recommended to accelerate the process of finalisation and adoption of amendments to Law 239/2008 and GD 967/2016. It would be important for the new provisions to include clear accountability mechanisms and proportionate administrative sanctions for violation of public consultation procedures. A review of Parliament and Government internal regulations is timely to limit the application of emergency procedures strictly to exceptional, clearly defined situations. At the same time, the prerogative of the Parliament to assess at an early stage the compliance of government drafts with the legal deadlines for consultation could be strengthened.
2. **Transform public consultations into a real and meaningful dialogue.** Ensuring the substantive and effective nature of public consultations, through the rigorous implementation of the regulatory framework, is a fundamental priority for strengthening good governance and decision-making transparency. This necessity stems from the identification of a major systemic deficiency, which lies not in the absence of legislation, but in the critically low level of compliance with its provisions. The fact that, according to official data, 73% of consultations are not documented through summaries of recommendations and meeting minutes demonstrates a serious implementation issue that undermines public trust and defeats the very purpose of dialogue between authorities and society. As a result, there is an urgent need to establish a strict control mechanism to guarantee the universal application of the legal obligation to publish a summary of recommendations for each draft act. To enhance accountability, this effort must be accompanied by the obligation to include in these summaries a reasoned justification for each civil society proposal that was not accepted. At the same time, in order to give depth to dialogue in strategically important areas such as justice reform or the development of the state budget, it is imperative to establish an extended and non-derogable minimum consultation period of at least 20 working days, as a fundamental prerequisite for genuine participatory governance.
3. **Strengthen integrity in appointment processes in key positions.** In order to enhance public confidence, it is important that appointments to positions of high responsibility are as depoliticised and merit-based as possible. The adoption of a single and transparent legal framework, in line with best practice and the recommendations of the Venice Commission, for appointments to key positions (e.g. judges of the Constitutional Court, members of the Audio-visual Council) is encouraged. This framework should promote open public competition, clear merit criteria, independent evaluation and public hearings as fundamental standards.

[50] UNIMEDIA. "(video) IMAS presented the data of the latest Social-Political Barometer in Moldova: 73% of respondents believe that the Government looks after its own interests." *UNIMEDIA*, 15 April 2025. Accessed 25 June 2025. https://unimedia.info/ro/news/def493161c1818a0/live-imas-prezinta-datele-ultimului-barometru-social-politic-din-moldova-73-dintre-respondenti-cred-ca-guvernarea-isi-vede-de-propriile-interese.html. https://unimedia.info/ro/news/def493161c1818a0/live-imas-prezinta-datele-ultimului-barometru-social-politic-din-moldova-73-dintre-respondenti-cred-ca-guvernarea-isi-vede-de-propriile-interese.html.

[51] "Majority of Moldovans have trust in and positive perception of the EU, poll shows". *EU NEIGHBOURS east*, 13 November 2024. Accessed 25 June 2025, https://euneighbourseast.eu/ro/news/opinion-polls/majoritatea-moldovenilor-au-incredere-in-ue-si-o-perceptie-pozitiva-a-acesteia-arata-un-sondaj-de-opinie/. https://euneighbourseast.eu/ro/news/opinion-polls/majoritatea-moldovenilor-au-incredere-in-ue-si-o-perceptie-pozitiva-a-acesteia-arata-un-sondaj-de-opinie/.

[52] The Barometer of Public Opinion shows that the level of trust in governing parties has fallen. Infotag, accessed June 25, 2025, http://www.infotag.md/politics-ro/202441/.

4. **Strengthen strategic civil society coordination for effective advocacy.** To counter the selective approach of the authorities, civil society should act in a more united and strategic, evidence-based manner. The strengthening of CSO coalitions (modelled on the *#ThinkTanks4EUMembership* initiative) to develop alternative monitoring reports, formulate joint reactions and increase the international visibility of findings through direct communication with development partners is encouraged. A strategic direction could be the development of innovative monitoring tools, such as a "Legislative Transparency Index", which would assess adopted laws against clear criteria and present the results in a visual and publicly accessible format.

Public Administration Reform

Average score:	**3,4 out of 5 points**

Recommendation: ***Moldova should continue implementing the public administration strategy, including a credible process of voluntary amalgamation.***

Score:	**4 out of 5 points**

Main developments

This recommendation is closely linked and indispensable to the recommendation in the Democracy Chapter - *Implementation of local government reform should continue*. Therefore, the main developments, constraints and priorities on local public administration reform are valid for this recommendation as well as for the one mentioned above.

In the period under review, among the most important developments related to the implementation of this recommendation is the development of the Monitoring Report for the years 2023-2026 on the progress in the implementation of the Programme for the implementation of the Public Administration Reform Strategy of the Republic of Moldova for the years 2023-2030.[53] The report highlights a full implementation rate of 74 percent of the actions for the year 2024; the development of the Monitoring Report on the realisation of the Action Plan for the implementation of the recommendations of the SIGMA Monitoring Report,[54] with a full implementation rate of 63 percent; and the approval of the Roadmap on "Public Administration Reform" (benchmark in the process of accession of the Republic of Moldova to the European Union) by Government Decision No 274/2025.[55] In addition, the composition of the Secretariat for the implementation of the Public Administration Reform Strategy is to be revised by including the representative of the Congress of Local Authorities of Moldova and civil society, the first meeting in the new format being convened on 18 March 2025. The Government Decision on the regulation of the organisation and functioning of the specialised central public administration authorities No 284/2025 was also approved.

At the same time, taking into account the priority of public administration reform in the process of accession to the EU, the European Commission announced the establishment of an Association Subcommittee for Public Administration Reform, within the institutional dialogue mechanism provided for by the Moldova-EU Association Agreement.

In addition, following the approval of the regulatory framework on voluntary amalgamation,[56] in the previous monitoring period, including the Methodology for voluntary amalgamation of administrative-territorial units[57], during the reference period, the Government carried out a wide range of activities aimed at promoting this process, as well as at providing methodological support to interested local public authorities.

Although these developments took place after the monitoring period established for this Report, it is important to note that two groups of administrative-territorial units have gone through the steps required

[53] https://gov.md/sites/default/files/users-media/media-16/media17/transparenta%20decizionala/reforma%20AP/raport_srap.pdf.
[54] https://gov.md/sites/default/files/Raport%20SIGMA.pdf.
[55] https://www.legis.md/cautare/getResults?doc_id=148499&lang=ro.
[56] https://www.legis.md/cautare/getResults?doc_id=138655&lang=ro.
[57] *The methodology was amended by Government Decision No. 797/2024 in order to facilitate the administration of the Voluntary Amalgamation Fund. Based on the revised methodology, an interinstitutional commission was established to oversee the process of granting financial incentives to administrative-territorial units that have either completed or initiated a voluntary amalgamation process.*

by law for voluntary amalgamation, approving the relevant decisions in this respect. The first group consists of the town Leova and the villages of Siîrma, Tochile, Răducani and Sărata-Răzeși of the Leova rayon, which, on 5 June 2025, submitted the file on voluntary amalgamation to the State Chancellery. On the same day, the State Chancellery received the file on voluntary amalgamation from the second group, which includes the village of Călinești, the commune of Chetriș and the village of Hîncești in the Fălești rayon. On 19 June this year, the Parliament approved the draft law on the amendment of Law No 764/2001 on the administrative-territorial organisation of the Republic of Moldova, which establishes the amalgamation of the two groups of administrative-territorial units.

It should be noted, in this context, the increased transparency of the process of voluntary amalgamation through the development, presentation and publication of the Report on the process of voluntary amalgamation of first level administrative-territorial units in the Republic of Moldova,[58] which reflects in detail the progress made during 2024.

A webpage dedicated exclusively to the voluntary amalgamation process - https://amalgamare.gov.md - has also been developed, providing access to information on the progress made, possibilities to simulate amalgamation scenarios and other useful resources for local public authorities.

Constraints

According to the Monitoring Report on the progress in the realisation of the 2023-2026 Implementation Programme of the 2023-2030 Public Administration Reform Strategy, the level of achievement of the actions planned for 2024 is assessed at 74 percent. While this result reflects substantial progress, a number of constraints remain, in particular as regards the implementation of the backlog in parallel with progress on the activities planned for 2025. In addition, the backlog related to the Action Plan for the implementation of the recommendations made in the SIGMA Monitoring Report needs to be cleared, with a level of achievement of about 63 percent at the end of 2024.

At the same time, although the progress achieved in the two groups of administrative-territorial units is to be appreciated, a constraint remains the absence of examples of localities that have fully finalised the voluntary amalgamation process and started its de facto implementation. The causes of this situation are highlighted in the Report on the process of voluntary amalgamation of first level administrative-territorial units in the Republic of Moldova, which mentions factors such as: low level of information, lack of confidence in the political sustainability of the process, but also the absence of infrastructure projects with significant impact to stimulate amalgamation.

The given constraints are to be analysed as a matter of priority and phased out gradually so that the process of voluntary amalgamation can be accelerated and serve as good practice for other local public authorities.

Priorities

1. Recover the backlog of the Programme for the years 2023-2026 on the implementation of the Public Administration Reform Strategy for the years 2023-2030.
2. Accelerate the implementation of the outstanding actions of the Action Plan on the recommendations made in the SIGMA Monitoring Report.
3. Prioritise the implementation of the actions stipulated in the Roadmap on Public Administration Reform, which is a benchmark in the process of Moldova's accession to the European Union.
4. Focus efforts on the groups of administrative-territorial units (clusters) that have made the most progress in the voluntary amalgamation process, by providing dedicated support so that they can generate examples and lessons learnt applicable at national level.

[58] https://amalgamare.gov.md/sites/default/files/2025-03/Raport%20amalgamarea%20voluntar%C4%83%202024.pdf.

Recommendation: ***Moldova needs to finalise salary reform plans and start their implementation.***

Score:	**3,5 out of 5 points**

Main developments

During the reporting period there have been no changes to the national legal framework for civil servants' pay as a whole. This is despite the fact that increasing the level of civil servants' pay, i.e. making it more attractive to join the civil service, remains a continuous endeavour. Since 1 January this year, by the Law No 310/1014 on the State Budget for 2025, the basic reference value for calculating the salaries of employees in the budgetary sector was increased from 2100 to 2200 MDL, which is applied to the calculation of the salaries of civil servants in public authorities of level I and II and civil servants within the administrative authorities subordinated to the ministries. In the case of civil servants in the central departments of ministries, regional treasuries of the Ministry of Finance, the State Chancellery or its territorial offices (with the exception of the First Deputy Prime Minister, Deputy Prime Minister, Minister, Government Agent and Secretary General of the Government), as well as civil servants in various agencies/inspectorates, the reference values have been maintained at the level of 2024, namely, 3000 MDL and 2500 MDL.

According to the Roadmap on "Public Administration Reform" (a benchmark in the process of Moldova's accession to the European Union), approved by Government Decision No. 274/2025, one of the strategic outcomes aims at "Increased attractiveness of the civil service and retention of civil servants, through the application of a meritocratic and transparent system of access and promotion in the civil service, adequate remuneration, reflecting fairness, fostering performance and organisational culture, focused on the development of human capital in the public service". It should be noted that, this year, the Ministry of Finance has started an extensive process of evaluation of functions in the budget sector, in line with the provisions of Article 6 of Law No. 270/2018 on the Unified Salary System in the Budget Sector, which establishes the obligation to systematically evaluate functions at least every five years. In this regard, two working groups were created:

1. The working group for the coordination of the salary reform process and the working group for the review of the regulatory framework on budgetary sector pay;
2. The working group for the evaluation of budget sector functions, which is composed of representatives of line ministries, public authorities and trade unions, and which is directly involved in the evaluation of some 250 representative functions/positions.

With a view to ensuring an objective process of evaluation of functions/positions in the budgetary sector, the Methodology for the evaluation of functions in the budgetary sector of the Republic of Moldova was developed, which is based on the evaluation of each representative function on the basis of the criteria set out in para. (2) art. 6 of Law No 270/2018. In this regard, it is necessary to mention that, by Law No 56/2025 on the amendment of Law No 270/2018 on the unitary system of salaries in the budgetary sector, the evaluation criteria also included the aspect related to incompatibilities and special situations.

Constraints

1. The salary increases applied from 1 January 2025 are not uniform, thus maintaining a significant gap between the reference values applicable to different categories of civil servants.
2. At the end of 2024, by Government Decision No 911/2024, the moratorium on the recruitment of budgetary sector staff was established for 9416 positions, including in the civil service, which increases pressure on existing staff and may lead to delays in the implementation of the commitments undertaken within the EU accession process.

Priorities

1. Finalise, by December 2025, the Action Plan on the phased and time-bound implementation of the salary reform for the period 2026-2032 and implement it.
2. Ensure broad public consultation on the amendment of the legal framework on public sector pay.
3. Reduce the number of benchmarks used to calculate civil servants' salaries.
4. Provide financial coverage from the state budget of the salary policy measures for all categories of civil servants.

Recommendation: ***Design and approve an overall policy and legislation on reforming the central public institutions, with a detailed roadmap for gradual implementation and for professionalising the civil service and merit-based human resources policies.***

Score:	**4 out of 5 points**

Main developments

For the monitored period, the most important achievements on this recommendation include the elaboration and approval in the first reading of the draft Law on Public Institutions[59] and the related amendments to the related legislative framework.[60] These aim at clearly defining the status of public institutions, clarifying the types of services they can provide and regulating the process of employing staff. At the same time, obligations on transparency and integrity of employees are established, introducing uniform rules on the declaration of assets and interests, management of conflicts of interest, financial reporting, public procurement, internal organisation and performance evaluation, as well as the obligation to ensure a transparent mechanism for the remuneration of employees of these institutions.

In order to ensure the effective implementation of the transitional rules provided for in the two above-mentioned laws, the State Chancellery has developed a roadmap providing for 23 subsidiary measures to be implemented during the transitional period from the second quarter of 2025 to the first quarter of 2027.

At the same time, it is worth mentioning the approval of the draft law on the amendment of some normative acts,[61] which aims to reorganise the central public administration by transferring several agencies from the subordination of the Government to the subordination of the relevant ministries. This should lead to greater efficiency and a clear demarcation of the functions of developing and implementing public policies .

As regards the strengthening of civil service management, during the reference period, the Government Decision No 201/2009,[62] which operationalises Law No 158/2008 on the civil service and the status of civil servant, was amended, and amendments introduced by Law No 47/2024 on the amendment of some normative acts[63] were implemented in order to update the regulatory framework for human resources management. These interventions are aimed at improving the staff planning process, strengthening the professional development system for civil servants by highlighting the strategic role of the national entity responsible for the continuous professional development of public administration staff, facilitating access to the public service for young specialists and members of the diaspora, clarifying the tasks of the actors involved in human resources management, reducing political influence in the process of filling public service positions, and establishing an Appeals Commission specialised in recruitment for senior management positions.

Further, measures are envisaged to strengthen the administrative capacity of the State Chancellery as the national coordinator of the civil service and civil servants management system, by increasing the staff of the Civil Service Management Directorate from four to 14 staff units. At the same time, it is worth mentioning the approval of the Roadmap on "Public Administration Reform" – a benchmark in the process of accession of the Republic of Moldova to the European Union – by Government Decision No 274/2025.[64] One of the key objectives of this document is the implementation of public administration reform, realised through monitoring and evaluation of the relevant strategic framework. It also aims to create a more efficient, transparent, modern and accountable public administration by developing a well-defined human resources

[59] https://parlament.md/material-details-md.nspx?param=07903c9f-8ee3-4d0d-ab60-a193ca75614e.
[60] https://parlament.md/material-details-md.nspx?param=2076f83c-aa20-4c02-bfc3-b5a47ea63246.
[61] https://parlament.md/material-details-md.nspx?param=6105c98b-cb0e-4620-bcf7-40dbfb3116a9.
[62] https://www.legis.md/cautare/getResults?doc_id=144962&lang=ro.
[63] https://www.legis.md/cautare/getResults?doc_id=142459&lang=ro.
[64] https://www.legis.md/cautare/getResults?doc_id=148499&lang=ro.

management system in the public service, orientated towards innovation and modern technologies, aligned with European principles and standards.

Additionally, on March 27, 2025, the Parliament ratified the Administrative Agreement between the Government of the Republic of Moldova and the European Commission regarding the secondment of Moldovan officials to the European Commission. On the same day, the draft law on the secondment of national experts to EU institutions and bodies, along with amendments to the related regulatory framework, was also voted in the first reading by Parliament.

The main purpose of the secondments is to facilitate the exchange of knowledge and best practices, to stimulate inter-institutional cooperation, and to provide staff of the authorities and public institutions of the Republic of Moldova with opportunities to develop practical experience.

Constraints

The drafting of the Public Institutions Law represents a significant step forward in regulating the organizational and operational framework of these entities. However, for certain categories of public institutions with responsibilities related to the analysis or approval of products and financing schemes, as well as the issuance of state guarantees (e.g., the Entrepreneurship Development Organization or the National Centre for Sustainable Energy), it is necessary to establish a special governance mechanism for the managed funds. This mechanism should ensure a high degree of independence in decision-making and contribute to increased transparency in institutional activities.

Moreover, within the same draft law, it is advisable to conduct an additional analysis of the provisions concerning the remuneration of members of public institution councils. It is imperative that this remuneration be established proportionally to the volume and complexity of the activities performed, rather than being strictly tied to the minimum wage.

At the same time, for the upcoming period, an additional constraint is the implementation of the Roadmap for the implementation of the Law on Public Institutions and the Law on the amendment of some normative acts (which constitute the normative framework related to the Law on Public Institutions), as well as the Roadmap on Public Administration Reform (benchmark in the process of Moldova's accession to the European Union), approved by Government Decision No 274/2025.

At the same time, it is important to finalise the process of recruitment of the 14 staff units within the Civil Service Management Directorate, as only seven of them are currently occupied.

Priorities

1. Adopt and publish the draft Law on Public Institutions and related amendments to the related legislative framework, Including the regulation of a distinct governance mechanism for public institutions that manage funds and issue state guarantees, as well as the revision of the remuneration criteria for council members.
2. Implement the Law on the amendment of some normative acts, which aims at reorganising the central public administration by transferring several agencies from the Government to line ministries.
3. Implement the Road Map for the implementation of the Law on Public Institutions and the Law on Amendments of Some Legal Acts (which constitutes the related legal framework for the Law on Public Institutions).
4. Implement the Roadmap on Public Administration Reform (benchmark in Moldova's EU accession process), approved by Government Decision 274/2025.
5. Finalise the recruitment process of 14 staff units within the Directorate for Public Service Management.

Recommendation: ***Improve compliance with the budget calendar and strengthen programme-based budgeting by specifying budget programmes and reducing the budget for 'General Actions'.***

Score: **2 out of 5 points**

Main developments

Compliance with the budget calendar. The budget calendar is established by Article 47 of the Law on Public Finance and Budgetary-Fiscal Responsibility.[65] As a rule, the budget calendar in the Republic of Moldova is not respected and has not been respected by any of the governments in the last 15 years.[66] Also in the period from July 2024 to May 2025, there have been deviations from the deadlines stipulated by the legislation at almost all major stages of the budgetary process.

Table 1. Compliance with the budgetary calendar

	Budget calendar	Actual
The Government approves the Medium-Term Budgetary Framework (MTBF) and submits to the Parliament the draft law amending some legislative acts	01.06[67]	07.08.2024[68]
The Parliament adopts amendments and additions to the legislation resulting from the budgetary-fiscal policy for the following year	15.07	31.07.2024[69]
The Government submits to the Parliament the semi-annual report on the execution of the National Public Budget (NPB) and its components for the current budget year	15.09	17.09.2024[70]
The Government approves and submits to Parliament the draft budget laws for the following year	15.10	04.12.2024[71]
Parliament adopts the budget laws for the following year	01.12	26.12.2024[72]
The Ministry of Finance, National Social Insurance House (NSIH) and National Health Insurance Company (NHIC) draw up and submit for audit to the Court of Accounts the annual reports on the execution of the state budget, State Social Insurance Budget (SIB) and compulsory health insurance funds	15.04	n/a
The Court of Accounts audits the annual reports on the execution of the state budget, SIB and compulsory health care insurance funds for the completed budget year and submits the audit report to the Government and Parliament	01.06	28.05.2025[73]
The Government approves and submits to the Parliament the annual reports on the execution of the state budget, SIB and compulsory health care insurance funds for the completed budget year	01.06	20.05.2025[74]

[65] https://www.legis.md/cautare/getResults?doc_id=145903&lang=ro#.
[66] https://stiri.md/article/economic/unde-e-proiectul-legii-bugetului-de-stat-2025-raspunsul-autoritatilor/.
[67] https://www.legis.md/cautare/getResults?doc_id=144721&lang=ro.
[68] https://moldova.europalibera.org/a/guvernul-a-aprobat-cadrul-bugetar-pe-termen-mediu-cheltuielile-vor-fi-rationalizate/33069158.html.
[69] https://www.parlament.md/ns-newsarticle-Politica-bugetarfiscal-i-vamal-pentru-anul-2025-prevede-msuri-de-stimulare-att-a-persoanelor-fizice-ct-i-a-agenilor-economici.nspx.
[70] https://mf.gov.md/ro/content/guvernul-aprobat-raportul-semianual-referitor-la-executarea-bugetului-public-na%C8%9Bional-pentru.
[71] https://www.mf.gov.md/ro/content/guvernul-aprobat-proiectul-legii-bugetului-de-stat-pentru-anul-2025.
[72] https://www.infotag.md/economics-ro/321325/.
[73] https://ccrm.md/ro/decision_details/1326/hotararea-nr-51-din-28-mai-2025-cu-privire-la.
[74] https://mf.gov.md/ro/content/proiectul-hg-cu-privire-la-aprobarea-proiectului-de-hot%C4%83r%C3%A2re-parlamentului-pentru-2.

The Parliament approves the annual reports on the execution of the state budget, SIB and compulsory health care insurance funds for the completed budget year	01.06	-

Sources: Government, Parliament, press

Programme-based budgeting. A large part of the state's expenditures are classified under the category "General Actions" (60% of the state budget expenditures in 2023 and 2024, and 58% in 2025[75]), which, according to the European Commission's 2024 Report on the Republic of Moldova regarding EU[76] enlargement policy, undermines budget transparency. The Ministry of Finance of the Republic of Moldova, in its response to our inquiry, stated that allocations/expenditures under the "General Actions" category are budgeted by programmes and allocated according to the Budget Classification, and the Explanatory Note to the draft annual budget law was supplemented with a description of the "General Actions" section. Regarding the strengthening of programme-based budgeting by specifying budget programmes, the Ministry of Finance reported no progress during the period from July 2024 to May 2025, noting that performance-based program budgeting has been implemented at the state budget level since the 2014 budget. Since 2015, program budgeting was extended to level II local public authorities, and from 2016 – to level I local public authorities. Thus, since 2016, performance-based budgeting has been implemented at all levels of public administration.

Indeed, Annex 3.1 to Law 310/2024 on the 2025[77] state budget presents state budget expenditures grouped by public authorities, specifying programmes and subprogrammes, including under the "General Actions" category, and tables detailing subprogramme financing are published along with the set of documents accompanying the draft annual budget law.[78] However, transparency could be improved by grouping allocations/expenditures of the state budget not by public authorities but by clusters of public policies, such as, following the EU example: research and innovation; regional development; people, social cohesion and values; environment and climate; security, etc. Furthermore, information by programs should be presented in a more accessible manner for the public, so that any non-specialist citizen can have answers to basic questions: "What political priorities is the Republic of Moldova's budget trying to achieve as a whole? And how well does it succeed?"

Constraints

In its response to our inquiry, the Ministry of Finance omitted to provide comments with reference to improving compliance with the budget calendar. In its explanation to the Court of Accounts[79], the Ministry of Finance mentioned the following impediments that led to the overrun of the deadlines foreseen in the budget calendar: overlapping and concurrent implementation of other priority and complex processes, preparations for the bilateral screening in the framework of the accession process, delays in the submission of financial reports by some central public authorities, identification of errors in the reports, carrying out works in accordance with the provisions of the Memorandum signed with the IMF etc.

Thus, the following constraints can be mentioned: (1) the Law on Public Finance and Budgetary-Fiscal Responsibility sets a timetable that does not realistically take into account the capacities of the authorities involved in the budgetary process, which leads to systematic delays; (2) the dialogue between the Ministry of Finance and the CPAs/LPAs in budget planning and reporting is not sufficiently active, resulting in delays and errors.

Priorities

[75] Annex 3 of the annual state budget laws.
[76] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52024SC0698
[77] https://www.legis.md/cautare/getResults?doc_id=149600&lang=ro#
[78] https://particip.gov.md/ro/document/stages/proiectul-legii-bugetului-de-stat-pentru-anul-2025/13550
[79] https://ccrm.md/ro/decision_details/1326/hotararea-nr-51-din-28-mai-2025-cu-privire-la

The constraints formulated above with respect to **adherence to the budgetary calendar** led to the following actions that should be taken to fulfil the Commission's recommendation:

1. Revise the budgetary calendar in such a way that it is possible for all authorities involved in the budgetary process to respect it;
2. Strengthen institutional capacity in the area of budgetary planning and reporting;
3. Promoting dialogue between the Ministry of Finance and central and local public authorities.

It should be noted that the same priorities are also present in the Public Finance Management Development Strategy for 2023-2030, which the Government is committed to implement.

With reference to the **reduction of allocations** provided for in the "**General Actions**" compartment of the state budget, the Ministry of Finance has announced its intention to reflect, starting with the state budget for 2026, transfers to the compulsory health care insurance funds in the budget of the Ministry of Health, and transfers to the state social insurance budget – in the budget of the Ministry of Labour and Social Protection. This arithmetical exercise will reduce the share of spending on "General Actions" from an estimated 60 percent to 45 percent of the total, but it will not change the degree of transparency of budget spending. Therefore, there is a need to further consolidate the classification of budget expenditure by specific programmes so that it is grouped according to the Government's policy objectives and the way the policies will be implemented. Furthermore, information by programmes should be presented in a more accessible way for the general public (possibly by publishing an annual summary on the performance of budget-funded programmes).

Judiciary

Average score:	**3 out of 5 points**

Recommendation: ***Continue making progress on the vetting process and on appointing top judges and prosecutors in line with European standards, especially the remaining members of the Superior Council of Magistracy and the Supreme Court of Justice, and the members of the four specialised bodies of the Superior Councils of Magistracy and of Prosecutors.***

Score:	**3 out of 5 points**

Main developments

During the monitoring period, the Superior Council of Magistracy (SCM) was completed with three additional members – two from civil society and one judge representing the Courts of Appeal, selected following the General Assembly of Judges in April 2025. Currently, the SCM operates with a full complement of 12 members - six each representing civil society and the judiciary.

At the General Assembly of Judges (GAJ) on 19 December 2024, the new members of the specialised Boards subordinated to the SCM were appointed from among the candidates who passed the extraordinary evaluation. Four judges were appointed to the Disciplinary Board. In addition, the panel includes three civil society representatives, appointed by the Minister of Justice following a competition. At the time of reporting, only one civil society representative had been appointed. According to Article 15, paragraph (4) of Law no. 178/2014 on the disciplinary liability of judges,[80] the meetings of the Disciplinary Board are deliberative if they are attended by at least 2/3 of the members of the Board in office, i.e. at least five members. The Board[81] currently has a sufficient number of active members to ensure that its meetings are deliberative.

Three judges have been appointed to the Board for the Selection and Evaluation of Judges. In addition to the magistrates appointed by the General Assembly of Judges, the Board for the Selection and Evaluation of Judges also includes two judges promoted by competition and appointed by the SCM, and four representatives of civil society, also selected by the SCM following a competition. Currently, the Board for the Selection and Evaluation of Judges has six members,[82] including three judges appointed from the GAJ, two magistrates appointed by the SCM and one representative of civil society. According to Article 17, paragraph (2) of Law No 147/2023 on the selection and performance evaluation of judges,[83] the meetings of the Board for the Selection and Evaluation of Judges are deliberative if they are attended by at least 2/3 of the members of the Board, i.e. at least six members. Thus, in its current configuration, the Board has the necessary number of members to hold deliberative meetings.

During the monitoring period, the specialised Boards subordinated to the Superior Council of Prosecutors (SCP) were also supplemented with new members from among the candidates who passed the extraordinary evaluation. Thus, at the General Assembly of Prosecutors on 11 February 2025, two prosecutor members were appointed to the Board for the Selection and Evaluation of Prosecutors[84] and two prosecutor members to the Disciplinary and Ethics Board of the SCP.[85] Subsequently, the SCP also appointed, following a public competition, two prosecutor members to each board and one civil society

[80] https://www.legis.md/cautare/getResults?doc_id=144930&lang=ro.
[81] https://www.csm.md/ro/organe-subordonate/colegiul-disciplinar/colegiul-disciplinar/membrii-cd.html.
[82] https://www.csm.md/ro/organe-subordonate/colegiul-pentru-selectia-si-evaluarea-judecatorilor/membrii-cse.html.
[83] https://www.legis.md/cautare/getResults?doc_id=144920&lang=ro.
[84] https://csp.md/index.php/colegiu/colegiul-pentru-selec%C8%9Bia-%C8%99i-evaluarea-procurorilor/membri.
[85] https://csp.md/index.php/colegiu/colegiul-de-disciplina-si-etica/membri.

member to the Disciplinary and Ethics Board of prosecutors. According to Law No 3/2026 on the Prosecutor's Office,[86] each college under the SCP consists of seven members: two are elected by the General Assembly of Prosecutors from among prosecutors; five are appointed by the SCP through public competition, three of them from among representatives of civil society and two– from among prosecutors. Both boards under the SCP are now fully established with seven members each.

The process of extraordinary evaluation of judges and prosecutors on the basis of Laws 65/2023 and 252/2023 continued. Out of the list of 45 judges and candidates for the post of judge in the Supreme Court of Justice (SCJ), the Commission evaluated 27 subjects, of which 14 reports of promotion and 13 of non-promotion. Another eight subjects are in the process of evaluation. The SCM has accepted 25 of the 27 evaluation reports issued by the Vetting Commission (one report was rejected by the SCM because the candidate withdrew from the competition and is in the process of re-evaluation, and one more report of the Commission is still to be analysed by the SCM). Three other subjects had previously passed the pre-vetting, two resigned from the position and five others withdrew from the competition. Recently, the SCM announced a new competition to fill vacancies at the SCJ, following which two candidates who passed the competition and the extraordinary evaluation were appointed as a judge at the SCJ.

The evaluation of judges of the Centre Court of Appeal has been finalised. From the list of 40 judges of the Centre Court of Appeal, the Commission evaluated 18 subjects, the promotion rate being 50 percent (nine promotion and nine non-promotion reports), 21 other subjects resigned from office, one subject had previously passed the pre-vetting procedure. Some of the reports have already been scrutinised by the SCM, which confirmed the Commission's proposals for four judges. In a further four cases the SCM has ordered a re-evaluation and the remaining files are still pending before the Council. Of the candidates who passed the evaluation, two were appointed as judges at the Centre Court of Appeal in March 2025. The evaluation process for judges of the North and South Courts of Appeal, as well as for candidates for the position of judge at the Courts of Appeal, has started. Following the start of the evaluation process, a total of 15 judges resigned from the North and South Courts of Appeal. To date, the Commission has published two promotion reports for the North Court of Appeal, three promotion reports for the South Court of Appeal and seven promotion reports for candidates for the position of judge in the Courts of Appeal.

The “presidents and vice-presidents of courts, as well as persons who have been acting in these positions for at least one year in the last five years, were also notified of the start of the evaluation. According to the list submitted by the Superior Council of Magistracy, almost 30 judges who have held senior positions in the judiciary in recent years will be subject to external evaluation. They represent the last category of judges to be subject to external evaluation under Law 252/2023".

According to the Activity Report of the Commission for the Evaluation of Prosecutors,[87] the Commission continued the evaluation of prosecutors within the Anticorruption Prosecutor's Office, targeting 53 subjects. In May 2025, the process of evaluating prosecutors within the PCCOCS and those in leadership positions within the General Prosecutor's Office was initiated.

Constraints

Since the start of the extraordinary evaluation process of judges and prosecutors, more than 100 judges and about ten prosecutors from the PA have left the system. At the end of May 2025, 15 prosecutors from the Prosecutor's Office for Combating Organized Crime and Special Cases (PCCOCS) announced their resignation, and at the beginning of June – another ten judges. Chain resignations were also recorded at the SCJ and the Centre, North and South Courts of Appeal. Currently, nine magistrates are working at the SCJ out of the 20 posts provided for by law. In order to ensure the functioning of the institution, the SCM has appointed judges from the lower and appellate courts to the SCJ by transfer and recently announced

[86] https://www.legis.md/cautare/getResults?doc_id=140076&lang=ro.
[87] https://vettingmd.org/wp-content/uploads/2025/03/Raport-de-activitate_-2024_-al_Comisiei_de-evaluare_a_procurorilor.semnat.pdf.

a new competition to fill vacancies at the SCJ. As a result, two successful candidates were appointed as judges at the SCJ. The situation is similar in the appellate courts, which have been hit hard by resignations. As a result, eight judges remained in office at the Balti Court of Appeal and three judges each at the courts in Cahul and Comrat. In order to avoid a bottleneck in the activity of the appellate courts, the SCM ordered several times the appointment by transfer of judges to the Centre, North and South Courts of Appeal until the vacant positions were filled.

Although both specialised Boards of the SCM currently have the minimum number of members necessary to ensure the deliberative character of their meetings and to carry out their work efficiently, their composition is not yet complete. The Disciplinary Board is to be supplemented by two members from civil society, and three more members are to be appointed to the Board for the Selection and Evaluation of Judges. Thus, more than three years after the start of the pre-vetting process, the specialised boards of the SCM continue to function with incomplete membership.

Moderate progress has been made in the work of the Prosecutors Evaluation Commission. During the monitoring period, the Commission finalised the evaluation of 32 candidates for the specialised boards under the SCP (eight subjects were evaluated by the end of June 2024). In May 2024, the Commission notified the prosecutors of the Anticorruption Prosecution Office about the initiation of the evaluation process, which concerns 53 subjects. One year later, the Commission published two non-promotion reports. In the first case, the reason for non-promotion was the failure of the subject under evaluation to submit the statements and questionnaire on ethical integrity in accordance with the requirements of Law 252/2023; in the other case, whose subject was the former chief prosecutor of the Anti-Prosecution Office (APO), the decision of non-promoting the vetting was taken due to her resignation from the position during the evaluation procedure. According to the provisions of the law, resignation occurring more than 20 days after the notification of the commencement of the vetting is equivalent to non-promotion of the process. At the end of May 2025, the prosecutors of the PCCOCS and chief-prosecutors of the General Prosecution Office's sections were also notified about the initiation of the extraordinary evaluation process.

According to Article 4 paragraph (6) of Law no. 252/2023, the evaluation of all subjects had tot be completed by 31 December 2025, this deadline has recently been extended to 31 December 2026. In the case of the Prosecutors Evaluation Commission, the following are to be evaluated:

- the prosecutors of specialised prosecutor's offices, including those delegated to them in the period from 1 January 2017 to the date of entry into force of Law no. 252/2023;
- prosecutors who, during the same period, have held or have been acting as chief prosecutor or deputy chief prosecutor for more than one year;
- prosecutors who have held the position of Prosecutor General, Deputy Prosecutor General or Head of Section in the Public Prosecutor's Office, including the interim holding of these positions for more than one year.

A contributing factor to the stalled evaluation process is the termination of USAID assistance in January 2025. According to the Commission's Activity Report,[88] "since its inception it has been fully supported in its activities by the "development partner" – in this case the US Government, represented by the US Embassy in the Republic of Moldova, and its implementing partners – the GSV Consortium, consisting of Dexis International and Zemitek.

Currently, the role of development partner for the Prosecutors Evaluation Commission has been taken over by the EU. "The new implementing partner is the Dutch organisation "Centre for International Legal Cooperation", which is also the partner supporting the Judges Evaluation Commission.

[88] https://vettingmd.org/wp-content/uploads/2025/03/Raport-de-activitate_-2024_-al_Comisiei_de-evaluare_a_procurorilor.semnat.pdf.

Priorities

1. Speed up the extraordinary evaluation procedures for prosecutors of the Anti-Corruption Prosecutor's Office and other prosecutors subject to evaluation under Law 252/2023;
2. Fill the remaining vacancies in the Selection and Evaluation Board of Judges and Disciplinary Board of the SCM;
3. Develop a sustainable and efficient mechanism to manage the human resources crisis in the judiciary, generated by the massive resignations in the context of the vetting process, with a priority on the rapid and transparent filling of vacancies at the Supreme Court of Justice and Courts of Appeal, in order to ensure the continuity of the judicial process and the functioning of the courts.

Recommendation: ***Improve the functioning of the National Institute of Justice by implementing all the outstanding 2022 TAIEX recommendations, develop human resource strategies for the judiciary and prosecution services and pursue implementation of the judicial map.***

Score:	**3 out of 5 points**

Main developments

TAIEX's 2022 recommendations are not public, so the analysis below is based on information provided by the National Institute of Justice (NIJ). According to the latter, the recommendations made by TAIEX experts cover the following general areas:

- The selection and appointment process of candidates for judges and prosecutors;
- Admission and graduation procedures of the NIJ;
- Content, structure and methodology of initial training;
- Continuing training programmes;
- Selection criteria and procedures for trainers;
- Evaluation mechanisms of training programmes;
- Modernisation of the institutional platform, including website and e-learning tools.

During the reporting period, NIJ continued the process of updating the curriculum and modernising the teaching process, including the introduction of EU Law, Judgecraft, Prosecutorcraft, cross-cutting inclusion of legal argumentation and legal writing. Action has been taken to develop an institutional strategic plan and to expand participation in international networks. The amendments made to the NIJ Law in July 2024 expressly provided for the composition and mechanism for the establishment of the Committees for the entrance examinations, stipulating that they are created during the duration of the competition and consist of seven full members and three alternates. The Commission includes two judges appointed by the CSM, two prosecutors appointed by the SCP Council and three university PhD professors in law selected by the NIJ Council. This formula ensures a balanced and predominantly external composition, thus avoiding the formation of a majority from a single institution. At the same time, more than 20 e-learning courses from the Council of Europe's HELP programme have been integrated, available both on the NIJ's internal ILIAS platform and on the CoE's HELP platform, with tutoring by national HELP certified trainers. The courses are electronically certified by NIJ.

The legislative process for the adoption of the Law on the Reorganisation of the Courts of Justice, which entered into force on 27 December 2024, was finalised. Following the adoption of the relevant legislative framework, the process of reorganisation of courts has started and is at an advanced stage of implementation. Thus, several courts have been merged and the courts of appeal have been reorganised and renamed into: the Centre Court of Appeal, the North Court of Appeal, and the South Court of Appeal, the latter having two seats – the central one in municipal of Cahul and the secondary one in municipal of Comrat. According to the Monitoring Report on the degree of realisation by 2024 of the measures of the Action Plan for the implementation of the Strategy for ensuring the independence and integrity of the justice sector for the years 2022-2025,[89] during 2024 the necessary measures were taken to identify land for the construction of new buildings for the courts of Strășeni, Hîncești, Soroca, Balti, Criuleni and Cahul. By GD no. 912 of 30.12.2024 it was ordered the transfer of a real estate for the construction of the Cahul Court.

At the same time, efforts were made to bring the map of the Prosecutor's Office in line with the new judicial map. Thus, in December 2024, the Superior Council of Prosecutors adopted the concept on the reorganisation and optimisation of the structure of the prosecutor's office system, and in January 2025,

[89] https://justice.gov.md/sites/default/files/document/attachments/raport_de_monitorizare_pentru_anul_2024.pdf

by order of the Prosecutor General,[90] the new map of prosecutor's offices was approved, which came into force as of 1 April 2025. Following the reorganisation, the number of territorial prosecutor's offices was reduced from 36 to 14. Thus, several district prosecutor's offices were merged, becoming secondary offices of larger structures. The Chisinau municipal prosecutor's office remains unchanged, while the former prosecutor's offices will continue to operate as territorial offices in the same buildings. The General Prosecutor's Office will have three new subdivisions – the Anti-Corruption and Money Laundering Section, the Environmental Offences Section and the Prosecution Representation Section at the Supreme Court of Justice.

In January 2025, the Strategic Plan of the Superior Council of Magistracy for the period 2025-2029 was adopted, which also contains a chapter on human resources. The document was developed with the support of the Council of Europe.

In June 2025, the Strategic Development Programme of the Superior Council of Prosecutors for the years 2025-2029 and the Action Plan for its implementation, with a dedicated human resources component, was approved by SCP Decision No. 1-214/2025, which aims at implementing and developing human resources policies in the Prosecutor's Office system.

Constraints

The NIJ's implementation of the 2022 TAIEX recommendations is progressing gradually, but is hampered by the fact that some of them go beyond the direct competences of the institution and require interventions from other relevant authorities, such as the Ministry of Justice (MoJ, the SCM and the SCP. In the absence of a coordinated mechanism for monitoring and institutional ownership, there is a risk of fragmentation of efforts and delays in reforms. The lack of adequate funding also represents a significant constraint for the NIJ, particularly with regard to salaries, which limits the institution's ability to attract and retain qualified staff.

According to information provided by the SCP, as a result of the reorganisation of the prosecutor's office map, all leading prosecutor positions in the territorial prosecutor's offices have become vacant, as most of the territorial prosecutor's offices (except for the Chisinau City Prosecutor's Office) have been reorganised through merger. As a result of structural reshuffles, as well as previously unfilled positions, there are currently 28 vacancies for chief prosecutor, including that of the Prosecutor General, and 60 vacancies for deputy chief prosecutor in the system.

Once these management positions are filled by competition, the executive positions will become vacant as a result of the promotion of prosecutors to management positions. It will be possible to fill the executive posts from the reserve pool of candidates, including from among NIJ graduates in the Register of Prosecutor Candidates, which currently comprises 60 graduates.

With a view to managing the staffing crisis, the SCP has in recent months announced four competitions to fill vacancies, three of which are at the top: the replacement of the position of Prosecutor General, Chief Prosecutor APO[91] (Following the competition, Mr. Marcel Dumbrăvan was appointed as Chief Prosecutor of the Anticorruption Prosecutor's Office.) and 22 positions of Chief Prosecutor and Deputy Chief Prosecutor.[92] In addition, a competition has been launched to fill eight vacant posts of prosecutor in the territorial prosecutor's offices.[93]

The significant shortage of staff at management level in the territorial prosecutor's offices, caused by the recent institutional reorganisation and structural reshuffles, is a major constraint for the smooth functioning

[90] https://www.csp.md/sites/default/files/2025-01/391_proiect_hot_modificarea_structurii_final_2025.pdf.
[91] https://csp.md/sites/default/files/2025-06/211_hot.anunt_concurs_pg_final.pdf.
[92] https://csp.md/sites/default/files/2025-06/216_hot_anuntarea_concursuri_final.pdf.
[93] https://csp.md/sites/default/files/2025-05/168_hot_anuntarea_concursuri_inj.pdf.

of the prosecution system. The vacancies at both chief prosecutors and deputy chief prosecutors' level affect the managerial and operational capacity of the territorial units, creating risks of overburdening existing staff and delays in the current work.

Priorities

1. Strengthen inter-institutional co-operation between the NIJ, SCM, SCP, MoJ and other relevant stakeholders with a view to an integrated and coordinated implementation of the TAIEX recommendations, including by establishing a joint mechanism for planning, monitoring and reporting on progress, ss well as ensuring that the NIJ is provided with an adequate institutional budget, particularly to cover staffing needs.
2. Consistent implementation of the Judicial Map and the new Prosecutors' Map. The completion of the structural reorganisation process needs to be supported by adequate administrative and logistical measures, including the construction of premises for the new courts and the operationalisation of the new structures of the prosecution.
3. Ensure the filling of vacancies in prosecutor's offices and courts by speeding up competition procedures, implementing a predictable selection timetable and making efficient use of the pool of NIJ graduates to avoid dysfunctional work of the institutions and prevent overburdening of existing staff.

Recommendation: ***Improve significantly clearance rates and disposition time in the courts.***

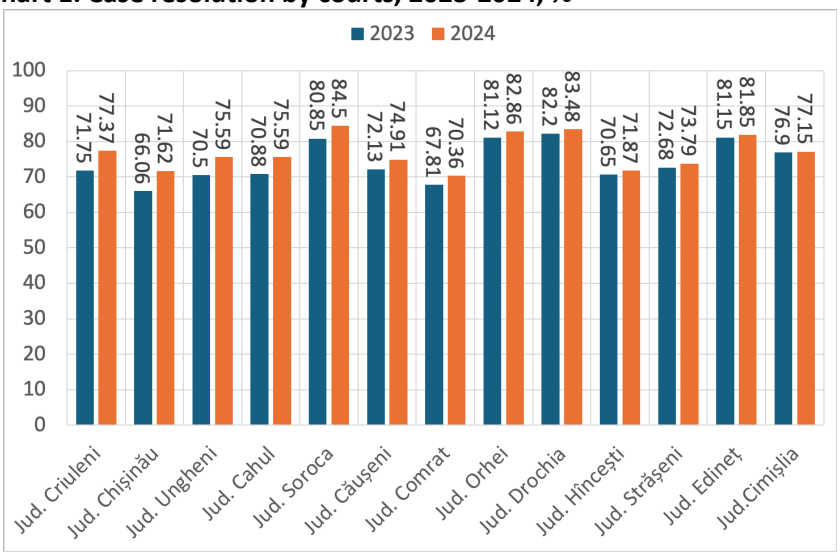
Score:	**3 out of 5 points**

Main developments

According to available data,[94] the average case resolution rate in the judiciary in 2024 is approximately 70%. First-instance courts recorded the best performance, while a more modest resolution rate was observed in higher courts (the Courts of Appeal and the Supreme Court of Justice). Thus, several courts showed a positive trend in their case resolution rates in 2024 compared to 2023.

According to data available a number of courts show a positive dynamic in the case clearance rate in 2024 compared to 2023.

Chart 1. Case resolution by courts, 2023-2024, %



Source: https://statistica.instante.justice.md/

Three courts have recorded the most notable increases in the clearance rate in 2024:

- Chisinau Court - 71.62 percent compared to 66.06 percent in 2023 (an increase of 5.56 percentage points (~8.41 percent))
- Criuleni District Court - 77.37 percent compared to 71.75 percent in 2023 (an increase of 5.62 percentage points (~ 7.83 percent))
- Ungheni Court - 75,59 percent compared to 70,50 percent in 2023 (an increase of 5,09 percentage points (~7,22 percent))

These are matched by four other courts with a moderate increase (2-4 percentage points) and six courts with minor changes (1-2 percentage points) in the case clearance.

As of February 2024, the Chisinau Court's offices are specialised: in criminal matters (criminal cases, misdemeanour cases related to the activity of the investigating judge) - Buiucani and Ciocana offices and in civil matters (civil cases, administrative disputes and insolvency) - Centru, Râșcani and Botanica (Central) offices. In addition, it was ordered to specialise the magistrates of the Chisinau Court in the examination of criminal cases sent to the court by the Anti-Corruption Prosecutor's Office, as well as the judicial control of pre-trial proceedings on these cases (requests, applications, petitions submitted by prosecutors to the

[94] https://statistica.instante.justice.md/

Anti-Corruption Prosecutor's Office, complaints against decisions and actions/inactions of the prosecutor in the Anti-Corruption Prosecutor's Office, etc.). A separate specialised panel has been created to examine corruption and related cases.[95]

According to the Report on the Activity of the Chisinau Court of Cassation for 2024,[96] the clearance rate of civil cases increased by 9 percent compared to 2023, while the time for liquidation of the civil case backlog decreased from 254.41 days in 2023 to 169.16 days in 2024. A positive dynamic is also observed in the clearance of criminal cases, which increased by 13 percent compared to 2023, while the time taken to clear the backlog of criminal cases decreased from 606.21 days in 2023 to 510.56 days in 2024. At the same time, the rate of examination of corruption charges increased by 55 per cent (153 cases in 2024 compared to 99 cases in 2023). The time taken to clear the backlog of criminal cases related to corruption offences decreased from 1217.88 days in 2023 to 775.28 days in 2024.

Constraints

In 2024, considerable decreases in the clearance rate of cases are recorded in:

- Court of Appeal Centre - 57.11 percent compared to 70.64 in 2023 (decrease of 13.53 percentage points (~19.15 percent))
- North Court of Appeal - 70.07 percent compared to 85.49 in 2023 (decrease of 15.42 percentage points (~18.04 percent))
- Supreme Court of Justice - 40.24 percent compared to 47.40 in 2023 (decrease of 7.16 percentage points (~15.11 percent))

This phenomenon is largely explained by the massive resignations of judges from these courts. A major constraint is also the additional workload of the remaining judges. Although the SCM has transferred judges from other courts to courts where there is an increased shortage of staff, this strategy is not sustainable in the long term as it puts additional pressure on the courts from which judges were transferred, with the system operating in a chronic shortage of staff at all levels. Another problem to efficient management of justice is the practice of excessively long interim appointments. Thus, in the case of the Courts of Appeal, two out of three courts have an interim president since 2021, while in the case of the SCJ the interim has lasted since 2019. At the level of the lower courts, out of 14 courts, only one has a fully mandated president. This prolonged provisional status affects not only managerial coherence, but also the capacity to implement institutional policies and to assume strategic responsibilities at the management level.

Against the backdrop of these structural dysfunctions, the issue of salaries continues to be a central factor of instability in the judiciary. Although the Constitutional Court[97] has clearly stated the obligation to ensure adequate and fair remuneration for judges and prosecutors, its 2022 ruling was implemented only partially.

In 2023, the reference value used to calculate judges' salaries was increased from 2,500 to 2,850 MDL, amid an inflation rate of approximately 13.4 percent. In 2024, the reference value remained unchanged, despite an inflation rate of around 6.97 percent. In 2025, the reference value was raised to 3,000 MDL. Although the increase made in 2025 represents a positive trend, according to the study of the Superior Council of Magistracy,[98] these increases do not compensate for the salary losses incurred in previous years. SCM has reiterated the need for urgent reform of the salary system, signalling that the current regulatory framework is inequitable and demotivating, especially for young judges or those who have not yet been evaluated. According to data provided by the Ministry of Finance, as of July 1, 2025, the reference value for calculating

[95] https://www.csm.md/files/Hotaririle/2024/06/64-6.pdf.

[96] https://jc.instante.justice.md/sites/jc.instante.justice.md/files/Raportul%20de%20activitate%20Judec%C4%83toria%20Chi%C8%99in%C4%83u%202024%20.semnat.pdf.

[97] https://www.constcourt.md/libview.php?l=ro&idc=7&id=2511&t=/Media/Noutati/Curtea-a-examinat-sesizarea-referitoare-la-salarizarea-judecatorilor-i-a-membrilor-Consiliului-Superior-al-Magistraturii/.

[98] https://www.csm.md/ro/noutatii/4216-csm-opteaza-pentru-o-reformare-urgenta-a-sistemului-de-salarizare-al-judecatorilor.html.

judges' salaries was additionally increased to 3,600 MDL, and for prosecutors, to 3,200 MDL. At the same time, according to the information provided by the Ministry of Justice, for judges and prosecutors who have passed the external evaluation or the evaluation conducted by the Evaluation Boards under the CSM and the CSP, the reference value used to calculate the salary will be 4,300 MDL. For Supreme Court of Justice judges, members of the CSM from among the judges, and members of the Boards who have passed the external evaluation, the reference value used to calculate the salary has been increased to 4,500 MDL.

Priorities

1. Ensure an effective mechanism to relieve the courts of excessive caseloads.
2. Ensuring the implementation of a fair and motivating salary policy for judges and prosecutors, as well as for auxiliary staff within the system.
3. Ensure the filling of vacant managerial vacancies in courts by organising and holding, within a reasonable timeframe, the legally required competitive examinations in order to avoid lengthy interim positions and to strengthen managerial stability in courts at all levels.

Fight against corruption

Average score:	3 out of 5 points

Recommendation: ***Ensure proactive and efficient anti-corruption investigations leading to a positive record of prosecutions and convictions at all levels.***

Score	3 out of 5 points

Key developments

On 1 March 2024, amendments to Article 270[1] of the Criminal Procedure Code entered into force, aimed at focusing the Anti-Corruption Prosecutor's Office (APO) on combating high-level corruption. The year 2024 is thus the first in which the institution has operated under its new powers. According to the Activity Report of the Anti-Corruption Prosecutor's Office,[99] in 2024 the APO handled a total of 853 cases (418 – criminal investigation and 435 – criminal prosecution), of which 71 were referred to court (60 percent), while 47 were discontinued or closed (40 percent). Thus, the backlog at the end of the reporting period was 204 cases (23 percent of the total number of cases handled).

At the same time, during 2024, with the participation of prosecutors from the Anti-Corruption Prosecutor's Office, the courts of first instance handed down 183 judgments concerning 251 persons, of which:

- convictions – 91 rulings against 109 persons;
- dismissal – 64 rulings against 94 persons;
- acquittal - 28 rulings against 48 persons.

In 2024, the number of criminal cases finalised with judgments in courts of first instance increased by 21 compared to 2023. Also, in 2024, seven "high-profile cases" were sent to court involving subjects such as MPs, judges, the Bashkan of Gagauzia, etc., for crimes such as illegal financing of political parties, abuse of office, illicit enrichment, false statements, influence peddling, etc.

After the separation of powers between the APO and the National Anti-Corruption Centre (NAC) in the investigation of corruption cases, the latter took over the prosecution of minor and systemic corruption cases. The prosecution of these cases, managed by the NAC's criminal investigation body, was assigned to the territorial prosecutor's offices. According to the Activity Report of the Prosecutor General's Office,[100] in 2024, prosecutors, together with criminal investigators from the National Anti-Corruption Centre, examined a total of 1491 criminal cases. Of these: 489 were pending cases; 587 were initiated by the NAC; 415 were referred from other bodies or were separated. Of the total number of cases handled by the NAC's criminal investigation body, decisions were taken in 927 criminal cases, of which 305 criminal cases involving 341 persons were referred to court. The number of criminal cases resolved doubled in 2024 compared to 2023, from 261 to 531 cases. According to the NAC, by the end of 2024, the Criminal Assets Recovery Agency (ARBI) within the NAC had 112 delegations in progress, involving 83 criminal cases against 157 individuals.

As a result of parallel financial investigations, 379 assets belonging to 97 subjects were identified in 62 criminal cases. The total value of the seized assets is 1.3 billion MDL (this amount includes also seizures applied at the end of 2023 and reflected in the ARBI records in 2024). During the reporting period,

[99] https://procuratura.md/anticoruptie/sites/procuratura.md.anticoruptie/files/2025-01/raportul-procuraturii-anticoruptie-2024.pdf.
[100] https://www.procuratura.md/sites/default/files/2025-04/raport-privind-activitatea-procuraturii-anul-2024-final.pdf.

approximately 101 million MSL was collected in the ARBI treasury accounts intended for the deposit of seized funds and proceeds from the sale of frozen assets.

At the same time, according to the 2024 Activity Report of the Prosecutor General's Office, cases of electoral corruption and illegal financing of political parties were a persistent phenomenon of systemic corruption. Thus, 119 criminal cases were initiated for voter corruption and illegal financing of political parties, involving more than 150 persons. Of these, 54 cases were sent to court, involving 73 defendants. In four of the cases, convictions have already been handed down.

Constraints

Although the changes aimed at separating the powers of the APO and the CNA in investigating corruption, introduced by Law 365/2023,[101] aimed at streamlining the investigation of large-scale and systemic corruption, the separation of the APO from the CNA has led to a series of delays in the examination of cases already at the criminal investigation stage. This is because they were transferred in accordance with the new powers assigned to both institutions and will have to be examined almost from scratch. Furthermore, there are still some shortcomings in the separation of cases according to jurisdiction. Thus, according to the APO's 2024 Activity Report, at least 11 criminal cases falling within the exclusive jurisdiction of the APO were identified which, contrary to the new regulations, were investigated by the NAC under the leadership of the territorial prosecutor's offices. At the same time, the APO's operational capacity was seriously affected by a lack of human resources, particularly in the context of resignations triggered by the vetting process. At the end of 2024, only 37 prosecutors were actually working within the institution, which put considerable pressure on the remaining staff and negatively affected the volume and pace of criminal case resolution. Accordingly, in 2024, the APO's capacity to manage pending cases decreased compared to the previous year: in 2023, the reduction in pending cases was 13.55 percent (251 cases at the beginning of the year versus 217 at the end), while in 2024 the reduction in pending cases accounted for about 6 percent (217 cases at the beginning of the year versus 204 at the end). At the same time, although in 2024 the rate of cases referred to court increased to 60 percent compared to 54 percent in 2023, overall the rate of cases resolved by the APO decreased to 118 compared to 173. This decrease in the number of cases resolved by the APO can be explained by limited institutional resources and the high workload per prosecutor.

In February 2025, the APO was also left without a chief prosecutor, who resigned from office. Following a public competition held by the SCP, Marcel Dumbravan was appointed chief prosecutor of the APO, having also served as interim chief prosecutor. These difficulties were compounded by significant financial constraints—the institution's budget was reduced during the year, and a large part of the expenditure was directed exclusively to salaries, to the detriment of investments in logistics, expertise, or technical equipment. Although a new organizational structure was adopted in November 2024, the administrative changes necessary to strengthen the institution's functioning were implemented with delay and only partially, while the lack of adequate premises and modern infrastructure continued to limit the operational capacity of this structure. Taken together, these constraints affect not only the efficiency of anti-corruption investigations, but also the institutional capacity to maintain a positive and sustainable record of prosecutions and convictions at all levels.

Priorities

1. Strengthen the operational capacities of the Anti-Corruption Prosecutor's Office by providing the necessary human, logistical, and financial resources.
2. Improve the mechanism for distributing cases according to competence, in order to avoid overlaps between the APO and the NAC.
3. Review the APO budget to ensure adequate investment in infrastructure, expertise, technical equipment, and functional premises.

[101] https://www.legis.md/cautare/getResults?doc_id=140196&lang=en.

Recommendation: ***Step up cooperation between the Anti-corruption Prosecutor's Office, the National Anticorruption Centre and law enforcement agencies; continuously monitor capacities of all institutions engaged in anti-corruption processes in carrying out their competences and provide sufficient resources for their functioning.***

Score:	**3 out of 5 points**

Main developments

By Order of the Prosecutor General No. 145/3 of 29 November, 2024,[102] the new Regulations of the Anti-Corruption Prosecutor's Office were approved, establishing an updated functional framework for the institution's work. Subsequently, on 2 December 2024, by Order No. 4 of the Chief Prosecutor of the APO, there was approved the new staffing table, which includes 139 positions (excluding prosecutors), namely: 30 criminal investigators, 40 investigation officers, 38 prosecutors' advisors, 26 civil servants, and five auxiliary staff.

By Decision No. 1-394/2024 of the Superior Council of Prosecutors,[103] amendments were made to *the Regulations on the procedure for selecting prosecutors, the procedure for evaluating the performance of prosecutors, and the functioning of the Board for the Selection and Evaluation of Prosecutors*, with a view to enhancing the role of specialized prosecutors in the selection and training of the team. Following the amendments, the Chief Prosecutor of the specialized prosecutor's office or the Prosecutor General (or the Deputy Prosecutor General) receive all the documentation submitted by the candidates and may analyse and express their views on it. This involvement contributes to increasing the transparency and objectivity of the evaluation process. The participation of the Prosecutor General (PG) and the Chief Prosecutor is optional and depends on the specific nature of the position for which the competition is organized. At the same time, the PG and the Chief Prosecutor of the specialized prosecutor's office are given the opportunity to formulate an advisory opinion on each candidate, which will be forwarded to the SCP, supporting a more comprehensive assessment. In addition, the chief prosecutor of the specialized prosecutor's office is invited to attend SCP meetings to express their views on appeals, except for those relating exclusively to legal issues.

Another important change is the introduction of a clear mechanism for calculating scores in the evaluation process. This is based on the number of years worked in each position, relative to the total period evaluated, thus contributing to a more fair and objective assessment of prosecutors' performance throughout their careers.

On 11 December 2024, within the Anti-Corruption Platform organized under the auspices of the Ministry of Justice, 12 key institutions signed the Inter-Institutional Cooperation Agreement on supporting the fight against corruption. This document commits the Ministry of Justice, the Ministry of Internal Affairs, the Prosecutor General's Office, the Anti-Corruption Prosecutor's Office, the Superior Council of Prosecutors, the National Anti-Corruption Centre, the Information and Security Service, the General Police Inspectorate, the General Border Police Inspectorate, the State Tax Service, the Customs Service, and the State Protection and Security Service to support the APO in identifying and seconding criminal investigation officers, intelligence and security officers, and specialists in areas relevant to the investigation of corruption. The signing of this agreement is an important step towards a coordinated and integrated approach to anti-corruption.

[102] https://procuratura.md/anticoruptie/comunicate/noutati/procuratura-anticoruptie-are-o-noua-structura-organigrama-si-regulament-de
[103] https://csp.md/sites/default/files/2024-12/394_hot_modificarea_regulament_csep.pdf.

At the level of the National Anti-Corruption Centre, based on Parliament Decision No. 217 of 31 July 2024,[104] an internal institutional restructuring was implemented, which aimed to clarify functional responsibilities, improve decision-making, streamline activities, and better manage resources. The new organizational structure facilitates a clearer delineation of responsibilities and better internal coordination, including with regard to the prevention of corruption within the institution.

Additionally, an anti-corruption judicial system was established, involving the creation of a specialized anti-corruption panel within the Chișinau District Court and specialized chambers within the Central Court of Appeal.

Constraints

Despite the progress made, major challenges remain regarding the operational capacity of institutions. The Anti-Corruption Prosecutor's Office operates with a staffing rate of only 50 percent for prosecutors and less than 30 percent for investigation officers, while the workload is increasing, particularly in relation to the investigation of senior executive officials. At the same time, with regard to the secondment of prosecution and investigation officers to the APO, the Inter-institutional Cooperation Agreement on supporting the fight against corruption has not yet being honoured by all parties. Additional difficulties are caused by frequent interventions in the very concept of the functioning of specialized anti-corruption bodies. Namely, in 2023, a comprehensive reform was implemented to separate the NAC from the APO by clearly dividing the powers of these two institutions, with the APO being responsible for investigating large-scale corruption and the NAC for small-scale and systemic corruption. The decoupling of the APO from the NAC was followed by a process of institutional strengthening, particularly in the case of the APO (provision of a separate budget, increase in staff, start of the process of identifying new premises, etc.). However, in February 2025, the legislator came up with a completely new concept for the fight against corruption. Draft Law No. 40/2025 on the Anti-Corruption Prosecutor's Office and the Fight against Organized Crime (PACCO) proposes the liquidation of the two existing specialized prosecutor's offices (APO and PCCOCS) and the creation of a new institution with mixed powers. The draft law was strongly criticized by representatives of state institutions (PG, APO, SCP, MoJ, etc.) and civil society, that noted that it "does not offer sustainable solutions for strengthening the fight against political corruption and the illegal financing of political parties, nor does it resolve any potential obstacles to the investigation and prosecution of criminal cases involving organized crime".[105] Furthermore, at that stage, the draft did not meet the requirements of Law No. 100/2017 on normative acts, as there was no anti-corruption or legal expertise. Nevertheless, the PACCO Draft Law was hastily passed in the first reading at the plenary of the Parliament of the Republic of Moldova on 20 February 2025.[106] The draft is to be sent for consultation to the Venice Commission.

The frequency of these conceptual reforms, often promoted without genuine consultation and impact analysis, undermines institutional stability and generates operational confusion, seriously affecting the ability to develop a coherent and effective anti-corruption policy.

Priorities

1. Ensure the urgent filling of vacant positions within the Anti-Corruption Prosecutor's Office, in particular prosecutors and investigation officers, by attracting and retaining qualified staff and by operationalizing the secondment mechanisms provided for in the Inter-Institutional Cooperation Agreement.

[104] https://parlament.md/ns-newsarticle-Structura-Centrului-Naional-Anticorupie-a-fost-modificat-pentru-a-spori-eficiena-eforturilor-anticorupie.nspx#:~:text=Chi%C8%99in%C4%83u%2C%2031%20iulie%202024%20%E2%80%93%20Parlamentul,%C8%99i%20crearea%20unor%20noi%20structuri.

[105] https://ipre.md/wp-content/uploads/2025/02/final-Nota-de-Pozitie_GEJ_Proiect-40_PACCO_27.02.2025_RO_final.pdf.

[106] https://www.parlament.md/sitting-details-md.nspx?sittingId=de8e7e78-f0b6-419a-b3dd-4c9a0045df60&materialId=48ba42ce-6939-4189-8be2-28f4b0e82dba.

2. Stabilize the institutional and legislative framework for the fight against corruption by stopping hasty legislative initiatives that further weaken existing structures. Any major reform needs to be preceded by genuine public consultations and impact assessments.
3. Strengthen and effectively implement the new regulatory and functional framework of the Anti-Corruption Prosecutor's Office, including by allocating the necessary resources to operationalize the newly approved structure and by accelerating the identification of suitable premises for the institution's activities.

Recommendation: ***Implement the ODIHR opinion and guidance on transparency and accountability and pending Group of States against Corruption (GRECO) recommendations, including as regards strengthening the capacity and improving the functioning of the National Integrity Authority (NIA) to effectively verify the assets and personal interests of high-level public officials.***

Score:	**3 out of 5 points**

Main developments

According to the third GRECO Interim Compliance Report,[107] which refers to the recommendations made in the fourth evaluation round on the prevention of corruption in relation to members of Parliament, judges, and prosecutors, it was found that the Republic of Moldova had satisfactorily implemented 13 of the 18 recommendations made. Four other recommendations have been partially implemented, while one recommendation relating to the regulation of lobbying, has not been implemented. The adoption of this Monitoring Report concludes the fourth round of the compliance procedure concerning the Republic of Moldova.

In the Compliance Report, GRECO notes that all recommendations concerning judges have been implemented. In terms of progress, the report mentions the formation of a new SCM and the amendment of the legal framework on disciplinary proceedings against judges, as well as the inclusion of statistics on disciplinary proceedings in annual activity reports. With regard to the prosecution system, GRECO welcomes the efforts taken to make the Prosecutors' Inspection operational.

The fifth round of GRECO evaluations concerns the prevention of corruption and the promotion of integrity among the highest executive officials (president, prime minister, deputy prime ministers, ministers, secretaries of state, secretaries of state of the Government, secretaries-general of the Presidency and the Government, presidential advisers and ministerial advisers – hereinafter referred to as PTEF), as well as for the police and border police. In total, the Report contains 25 recommendations, on whose implementation the Government was to report to GRECO.

The fifth GRECO Evaluation Report highlights the need to improve the detailed control procedures of the National Integrity Authority over the declarations of assets and personal interests of PTEF, as well as the need to establish an internal monitoring mechanism to ensure the consistency of ANI integrity inspectors' decisions and a fair distribution of workload among them.[108] Thus, in March 2025, amendments were made to Law No. 132/2016 on the National Integrity Authority and Law No. 133/2016 on the declaration of assets and personal interests.[109] The amendments include: clarification of control procedures, including the extension of checks on intermediaries, creditors, donors, and benefactors; clearer regulation of the status and independence of integrity inspectors, including by guaranteeing their right to refuse illegal orders; clear regulation of decision-making independence on a case-by-case basis; the possibility of inter-institutional transfer and the application of gradual disciplinary sanctions. The integrity inspector is empowered to initiate administrative proceedings in cases where declarations of assets and interests contain incomplete or erroneous information and the differences found exceed the threshold of two average monthly national salaries in the economy. At the same time, the provisions on the subject of the declaration are substantially detailed, and the terms “beneficial owner” and “substantial difference” are redefined in accordance with Law No. 208/2017 on the prevention and combating of money laundering and the financing of terrorism.[110] Similarly, the deadlines for submitting declarations were clarified and

[107] https://www.coe.int/en/web/greco/home/-/asset_publisher/lxOP5Yph48Zi/content/republic-of-moldova-publication-of-the-third-interim-compliance-report-on-the-republic-of-moldova.
[108] https://www.legis.md/cautare/getResults?doc_id=147738&lang=en.
[109] https://www.legis.md/cautare/getResults?doc_id=147882&lang=en.
[110] https://www.legis.md/cautare/getResults?doc_id=146050&lang=en.

restrictions on the acquisition, use, and disposal of assets were introduced. Persons holding elective public office or public dignity who are either identified as having unjustified wealth or are the subject of a finding to that effect are prohibited from holding public office for three years.

An important change is that the completeness and accuracy of declarations of assets and personal interests will be verified by automated means using the electronic submission system, in accordance with the procedure established by the president of the ANI.

In order to streamline the institution's work, the structure of the ANI has also been changed.[111] Several departments have been merged to form the Internal Security, Integrity and Human Resources Department, and two new structures have been established: the Document Management Service and the Internal Audit Service. Technical staff have been excluded from the ANI structure with the transfer of this unit to the Finance and Administration Department with civil service status.

In its latest report on the 2024 presidential elections and constitutional referendum in the Republic of Moldova, published in March 2025,[112] ODIHR recommends revising the legal framework governing referendums to bring it in line with international good practice. In addition, "the law should allow a wider range of stakeholders to participate in the referendum campaign, regulate the involvement of public officials in the referendum campaign, and provide equal campaign opportunities for supporters and opponents of the referendum." Efforts are also needed to update the information in the Voter Registry so that data of deceased persons can be automatically or timely removed. The ODIHR recommends developing and implementing mechanisms to monitor the online election campaign, including on social media platforms, to counter all forms of manipulative content that could undermine public confidence in the electoral process.

Constraints

More than eight years after the publication of the fourth round of GRECO's evaluation report on the Republic of Moldova, the fourth round of the compliance procedure has been completed. According to the first two compliance reports, the overall level of compliance of the Republic of Moldova was assessed as unsatisfactory. Subsequently, in its third compliance report, GRECO found that: 72 percent of the recommendations (13 out of 18) had been implemented satisfactorily, 22 percent (four recommendations) had been partially implemented, and 5 percent (one recommendation) had not been implemented.

Among the partially implemented recommendations are those related to legislative transparency (recommendation no. 1), the adoption of a code of conduct for members of Parliament (recommendation no. 2), ensuring more independent and effective control by the NIA of compliance with integrity rules (recommendation no. 4) and ensuring objectivity, impartiality, and transparency in the functioning of the SCP, including by excluding ex officio members from the composition of that institution (recommendation no. 15). Recommendation no. 3 on the regulation of lobbying remains unimplemented. Among the main constraints identified by GRECO are: the frequent use of the emergency procedure for the adoption of legislation, which limits the possibility of genuine public consultation; the retention of ex officio members, such as the Minister of Justice and the President of the SCM, in the SCP; and the absence of a majority of prosecutors in this self-governing body, which affects its representativeness vis-à-vis the entire system.

With regard to the NIA, although Law No. 132/2016 was amended to improve the control instruments and the status of integrity inspectors, the institution still faces a shortage of active inspectors in relation to the increased volume of checks. The implementation of automated verification systems is still at an early

[111] https://www.parlament.md/preview?id=188041b3-703e-47dd-ae84-1bb1cecb49ce&url=https://ep-sp.parlament.md/materials/638829432152908030/Documents/20250520155708.PDF&method=GetDocumentContent.
[112] https://www.osce.org/files/f/documents/3/9/587451_0.pdf.

stage, and their integration with other relevant databases (e.g., land registry, tax registry, banking systems) is incomplete or faces delays and technical barriers. The lack of a fully functional framework for internal monitoring of decisions and task allocation among inspectors creates risks of inconsistency and overburdening of existing human resources.

Priorities

1. Implement the recommendations of the fifth GRECO evaluation report and the outstanding recommendations of the fourth GRECO evaluation report.
2. Strengthen the capacity of the NIA by increasing the number of integrity inspectors and ensuring a fair distribution of tasks in order to deal effectively with the verification of declarations.
3. Accelerate the implementation of automated systems for verifying declarations of assets and personal interests, including by ensuring their interoperability with relevant public registers (cadastre, tax, banking, etc.).
4. Increase the transparency of the legislative process, including by limiting the use of emergency procedures and ensuring genuine public consultation in the law-making process.

Fundamental rights

Average score:	3.3 out of 5

Recommendation: ***Continue implementation of the national programmes on preventing and combating domestic violence and violence against women, gender equality and in support of the Roma population.***

Score	4 out of 5

Main developments

The reference period was marked by continued efforts to strengthen the institutional and legislative framework for combating violence against women, in line with the commitments of the Istanbul Convention.

A major achievement is the full operationalization, as of January 2024, of **the National Agency for the Prevention and Combating of Violence (ANPCV)**.[113] Created by amending Law No. 45/2007 and reporting directly to the Government, ANPCV has a strong mandate for inter-institutional coordination, implementation of national programs, monitoring, and reporting on the implementation of the Istanbul Convention.[114] In the first half of 2024, the agency assessed the national situation through some 40 field visits and coordinated over 1,000 information activities, involving around 30,000 people.[115] The institutional framework was completed in June 2024 with the establishment of **the National Coordinating Council** (under ANPCV) to ensure policy coherence in the area of implementation of national programmes on the prevention and combating of violence against women and domestic violence.

In the process of implementing the "RESTART" reform at the territorial level, positions for specialists in the prevention of domestic violence and rehabilitation of crime victims have been established within the ATAS, STAS, and social assistance and child rights protection structures in Chișinău municipality and the Gagauzia Autonomous Territorial Unit. Specialists within ATAS are responsible for coordinating, planning, evaluating, and monitoring activities in this field at the level of the assigned territory, while the specialist within STAS is responsible for coordinating the activities of the territorial multidisciplinary team, as well as evaluating and monitoring the activities carried out by this team.

Information on actions undertaken by the social sector in the area of domestic violence is collected weekly through the "Power BI" data collection and analysis platform.

The ANPCV is monitoring and implementing **the National Programme on Preventing and Combating Violence Against Women and Domestic Violence for 2023-2027**, approved by Government Decision No. 332/2023,[116] a strategic document developed by the MLSP together with civil society and development

[113] European Commission. *Republic of Moldova 2024 Report.* SWD (2024) 698 final. Brussels, October 30, 2024. Accessed on June 25, 2025, https://www.eeas.europa.eu/sites/default/files/documents/2024/Moldova%20Report%202024.pdf.

[114] Parliament of the Republic of Moldova. "A National Agency for the Prevention and Combating of Violence against Women and Domestic Violence will be established in the Republic of Moldova." *Parlament.md,* July 31, 2023. Accessed on June 25, 2025, https://www.parlament.md/ns-newsarticle-n-Republica-Moldova-va-fi-creat-Agenia-naional-de-prevenire-i-combatere-a-violenei-fa-de-femei-i-violenei-n-familie.nspx.

[115] UN Women Moldova. "Activity Report of the National Agency for the Prevention and Combating of Violence against Women and Domestic Violence, heard in Parliament." *UN Women Moldova,* November 2024. Accessed June 25, 2025, https://moldova.unwomen.org/ro/stories/comunicat-de-presa/2024/11/raportul-de-activitate-al-agentiei-nationale-de-prevenire-si-combatere-a-violentei-impotriva-femeilor-si-a-violentei-in-familia-audiat-la-parlamen.

[116] Government of the Republic of Moldova. "National Program on Preventing and Combating Violence Against Women and Domestic Violence for 2023-2027." Government Decision No. 461 of July 12, 2023. *Official Gazette of the Republic of Moldova,* No. 240-245 (July 14, 2023), Art. 582. Accessed on June 25, 2025, https://natlex.ilo.org/dyn/natlex2/r/natlex/fe/details?p3_isn=115908.

partners. The implementation of the programme has made notable progress, with an achievement rate of about **93 percent** – of the 58 planned actions, 47 have been fully implemented, two are in progress, and nine have not been implemented/have been transferred.

Key achievements include:

Prevention and awareness (Objective I, 86 percent rate): Over 60 national campaigns, six public debates, and dozens of media appearances; 1,374 social workers and 5,839 professionals from other fields (police, health, education) were trained. Five key institutions have integrated specialized training modules.

Victim protection (Objective II, rate 56 percent): In 2024, social assistance services supported **727 victims** (an increase of 316 cases compared to 2023). This includes 530 victims assisted in placement services, 37 victims of sexual violence assisted by the Ungheni regional service, and 79 women with disabilities supported through economic empowerment programmes.

Justice system response (Objective III, 100 percent rate): All 11 monitored actions were completed, including the approval of Government Decision No. 449/2024 on the National Coordinating Council.

Coordinated policies (Objective IV, 89 percent rate): 63 percent of the multidisciplinary territorial teams are operational and 106 specialists have been trained in statistical data collection.

At the legislative level, in July 2024, by amending Law No. 45/2007, the term **"femicide"** was introduced for the first time, an important step towards recognizing this form of violence. And on 22 May 2025, Parliament adopted a crucial amendment: **exempting victims of domestic violence from paying state fees** and stamp duty in civil cases (property division, etc.), a measure that removes a financial barrier and facilitates access to justice.[117]

With regard to the development of specialized services, the priority for 2025 is the project "Economic Empowerment of Women through Gender-Based Violence Response Services." The activities take place in four regions: Chișinău, Bălți, Cahul, and Ștefan Vodă.. This follows the creation of a new centre in the Râșcani district in 2024 (27 places, fully accessible) and the renovation or equipping of centres in Chișinău, Hâncești, Căușeni, Ștefan Vodă, and Bălți with the support of development partners.

Constraints

Despite legislative progress, the effective implementation of policies to combat violence is hampered by major systemic obstacles, in particular the lack of specialized services. GREVIO and the European Commission reported in 2023-2024 that there were insufficient shelters: only nine centres nationwide, with 182 places, which were particularly insufficient in rural areas.

The justice system remains poorly involved, with delayed investigations, revictimization, and a low conviction rate. In 2024, 45.1 percent of protection orders and 17.6 percent of emergency restraining orders were violated, reflecting the low efficiency of supervision.

A critical issue remains the lack of sustainable and predictable funding. The financing mechanism, established by Government Decision no. 332/2023, is fragmented, stipulating that resources come from the individual budgets of the authorities involved and from "other sources." Consequently, the State Budget Law for 2025 does not contain clear budget lines dedicated to the 2023-2027 National Program or the ANPCV. This model makes it difficult to monitor total allocations and creates a heavy dependence on external partners' funds, calling into question the long-term sustainability of the reforms.

[117] Summary of the plenary session of Parliament on May 22, 2025, accessed on June 25, 2025, https://www.parlament.md/ns-newsarticle-Sinteza-edinei-plenare-a-Parlamentului-din-data-de-22-mai-2025.nspx

The development of an integrated information system for the collection of disaggregated statistical data, although an announced priority,[118] remains a challenge. Currently, data collection is uneven and fragmented between different institutions (police, social assistance, justice), which makes a comprehensive analysis of the phenomenon difficult.[119] Official data for 2024 indicate a worrying magnitude of the phenomenon: the police recorded approximately 16,000 calls related to domestic violence, while the Trust Hotline for women and girls received 2,024 calls, which led to the examination of 450 unique cases of domestic violence and 82 cases of sexual violence. However, these process indicators, although useful, are insufficient to measure the actual prevalence of violence, identify trends, and underpin evidence-based public policies. This gap between reporting and legal response is acknowledged even by the ANPCV, which lists among its pending issues the need to analyse the causes of the discrepancy between the high number of complaints and the low number of criminal or contravention proceedings initiated.

The establishment of the ANPCV and the two national councils represents an important step towards ensuring policy coherence at the national level; however, their success depends on the capacity of local authorities to implement actions on the ground. Without adequate resources and competencies at the local level, these structures risk remaining bureaucratic and ineffective. A critical vulnerability remains the weak link between the central and local levels, which requires urgent attention. In this context, a key role is played by development partners such as UN agencies and civil society organizations, including those grouped in specialized platforms like the National Coalition "Life Without Domestic Violence" and the Gender Equality Platform. These actors play a dual role—as service providers and advocacy partners—reflecting both the maturity of civil society and the state's dependence on external expertise, which must be balanced through the strengthening of public institutions.

Priorities

1. **Expanding the service network**: There is an urgent need to create shelters, counselling centres, and economic reintegration services, especially in rural areas.
2. **Improving the judicial response**: A shift to a systemic and victim-cantered approach is needed through continuous and mandatory training for judges, prosecutors, and police officers, focusing on implementation of the Istanbul Convention. Monitoring the implementation of legislation on prevention and combating of violence is necessary.
3. **Sustainable funding**: It is essential to overcome the fragmented funding model established by Government Decision no. 332/2023. It is necessary that the 2026 Budget Law establishes a clear and centralized budget line covering the full costs of the ANPCV and the 2023-2027 National Program. This measure will ensure predictability, enable efficient monitoring of funds, and reduce dependence on external financing and disparate allocations from other authorities' budgets.
4. **Effective data system**: Completing the information system for collecting disaggregated data and launching the National Study on Violence (2025-2026) are crucial for evidence-based public policies.

Implementation of programmes to promote gender equality

Developments

The Republic of Moldova continues to align its gender equality policies with European standards and sustainable development goals. The government is implementing the Programme for the Promotion and Ensuring of Equality between Women and Men for 2023-2027,[120] one of the two key frameworks mentioned in the 2024 European Commission Report. The programme provides for concrete actions in seven priority

[118] National Agency for the Prevention and Combating of Violence against Women and Domestic Violence. "Policy documents." Accessed June 25, 2025, https://anpcv.gov.md/ro/activitate.html.
[119] Platform for Gender Equality. "Opinion on the draft law amending certain legislative acts on the migration of central administrative authorities." *Platform for Gender Equality,* January 29, 2025. Accessed on June 25, 2025, https://egalitatedegen.md/aviz-la-proiectul-legii-cu-privire-la-modificarea-unor-acte-normative-privind-migrarea-autoritatilor-administrative-centrale/.
[120] Ministry of Labour and Social Protection of the Republic of Moldova. "Program for accelerating gender equality." April 2023. Accessed June 27, 2025, https://social.gov.md/wp-content/uploads/2023/04/Program-accelerare-egalitate-de-gen.pdf.

areas, such as education, health, and the labour market, and includes measures such as the development of care services, training for women in leadership (1,400 by 2027), and campaigns on equal pay. In the 2025 Global Gender Gap Report published by the World Economic Forum, the Republic of Moldova ranks 7th—marking its first-ever entry into the global top 10.

An important step forward is the adoption of Law No. 180/2024, which ensures equal access to goods and services by eliminating gender discrimination.[121] Women's participation in elected office has grown slowly but steadily: women mayors account for 24 percent after the 2023 elections, while women MPs reached 40 percent in 2024,[122] and the proportion of women members in the Government was 41.2 percent as of June 2025. The share of women among all police employees, including those in civil protection and border guard institutions, was 26.1 percent at the beginning of 2024. At the same time, the proportion of women among all judges was 52.0 percent at the beginning of 2025. As a result of the actions undertaken, in 2025, the Republic of Moldova was ranked 7th in the Global Gender Gap Report published by the World Economic Forum.

In economic terms, the Organization for Entrepreneurship Development (ODA) supported 176 women entrepreneurs (94 start-ups and 82 expansions), helping to maintain over 1,400 jobs and create 838 new ones. The projects approved for 2024-2025 have attracted investments of over 80 million MDL. However, women entrepreneurs in Moldova still have limited access to financial resources, a reality confirmed by statistics. Although about 34 percent of businesses in the country are run by women, they face a significantly higher rejection rate for loan applications than men. This difficulty in accessing bank capital leads many women entrepreneurs to resort to financing from their own or family sources, which hinders their expansion and widespread involvement in entrepreneurial activity.[123] To integrate a gender perspective into public policies, gender units and gender coordination groups have been set up in ministries. MLSP and Ministry of Agriculture and Processing Industry (MAFI) are pilot authorities for the inclusion of the gender dimension in the 2025 budget,[124] resulting in the integration of gender indicators in several budget subprograms.

These efforts are supported by a wide range of international partners. UN agencies such as UN Women and UNFPA implement dedicated programmes: UN Women supports projects aimed at the political and economic empowerment of women and combating stereotypes, while UNFPA, through its 2023-2027 Country Programme (USD 12.2 million), focuses on realizing sexual and reproductive rights and health. Similarly, the European Union and the Council of Europe allocate significant resources, including direct funding or through projects implemented by civil society organizations, to support the political, economic, and social empowerment of women, as well as efforts to prevent and combat violence against girls and women.

Constraints

Progress in gender equality is limited by persistent structural barriers. Although women's participation in the labour market is increasing, wage inequalities remain deep. At the beginning of 2025, the average pension for women was more than 700 MDL lower than that for men. The largest pay gaps are found in IT (38 percent), finance (34.6 percent) and health (25.6 percent), and are caused by occupational segregation,

[121] Parliament of the Republic of Moldova. Law No. 180 of July 18, 2024, on the amendment of certain legislative acts (on equal access of women and men to goods and services). *Official Gazette of the Republic of Moldova,* No. 323-326 (August 5, 2024), Art. 533. Accessed on June 27, 2025, https://www.legis.md/cautare/getResults?doc_id=144405&lang=en.o.

[122] Ermolenco, Alexandra, Natalia Covrig, Cristina Cojocaru, and Alina Andronache. *Gender Equality Index 2024: Stagnation in the fight for gender equality: what is stopping us from moving forward?* Chisinau: Partnership for Development Center, March 2024. Accessed on June 25, 2025, https://progen.md/wp-content/uploads/2024/03/CPD_IEG-2024.pdf.

[123] The National Bureau of Statistics, in collaboration with UN Women and UNDP, found that approximately one-third (33.9%) of enterprises in the Republic of Moldova are owned or managed by women. A World Bank study also found that loan applications from women-led firms in Moldova are rejected at a higher rate (28.1%) than those from men-led firms (19.7%). This information is corroborated by various reports on women's entrepreneurship, including analyses by the Organization for the Development of Entrepreneurship (ODA) and reports published by UN Women Moldova.

[124] The state budget law for 2025 was published in the Official Gazette - Moldpres, accessed on June 25, 2025, https://www.moldpres.md/rom/economie/legea-bugetului-de-stat-pentru-anul-2025-a-fost-publicata-in-monitorul-oficial

glass ceilings and the burden of unpaid care work.

Gender units in ministries do not have clear mandates or sufficient resources to influence policies and budgets. The 2024 EC report highlights the need for better coordination and institutional accountability.

Another major obstacle is the hostile political environment. Women candidates frequently face sexist speech, denigration, and harassment, which discourages political involvement and perpetuates underrepresentation. The 2024 EC report notes with concern that women politicians and candidates for elected office are frequently subjected to **smear campaigns, hate speech, and sexist attitudes** during election campaigns and in the public sphere.[125] This phenomenon not only affects the individuals concerned, but also discourages other women from entering politics, perpetuating their underrepresentation.

The sustainability of policies is affected by the lack of clear budget allocations for the Programme for the Promotion and Ensuring of Equality between Women and Men for 2023-2027, with funding largely dependent on the general budgets of ministries and external donors. An analysis of the 2025 State Budget Law does not reveal specific and transparent budget allocations for the implementation of this programme.

The EC report highlights the direct link between care services and women's economic participation. Investments in accessible nurseries and kindergartens should be seen as strategic measures with positive economic and social impact, and not just as social spending. This argument is essential for future budget decisions.

Priorities

1. **Reducing the pay gap**: It is essential to move forward with the implementation of the measures set out in the National Programme, including the development of the equal pay portal and training for employers on the evaluation of work of equal value.
2. **Strengthening the gender mainstreaming mechanism**: The mandate and responsibilities of gender units in ministries need to be clarified and supported with adequate resources. Clear mechanisms are needed to monitor the integration of the gender perspective into policies and budgets.
3. **Combating stereotypes and sexist discourse**: National awareness-raising campaigns and effective mechanisms to sanction sexist discourse should be launched in cooperation with relevant regulatory institutions.
4. **Economic empowerment of women**: The support programme for female entrepreneurship should be implemented with clear measures on access to finance, training, and support for women in rural areas and vulnerable groups. The successful model of the ODA Programme can be expanded.

Implementation of the Program for Supporting the Roma Population in the Republic of Moldova for 2022-2025

Key developments

Although Roma inclusion remains an area of major challenges, some progress has been made in terms of policies and institutional structures in this area. The government is implementing the Programme for the Support of the Roma Population for 2022-2025 (Government Decision No. 576/2022)[126] in response to the failures of the previous plan and the heightened vulnerabilities of this community. The programme focuses

[125] European Commission. *Communication on the EU's enlargement policy. Report on the Republic of Moldova 2024.* EU Neighbours East, February 12, 2025. Accessed on June 25, 2025, https://euneighbourseast.eu/ro/news/publications/comunicare-privind-politica-de-extindere-a-ue-raport-republica-moldova-2024/.

[126] Government of the Republic of Moldova. "Moldovan Government approved program to support Roma population." *Government of the Republic of Moldova,* August 3, 2022. Accessed June 25, 2025, https://gov.md/en/content/moldovan-government-approved-program-support-roma-population.

on areas such as: education, health, employment, social protection, civic participation, combating discrimination, and supporting community mediators.

According to the Ministry of Education and Research, between 2023 and 2025, the number of Roma children enrolled in kindergartens (from 216 to 233)[127] and in general education (from 1,114 to 1,645) increased. Merit scholarships awarded to Roma pupils and students reached 94.[128] Educational materials on Roma culture have been introduced, and information and material support campaigns are being carried out in over 50 communities. The extension of free meals for pupils in grades V-IX, starting in September 2025, will particularly support vulnerable children.

In 2024, the ARI signed a memorandum of cooperation with the "Voice of Roma" Coalition to combat discrimination and promote the rights of Roma. The number of state-funded community mediators has reached 56.[129] They have received training in human rights and gender equality, facilitating access to social assistance and compensation for communities in districts such as Călărași and Edineț.

Constraints

Despite a detailed strategic framework, the field of Roma inclusion suffers from a major discrepancy between stated commitments and the reality on the ground. The constraints are deep-rooted, systemic, and reflect the state's inability to bring about concrete change for the Roma community. Although the official data presented by the Ministry of Education and Science (MEC) is optimistic, the monitoring report of the Coalition "Vocea Romilor" (December 20 2024)[130] indicates challenges in achieving the objectives of the 2022-2025 Programmed, particularly in education—an area that is essential for combating poverty:

- Only 39 percent of Roma children are enrolled in preschool education;
- Only 43 percent of those of compulsory school age (7-16 years) attend general education;
- In some localities, the situation is critical—in Otaci, for example, the school enrolment rate is only 6 percent, while in Soroca and Edineț, similar levels of exclusion are recorded;
- The school dropout rate is 2 percent, and unmotivated absenteeism reaches 6 percent of all school-age children.

These data, collected from 52 administrative units, confirm the assessments of the 2024 European Commission Report, which notes "limited progress" in the inclusion of Roma, a conclusion supported by multiple civil society analyses.

Overall, this area is marked by the most significant discrepancy between the policies adopted and the concrete results achieved. The national programme, although well-developed, functions more as a form of formal compliance, without financial support and real implementation mechanisms. This approach undermines the credibility of Moldova's human rights commitments.

The main causes of educational and social exclusion remain extreme poverty, lack of identity documents, parental migration, and persistent discrimination. The 2024 EC Report confirms that Roma in Moldova continue to be affected by racism and discrimination, including in access to employment. Economic

[127] Government of the Republic of Moldova. "Program to support the Roma population in the Republic of Moldova for 2022-2025." Government Decision No. 576 of August 10, 2022. Accessed on June 25, 2025, https://natlex.ilo.org/dyn/natlex2/natlex2/files/download/114083/MDA-114083.pdf.

[128] Government of the Republic of Moldova. "On the approval of the Program for the support of the Roma population in the Republic of Moldova for the years 2022-2025". Decision No. 131 of March 2, 2022. Accessed on June 25, 2025, https://particip.gov.md/ro/download_attachment/16572.

[129] Government of the Republic of Moldova. *Report on the Government's activity in 2024.* April 2025. Accessed on June 25, 2025, https://gov.md/sites/default/files/media/documents/2025-04/Raportul%20cu%20privire%20la%20activitatea%20Guvernului%202024.pdf.

[130] Agency for Interethnic Relations. "The Agency for Interethnic Relations and the Roma Voice Coalition have signed a Memorandum of Cooperation to promote the social inclusion of the Roma community." *Agency for Interethnic Relations,* February 19, 2024. Accessed on June 25, 2025, https://ari.gov.md/ro/content/agen%C8%9Bia-rela%C8%9Bii-interetnice-%C8%99i-coali%C8%9Bia-vocea-romilor-au-semnat-un-memorandum-de-cooperare.

programmes are generally undifferentiated and do not take into account the specific needs of Roma, which limits their effectiveness.

Although 16 localities have approved local action plans, local public authorities lack sufficient resources for implementation. Congress of Local Authorities from Moldova (CALM) has drawn attention to the lack of financial and human support, which turns delegated responsibilities into unfulfilled tasks.

At the same time, although the number of community mediators has increased, poor working conditions lead to instability and reduced efficiency of the network.

Roma women continue to face multiple discrimination—ethnic, gender, and economic. Current policies, which are sectoral in nature, do not integrate an intersectoral perspective. Programmes for gender equality and combating violence recognize the vulnerability of Roma women but do not include specific measures dedicated to them.

Priorities

1. **Urgent interventions in education**: A national programme with adequate funding is needed to increase Roma children's school participation through material support, school mediation, remedial classes, and clear anti-segregation measures. It is crucial to monitor school attendance, not just enrolment.
2. **Strengthening the role of community mediators**: Review of the legal framework, adequate remuneration, and sufficient logistical resources. The establishment of the position of educational mediator must be consolidated.
3. **Dedicated budget for Roma inclusion**: Allocating a clear budget line in the 2026 Budget Law would mark the transition from symbolic interventions to sustainable public policies.

Recommendation: ***Take steps to improve detention conditions and address all the recommendations of the 2023 report of the Committee on the Prevention of Torture, and towards improving the medical treatment given to vulnerable groups in the state's care.***

Score:	**3 out of 5 points**

Key developments

During the monitoring period, the Moldovan authorities took a number of concrete steps in the context of this recommendation, demonstrating an effort to align with European standards and respond to the Commission's suggestions in a timely manner. Although these developments have not yet resolved the underlying problems, they have created a framework for more far-reaching reforms and generated some progress in key areas.

Significant progress has been made in strengthening the public policy framework underpinning the direction of medium- and long-term reforms. The government has approved key policy documents that directly address the issues raised in the recommendation.

Adoption of key policy documents:

The National Human Rights Programme (NHRP) for 2024-2027 (GD no. 164/2024) is a central pillar of this effort. Its importance stems from the fact that it includes specific actions, with clear deadlines and responsibilities, to directly address the recommendations of the Committee for the Prevention of Torture (CPT). Notable actions include the development of an action plan dedicated to combating violence among prisoners (with a deadline for implementation in 2024-2026), the revision of the methodology for calculating detention capacity (deadline 2024) and the development of a concept for the transfer of prison health care to the Ministry of Health (deadline 2024).[131]

The National Programme for the Accession of the Republic of Moldova to the European Union for 2025–2029 (NPA) is the main document for planning and monitoring the fulfilment of obligations arising from and undertaken during the accession negotiations. Chapter 23 of the NPA outlines a series of actions to be implemented by 2029, focusing on justice reform and the protection of fundamental rights, with the aim of reforming the system through the alignment of national legislation with European standards.

Improving detention standards:

Concrete measures have been taken to improve the daily living standards of persons deprived of their liberty.

The approval of new food standards by Government Decision, which will enter into force on 1 January 2025, is part of the direct implementation of recommendations on material conditions. The new standards are more diverse, reduce the quantity of products considered unhealthy, and are tailored to the specific needs of vulnerable groups such as pregnant women, children in the care of their mothers, and persons with medical conditions.[132]

The approval of new regulations on medical examinations for seriously ill prisoners is another essential measure for the protection of vulnerable groups, creating a clearer mechanism for managing complex

[131] Government of the Republic of Moldova. "National Program on Ensuring Respect for Human Rights for 2024-2027 and Action Plan for its Implementation." Decision No. 100 of February 7, 2024. Accessed on June 25, 2025, https://natlex.ilo.org/dyn/natlex2/natlex2/files/download/117326/MDA-117326.pdf.

[132] Government of the Republic of Moldova. "Draft Decision on the approval of minimum food standards and the substitution of certain food products with others for persons in penitentiary institutions." Draft. Accessed on June 25, 2025, https://gov.md/sites/default/files/document/attachments/nu-1077-mj-2024.pdf.

medical and health cases.[133] According to data presented by the National Prison Administration (NPA), two new national clinical protocols were adapted and institutionalized in 2025, and a total of 25 standard operating procedures were updated between 2021 and 2025.

One of the most visible advances concerns the unblocking of infrastructure projects that had been stalled for years, a constant source of criticism from international bodies.

The construction of the new prison in Chișinău has entered a new phase with the takeover of project management by the United Nations Office for Project Services (UNOPS). The agreement was signed on 16 January 2025, ratified by Parliament on March 13, and promulgated on 18 March 2025. The project, with a planned capacity of 1,050 places and a completion date in 2028, is vital for replacing Penitentiary No. 13, an institution that has led to numerous convictions of the Republic of Moldova at the European Court of Human Rights (ECtHR) due to inhumane conditions of detention.[134] According to the schedule presented by the NPA, after a period of review of the technical design by UNOPS, the actual start of construction is estimated for 1 December 2025.

The progress of the construction of the Bălți Detention Centre is another important project aimed at reducing overcrowding in prisons in the north of the country.[135] The authorities have announced the start of the second phase of its construction.

In addition to these major projects, the activity report of the National Prison Administration (NPA) for 2024 mentions **the carrying out of routine and major repairs in 359 detention facilities** and 264 other premises (offices, food blocks, pharmacies), demonstrating an effort to improve material conditions throughout the system.

At the management level, measures have been implemented to stabilize the human resources situation and improve the quality of medical services. **Salary increases** for NPA employees, supported by the government, are a measure aimed at increasing the attractiveness of the profession, motivating existing staff, and reducing staff turnover, a chronic problem in the system.

In the field **of healthcare**, in addition to equipping medical facilities and achieving an accreditation rate of 82 percent,[136] efforts have been made to provide continuous training for staff. According to the NPA, during 2024, 28 doctors and 27 nurses benefited from refresher courses, and in 2025, another 20 medical staff were trained in mental health. Critical public health programmes, such as those for the treatment of tuberculosis and HIV (with the expansion of methadone substitution therapy in 13 prisons), continued, indicating a continued focus on these issues.

Strengthening staff capacity in the prevention of torture was another area of focus. Throughout 2024, with the support of partners, numerous training sessions on the prevention of ill-treatment were organized. NPA data show that 465 employees were trained through the Office of the Ombudsman and another 189 officials through the Promo-LEX Association.

Data presented by the Ombudsman indicate a **decrease in the number of hunger strikes and incidents of aggression against staff** in 2024, which could suggest some improvement in the overall climate in prisons.

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[133] Mihalache, Eliza. "The prison system in the Republic of Moldova under pressure: staff shortages, poor conditions, and limited access to medical services." *Moldova 1,* April 2, 2025. Accessed June 25, 2025, https://moldova1.md/p/46614.

[134] National Prison Administration. "Public servants with special status in the prison system have evaluated their work in 2024." *ANP – National Prison Administration,* January 29, 2025. Accessed on June 25, 2025, https://www.anp.gov.md/randomfunctionarii-publici-cu-statut-special-din-sistemul-penitenciar-au-evaluat-activitatea.

[135] Ministry of Justice of the Republic of Moldova. "Press releases." Accessed June 25, 2025, https://www.justice.gov.md/ro/advanced-page-type/comunicate-de-presa?month=2025-04&page=8.

[136] Government of the Republic of Moldova. *Report on the activity of the Government in 2024.* April 2025. Accessed on June 25, 2025, https://gov.md/sites/default/files/media/documents/2025-04/Raportul%20cu%20privire%20la%20activitatea%20Guvernului%202024.pdf.

Constraints

Despite the progress listed, the implementation of the Commission's recommendation is severely limited by a number of structural and systemic constraints. The analysis of civil society and Ombudsman reports paints a less optimistic picture than government statements, revealing deep-rooted obstacles that undermine the effectiveness of the reforms initiated. Two of the most serious problems identified by the Council for the Prevention of Torture (CPT) – violence among prisoners and overcrowding – continue to affect the prison system, sustained by deep-rooted structural causes.

Violence and informal hierarchies remain a toxic reality. The CPT's 2023 report was damning in its assessment of the authorities' failure to eradicate this phenomenon over the years.[137] More recent reports, such as that of the Council for the Prevention of Torture, confirm that the problem persisted in 2024, affecting the physical and psychological safety of prisoners. The phenomenon is not just a behavioural issue, but also a direct consequence of a power vacuum left by the administration. The CPT has explicitly linked this situation to the "chronic shortage of supervisory staff" and the "dependence on informal prisoner leaders to maintain control." Therefore, any plan to combat violence that does not address the staff crisis is doomed to failure.

The paradox of overcrowding reveals a major inconsistency in the state's criminal policy. While the Ministry of Justice is trying to alleviate overcrowding through infrastructure projects and administrative measures, the judicial system is fuelling it. The Ombudsman's report for 2024 signals, for the first time in recent years, an increase in the total number of prisoners, from 5,695 to 5,844. The NPA report clarifies the source of these figures: an alarming 34 percent increase in the number of people in pre-trial detention.[138] This trend partially negates efforts to reduce the prison population and demonstrates that the EU recommendation cannot be implemented by the NPA alone. A coordinated reform of the entire criminal justice chain is needed, including a reassessment of the excessive use of pre-trial detention – an issue previously highlighted by the Legal Resources Centre of Moldova. The lack of adequate resources is probably the biggest obstacle to real and sustainable reform.

Staff shortages are mentioned as a fundamental problem in almost all critical reports and affect not only security activities but also control and support functions. The NPA reports a shortage of 80 posts in the security and escort sector alone and high turnover among young specialists. Evidence of the impact of this shortage is that, according to official information, in 2023 it was not possible to carry out any internal audit missions within the NPA due to insufficient staff in the specialized subdivision. In this context, there is a flagrant contradiction in government policies. Although the salary increase is a correct and necessary measure, its effect is negated by a moratorium on hiring in the budgetary sector, which has blocked 205 positions in the prison system. Even though there is a legal mechanism for unblocking critical positions through justified requests to the Ministry of Finance (according to Government Decision No. 911/2024), the fact that the National Administration of Penitentiaries (NAP) and the Ministry of Justice have not made use of this procedure (as indicated by information provided by the Ministry of Finance) points to a deeper issue of management and prioritization. This approach demonstrates a lack of coherent strategic vision for human resources in the sector, undermining from the outset any reform that depends on sufficient and motivated staff.

Financial and bureaucratic bottlenecks and project failures create a significant gap between planning and execution. The NPA openly acknowledges that a significant part of its action plan has not been implemented or is behind schedule due to lack of funding and slow bureaucratic procedures. A telling example is **the**

[137] "The European Committee for the Prevention of Torture urges Moldova to address the issue of violence and informal hierarchies among prisoners." *JURIDICE.ro,* October 12, 2021. Accessed on June 25, 2025, https://www.juridice.ro/705125/comitetului-european-pentru-prevenirea-torturii-indeamna-moldova-sa-abordeze-problema-violentei-si-ierarhiilor-informale-intre-detinuti.html.

[138] National Prison Administration. "Report on the activity of the prison administration system for the year 2024." Accessed on June 25, 2025, https://www.anp.gov.md/sites/default/files/DPAM/Bilant%2C%20rapoarte%20analitice/BILAN%C8%9A%202024.pdf.

suspension in February 2025 of the project to implement a new digitalized prisoner file management system. The project, with a budget of approximately USD1.94 million provided by the US Government, was halted at the request of the donor, and the authorities are now looking for new partners. Furthermore, the financing of the most important infrastructure project in the sector—the new prison in Chișinău—is facing uncertainty. According to NPA data, of the EUR25.9 million required from its own contribution, only EUR15.57 million is provided for in the budget, with the remainder to be covered by external projects. This vulnerability is amplified by key information from the Ministry of Finance: according to the loan agreement with the Council of Europe Development Bank, any increase in the cost of the project must be covered in full by the government, which adds additional financial pressure. This paints a picture of "reform on paper", where the government adopts ambitious strategies but fails to provide the resources and stability needed to implement them. The failure to adequately protect vulnerable groups is the most serious shortcoming in the implementation of the Commission's recommendation, indicating that the impact of reforms on people's lives is still minimal.

Healthcare remains poor, despite progress in terms of equipment. The fundamental problem is the acute shortage of medical staff. According to official data provided by the NPA, there are **53.5** vacant **medical staff positions** out of a total of 254.25, representing a shortage of over 21 percent. Although the authorities report measures to attract staff, such as salary increases and requests for the allocation of resident doctors, the crisis persists, affecting critical specialties (psychiatrists, dentists) in particular.[6] This lack of staff, combined with the fact that a significant number of medical units in prisons are not accredited, directly affects the quality of care for chronically ill patients, persons with disabilities, and other vulnerable prisoners.

The Ombudsman's report on children's rights is alarming and highlights challenges in protecting the most vulnerable group. At **Penitentiary No. 10 in Goian,** a recently renovated block was found to be "significantly damaged," with destroyed cells, toilets without doors or windows, and no lighting, indicating a total loss of administrative control and a dangerous environment. A critical shortcoming previously identified at Penitentiary No. 7 Rusca—the lack of a dedicated budget for the food and hygiene of children under three living with their incarcerated mothers—has been addressed through legislation. In response, via Government Decision no. 228/2024, which came into force on January 1, 2025, new norms were approved. For the first time, these norms establish specific food and hygiene product allowances for pregnant inmates, nursing mothers, and the children living in penitentiaries with them. These regulations resolve a direct violation of child rights and demonstrate progress in the state's capacity to ensure minimum living conditions for its most vulnerable groups.

Priorities

To accelerate progress and overcome the constraints identified, the Moldovan authorities must focus on a set of clear priorities, moving from planning to decisive and adequately funded action.

1. **Operationalizing the fight against violence.** The authorities must move from planning to action by allocating resources and launching the first concrete measures in the Order of the Ministry of Justice no. 244/2024 on the approval of the Action Plan for the alignment of penitentiary institutions with European standards and combating the criminal subculture for the years 2024-2027. At the same time, the new methodology for calculating detention capacity must be finalized and implemented in order to obtain a realistic picture of overcrowding and manage prisoner flows more effectively.
2. **Unblock human resources.** Instead of awaiting a general revision of the moratorium, the National Administration of Penitentiaries (NAP) and the Ministry of Justice must proactively use the existing legal mechanism. It is imperative to urgently submit well-reasoned requests to the Ministry of Finance for the unblocking of critical vacant positions — particularly in the areas of security, regime, medical care, and internal audit — given the need to strengthen strategic sectors. Without an adequate number of personnel, no reform can be effectively implemented.

3. **Ensuring the completion of key infrastructure.** It is essential to establish a strict implementation timetable, with guaranteed and full multi-annual funding, for the construction of the new prison in Chisinau, including by identifying sources to cover existing budget shortfall. Close monitoring of the process by UNOPS is crucial to meet the 2028 deadline and avoid past delays.
4. **Implement a coherent human resources strategy.** In addition to salaries, the NPA needs to develop and implement a long-term human resources strategy. This should include attractive recruitment programmes, continuous training tailored to current challenges (including conflict management and dynamic security), and mechanisms to retain qualified staff. Such a strategy will combat structural shortages and reduce the administration's dependence on informal leaders of prisoners.
5. **Complete the healthcare reform.** The process of transferring responsibility for prison healthcare from the Ministry of Justice to the Ministry of Health must be accelerated, in line with the concept pending approval. This structural reform is essential to ensure the independence of medical practice, attract qualified personnel from the civilian healthcare system, and improve the quality of services for all detainees — particularly for vulnerable groups.

Recommendation: ***Improve interinstitutional cooperation, especially with the Equality Council and the People's Advocate, as well as ensuring adequate resources***

Score:	**3 out of 5 points**

Main developments

During the reporting period, the Republic of Moldova took a number of measures to respond to the European Commission's recommendation, which included strengthening the strategic framework, making budget planning more visible, and stepping up practical cooperation activities.

A significant development is the formal recognition at the highest political level of the importance of strengthening national human rights institutions in the context of the country's European path. The government has explicitly included the action "Strengthening the capacities of national human rights institutions" in the strategic documents related to the Growth Plan for Moldova.[139] This measure is particularly important because it directly links the performance of the People's Advocate (PA) and the Council for Equality (CE) to progress in implementing reforms that are a condition for accessing financial assistance from the European Union.[140]

Interinstitutional coordination was improved by the creation, on 13 March 2024, of the European Integration Bureau (EIB), which became the main body managing the accession process.[141] The active involvement of the PA and the CE in the screening process of the acquis communautaire, formally launched on 25 June 2024, demonstrates a higher level of integration of these institutions in the technical dialogue with the EU. Their participation in the assessment of the compliance of national legislation within Cluster 1 – "Fundamentals" ensures that the human rights perspective is taken into account from the early stages of negotiations.

At the same time, a strengthened strategic dialogue has been noted. PA participated in public consultations on the National Development Strategy "Moldova 2030", where it emphasized the need to strengthen the INDU and integrate a human rights-based approach into all public policies.[142] This openness on the part of the executive to receive input from relevant institutions during the strategic policy development phase is a positive development.

The analysis of allocated resources reveals a mixed picture, characterized by budget planning that recognizes needs but is insufficient to ensure optimal functioning. The analysis of allocated resources confirms a systemic issue: although the needs are acknowledged in policy documents, actual funding remains insufficient to ensure optimal functioning. This trend is clearly illustrated by the situation regarding funds for mandate-related activities. Despite the commitment made through the National Programme on Ensuring Respect for Human Rights for 2024–2027 (Government Decision No. 164/2024) to allocate an additional 1.5 million lei, the Medium-Term Budgetary Framework for 2026–2028 shows that these resources remain unallocated. This omission has critical implications, particularly for the Office of the People's Advocate, which is facing a shortfall of approximately 2 million lei in personnel expenditure. Current funding is sufficient to cover only 54 out of the 72 positions provided by law, and salaries for the

[139] Government of the Republic of Moldova. "Annex B. Cluster 1. Fundamental Values," in *the National Program for the Accession of the Republic of Moldova to the European Union for 2025-2029.* Accessed on June 26, 2025, https://old.gov.md/sites/default/files/anexa_b_cluster_1.pdf.
[140] Expert-Grup. "Position paper on the draft amendment to the State Budget Law for 2025 (the "Budget Plus" program)." Published on June 26, 2024. Accessed on June 26, 2025, https://www.expert-grup.org/ro/biblioteca/item/2941-notă-de-poziție-privind-proiectul-de-modificare-a-legii-bugetului-de-stat-pentru-anul-2025-programul-„bugetul-plus".
[141] Government of the Republic of Moldova. *Report on the Government's activity in 2024.* April 2025. Accessed on June 26, 2025, https://gov.md/sites/default/files/media/documents/2025-04/Raportul%20cu%20privire%20la%20activitatea%20Guvernului%202024.pdf.
[142] Office of the People's Advocate. "Opinion of the People's Advocates on the National Development Strategy 'Moldova 2030'." *Ombudsman.md,* August 22, 2022. Accessed on June 26, 2025, https://ombudsman.md/opinia-avocatilor-poporului-cu-privire-la-strategia-nationala-de-dezvoltare-moldova-2030/.

existing 48 staff members are secured only until October 2025 — creating an imminent operational crisis.

The Law No. on the state budget for 2024[143] According to official data from the Office of the People's Advocate (OPA), the executed budget in 2024 amounted to MDL 26.1 million, out of a planned total of MDL 28.2 million. In the same year, the Equality Council had an approved budget of MDL 8.3 million. For 2025, the approved budget for the OPA is MDL 31.2 million. This amount includes MDL 2 million from external sources, allocated for a project funded by UNHCR. A budget revision in June 2025, which increased allocations for various sectors, did not include additional funds for the OPA or the Equality Council — indicating that these institutions were not treated as an urgent priority.

A notable development is the PA's ability to attract significant external funding. On 8 May 2024, a EUR 800,000 project funded by the Council of Europe was launched to strengthen institutional capacities. Similarly, the UN Socio-Economic Response and Recovery Plan allocated USD 800,000 to support the monitoring capacities of the PA and CE in the context of the refugee crisis. This external support, while vital, also highlights a structural dependency, which will be analysed in the next section.

During the monitoring period, both institutions demonstrated enhanced practical cooperation. According to official information, cooperation between the People's Advocate and the Council for Equality takes place on several levels, including through the referral of discrimination cases from the PA to the CE, through the functioning of a joint advisory council on linguistic minorities, and through the implementation of a Memorandum of Understanding for the development of specific human rights indicators.

The Council for Equality has held numerous information and training sessions with police officers (in Calarasi and Soroca), collaborated with the "Stefan cel Mare" Academy of the Ministry of Internal Affairs, trained journalists on human rights issues, and actively participated in round tables on combating hate speech, especially in the electoral context.

Dialogue with the legislative and executive authorities was constant. Both the CE and the PA presented their activity reports for 2024 to the relevant parliamentary committees. However, in the case of the Office of the People's Advocate, this process is hindered by a misperception at the parliamentary level regarding the status of the Annual Report on the observance of human rights and freedoms, which is often treated merely as an activity report. To address this issue and strengthen the institution's independence, there is a growing need to amend the Parliament's Rules of Procedure (Law No. 797/1996), by introducing a clear procedure for plenary examination of the report, similar to the one applicable to the Court of Accounts (Article 128[1]). The PA's monitoring activity was also intense, with 58 visits to places of deprivation of liberty in 2024. Visibility was enhanced through extensive information campaigns, such as the "Human Rights Caravan 2024", which reached over 1,160 citizens directly, and the #EuNuAplic166/1 campaign against torture, carried out in partnership with various law enforcement agencies.

Cooperation with civil society remains an important pillar, with both institutions maintaining strong partnerships with organizations such as Promo-LEX, particularly for monitoring the human rights situation in the Transnistrian region.

Despite the progress made, the full implementation of the recommendation is hampered by a number of structural and contextual constraints, the most pressing being the lack of funding, which has a knock-on effect on the operational capacity and independence of institutions.

Chronic underfunding of national human rights institutions is the main obstacle to the effective implementation of the recommendation. According to a recent PA's estimate, the financial resource deficit

[143] Parliament of the Republic of Moldova. Law No. 418 of December 22, 2023, on the state budget for 2024. *Official Gazette of the Republic of Moldova,* No. 510-513 (December 29, 2023), Art. 915. Accessed on June 26, 2025, https://www.legis.md/cautare/getResults?doc_id=140974&lang=ru.

amounts to approximately MDL 15 million, affecting both staff costs and mandate activities. More seriously, for 2025, the financial resources allocated for staff costs cover the salaries of only 45 of the 72 positions approved by law. Moreover, the situation becomes even more critical when analysing the staff directly involved in fulfilling the mandate. Due to the need to cover support functions as well, only 50% of the personnel required for directly assisting the People's Advocates are effectively employed.

The consequences of this deficit are direct and severe. First, salaries that are not competitive with other public institutions lead to high turnover of qualified staff, affecting institutional memory and expertise.[144] Second, limited resources constrain the ability to carry out essential activities, such as human rights promotion campaigns, contracting external expertise for complex cases, and conducting in-depth monitoring at the national level.

In this context, dependence on external funding becomes a double-edged sword. The fact that 22.26 percent of the PA's budget in 2024 came from external sources was crucial for the institution's operational survival. However, this dependence creates a strategic vulnerability and directly contradicts the Paris Principles, which stipulate that national human rights institutions must have adequate and stable funding from the state budget to guarantee their independence. The long-term sustainability of the institution cannot depend on donor funding cycles.

Beyond financial constraints, the independence of institutions is also tested by political pressures and a legal framework that presents vulnerabilities. In 2024, the PA documented a case of direct interference, in which the leadership of the General Police Inspectorate challenged a special report by the PA and threatened legal action, an action perceived as an attack on the institution's independence. This trend continued in the current year (2025), when the Prosecutor General used unfounded accusations and unacceptable language in a public statement, published by Ziarul de Gardă, in response to the findings and recommendations issued by the People's Advocate Office in a special report. Furthermore, legislative changes in 2023 allowing the People’s Advocate to be detained without prior parliamentary approval in cases of flagrant crime are considered a vulnerability that could be exploited politically, contrary to Venice Commission standards.

The institution’s effectiveness is further undermined by a modest implementation rate of its recommendations, although it must be emphasized that the responsibility for this lies solely with the public authorities concerned. According to 2023 data presented by the People’s Advocate (PA), only 57 percent of the PA’s recommendations and 77 percent of those issued by the Advocate for Children’s Rights were fully or partially implemented, while a significant proportion (37 percent and 16 percent, respectively) remained unimplemented. Another major procedural constraint is the absence of a Rapid Referral Protocol for cases of torture to the Prosecutor’s Office — a document that, despite repeated requests from the Ombudsperson, has yet to be approved, thus hindering a timely and effective response in such cases.

The Council for Equality, in turn, faces considerable political and social resistance, particularly on sensitive issues such as the rights of the LGBTQ+ community. Criticism from political or religious actors and decisions by local authorities to ban public demonstrations undermine the Council's authority and effectiveness, creating a climate of pressure.

The limited administrative and financial capacity of public authorities, particularly at the local level, is another obstacle. Even when the political will exists, many municipalities lack the resources to implement recommendations on, for example, making infrastructure accessible. In addition, political polarization and the instrumentalization of human rights issues during election periods create a hostile environment for the

[144] Parliament of the Republic of Moldova. “Annual Report of the Ombudsman on the observance of human rights and freedoms in the Republic of Moldova in 2024, heard by the Committee on Human Rights and Interethnic Relations.” *Parlament.md,* April 15, 2025. Accessed June 26, 2025, https://www.parlament.md/ns-newsarticle-Raportul-anual-al-Avocatului-Poporului-privind-respectarea-drepturilor-i-libertilor-omului-n-Republica-Moldova-n-anul-2024-audiat-de-Comisia-drepturile-omului-i-relaii-interetnice.nspx.

work of the INDU, diverting public attention from substantive issues.

This dynamic creates a vicious circle: chronic underfunding leads to reduced operational capacity, which forces institutions to rely on external funding, exposing them to political criticism of “foreign influence” and undermining their independence. This cycle is the main constraint to the full implementation of the Commission's recommendation.

Priorities

To overcome the identified constraints and ensure sustainable implementation of the recommendation, the Moldovan authorities should focus on the following strategic priorities, which aim to strengthen resources and independence and improve the efficiency of cooperation mechanisms.

1. **Adequate multi-annual budgeting:** It is imperative to shift from often reactive annual budget planning to predictable multi-year budgeting for the People’s Advocate (PA) and the Equality Council (EC). This budgeting must be aligned with the actual costs required to fulfil their legal mandates, including competitive staff salaries. A priority budget revision in 2025 is necessary to cover the PA’s personnel shortfall, followed by appropriate planning for the 2026 budget. To ensure this, the legal framework needs to also be amended so that the PA’s budget preparation process is based on the institution’s real needs, rather than predetermined ceilings set by the Ministry of Finance, guaranteeing full funding for approved staffing levels.
2. **Strengthening legal guarantees of independence:** Parliament should review Law No. 52/2014 on the People’s Advocate to strengthen the functional immunity of the People’s Advocate, in full compliance with the recommendations of the Venice Commission and European partners. Any legislative ambiguity that could allow political pressure or interference in the institution's work should be removed.
3. **Establish a parliamentary monitoring mechanism:** It is recommended to establish, within the Parliamentary Commission on Human Rights and Interethnic Relations, a formal mechanism to monitor the implementation of the recommendations issued by the PA and the CE. This mechanism should include mandatory periodic hearings of the relevant ministries and agencies and culminate in the publication of annual progress reports, thus ensuring political accountability.
4. **Adoption of a government response methodology:** The government, through the State Chancellery, should develop and adopt a standardized procedure whereby each ministry or public agency targeted by an PA or CE recommendation is required to develop a concrete action plan. This plan should contain clear deadlines, designated responsible persons, and performance indicators, ensuring a structured and monitorable response.
5. **Mandatory training programs:** Mandatory training modules on the role, mandate, and case law of the PA and CE should be included in initial and continuing training programmes for civil servants, judges, prosecutors, and police officers. These programmes should be managed by structures such as the National Institute of Justice and the Academy of Public Administration.
6. **Strategic communication campaigns:** It is recommended that the Government, in partnership with the PA, the CE, and civil society, develop and fund national communication campaigns. Their aim should be to raise public awareness of the role of the PA and the CE, combat misinformation, and increase citizens' trust in human rights protection mechanisms.

Freedom of expression

Average score:	2,6 out of 5 points

Recommendation: ***Ensure adequate protection of journalists against intimidation and attacks, including by thorough law enforcement investigations.***

Score	3 out of 5 points

Key developments

During the reporting period, there were several cases of intimidation, harassment, and verbal and physical abuse against journalists. These included verbal attacks by several politicians, including online, as well as cases of physical assault and attempts to publicly discredit media representatives. Thus, in February[145] and March[146] 2025, several journalists were physically assaulted by participants in protests held in front of courts, hindering or blocking their work. In September 2024,[147] the headquarters of the public company "Teleradio-Moldova" was vandalized, and a journalist received death threats online.[148]

In the Autonomous Territorial Unit of Gagauzia, intimidation of the independent press continued,[149] including through derogatory rhetoric from local leaders.[150] Restrictions imposed on journalists from the right bank of the Nistru in the Transnistrian region continued: in June 2024[151] and in February 2025[152] several media representatives were detained in the region while performing their professional duties. Following the intervention of the Chisinau authorities, they were released, but the cases were not investigated by the competent national authorities.

Although civil society organizations reacted quickly, condemning the attacks and calling for the authorities to intervene, institutional responses were modest. However, during this period, the Ministry of Culture and the Parliamentary Committee on Culture, Education, Research, Youth, Sports, and Media worked on an initiative to amend the criminal legislation with a view to improving current protections and increasing penalties for those who assault journalists.

Constraints

Journalistic activity remains insufficiently protected against attacks, threats, and political or economic pressure. Journalists continue to report cases of aggressive behaviour by officials who refuse to provide information, use offensive language, or make unfounded accusations in public.

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[145] https://cji.md/cerem-stoparea-si-contracararea-actiunilor-ilegale-ale-protestatarilor-asociati-politicianului-fugar-ilan-sor-indreptate-impotriva-jurnalistilor/.
[146] https://cji.md/condamnam-comportamentul-degradant-fata-de-presa-manifestat-de-sustinatorii-bascanei-evghenia-gutul-si-cerem-organelor-de-drept-sa-asigure-securitatea-jurnalistilor/.
[147] https://cji.md/ong-urile-de-media-isi-exprima-ingrijorarea-in-raport-cu-vandalizarea-sediului-companiei-teleradio-moldova-si-solicita-investigarea-prompta-si-eficienta-a-cazului/.
[148] https://cji.md/ong-urile-de-media-solicita-organelor-de-drept-sa-sanctioneze-autorul-amenintarilor-cu-omor-la-adresa-jurnalistului-vasile-botnaru/.
[149] https://cji.md/condamnam-comportamentul-inadecvat-al-angajatului-comitetului-executiv-al-gagauziei-si-cerem-tragerea-la-raspundere-a-acestuia-pentru-intimidarea-jurnalistilor/.
[150] https://cji.md/declaratie-de-solidarizare-cu-jurnalistii-din-gagauzia-condamnam-comportamentul-inadecvat-in-raport-cu-presa-manifestat-de-mihail-vlah-consilier-al-bascanei-gagauziei-precum-si-de-boris-novak-ex/.
[151] https://cji.md/ong-urile-de-media-isi-exprima-ingrijorarea-in-raport-cu-retinerea-jurnalistului-timofei-iliusin-in-regiunea-transnistreana/.
[152] https://cji.md/condamnam-comportamentul-inadecvat-al-angajatului-comitetului-executiv-al-gagauziei-si-cerem-tragerea-la-raspundere-a-acestuia-pentru-intimidarea-jurnalistilor/.

On the ground, risks increase during the coverage of demonstrations or events of public interest, where media representatives become the target of participants' frustration. In the Transnistrian region, the free movement of journalists remains restricted, and in the Autonomous Territorial Unit of Gagauzia, pressure on the local press continues, despite public calls to abandon such practices.

Priorities

1. The competent authorities should promptly investigate cases of harassment and physical abuse, applying sanctions commensurate with the offences committed.
2. The central authorities should monitor and respond firmly to restrictions on press freedom in the Transnistrian region and in the Gagauz autonomy, ensuring that the fundamental rights of journalists are respected.
3. The authorities should establish an institutional mechanism for the protection of the media, providing for clear sanctions for abusers.

Note: On July 10, 2025, amendments to Article 180^1 of the Criminal Code and Article 61 of the Contravention Code were passed in their final reading. These amendments introduce criminal penalties for actions that obstruct or intimidate the press in connection with their professional activity, as well as administrative penalties for insulting or assaulting journalists.

Recommendation: ***Extend the ownership transparency requirements to online and print media.***

Score:	**2 out of 5 points**

Main developments

During the reporting period (July 1, 2024 - June 15, 2025), no significant legislative progress was made on extending transparency requirements for ownership of print and online media. Towards the end of 2024, the Joint Working Group on Improving Media Legislation drafted a Press Law, which includes provisions on ensuring transparency of ownership of print and online media. However, this has not resulted in clear legislative proposals or public initiatives from the authorities. The legal framework remains unchanged, while the online and print media continue to operate without clear obligations to publish data on ownership, editorial structure, or sources of funding.

Constraints

The lack of transparency regarding the ownership of online media remains one of the biggest gaps in the regulation of the sector. Most online portals do not provide basic identification information (address, contact details, editorial team, type of organization, etc.). This prevents the public from assessing the credibility of sources and encourages the emergence of propaganda outlets, which are used to spread disinformation, particularly during election periods.

Similarly, the lack of clear regulation of online media ownership allows for their non-transparent concentration, which affects pluralism and fair competition. Portals controlled from behind the scenes, including by politicians or people with partisan interests, promote political agendas covertly or openly, affecting the quality of information and public trust in the media.

Competition law is not effectively enforced in this area, and the relevant authorities do not have sufficient leverage to sanction situations of dominance in the media market. In the absence of control mechanisms, the print and online media are vulnerable to non-transparent political and economic influences.

Priorities

1. Reform the legal regime governing media ownership to include transparency requirements for print and online media, in line with European standards on media pluralism and integrity.
2. Adopt a public register of media outlets, accessible online, containing information on ownership, editorial composition, sources of funding, and editorial policy.
3. Develop mechanisms to prevent excessive concentration and anti-competitive practices in the media space.

Recommendation: ***Improve self-regulation mechanisms in the media.***

Score:	**3 out of 5 points**

Key developments

During the reporting period, there were some developments in the area of media self-regulation. An important step was the completion by the Press Council (PC) of the review of the Code of Ethics for Journalists in the Republic of Moldova in 2024. This revision aimed to adapt the Code to the new realities of journalism, particularly in the digital context and the use of artificial intelligence in media content creation. A register of signatories to the Code of Ethics was drawn up, along with regulations establishing the content, preparation, maintenance, and updating of the register of signatories to the Code of Ethics for Journalists in the Republic of Moldova.

The Press Council adopted 39 decisions between July 1, 2024, and June 15, 2025, most of which (37) were generated by complaints, requests, or complaints from institutions or media consumers. In parallel, other non-governmental organizations (e.g., the Centre for Independent Journalism, the Media Guard Association) have implemented complementary initiatives to monitor and hold the press accountable.

Constraints

Despite this progress, many media outlets—especially online—continue to frequently violate ethical standards. Media products are affected by a lack of human and financial resources, and content is often taken from other sources without verification or contextualization. Few media institutions have internal codes of ethics, and plagiarism remains a major problem, exacerbated by the inappropriate use of artificial intelligence tools.

The Press Council, registered as a separate legal entity in 2023, has not yet managed to consolidate itself institutionally, operating mainly on a project basis. Its work is largely focused on resolving complaints, without systematic monitoring of media content. In addition, the Council's authority is not recognized by all newsrooms, and solidarity within the journalistic community remains low.

Priorities

1. Strengthen the Press Council institutionally, including by developing a strategic plan and hiring staff.
2. Implement the new version of the Code of Ethics for Journalists and promote it among newsrooms.
3. Extend the Press Council's activities to proactively monitor media content and produce trend reports.
4. Support solidarity among journalists and encourage internal self-regulation in newsrooms.
5. Promotion by NGOs of a culture of ethics in journalism, including through media education campaigns and public involvement in press monitoring.

Recommendation: ***Review the rules for selecting members of public media institutions such as the Public Broadcasting Service and the Audiovisual Council***

Score:	**5 out of 5 points**

Key developments

During the reporting period, Parliament drafted a law[153] amending the Audiovisual Media Services Code of the Republic of Moldova (CSMA), which, among other things, proposes to revise the rules for selecting the governing bodies of the Public Broadcasting Service (TRM) and the members of the Audiovisual Council (AC). One of the key changes concerns the procedure for appointing the Director General of the TRM who, according to the new legislative initiative, will be selected through a public competition by the Supervisory Council (SC) and not by Parliament, as is currently the case. The composition of the SC will also be changed, as it will no longer be appointed by Parliament but by the Audiovisual Council. Consequently, the competition and appointment procedures will also be changed, and the Supervisory Council will report annually to the CA and Parliament.

Changes are also proposed to the selection procedure for the AC: two members proposed by Parliament, representing the majority and the parliamentary opposition (instead of three, as is currently the case); one member proposed by the head of state; one member proposed by Government); three members proposed by civil society organizations, following selection through a public competition. At the same time, the draft provides for the repeal of legal provisions allowing the dismissal of AC members in the event of failure to properly perform their duties or as a result of negative evaluations during parliamentary control.

The draft law was registered at the end of May 2025 and underwent a round of public debate in early June.

Constraints

In the autumn of 2021, Parliament made several amendments to the CSMA,[154] intervening in the mechanisms that guaranteed the institutional independence of the Audiovisual Council (AC) and the Public Broadcasting Service – Teleradio-Moldova (TRM).

Through these amendments, the powers to appoint, evaluate, and dismiss the Director General of the TRM were transferred to the direct control of Parliament, replacing the authority previously held by the TRM Supervisory Board. The current Code does not specify certain minimum qualifications required for the position of Director General of the TRM, while the criteria for dismissing members of the Supervisory Board are vaguely formulated, including subjective reasons such as "unsatisfactory performance."

Furthermore, in certain situations, the CSMA allows for the early dismissal of Supervisory Board members on vague grounds, such as "failure to fulfil their duties," without a clear and verifiable procedure, which may put political pressure on members and affect institutional stability. In the absence of a public and transparent competition procedure for selecting the Director General of the TRM, questions arise regarding the meritocracy and transparency of this process. At the same time, the lack of clear and objective criteria for dismissing members of the Supervisory Board and the Board of Directors creates the possibility for any parliamentary majority to use these provisions for political purposes. Several civil society organizations in the Republic of Moldova, together with international organizations,[155] have criticized these provisions, emphasizing that they contravene standards on the quality of law—in particular, with regard to the

[153] https://parlament.md/preview?id=1e6c9e3e-9083-4e16-a37a-477f38ec5588&url=https://ep-sp.parlament.md/materials/638839800109724792/Documents/20250529142938.pdf&method=GetDocumentContent.
[154] Audiovisual Media Services Code of the Republic of Moldova, https://www.legis.md/cautare/getResults?doc_id=129017&lang=en#.
[155] Opinion of the OSCE Representative on Freedom of the Media, https://www.osce.org/representative-on-freedom-of-media/509924.

accessibility, clarity, and predictability of rules—and may lead to the subordination of the TRM's management to the political interests of the government.

Priorities

1. Align the legal framework with the EU Audiovisual Media Services Directive (Directive 2018/1808, updating Directive 2010/13/EU) and the Recommendation of the Committee of Ministers of the Council of Europe REC (2000)23, to guarantee the independence of the governing bodies of the public broadcasting service and the audiovisual regulatory authority from the influence of public authorities.
2. Repeal of legislative provisions susceptible to abuse, which allow Parliament to dismiss, without clear and objective criteria, the governing bodies of the public media service provider and the members of the audiovisual regulatory body.
3. Revision of the selection procedures for members of the audiovisual regulatory authority and the governing bodies of the public media service provider so that they are transparent, merit-based, include clear eligibility criteria, and ensure political and social balance, reflecting the pluralism of society.

Note: The draft law amending the Audiovisual Media Services Code of the Republic of Moldova No. 174/2018 was adopted in its final reading on July 10, 2025.

Recommendation: ***Review the national mechanism allowing the suspension of TV channels under the law on strategic investment to bring it in line with EU and international standards.***

Score:	0 out of 5 points

Main developments

During the reporting period, the mechanism was not reviewed. The issue was not discussed in the Joint Working Group on Improving Media Legislation, which includes members of parliament and civil society representatives.

Constraints

The mechanism for suspending TV licenses was legislated through an amendment to Law No. 174/2021 on the mechanism for examining investments of importance to state security,[156] which was voted on and promulgated at the end of December 2023. Initially, the draft law provided for "ensuring the integrity and functionality of the electricity market", but was subsequently supplemented by an amendment referring to the mechanism for the temporary suspension of TV station licenses by *the Council for the Promotion of Investment Projects of National Importance.* Thus, the audiovisual media sector was explicitly included in the list of areas of importance for state security, meaning that investments in this sector may be subject to review and, if necessary, rejection if the authorities consider them a risk to national security. Until the introduction of the new mechanism for suspending permits for audiovisual media service providers, the law allowed for the forced suspension of broadcasting licenses only on the basis of a court decision—an important guarantee of respect for the principles of legality and protection of freedom of expression.

The new legislative provisions have given *the Council for the Promotion of Investment Projects of National Importance* levers that allow the suspension of TV stations' activities without a court decision. Several civil society organizations in the country and abroad have signalled[157] that these levers could be abused and could have a negative impact on media freedom. The mechanism raises several legal and democratic concerns, including: the risk of political interference if the legislation is used to block or sanction media outlets under the pretext of protecting national security; the involvement of government entities other than the specialized regulatory authority – the Audiovisual Council – in the decision-making process on media activity; the lack of a prior assessment of media content that would justify the exclusion of courts from the suspension procedure, which weakens the guarantees of judicial review and the protection of fundamental rights.

Priorities

1. Review and align the current mechanism for suspending broadcasting licenses with European standards, in accordance with the principles of the rule of law, press freedom, and proportionality.
2. Ensure a clear distinction between national security and media regulation, with powers over media service providers vested exclusively in the independent audiovisual authority—the Audiovisual Council—and not in other state structures, such as those with responsibilities in the field of security or strategic investment.
3. Clarify and harmonize the audiovisual legislative framework so that the suspension or withdrawal of broadcasting licenses is based on clear, predictable, and proportionate criteria. The mechanism must guarantee the transparency, legality, and independence of regulatory authorities, be integrated into a coherent regulatory framework focused on media legislation and international standards, and provide effective appeal mechanisms for affected media outlets.

[156] https://www.legis.md/cautare/getResults?doc_id=147688&lang=ro#.
[157] https://cji.md/ce-presupune-noul-mecanism-de-suspendare-si-revocare-a-licentelor-posturilor-tv/

Justice, freedom, and security

Average score:	3.8 out of 5 points

Recommendation: ***Continue improving interinstitutional cooperation and coordination, strengthen institutional capacity and sharing information in the area of security to ensure effective prevention and response capabilities, including in a crisis*.**

Score:	4 out of 5 points

Main developments

On July 10, 2025, the Parliament voted in the second reading on draft law No. 184/2025 regarding crisis management.[158] The law establishes the creation of a national system for integrated crisis management, with clearly defined prerogatives for public institutions, and sets a framework for cooperation with economic operators and non-governmental organizations. At the same time, a National Crisis Management Centre is to be established, which will coordinate interaction among all public and private entities involved in crisis management. Another key element is the development and implementation of the National Crisis Management Plan, a fundamental policy tool for all actors engaged in crisis management.

On 16 December 2024, the Ministry of Internal Affairs approved the new Regulation on the organization and functioning of the Joint Risk Analysis Group at the national level in the field of combating cross-border crime, trafficking in human beings, and illegal migration. Following approval of the modificaitons, two new agencies were included in the Joint Strategic Risk Analysis Group: the Operational Management Inspectorate of the Ministry of Internal Affairs (OMI) and the Office for the Prevention and Combating of Money Laundering (OPCSB). The revised Regulation also places greater emphasis on thematic risk analysis.

The framework for interinstitutional cooperation and coordination in the field of security and effective crisis response between the Ministry of Defense and the General Inspectorate of the Border Police is regulated by Article 59 of Law No. 28/2024 on the State Border of the Republic of Moldova,[159] which came into force on January 6, 2025. At the same time, the Ministry of Internal Affairs has drafted the Law on the Identification, Designation, and Protection of National Critical Infrastructures,[160] which was publicly consulted in January of the current year. Currently, the draft law is under revision to incorporate proposals and recommendations received during the consultation process.

In order to improve coordination and clarify the responsibilities of state institutions involved in the recovery of stolen assets in the context of the 2014-2015 bank fraud, on 18 September 2024, several public authorities and institutions responsible for implementing the National Asset Recovery Programme for 2023-2027 signed a Memorandum of Understanding. On the basis of this Memorandum, a Coordination Committee, an Executive Working Group, and a High-Level Monitoring Committee chaired by the Prime Minister of the Republic of Moldova were established. Measures to overcome constraints and challenges in the asset recovery process are adopted on the basis of the protocols of the working group's meetings. Since its establishment, the Monitoring Committee has met three times. During these sessions, topics such as amending the legal framework to strengthen the mechanism for confiscating criminal assets, organizing the

[158] https://parlament.md/material-details-md.nspx?param=28051afb-5039-4167-996e-020fe1131efa
[159] https://www.legis.md/cautare/getResults?doc_id=142194&lang=ro.
[160]https://particip.gov.md/ro/document/stages/proiectul-de-lege-privind-identificarea-desemnarea-si-protectia-infrastructurilor-critice-nationale/12719.

process of identifying criminal assets abroad, as well as the developments and progress in the asset recovery process.

Also, on 18 February 2025, the National Anti-Corruption Centre, theGeneral Prosecutor's Office, the Ministry of Finance, the State Tax Service, and the National Union of Judicial Executors signed an interinstitutional cooperation agreement aimed at strengthening and streamlining the process of recovering criminal assets The Agreement underscores the signatories' commitment to protecting public finances and strengthening the capacity of national authorities to combat crime effectively and transparently.

Constraints

One of the main constraints relates to the operationalization of the legislative and institutional framework for crisis management, emergency situations, and countering hybrid threats. Although there is currently a consolidated legislative framework in this regard, coordination between different institutions is still needed to analyse, identify, and manage crisis situations and hybrid threats.

Another challenge is to strengthen the capacities of relevant institutions, such as the Ministry of Internal Affairs, Ministry of Defence, Information Technology and Cybersecurity Service (STISC), the Cyber Security Agency, and the Centre for Countering Disinformation and Strategic Communication. All these structures need to have trained and equipped subdivisions to ensure effective cooperation with the National Crisis Management Centre.

Priorities

1. Operationalization of the National Crisis Management Centre and development of the National Crisis Management Plan.
2. Develop and implement, at the level of government authorities, an early warning mechanism against hybrid threats.
3. Intensify information exchange between security and intelligence agencies in the Republic of Moldova and EU member states.
4. Expand the EU financial and technical assistance to Moldovan institutions responsible for crisis management, countering hybrid threats, and strategic communication.

Recommendation: ***Strengthen the legal framework and institutional capacity for assessing risks and fighting cybercrime.***

Score:	**4.5 out of 5 points**

Key developments

On 25 July 2024, the Parliament of the Republic of Moldova approved Law No. 200/2024[161] amending Law No. 20/2009 on preventing and combating cybercrime. At the same time, a draft Government Decision approving the Regulation on the procedure for blocking access to web pages containing information intended and used for the commission of crimes was drafted and submitted for public consultation.[162]

On 20 November 2024, the Government approved a set of measures to implement the Lanzarote Committee's Recommendations on ensuring the implementation of the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (the Lanzarote Convention) for the period 2025-2026.[163] Amendments to the Criminal Code of the Republic of Moldova and the Contravention Code in the field of preventing and combating cybercrime entered into force on 7 September 2024.

On 31 January 2025, the Advanced Cybercrime Laboratory CyberLab was established and officially launched, a facility that will enable in-depth digital investigations, strengthening the country's efforts to effectively combat cybercrime. The laboratory was established with the support of the EU4SecurityMoldova Project, funded by the European Union and implemented by the European Union Agency for Law Enforcement Training (CEPOL), which covered hardware, software, and training measures. Overall, the project supports law enforcement agencies in addressing the challenges posed by hybrid warfare threats.

In March 2025, two specialists from the Cyber Security Agency's cyber incident and crisis response team participated in training on the use of compatible tools for digital incident management, organized by the CyberEast+ Project. Also, within CyberEast+, on March 20-21, 2025, five police officers, representatives of other authorities, internet providers, and mobile phone operators participated in a workshop on the Second Additional Protocol to the Council of Europe Convention on Cybercrime on enhanced cooperation and the disclosure of electronic evidence.

Constraints

Although the Republic of Moldova has made significant progress in developing its legislative and policy framework on cybersecurity, the main challenge currently lies in operationalizing all processes and working mechanisms to ensure effective coordination of the responsibilities of each institution in this area. The capacity building and technical equipment of the Cyber Security Agency, as well as the adequate training of staff in each government institution on the implementation of cyber security protocols, remain the main constraints at present.

At the same time, the limited involvement of the private sector and civil society in the consultation and discussion process on policy documents, as well as at the level of consultative bodies such as the Coordinating Council on Cyber Security, limits opportunities for dialogue, transfer of good practices, communication, and promotion of the importance of cyber security at the national level.

[161] https://www.legis.md/cautare/getResults?doc_id=144568&lang=en.
[162] https://gov.md/sites/default/files/media/documents/sedinte-de-guvern/2025-05/NU-152-MAI-2025.pdf.
[163] https://old.gov.md/sites/default/files/document/attachments/nu-797-mai-2024_0.pdf.

Priorities

1. Strengthen the technical capacities and human resources of the National Cybersecurity Agency.
2. Ensure effective institutional cooperation between the National Cyber Security Agency, the EU Partnership Mission and the the government institutions to facilitate the identification and assessment of potential risks to the cyber security of the Republic of Moldova.
3. Strengthening dialogue between authorities, the private sector, and civil society on cybersecurity to ensure an inclusive and transparent consultation process on decision-making in this area.

Recommendation: ***Update national strategic documents in line with the National Security Strategy and adopt a national serious organised crime threat assessment (SOCTA).***

Score:	**3 out of 5 points**

Key developments

On 26 December 2024, the Parliament of the Republic of Moldova approved the National Defence Strategy for the years 2024–2034.[164] The document, developed based on the provisions of the National Security Strategy, outlines the threats and risks to national defence, sets the defence policy objectives, and defines a series of priority directions aimed at addressing current challenges and strengthening the national defence system.

At present, the draft Military Strategy of the Republic of Moldova for the years 2025–2035[165] is in the process of being finalized and approved by governmental authorities. The objectives of this document are aligned with the provisions of the National Defence Strategy and are intended to support the implementation of defence sector reform.

At the same time, the Supreme Security Council, in collaboration with the Security and Intelligence Service of the Republic of Moldova, the Ministry of Defense, the Ministry of Internal Affairs, the Ministry of Justice, the Ministry of Finance, and the representative of the Parliament's Committee on National Security, Defense, and Public Order, is working on the draft National Security Law.

The process of drafting the National Security Law implies extensive institutional coordination, public consultation, and conceptual consolidation, with the involvement of the main national security authorities and international partners. The activities carried out aimed to clarify and define the responsibilities of institutional actors and to develop the regulatory framework for national security policy, the functioning of the security system, and crisis response.

In 2024, the Serious Organized Crime Threat Assessment (SOCTA) was developed. The report on the assessment of serious and organized crime recorded in 2022–2023 was prepared in accordance with the SOCTA methodology, based on extensive input from the specialized subdivisions of the National Investigation Inspectorate and those under the Ministry of Internal Affairs, the Prosecutor General's Office, the Special Cases Prosecutor's Office, and the Customs Service.

The report's recommendations have been forwarded to the relevant subdivisions for review, operational use, and as a basis for views, proposals, and actions to be taken to mitigate the risks associated with the identified criminal phenomena.

Constraints

The interim evaluation of the Crime Prevention and Control Program for 2022-2025 finds that the six general objectives have been partially implemented, at a rate of 50 percent. At the same time, only 45 percent of the results were implemented as planned or exceeded the planned indicators.

In the context of the Interim Evaluation Report of the Crime Prevention and Combating Programme for 2022-2025,[166] an implementation rate of 48 percent was set for the monitoring indicators of the actions

[164] National Defence Strategy of the Republic of Moldova for 2024–2034, https://www.legis.md/cautare/getResults?doc_id=146655&lang=ro.
[165] Draft Government Decision on the Approval of the Military Strategy of the Republic of Moldova for 2025–2035 https://particip.gov.md/ro/document/stages/proiectul-hotararii-guvernului-cu-privire-la-aprobarea-strategiei-militare-a-republicii-moldova-pentru-anii-2025-2035/12840.
[166] https://mai.gov.md/sites/default/files/Activitatea/Rapoarte/Raport%20de%20evaluare%20intermediara%20a%20PPCC.pdf.

planned for 2022-2023. Of the 21 monitoring indicators provided for in the Action Plan for 2022-2023, ten indicators have been achieved; three indicators have not been achieved on time, but have made good progress; four indicators have not been achieved according to the pre-established terms and there is no progress; while two indicators have not even been initiated.

The implementation rate of the monitoring indicators for the 80 indicators planned for the entire 2022-2025 programme period is only 16 percent. Of these, over 60 percent are legislative and administrative changes.

Priorities

1. Complete the process of drafting and approving the Military Strategy and the National Security Law, in accordance with the provisions of the National Security Strategy. Ensure an inclusive public consultation process on the draft National Security Law.
2. Intensify efforts to implement the actions included in the Crime Prevention and Combating Programme for 2022-2025 and allocate the necessary financial resources for this purpose.
3. Prepare and publish the Report on the assessment of serious and organized crime recorded during 2024.

ECONOMIC CRITERIA

The existence of a functioning market economy

Average score:	**3.3 out of 5 points**

Recommendation: ***Implement the National Strategy for Economic Development, in particular actions related to the privatisation and reform of state-owned enterprises, while improving competition and reducing state interference in price setting.***

Score	**3.5 out of 5 points**

Main developments

The National Economic Development Strategy 2030[167] refers only to state-owned enterprises, not to state-controlled joint-stock companies. Consequently, the priority areas set out in the strategy also focus only on state-owned enterprises. Thus, priority direction No. 9 is entitled "Ensuring the efficiency and sustainability of state-owned enterprises." At the same time, action 9.1 provides for the implementation of effective management and corporate governance systems only for state-owned enterprises retained in the state portfolio (not eligible for privatization), not for companies with majority state capital or those that are subjected to privatisation. In terms of indicators, the strategy aims, among other things, to increase the number of privatized/liquidated state-owned enterprises and the percentage of state-owned enterprises implementing good governance practices. As of 1 June 2025, no report had been identified on the implementation of the National Economic Development Strategy 2030 (NEDS 2030).

According to the provisions of the National Economic Development Strategy (SNDE 2030), its implementation is carried out through medium-term sectoral programs, which will detail and specify the actions, funding sources, and performance indicators. Thus, according to the 2024 report on the implementation of the Programme on the Management of State-Owned Property for 2024-2027[168] , responses received from authorities, as well as publicly available information, the following progress has been made during the monitoring period towards the implementation of the EU Commission's recommendation:

- Corporate governance codes have been approved for 27 joint-stock companies with state capital, 1 limited liability company, as well as for 6 state-owned enterprises.
- 11 state-owned enterprises have been reorganized or are in the process of reorganization;
- Amendments to the Insolvency Law were approved and monitoring of enterprises in insolvency was improved to protect the public interests;
- SA "Aroma" was removed from insolvency;
- On 18 October 2024, a contract was signed for the development of the Information System "Register of Public Assets and State Property Management," which aims to digitize the processes and all registers within the Agency for Public Property (APP) by the end of June 2026.
- The training module for members of state-owned company boards was launched;
- Audit committees were established for 11 state-owned enterprises;
- The assessment report on the state-owned enterprise "Glass Factory" (as a unique assets complex) was finalized.

[167] GD No. 393/2024.
[168] Progress report on the implementation in 2024 of the Programme on the administration of state-owned property for the years 2024-2027.

At the same time, even during this monitoring period, the results of the screening of state-owned companies, approved by the Screening Commission on 29 December 2023, were not made public. This is despite the Government's commitment undertaken before the International Monetary Fund.[169] According to the Progress Report on the Implementation in 2024 of the Programme for the Administration of State Public Property for 2024–2027, following the process of sorting state-owned companies, the Public Property Agency (APP) recommended the reorganization of 52 state enterprises and the liquidation of 30 state-owned enterprises that are inactive.

The list of state-owned companies not eligible for privatization and that of the assets subject to privatization need to be brought in line with the screening results. As a result of the screening process, the list of state-owned companies not eligible for privatization, annexed to Law No. 121/2007, needs to be updated. Thus, the screening committee identified 68 state-owned enterprises as not eligible for privatization. However, the annex to Law No. 121/2007 lists 93 state-owned companies that are not eligible for privatization. Although the list may also include enterprises recommended for reorganization into another legal form, in the absence of publicly available results of the screening process, we cannot determine which category the enterprises listed in the annex to Law no. 121/2007 belong to. The EU Commission's October 2024 report also mentions that the government reported ten state-owned companies as included in the list of companies recommended for immediate privatization following the screening exercise. On the other hand, Annex 2 to Government Decision No. 945/2007 lists only nine state-owned companies subject to privatization. Thus, the publication of the screening results would clarify the state's vision and reasoning regarding state ownership of the companies on the list. Thus, publishing the sorting results would provide clarity regarding the state-owned companies listed as subject to privatization and those not subject to privatization.

On 18 June 2025, the Government approved and submitted to Parliament a draft amendment to Law No. 121/2007 on the administration and privatization of public property. Among the amendments proposed is the regulation of the approval by the APP of a document reflecting the general long-term economic expectations and objectives to be achieved by strategic state-owned companies (regulation of the approval of state-owned companies' mandates/ “vision”).

During the monitoring period, the website of the Agency for Public Property did not list the Annual Governance Declarations in the profiles of the managed companies, which explain how the companies implement the Corporate Governance Code. The boards of state-owned companies, the audit committees of state-owned companies, and the supervisory commissions do not publish annual activity reports (except for isolated cases).

The launch of competitions for the position of independent member of the boards of state-owned companies is welcome. Greater transparency in the selection process for independent members of the board of directors BoD, and control bodies of state-owned companies should be ensured. In their current form, the regulation on the selection of members of state-owned company boards (Government Decision No. 209/2023), as well as the regulation for selection of the members of audit committees and board of censors (Government Decision No. 210/2023) apply to all state-owned enterprises. This creates an unjustified administrative burden for the authority responsible for the administration and privatization of public property and makes it difficult for problematic enterprises or enterprises with a lower turnover or more modest activity to identify members for their management and supervisory bodies.

During this monitoring period, the Government has not submitted to Parliament the report on the totals of the administration and privatization of public property for the previous year, as required by Article 69(3) of Law No. 121/2007.

[169] Letter of intent from the Government of the Republic of Moldova to the International Monetary Fund dated June 13, 2024, page 22 - "*To increase the transparency of the state's actions, we will publish the results of the screening on the Government's website.*"

Constraints

1. Lack of transparency of the results of the screening of state-owned companies.
2. Slow process of initiation of privatizations of state-owned companies.
3. Lack of comprehensive investment profiles for state-owned companies included in the list of state-owned assets subject to privatization.
4. Unjustified administrative burden arising from the obligation to hold competitions to identify members of management and control bodies for all state-owned enterprises, including those with problems.
5. Delays in the reorganization of the Agency for Public Property.
6. Weak governance at the sector level, and insufficient monitoring of state-owned enterprise governance.

Priorities

1. Extend the applicability of the provisions of the 2030 Economic Development Strategy to joint-stock companies with majority state ownership.
2. Accelerate preparations for the privatization of state-owned companies included in the list of assets eligible for privatization.
3. Limit the application of regulations on the competitive selection of members of the management and control bodies of state-owned companies to enterprises that reach a certain turnover or/and number of employees.
4. Publish the results of the screening of state-owned companies.
5. Professionalize the boards of state-owned companies and strengthen the process of monitoring compliance by the management and control bodies of state-owned companies with corporate governance principles, regulations, and best practices.
6. Reorganize the Agency for Public Property to enable it to meet the functional requirements placed on it.
7. Resume the Government's submission to Parliament for approval of the Annual Report on the results of public property management and privatization for the previous year.

Recommendation: ***Implement the Strategy for the Reduction of Undeclared Work in order to reduce undeclared work and carry out a review of the tax system to identify possible avenues to encourage workers to shift to declared work.***

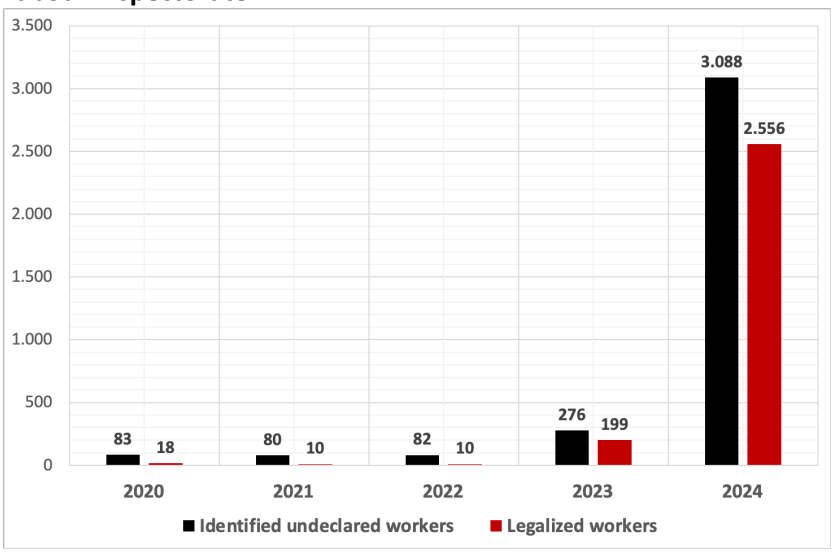
Score:	**3 out of 5 points**

Main developments

The National Employment Programme for 2022-2026[170] is the main strategic planning document relevant to this recommendation, one of its four specific objectives being to "Reduce informal employment from 22.9 percent in 2021 to 19 percent (-3.9 percent) in 2026." Based on this specific objective, in 2024, the MLSP approved the National Programme for the Reduction of Undeclared Work for 2024-2025,[171] which targets two areas of development: i) Improving prevention and detection, and ii) Encouraging the transformation of undeclared work into declared work. The implementation of the Programme is largely entrusted to labour inspectors, who will identify cases of undeclared work, encourage employers to legalize their employees by paying the taxes due, and apply appropriate sanctions in order to transform undeclared work into declared work.

The Labour Inspection Reform, launched in 2022 (possibility of unannounced inspections for undeclared work, better risk analysis when planning inspections, reorganization of the State Labour Inspectorate (SLI) with improved governance), has begun to yield results through a more active presence of the Inspectorate in combating undeclared work. During 2024, labour inspectors detected 3,088 cases of undeclared work, of which 80.8 percent of the persons were legalized. At the same time, between January 1 and May 20, 2025, another 2,000 cases of undeclared work were detected, of which 70 percent were legalized. It should be noted that in 2023, only 270 cases of undeclared work were detected, while in 2020-2022 the average annual number of such cases was less than 100.

Chart 2. Evolution of undeclared work cases detected by the State Labour Inspectorate



Source: Ministry of Labour and Social Protection

According to statistical data, in 2024 the labour force (active population aged 15 and over) was 889,100 people, down by 4.3 percent compared to 2023. At the same time, the labour force participation rate of the population aged 20-64 (the proportion of the labour force aged 20-64 and over in the total population of

[170] https://www.legis.md/cautare/getResults?doc_id=134612&lang=ro.
[171] https://social.gov.md/wp-content/uploads/2024/05/Program-de-reducere-a-muncii-nedeclarate.pdf.

the same age group) was 59.1 percent, up from the previous year (58.4 percent in 2023). At the same time, there was an improvement in indicators related to informal work. Thus, the share of people in informal employment was 20.6 percent of the total number of employed persons (23.0 percent in 2023). In particular, undeclared work among employees accounted for 5.8 percent, down from the previous year (7.1 percent in 2023), while 14.8 percent of the total number of people employed in the economy worked in the informal sector (16.2 percent in 2023).

Despite the progress announced above, undeclared and underreported work remains widespread. During the period under review, no review of the tax system was carried out with a view to encouraging workers to move to declared work. The most important initiative in recent years remains the draft law proposed in 2022 by the MLSP,[172] which provides for the subsidization of wage increases of more than 50 percent for two years. For employers, the draft provides for reimbursement of the social security contribution corresponding to the wage increase, while for employees, exemption from payment of the compulsory health insurance premium in the form of a percentage-based contribution. The aim of the project is to formalize undeclared work and provide additional motivation for employees to increase productivity. Although the measure in question was included in the Government's Action Plan for 2024,[173] the project was not promoted on the agenda of the Cabinet of Ministers.

Another important measure with fiscal implications and an impact on reducing undeclared work is the "Digital Vouchers for Day Laborers" project,[174] launched by the Ministry of Labour and Social Protection. The initiative aims to improve social protection for day laborers in agriculture and simplify the process of paying social contributions, while also combating undeclared work and creating a transparent and efficient digital system for managing payments for day laborers. The new system is expected to be adopted on a pilot basis by a target group in 2025, and will subsequently be institutionalized at the national level for all farmers depending on the piloting results.

It is worth noting that, outside the monitoring period, in July 2025, the Parliament adopted a draft law regulating the independent economic activity of individuals (freelancers),[175] offering them a simplified fiscal regime without the need to register a legal entity. Under this regime, a flat tax rate of 15 percent applies – covering income tax, social security contributions, and health insurance – up to an annual income ceiling of 1.2 million MDL. Beneficiaries are also exempt from accounting requirements and filing tax reports. The law is set to enter into force on January 1, 2026. This fiscal regime has the potential to bring a significant number of individuals from the informal economy into the formal sector. However, its success is not guaranteed and will largely depend on the capacity of relevant institutions to ensure effective and fair implementation. There are real risks, such as the substitution of employment contracts with independent collaborations, or the underreporting of income by those who opt into this regime, which could undermine tax equity and compliance.

Constraints

1. Perception by companies, especially SMEs, of high compliance costs (high level of taxation and accounting requirements).
2. Significant presence of cash in the economy and the tendency of some firms to trade products and provide services without calculating and paying VAT.
3. General public perception of tolerance of undeclared/under-declared work.
4. Low awareness of the link between taxes paid to the budget and the overall level of collective well-being.

[172] https://particip.gov.md/ro/document/stages/proiect-de-hotarare-de-guvern-cu-privire-la-aprobarea-proiectului-de-lege-pentru-aprobarea-mecanismului-automatizat-de-subventionare-a-cresterii-salariale/9746.
[173] https://www.legis.md/cautare/getResults?doc_id=141017&lang=en.
[174] https://zilieri.gov.md/front/.
[175] https://www.parlament.md/material-details-md.nspx?param=b0c8cfb5-f4cb-4395-88e1-ac7b63f5e7fa

5. Limited human, technical, and financial capacities of the State Labour Inspectorate relative to the scale of undeclared and underreported work.

Priorities

1. Implement the measures in the National Programme for Reducing Undeclared Work for 2024-2025, with a focus on strengthening the capacities of the State Labour Inspectorate.
2. Improving cooperation between the SLI and the State Tax Service in combating undeclared and underreported work.
3. Promote and establish an automated mechanism for subsidizing wage increases. Review the tax system and analyse the opportunity to implement other measures with a positive impact on reducing the share of undeclared and underreported work.
4. The piloting of the 'Digital Vouchers for Day Laborers' project and its nationwide rollout, with adjustments based on the results of the pilot phase.

Recommendation: ***Take further steps to improve the quality and inclusiveness of education and training and improve the assessment of labour market needs, including through regular surveys and stronger consultations with social partners.***

Score:	4 out of 5 points

Main developments

Through extensive consultation with representatives of the business community and other stakeholders, the Nomenclature of Vocational Training Fields and Occupations/Professions has been updated with new qualifications.[176] The operated changes align professional qualifications with occupational and training standards for four qualifications in the *Renewable Energy Systems* study programme, three qualifications in the *Food Quality Control* study programme, and eight qualifications in *the Water, Gas, and Sewerage Installation and Maintenance* study programme.

In January 2025, the new concept for the development of the school curriculum was approved.[177] This shifts the focus: i) from a curriculum based on information and knowledge to a curriculum cantered on key competencies (what the student knows, understands, can do, and values); ii) to making rigid framework plans more flexible by allowing schools to use 25 percent of the planned hours as they see fit; iii) to moving from compartmentalized (subject-based) teaching to cross-curricular and interdisciplinary teaching; iv) from assessment based on grades and standardized tests to competency-based assessment, etc.

On 21 November 2024, almost ten years after the approval of the Framework Plan[178] for technical vocational education, the Ministry of Education and Research approved the Reference Framework for the Curriculum for Technical Vocational Education[179] and the Methodological Guide for the Development of the Curriculum for Technical Vocational Education.[180] The approval of these secondary legislative acts significantly extends the curricular autonomy of technical vocational education institutions, enabling them to adapt their study programmes to local needs and those of the labour market. The Methodological Guide for the Development of the Curriculum for Vocational and Technical Education also creates a framework for transposing occupational standards into qualification standards. At the same time, from a methodological point of view, the Guide explicitly links occupational standards and national qualifications to those of the European Qualifications Framework (EQF) by transposing the units of competence related to the occupational standard into learning outcomes in accordance with the EQF.

The number of students enrolled in dual education in vocational and technical education institutions is steadily increasing. By 2025, their number is expected to double (2000) compared to 2023 (1011). At the same time, the number of economic units participating in dual education has increased from 140 in 2023 to 170 in 2024 (an increase of 21 percent).

The state order for 2025-2026 takes into account the needs of the labour market, as well as the need to fill the shortage of teachers and engineers. In accordance with the provisions of the draft Government Decision on plans (state order) for admission to higher education for the 2025-2026 academic year,[181] 23 percent of state-funded places in Cycle I (bachelor's degree) and Cycle II (master's degree) will be allocated to education sciences and 16 percent to engineering and engineering activities.

[176] Government Decision No. 349/2025.
[177] Order of the Minister of Education and Research No. 55 of January 15, 2025.
[178] Order of the Minister of Education and Research No. 1205 of December 16, 2015.
[179] Order of the Minister of Education and Research No. 1020/2024.
[180] Order of the Minister of Education and Research No. 1652 of November 21, 2024.
[181] https://particip.gov.md/ro/document/stages/proiectul-de-hotarare-cu-privire-la-planurile-comanda-de-stat-de-admitere-in-invatamantul-superior-cu-finantare-de-la-bugetul-de-stat-pentru-anul-de-studii-2025-2026/14539.

The Nomenclature of Fields of Study and Specialties in Higher Education has also been updated.[182] The new Nomenclature optimizes and generalizes several bachelor's degree programmes that were too narrow and created employment problems for graduates. Similarly, the Nomenclature introduces new specializations required by the labour market, such as *Econometrics and Data Analysis, Computer Science and Economic Cybernetics, Computational Mathematics and Modelling, Artificial Intelligence, Horticulture and Viticulture*, etc.

The National Institute for Education and Leadership (INEL) actively contributes to improving the quality of education by training national and institutional mentors and by ensuring, during the monitoring period, over 400 mentoring sessions for young specialists and professional development sessions for approximately 10,000 teachers from over 350 educational institutions across the country. During the monitoring period, the INEL mentor network grew to include 80 national mentors and 740 institutional mentors.[183]

Among the progress made during the monitoring period in implementing the Roadmap for the Operationalization of the National Qualifications Framework (2023-2027), we can mention:

- the regulatory framework for partial qualifications (micro-qualifications) is being developed and approved;
- the regulatory framework on regulated professions, in line with European Union standards, is in the process of being approved for application in procedures for the recognition of professional qualifications obtained abroad;
- the Sectoral Qualifications Frameworks for the pilot areas of *ICT, health, and education* have been developed, posted on particip.gov.md, approved by the National Council for Qualifications, and are currently being finalized;
- the composition of the National Qualifications Council has been updated and its Rules of Procedure have been approved, in line with its new functions and the objective of making the CNC operational;
- the Methodology for registering qualifications in the National Qualifications Register has been developed, approved, and implemented, etc.

Among the main progress made during the reporting period in the implementation of the Inclusive Education Development Programme are:

- the approval of a new Methodology for financing kindergartens,[184] which was piloted in 2025 and provides for double costs for the purchase and additional expenses for support staff;
- the development of a draft Methodology for the inclusion of children with special educational needs and/or disabilities in early education institutions;
- drafting of the Instructions for the implementation, in early education, of the Methodology for assessing child development;
- finalizing 90 psycho-pedagogical assessment and career guidance files for students with special educational needs in order to facilitate their transition to vocational and technical education.

In order to eliminate discrepancies between the salaries of teachers in higher education and those in general and vocational-technical education, the Government approved Government Decision No. 283/2025, which increases the monthly allowance for the Doctor Habilitatus or professor and for the title of doctor of science or university lecturer.

Constraints

1. The reform of the school curriculum depends heavily on the professionalism of teachers, but also on the teaching tools at their disposal (textbooks, school kits, tools and materials for active learning,

[182] Government Decision No. 412/2024.
[183] In accordance with the response of the Ministry of Education and Research No. 03/1-09/4419 of 20.06.25.
[184] Government Decision No. 685/2024.

etc.). The lack of time for teachers to create active materials and accurate assessments of skills, as well as the problem of oversized classes, are among the main obstacles that could jeopardize curriculum reform in the Republic of Moldova.

2. The lack of technical skills in many vocational and technical education institutions (for converting occupational standards into curriculum content), the insufficient level of teacher training, and the lack of dedicated remuneration for professionals involved in curriculum development and approval, as well as the weak or purely formal participation of business representatives in curriculum development, may jeopardize the operationalization of the Methodological Guide for the Development of Curricula for Vocational Education, thus limiting the importance of this document in connecting vocational education with the expectations and requirements of the labour market.
3. Investments in education have a very delayed impact on the labour market and the economy as a whole. Thus, investments made by the state through the so-called state order begin to pay off only after at least two years in the case of Cycle II master's degrees and three years in the case of Cycle I bachelor's degrees, and adjustments to the vocational and technical curriculum can have an impact on the labour market within a period ranging from one year (in the case of vocational schools for high school graduates) to four years in the case of college graduates.
4. Although the Nomenclature of Fields of Study and Specializations in Higher Education has been updated, universities may encounter difficulties in attracting qualified teaching staff who can ensure the development and implementation of new study programmes, which may lead to an inability to bridge the skills gap demanded by the labour market.

Priorities

1. Continuous training and education of teachers to develop curricula in line with the new guidelines and occupational standards.
2. Allocation of dedicated financial resources for curriculum development, piloting, and implementation activities.
3. Support teachers in developing skills-based formative and summative assessment materials.
4. Supporting school curriculum reform by updating textbooks, possibly by translating textbooks from countries with the best results in OECD (PISA) assessments.
5. Expanding dual education and partnerships with the private sector.
6. Diversify dual qualifications offered according to local and regional economic needs.
7. Complete the regulatory framework for partial qualifications (micro-qualifications) and regulated professions, and promote the certification of professional skills acquired in the workplace (non-formal and informal education).
8. Increase the attractiveness of teaching and academic careers, including by continuing policies to increase salary bonuses for scientific and teaching staff.
9. Expand mentoring programmes for the integration of young specialists into education.
10. Developing inclusive education at all levels, finalizing and implementing methodologies for the inclusion of children with SEN in early childhood and general education.
11. Ensuring differentiated funding and the necessary support staff in inclusive kindergartens and schools.
12. Increasing the relevance of higher and vocational education for the labour market.
13. Align state procurement with forecasts of shortages of specialists in education, engineering, ICT, and other priority areas.

Recommendation: ***Prioritize investment in infrastructure, especially to further improve energy security and climate resilience, to overcome the rural-urban digital divide and facilitate international trade*.**

Score:	**3.5 out of 5 points**

Key developments

The construction projects for the 400 kV Vulcănești-Chișinău, Bălți-Suceava, and Strășeni-Gutinaș overhead power lines (OPL) are critical for improving the energy security and climate resilience of the Republic of Moldova. The Vulcănești-Chișinău OPL will supply the capital and the central part of the country directly from Romania, bypassing localities in the eastern districts of the Republic of Moldova and eliminating political and technical vulnerabilities. At the same time, the Bălți-Suceava OPL will ensure consolidation of interconnection of the Republic of Moldova with the ENTSO-E system and the EU electricity market, providing alternative import routes. In addition, the modernization of the power stations in Chișinău, Bălți, and Vulcănești will increase the reliability of the country's entire energy sector, reduce energy dependence on a single source (MGRES), and increase resilience to extreme weather events (strong winds, extreme temperatures, etc.).

Implementation of interconnection projects is lagging behind. The 400 kV Vulcănești-Chișinău power line is due to be completed in 2025,[185] the progress in May 2025 stands at 66 percent, while the modernization works of the Vulcănești station – only 13 percent. Thus, according to estimates by the Ministry of Energy, the work is expected to be completed in June 2026.[186] As for the 400 kV Bălți-Suceava power line, the tender was to be launched at the end of June 2025, with completion of the work scheduled for the end of 2027 - early 2028.

Following the suspension of USAID funding, the construction project for the Strășeni-Gutinaș power line has been put on hold. The 400 kV power line, which was intended to increase cross-border electricity transmission capacity, is included in the Integrated National Energy and Climate Plan with a completion deadline of 2031.

Other achievements during the reporting period that have an impact on the energy security and climate resilience of the Republic of Moldova include:

- The approval of the National Integrated Energy and Climate Plan (NIECP) 2025-2030, which sets the strategic framework for achieving national energy and climate targets;
- On 26 June 2025, the Parliament approved the new Law on Electricity, which transposes into national legislation three key EU legal acts (the Electricity Directive, the Electricity Regulation, and the ACER Regulation). The law also establishes the basis for the transposition of EU network codes and guidelines through secondary legislation, as part of the Clean Energy Package;
- establishing the procedures and IT system necessary for the operation of the day-ahead and intraday markets;
- The first tender for granting the status of large eligible producer was launched on 16 August 2024. The tender targets renewable energy projects with a total capacity of 165 MW, of which 105 MW are allocated for wind power plants and 60 MW for photovoltaic plants. Following the opening of the financial offers in June 2025, the winners of the tender were designated. The second tender is expected to be organized by the end of 2025, according to the timeline approved by Government Instruction No. 64/2025;
- Approval of Law No. 74/2024 on climate change, which sets the objective of achieving climate neutrality by 2050;

[185] Vocea Basarabiei "Secretary of State: The Vulcănești-Chișinău power line will be ready in 2025."
[186] According to the response of the Ministry of Education No. 08-1625, dated 13.06.2025.

- Establishment of the National Commission on Climate Change by Government Decision No. 425/2024, with the aim of ensuring the correlation of sectoral commitments in the field of climate change for the achievement of national targets assumed at international level;
- Increasing the share of electricity from renewable sources from 3.1 percent in 2020 to 16.7 percent in 2024.

According to the latest World Bank report on the logistics performance index,[187] Moldova scored lowest in the areas of customs and infrastructure (an index of 1.9 out of a maximum of 5). In this context, feasibility studies on improving border infrastructure have been approved for the Ungheni (RO) - Ungheni (MD), Albița (RO) - Leușeni (MD), and Galați (RO) - Giurgiulești (MD) border crossing points. The work is expected to be completed in 2027.

With regard to improving rail and road infrastructure, several positive developments were recorded during the reporting period. In February 2025, three participants were prequalified[188] to submit bids for the rehabilitation of the North-Centre section of the North-South rail corridor. Bids will now be submitted to select the winning company or consortium. In November 2024, the consortium that will support the CFM's project implementation unit in rehabilitating the North-Centre section of the North-South railway corridor by 2028 was selected.[189]

Another important step towards improving the railway infrastructure is Government Decision No. 264/2025, which establishes the general conditions of the multi-annual contract for the administration of railway infrastructure, which will ensure the allocation, from the state budget, of the necessary funds for infrastructure maintenance, network operation, and new investments.

Although the feasibility study for the Multimodal Logistics Centre in Bereşti (Ungheni) was completed in 2024, there is still no certainty regarding its funding and the expected timetable for the implementation of this investment project, which is critical for facilitating international trade. The Bereşti Multimodal Logistics Centre is included in the indicative list of investment projects proposed for financing under the Reform and Growth Facility for Moldova. Similarly, despite the fact that the process of preparing the feasibility study for the 1435 mm electrified line between Chișinău and Ungheni started back in 2022 and was expected to be completed in 2024, the new deadline for completing the feasibility study is 2026.

As of 31 December 2024, only 36 percent of express (M) and regional (G) roads, as well as 44 percent of republican (R) roads, were in good and very good condition.[190] The resumption in 2025 of the publication of monthly progress reports on the rehabilitation of externally financed national public roads connecting to the core and extended TEN-T networks is welcome. According to the most recent monthly progress report made public[191] (for April 2025), of the seven projects under implementation, only the Vulcănești bypass[192] is registering a progress close to what was planned, suggesting that it will be probably completed on time. The rest of the contracts are being implemented with significant delays.

The construction of sections 4, 5, and 6 of the Chișinău ring road has remained at the pre-feasibility study stage, as it has not been approved by the Technical Council.[193] This is despite the fact that the capital's ring road is expected to be completed by 2030. At the same time, commercial facilities with unauthorized access to the section of the ring road rehabilitated with foreign funds have already been built on section 1 of the

[187] World Bank Logistics Performance Indicator 2023.
[188] Notification of prequalified participants.
[189] Notification of award of contract for supervision and support of the implementing unit.
[190] Report on the implementation of the Program on the allocation of Road Fund resources for national public roads for 2024, Official Gazette No. 237-240(9747-9750), pp. 109-110.
[191] Monthly progress reports
[192] Works contract No. RSP/W14/01: Construction of M3 Chișinău - Comrat - Giurgiulești - Romanian border, Vulcănești border sector, km 0+000 - km 8+580.
[193] MIDR response letter no. 04-3305 of 19.06.2025.

ring road, which violates the European standards under which this road is being rehabilitated, endangering road safety and affecting the speed regime.

Work has started on the new bridge over the Prut River in Ungheni. It will connect to the TEN-T core network via the Târgu Mureș-Iași-Ungheni motorway. The Romanian authorities have also contracted pre-feasibility studies for four other bridges over the Prut River: Costești (MD) - Stânca (RO), Leova (MD) - Bumbăta (RO), Leca (MD) - Fălciu (RO), and Bărboieni (MD) - Răducăneni (RO).[194]

The infrastructure at the Leova-Bumbăta border crossing point remains underutilized, particularly by heavy goods vehicles, due to the insufficient load-bearing capacity of the road passing through Bumbăta (RO).

The road fund remains subject to the principle of annuality, which prevents its effective use for rehabilitation or maintenance contracts lasting longer than one year, or for so-called multi-annual performance-based contracts. The governance and transparency of the fund remain poor, and the general principles established by the Road Fund Law continue to be violated by programs with an electoral bias. Thus, instead of increasing the funds allocated for the maintenance of local roads based on fair principles established by law,[195] in an election year, MDL 500 million will be used to finance the rehabilitation of communal roads and streets through the "Europe is Near" program, with the allocation of funds to be made based on the results of project application evaluations.

The Road Fund Council remains political,[196] without being assisted by a permanent secretariat, the annual evaluation of the execution of the fund's resources is mostly formal; moreover, the Council's decisions are not necessarily based on principles of investment efficiency. Funding for the Fund remains insufficient and uncertain, with allocation increases synchronized with electoral cycles, which jeopardizes predictability and the supply's capacity to respond effectively to fluctuations in demand.

To remove the Republic of Moldova from the blacklist of the Paris Memorandum of Understanding on Port State Control, the Ministry of Infrastructure and Regional Development (MIRD) has drafted a Government decision on approving the Roadmap for improving the status of the Republic of Moldova's flag in relation to the Paris Memorandum of Understanding on Port State Control for 2025-2027. The draft was resubmitted to the Ministry of Finance for repeated approval.[197]

The rural/urban digital divide is to be reduced through the implementation, as of 1 January 2026, of the provisions of Article 3 of Law No. 72 of April 10, 2025, which transposes the provisions of Directive (EU) 2018/1972 and guarantees any natural or legal person access, under non-discriminatory conditions, to publicly available electronic communications services throughout the territory of the Republic of Moldova.

Constraints

1. Until the completion of interconnection projects, the Republic of Moldova remains vulnerable in terms of energy security.
2. The slow pace of implementation of infrastructure rehabilitation projects, including rail and road infrastructure, creates additional pressures and costs for the Moldovan economy.
3. The weak governance of the Road Fund and the circumvention of general principles through election-oriented programmes jeopardize the effective planning and allocation of road maintenance resources.

[194] The Republic of Moldova and Romania are making progress in the construction of four new bridges over the Prut River.
[195] Art 11, al (9), Law no 397/2003 on local public finances
[196] Point 5, Annex no. 4 to Law no. 720/1996 on the Road Fund (8 representatives of central public administration authorities and 3 representatives of public associations and employers' organizations in the field of transport and roads)
[197] Letter MIRD from 18.07 2025

4. For almost 17 years, the Republic of Moldova has continued to appear on the blacklist of the Paris Memorandum of Understanding on Port State Control.[198]

Priorities

1. Clarify and address the causes of chronic delays in the implementation of infrastructure projects, especially the IFI funded ones.
2. Accelerate the implementation of the 400 kV Vulcănești-Chișinău and Bălți-Suceava power line construction projects and the operationalization of day-ahead and intraday energy markets.
3. Ensure, through the Growth Plan for Moldova, the necessary resources to prioritize the construction of the 400 kV Strășeni-Gutinas power line.
4. Reform the Road Fund by ensuring its transition to a third-generation fund.
5. Refrain from creating investment programmes that circumvent the general framework.
6. Accelerate the construction of the Chisinau ring road.
7. Prohibit the construction of commercial facilities in the area of national public roads in order not to endanger speed limits and traffic safety and not to affect the structural elements of the road.
8. Approve the roadmap for improving the status of the Republic of Moldova's pavilion under the Paris Memorandum of Understanding.
9. Accelerate the preparation of the pre-feasibility study for the European gauge electrified railway line between Chișinău and Ungheni.

[198] Paris MOU annual report 2008, p. 29.

Recommendation: ***Implement the National Investment and Export Promotion Programme to attract foreign direct investment and support the integration of local business in global value chains.***

Score:	**3 out of 5 points**

Key developments

Since July 2024, with the approval by the Government of the National Programme for Attracting Investment and Promoting Exports for 2024-2028 (PNAIPE),[199] the Republic of Moldova once again has a clear vision in this direction. Even though some actions due by the end of 2024 have not been completed and others have been partially completed, the overall dynamics of the program's implementation are promising.

Among the efforts to attract investment during this period, including FDI, the most emblematic remains the operationalization of the regional state aid scheme for investment[200] starting in 2025. By covering up to 60 percent of the investment value and combining grants with tax incentives, the scheme provides an incentive to attract and expand investment in six strategic industrial sectors and represents an alternative to Free Economic Zones (FEZ) (new members, after 31 December 2023, no longer have the facilities associated with FEZs). Traditional FDI attraction activities were also organized, such as nine business missions to present investment opportunities in the Republic of Moldova, participation in international exhibitions with eight country stands, and the development of a media campaign to improve the country's investment image. At the same time, the Investment Agency (IA) was involved in preparing and promoting the privatization process by developing seven investment profiles for assets eligible for privatization and by conducting, in collaboration with the APP, 30 fact-finding visits for strategic investors. In addition, the IA has been involved in promoting and generating interest among foreign investors in the renewable energy tender organized by the Ministry of Energy.

In terms of export promotion and integration of domestic companies into global value chains, during the period in question 157 companies were supported through the Subsidy Programme for Participation in International Exhibitions and Events (which generated additional contracts worth approximately USD 4.7 million), another 73 companies through export missions (which generated new contracts worth around USD 7 million) and 249 companies for activities to educate exporters on foreign markets. At the same time, at the beginning of 2025, the Government approved the Programme for increasing the competitiveness of local producers and their integration into value chains,[201] which is implemented by the Organization for Entrepreneurship Development (ODA). Through this programme, SMEs are able to access financial support of up to two million MDL for the implementation of engineering and IT solutions, the application of international standards, laboratory testing, and obtaining the necessary certifications. The programme also includes the contracting of marketing consulting services, intellectual property protection measures, the acquisition of licenses, and participation in B2B events.

Actions to promote the country's image included organizing the “Moldova Business Week” event, providing economic and commercial training to 60 Moldovan diplomats posted abroad, organizing the annual meeting for representatives of the diplomatic corps accredited in Chisinau, as well as other actions dedicated to diplomatic missions. At the same time, a series of bilateral forums were organized to attract investment and promote exports, the digital platforms *invest.gov.md* and *iplatforms.gov.md* were developed and updated (with 191,000 unique visitors between 2024 and May 2025), and preparations were made for the Osaka 2025 and Expo 2030 world exhibitions.

[199] https://www.legis.md/cautare/getResults?doc_id=144431&lang=en.
[200] https://www.legis.md/cautare/getResults?doc_id=146447&lang=en.
[201] https://www.oda.md/ro/media-page/presa/comunicate-de-presa/granturi-de-pana-la-2-milioane-de-lei-pentru-imm-uri-prin-programul-de-crestere-a-competitivitatii-producatorilor-locali-si-integrarea-in-lanturile-valorice.

Another noteworthy aspect concerns the reorganisation of the Investment Agency from a public authority into a public institution and the increase of its effective team from eight to 22 employees, with competitions underway to fill the vacant positions. The institution has started actively using HubSpot CRM, as well as creating subdivisions dedicated to post-investment support, economic diplomacy, and the diaspora. At the same time, in accordance with one of the measures in the PNAIPE, the institutional strategic development document for the Investment Agency is currently being drafted.

The performance of FDI attraction for 2024 at the country level remains modest, with net FDI inflows of USD 333 million, representing a decrease of 6.7 percent compared to 2023 and 43.1 percent compared to 2022. In 2024, the largest share of net FDI inflows continues to come from existing investors through profit reinvestment (USD 393 million), with the largest share coming from financial and insurance activities. Net FDI inflows in the form of equity and shares, other than reinvested earnings, totalled only USD 1.07 million in 2024, with inflows of USD 50.76 million and outflows of USD 49.69 million. At the same time, FDI outflows in the form of debt exceeded inflows by USD 60.5 million, contributing negatively to total net FDI inflows in 2024.

From an investment climate perspective, the latest Transparency International Corruption Perceptions Index report[202] shows an improvement in Moldova's position, which ranked 76th out of the 180 countries included in the study, with an aggregate score of 43 out of 100 (up from 32 points out of 100 in 2019). At the same time, the latest edition of the Heritage Foundation's Index of Economic Freedom shows a score of 58.3 points out of 100 for the Republic of Moldova[203] , placing it in 97th place out of 184 countries. Among other things, it is noted that Moldova's economic performance is below potential and that weak rule of law undermines the prospects for more significant and dynamic economic development in the long term. Similarly, it is noted that the Republic of Moldova has adopted some regulatory reforms, but bureaucracy and lack of transparency continue to hamper the creation and operation of private enterprises.

Constraints

- Persistent regional geopolitical instability and related crises, fuelled by the war in Ukraine. Except for Russia and Belarus (which is de facto part of the conflict), Moldova is Ukraine's only neighbour that is not a member of NATO.
- Slow pace of justice reform and related structural reforms.
- Imbalances in the labour market.
- Delays in approving and implementing the Economic Diplomacy Programme, which would complement the PNAIPE.
- Limited resources for investment attraction and export promotion activities and limited coordination of efforts between institutions.
- Limited budgetary resources for public investment, including investment in business infrastructure, compared to Eastern European countries that have access to EU structural instruments.
- The use of the Council for the Promotion of Investment Projects of National Importance as a vehicle for countering potential security threats or protecting the information space remains questionable, especially given the limited evidence provided by this structure in support of its decisions.

Priorities

1. Approve the Economic Diplomacy Programme and ensure better synergy between institutions responsible for attracting investment and promoting exports (Investment Agency, MEDD, Ministry of Foreign Affairs);

[202] https://www.transparency.org/en/cpi/2024/index/mda.
[203] https://www.heritage.org/index/pages/country-pages/moldova#:~:text=Moldova's%20economic%20freedom%20score%20is,countries%20in%20the%20Europe%20region.

2. Accelerate the alignment of national legislation with the EU acquis and strengthen the relevant institutions, particularly in areas such as competition, quality infrastructure, and consumer protection;
3. Advance justice reform, with results that significantly increase the credibility of the system and the sense of protection for investors;
4. Prepare the process of privatization of state assets in line with the requirements of the Strategy on State Property Management in State-Owned or Majority State-Owned Enterprises for 2023-2030, including by attracting foreign investment.

Recommendation: ***Gradually reduce the fiscal deficit as the economic recovery takes hold, increase public investment, including by applying the new single project pipeline framework, continue to broaden the tax base and conduct spending reviews in the most significant areas of expenditure, such as social protection.***

Score:	**3 out of 5 points**

Key developments

The year 2024 was marked by an improvement in the balance of public finances through a reduction in the National Public Budget (NPB) deficit relative to GDP—from 5.1 percent in 2023 to 3.9 percent in 2024. This was due to a positive factor—higher-than-expected tax and fee revenues (+8.7 percent), amid economic growth of only 0.1 percent—but also to a negative factor, manifested in continued under-execution of capital expenditures. In 2024, total NPB revenues increased by 7.9 percent, supported mainly by increases in tax revenues on wages (income tax +19.9 percent, contributions +15.6 percent) and consumption (VAT +10.6 percent, excise duties +12.9 percent). At the same time, total expenditure grew at a slower pace (+4.3 percent). On the one hand, current expenditure increased by 6.2 percent (97.5 percent of the planned level), while capital expenditure recorded a year-on-year decrease of 12.7 percent and an execution rate of 87.2 percent, of which capital investments accounted for only 56.1 percent.

Although the Medium-Term Budget Framework (MTBF) 2025-2027,[204] voted by the executive in August 2024, assumed a continued reduction of the budget deficit to 3.8 percent of GDP in 2025 and 3.4 percent in 2026, the realities of the current year have reversed the trend. As a result, even though the State Budget Law for 2025[205] assumed a budget deficit of 4.05 percent of GDP (14 billion lei), the April adjustment[206] conditioned the increase of the NPB deficit by four billion MDL up to 5.2 percent of GDP.

Some progress continued in the governance of investment projects financed from the state budget. Thus, the single project grid—which establishes a mechanism for identifying, evaluating, planning, approving, implementing, monitoring, and managing public capital investment projects—was applied to all new investment projects included in the 2025 budget. At the same time, the list of new eligible capital investment projects proposed for financing from the state budget has been posted on the website of the Ministry of Finance,[207] including detailed descriptions of the projects.

Currently, only evaluated and eligible projects can be included in the MTBF and in the annual budget law. Between March 2024 and June 2025, the central public administration authorities submitted 50 new projects for review in the Capital Investment Project Register Information System, of which 14 were validated as eligible, 22 are under review and evaluation, whereas 11 proposals considered incomplete were returned for adjustment.

Data on budget revenues relative to economic growth suggest that some progress has been made in broadening the tax base and improving tax compliance. The State Tax Service's voluntary compliance programs, the State Labour Inspectorate's efforts to combat undeclared work, and measures such as the gradual expansion of the "Electronic Sales Monitoring" SIA have led to improved public revenue collection. At the same time, in the Memorandum with the IMF,[208] the Government committed to the following measures during 2025: i) revising the conceptual framework for the main categories of taxes, including a new Chapter III of the Tax Code - establishing a new framework for VAT, ii) streamlining tax incentives, including for broadening the tax base or reviewing preferential tax regimes, with the aim of generating

[204] https://www.legis.md/cautare/getResults?doc_id=144721&lang=en.
[205] https://www.legis.md/cautare/getResults?doc_id=146467&lang=en.
[206] https://www.legis.md/cautare/getResults?doc_id=148145&lang=en.
[207] https://www.mf.gov.md/ro/content/lista-proiectelor-noi-de-investi%C8%9Bii-capitale-publice-plasate-%C3%AEn-si-rpic-propuse-spre.
[208] https://imf.md/press/LOI_MEFP_TMU_rom-Dec24.pdf.

additional annual revenues of at least MDL 900 million, and iii) strengthening budget revenue administration.

Some progress has also been made in terms of rationalizing expenditure. At the end of 2024, an analysis of expenditure rationalization in the health sector was published.[209] According to the Ministry of Finance, this analysis is currently being discussed with the institutions involved with a view to implementing the proposed efficiency measures. To rationalize expenditures in the social protection sector, a report was developed; however, it is not publicly available. Moreover, there is currently no consensus between the proposals in the report and the vision of the ministry responsible for social policies (the Ministry of Labour and Social Protection – MLSP). Additionally, independently of the report's findings, some reforms aimed at more efficient targeting of public spending have been carried out in recent years through promoted policies (e.g., RESTART, social assistance).

Constraints

- Prolonged geopolitical tensions (war in Ukraine, global protectionist policies) with a negative impact on the stability of public finances.
- The impact of electoral cycles, which put additional pressure on the budget deficit and on government spending outside the governance and strategic planning framework.
- Under-execution and delays in budget-financed investment projects.
- Poor governance in the administration of public investment projects and insufficient expertise in the private sector. The emergence of new requirements for the implementation of investment projects, such as ESG (environmental, social, governance) assessments, makes the investment project management process even more complex, given the existing level of preparation and expertise.
- High share of the informal economy.
- Delays or slow implementation of reforms with potential for optimization and better use of public money.

Priorities

1. Advance the European integration process (including the implementation of the Reform Agenda and the Economic Growth Plan) to improve the investment climate and attract development funds, both of which have a positive impact on budgetary balance;
2. Better align the annual budget laws with the MTBF and ensure political accountability through the approval of medium-term macro-budgetary limits;
3. Improve governance in the administration of investment projects, following OECD best practices, to increase the efficiency of resource use and minimize political clientelism;
4. Continue the efforts undertaken, including in the context of the Memorandum with the IMF, such as: i) reviewing the conceptual framework for the main categories of taxes, ii) streamlining tax incentives, including for broadening the tax base or reviewing preferential tax regimes, and iii) strengthening budget revenue administration.
5. Implement in practice of expenditure rationalization measures in the healthcare sector, implementation of expenditure rationalization in the social protection sector through consensus with the line ministry, and conducting sectoral spending reviews for other areas such as education or private sector support (e.g., agricultural subsidies).
6. Approval of a methodology for institutionalizing the expenditure rationalization process.

[209] https://mf.gov.md/sites/default/files/documente%20relevante/Raportul%20privind%20ra%C8%9Bionalizarea%20cheltuielilor%20%C3%AEn%20sectorul%20s%C4%83n%C4%83t%C4%83%C8%9Bii.pdf.

Public procurement

Average score:	2.6 out of 5 points

Recommendation: ***Adopt and implement a new public procurement programme, including initial benchmarks, annual targets, responsibility for implementation, and reporting.***

Score	2.5 out of 5 points

Main developments

With regard to the adoption of the new public procurement programme, the recommendation was fulfilled in 2023 with the approval, by Government Decision No. 625 of August 30, 2023,[210] of the National Programme for the Development of the Public Procurement System for 2023-2026. It sets out the priorities, specific objectives, benchmarks, intermediate and final targets, and includes the Action Plan detailing the measures to be taken to achieve the objectives, the deadlines, the institutions responsible, the monitoring indicators, and the estimated costs for the measures to be financed from external assistance.

With regard to the implementation of the Programme, according to *the Report on the implementation of the Action Plan for the implementation of the National Programme for the development of the public procurement system for 2023-2026*[211] and *the Report on the implementation of the Action Plan of the Ministry of Finance for 2024,*[212] the following actions related to the specific objectives of the Programme were carried out during 2024 and beginning of 2025:

- The new draft law on public procurement was approved by the Government through Protocol Decision No. 19.5/2025 of June 5, 2025, and sent to Parliament for review and adoption.
- The new Law on Works and Services Concessions[213] was adopted on February 20, 2025, and will enter into force in March 2026.
- Adjustments were made to the regulatory framework, including through the amendment of the Methodological Norms on the procedure for awarding sectoral procurement contracts/framework agreements in the sectors of energy, water, transport, and postal services.[214]
- The Public Procurement Agency carried out monitoring activities to ensure the correctness of the initiation and conduct of procurement procedures.
- The grant agreement for financing the re-engineering of the electronic procurement system and the public procurement centralization reform was signed.
- Model technical specifications with sustainability criteria were developed for three procurement items (cars; computer equipment, printer paper), and some of the existing model technical specifications with sustainability criteria were revised (organic fruit and vegetables, energy-efficient double-glazed windows and doors).

Some actions in the Programme were initiated with delay and are currently being implemented:

- Drafting and approval of the law on the award of certain works, supply, and service contracts by contracting authorities or entities in the defence and security sectors. The draft was prepared,

[210] https://www.legis.md/cautare/getResults?doc_id=139302&lang=ro.
[211] Report on the implementation of the Action Plan for the implementation of the National Program for the Development of the Public Procurement System for 2023-2026 (1).pdf.
[212] https://mf.gov.md/sites/default/files/raport%20PAMF%2031.12.2024.pdf.
[213] https://www.legis.md/cautare/getResults?doc_id=147735&lang=ro
[214] https://www.legis.md/cautare/getResults?doc_id=146766&lang=en.

publicly consulted, reviewed by experts, and submitted to the European Commission for final consultation. The action has been rescheduled from the fourth quarter of 2023 to the second quarter of 2025.

- The draft Regulation on the certification of specialists in the field of public/sectoral procurement was registered with the State Chancellery and submitted for approval/compatibility expertise on June 23, 2025.
- Centralized procurement or the use of auxiliary procurement services – questionnaires were developed to assess the administrative and professional capacity of staff involved in the public procurement process within central and local public authorities. Additionally, in June 2025, meetings were held with public authorities and civil society organizations to discuss opportunities for the centralization of public procurement.

Constraints

Several actions planned for 2024– Q1 2025 were not implemented or even initiated. Thus, for some unimplemented activities, the implementation deadline is set for 2027, including in the report published by the Ministry of Finance, which exceeds the implementation period set out in the Programme and Action Plan. In addition, some activities that had not been initiated by the end of 2024, prior to the approval of the amendments to the National Public Procurement Development Programme for 2023-2026, were excluded:[215]

- Development and approval of the re-engineering concept for the electronic procurement system.
- Drafting and approval of the Government Decision amending the Regulation on the planning of public procurement contracts.
- Adjustment/amendment of model contracts for public/sectoral procurement.
- Assessment of the actual situation regarding the implementation of procurement contracts (2027).
- Developing a guide to good practice on the association of contracting authorities/entities for the purpose of conducting joint public procurement procedures.
- Defining the competences of personnel involved in public procurement (civil servants or contract staff) – activity excluded.
- Developing a framework document on the competences of personnel involved in public procurement and establishing partnerships with relevant academic institutions.
- Developing and approving the curriculum for the certification of public procurement specialists and the criteria for authorizing training centres, tools, and methodological benchmarks for organizing training on the certification of public procurement specialists.

According to the Ministry of Finance, a draft Government Decision has been developed to amend the National Program for the Development of the Public Procurement System for 2023–2026. The need for these amendments, according to the authority, stems from the adjustment of commitments undertaken during the bilateral screening process and the inclusion of additional actions in the Reform Agenda associated with the Growth Plan. At the same time, the adjustment of implementation deadlines is due to delays in securing the necessary financial resources.

Priorities

The Action Plan for the implementation *of the National Programme for the Development of the Public Procurement System for 2023-2026* provides for a set of critical actions to be initiated and/or completed in 2025-2026, including:

[215] The national programme for the development of the public procurement system for 2023-2026 has not been amended since its approval in 2023.

1. Continuing the process of harmonizing public procurement and sectoral legislation with the EU acquis.
2. Re-engineering the electronic procurement system in accordance with national and European regulations.
3. Monitoring and evaluating policy documents that use public procurement to achieve the objectives set.
4. Implementation of sustainable public procurement.
5. Streamlining public procurement monitoring activities.
6. Developing, strengthening the capacities and professionalizing the staff responsible for procurement, including through the development, approval, and implementation of a certification mechanism for public procurement specialists.

Recommendation: ***Monitor low-value public procurement procedures more effectively.***

Score:	2.5 out of 5 points

Main developments

According to the Regulation on low-value public procurement, approved by Government Decision No. 870 of 14.12.2022,[216] contracting authorities/entities are required, with some exceptions, to conduct the procedure for awarding low-value contracts through the Automated Information System "State Register of Public Procurement". In the case of direct procurement, contracting authorities/entities are required to submit quarterly, by the 15th of the following month, to the SIA RSAP (MTender) information on low-value public procurement carried out outside the electronic system.

According to the Report on Public and Sectoral Procurement Activity,[217] prepared by the Public Procurement Agency, in 2024, small-value public procurements were made in the amount of MDL 2,612.6 million, of which MDL 358.0 million (13.7 percent) were made through the publication of a participation announcement and MDL 2,254.6 million (86.3 percent) were made through direct contracting.

The total amount of low-value sectoral procurements made in 2024 was MDL 379.5 million, of which MDL 181.3 million (47.8 percent) were made through the publication of a participation announcement and MDL 198.2 million (52.2 percent) through direct contracting. At the same time, the Report does not specify the number of low-value procurements made or the number of low-value contracts signed.

According to the Regulation on low-value public procurement, the Public Procurement Agency is responsible for monitoring compliance with the conduct of low-value public procurement.

The purpose of monitoring is to prevent and combat fraud and deviations from public procurement legislation; to strengthen the capacities of contracting authorities and develop the skills of the business community in the field of public procurement; and to increase the efficiency of the public procurement system.

According to the Regulation on the organization and functioning of the Public Procurement Agency,[218] monitoring compliance with the conduct of low-value public procurement involves:

- ✓ identifying cases where contracting authorities or entities do not apply the provisions of the Regulation on low-value public procurement;
- ✓ identifying cases where low-value public procurement is not planned;
- ✓ establishing cases where low-value public procurement is carried out without using the automated information system "State Register of Public Procurement";
- ✓ identifying cases where information on low-value public procurement carried out in accordance with the provisions of the Regulation on low-value public procurement is not reported;
- ✓ identifying cases where planned purchases of goods, services, and works are split up to avoid the public procurement procedure established in Law No. 131/2015 on public procurement, and in Law No. 74/2020 on procurement in the energy, water, transport, and postal services sectors and in the normative acts in the field of public procurement;
- ✓ issuing thematic monitoring reports in the event of irregularities/non-compliance.

[216] https://www.legis.md/cautare/getResults?doc_id=134614&lang=en.
[217] https://tender.gov.md/sites/default/files/document/attachments/raport_aap_2024_total.pdf.
[218] https://www.legis.md/cautare/getResults?doc_id=141704&lang=en.

In the event of deviations from the legislation and violations of public/sectoral procurement principles, the Agency shall draw up monitoring reports and inform the contracting authorities/entities of the findings and remedial solutions, which shall be in the form of recommendations. The actions taken by the contracting authorities/entities shall be supervised by the Agency. According to the Report on the exercise of monitoring powers,[219] in 2024 the Agency, following the monitoring of 653 procurements or 1.9 percent, including of thematic monitoring at 4 contracting authorities, according to the Report on the implementation of the action plan of the Public Procurement Agency for 2024,[220] drew up 193 monitoring reports. At the same time, according to the Agency, in the event of formal or non-substantial errors and non-conformities, the institution informed the contracting authorities/entities in order to remove and/or correct the shortcomings.

Following the monitoring activities carried out in 2024, several administrative proceedings were initiated, with sanctions imposed on the persons responsible within the institutions. Ten of the 12 administrative penalties imposed relate to the failure to plan or the poor planning of public procurement, as well as the artificial division of procurement into separate low-value contracts in order to avoid the application of the appropriate legal procedures. According to information provided by the Public Procurement Agency (PPA), in the first five months of 2025, the number of monitoring activities increased, with 175 reports prepared in this regard. The improved performance in this area is attributed to the increase in the number of agency employees responsible for procurement monitoring during the examined period (from 4 to 12 people).

Constraints

Despite the approved monitoring responsibilities, the establishment of a separate subdivision for this purpose, and a tool for reporting and recording low-value public/sectoral procurement, there are significant reservations about improving the efficiency and effectiveness of the process of monitoring low-value procurement and reporting on the results of monitoring activities.

1. According to the Public Procurement Agency (PPA), the RSAP Information System (MTender) provides limited tools for monitoring public and sectoral procurements, including those of low value. Data collection is carried out manually by PPA staff, and the system lacks the capability to generate reports based on predefined criteria.
2. Lack of legal and digital tools to ensure completeness and accuracy in reporting and verifying data on all planned and executed low-value procurements.
3. Lack of an approved methodology or monitoring guide for low-value procurements for the Public Procurement Agency (PPA).
4. The reports published by the Public Procurement Agency and the Ministry of Finance do not provide concrete information on the monitoring of low-value public and sectoral procurement and its results, including in terms of indicators derived from the functional responsibilities for monitoring low-value public/sectoral procurement, nor do they provide an overview of the scope of monitoring activities in relation to the number or value of low-value procurements made during the period in question. Furthermore, the published reports do not contain information on public and sectoral procurement.
5. The number of monitoring reports prepared in 2024 is 17 percent lower than in 2023 and 8.5 times lower than in 2019, due in part to insufficient staff and experience of the Agency's staff in the field of public and sectoral procurement.
6. There is a low level of implementation by contracting authorities and entities of the Agency's recommendations following monitoring activities—more specifically, only 26 percent of measures have been fully remedied and 23 percent partially remedied in 2024, with an increase in these indicators during the first five months of 2025 reaching 33.1 percent for full remediation and 41.7 percent for partial remediation.

[219] https://tender.gov.md/sites/default/files/document/attachments/raport_privind_monitorizarea_2024.pdf.
[220] https://tender.gov.md/sites/default/files/document/attachments/raport_pa_aap_2024.pdf.

Priorities

1. Continued full implementation by the Public Procurement Agency of the Regulation on low-value public procurement, approved by Government Decision No. 870/2022, along with its functional responsibilities.
2.
3. Increasing the value share of monitored small-value public/sectoral procurements within the total value of small-value procurements carried out.
4. Reducing the number and share of small-value procurements conducted through illegal splitting of procurements to avoid competitive procedures.
5. Separate reporting of monitoring activities for small-value public/sectoral procurements, including by the respective functional responsibilities.
6. Filling positions in the subdivision responsible for monitoring and strengthening the capacity of its employees.
7. Enhancing the level of implementation of prescriptions issued by the Agency following monitoring activities, by providing the Agency with the necessary instruments for this purpose.
8. Reviewing and improving the reporting tool for small-value procurements, as well as implementing measures that will hold authorities and contracting entities accountable for full and timely reporting.
9. Developing and approving a methodology (or guide) for monitoring small-value procurements, incorporating alert indicators and increasing the efficiency and impact of monitoring activities.
10. Incorporating functionalities into the new electronic procurement system that will facilitate the monitoring process of public and sectoral procurements, including small-value procurements.

Recommendation: ***Align laws on concessions and public-private partnerships with the EU acquis.***

Score:	**3,5 out of 5 points**

Main developments

Despite numerous weaknesses[221] related to the draft amendments to the Law on Public-Private Partnerships and the Law on Concessions for Works and Services, both were approved by Parliament in July 2023, only for new legislative amendments to both laws to be announced a few months later.

Although there is no consolidated EU legislation specifically regulating public-private partnerships (PPPs), their establishment and implementation is reflected in various sectoral legislation, such as regulations on public procurement/state aid or public finance regulations. Thus, the provisions of Law No. 131/2015 on public procurement, which partially transposes EU Directive 2014/24, also apply to partnerships and concessions, and the special law on public-private partnerships must transpose the principles reflected in European regulations.

However, even after the amendments of February 2025, the Law No. 179/2008 on public-private partnerships does not transpose the provisions of EU Directive 2014/24. Thus, the law in question continues to stipulate the possibility of selecting a private partner even if only one bid is submitted, as well as the possibility of selecting a private partner on the basis of a simplified competitive dialogue procedure, without detailing the particularities of this procedure in the case of PPP projects. Furthermore, the Law on public-private partnerships artificially restricts the tender by specifying the obligation to submit the tender in a sealed envelope, and also to submit the tender and any appeals in Romanian only. Unlike the new Concessions Law No. 22/2025, the Law No. 179/2008 does not require the publication of notices of competition for the identification of the public partner in the Official Journal of the European Union.

After its approval in 2023, the Concessions Law underwent two major amendments – by Law No. 22, approved by Parliament in February 2025, and by Law No. 94 of 8 May 2025, which introduces a state fee for the submission of appeals and which also applies to concession contracts. In accordance with the provisions of Law No. 22 of 20.02.2025, starting with 20 February 2026, Law No. 121/2018 on concession of works and service will be repealed.

Neither the Law on public-private partnerships nor the Law on concessions provide for measures to ensure transparency in the monitoring of the implementation of PPP and concession contracts. They do not refer to the obligation of authorities to publish information on the implementation of PPP and concession contracts or to make transparent the information from the Register of Public Assets and State Property Management relating to PPP and concession projects.

Constraints

1. The Law on PPPs:
   - provides for the possibility of initiating a PPP on the basis of a simplified procedure (e.g., selection of the private partner through competitive dialogue), without specifying the details of the implementation of this procedure in the case of PPP contracts;
   - allows a PPP to be initiated even if only one bid was submitted in an open tender, which raises the risk of fraud and harm to the public interest;
   - does not require the publication of a notice of a competitive tender in the Official Journal of the European Union (Tenders Electronic Daily);

[221] Rapcea, V. "Partnerships in trouble: analysis of the draft amendment to the PPP law," Expert-Grup, July 2023.

- requires that the bid be submitted in a sealed envelope, which, from the outset, excludes the submission of bids in electronic format via an electronic procurement platforms;
- specifies that the bid and any appeals must be submitted in Romanian, which may restrict foreign investors' access to the competition to identify the private partner.

2. The introduction of a fee of 0.5 percent of the contract value for appeals concerning the concessionaire's contracting procedure may discourage appeals by investors who consider themselves disadvantaged by the outcome of the competitive tender.
3. Reduced transparency regarding the identification process of private investors for PPPs and Concessions.
4. Low transparency in the implementation of PPPs and concession projects.

Priorities

1. Amend the Law on Public-Private Partnerships to ensure its alignment with the provisions of the acquis communautaire.
2. Assess the possibility of integrating both instruments—PPP and concessions—into a single special regulation.
3. Eliminate excessive barriers to the submission of appeals related to the award of a PPP and concession contract.
4. Disseminate widely the PPP and concession draft legal proposals.
5. Ensure transparency in the implementation of PPP and concession contracts, with systematic publication of progress reports for each PPP and concession contract in progress.
6. Prohibit the initiation of PPP and concession projects in cases where the competitive tender has not been sufficiently publicized and at least two bids have not been submitted.

Recommendation: ***Continue taking effective steps to ensure the efficiency and transparency of the public procurement system, including by boosting efforts to design and develop the new e-procurement system.***

Score:	**2 out of 5 points**

Key developments

According to the National Programme for the Development of the Public Procurement System for 2023-2026, approved by Government Decision No. 625 of 30 August 2023, one of its key objectives is to re-engineer the electronic procurement system (to meet national and European requirements) and achieve a minimum of 80 percent of the value of annual procurements using the electronic system (e-procurement) for the entire procurement cycle (planning, procedure, award, contract management, amendments). Thus, by the end of 2025, the indicator "share of procedures carried out through the electronic system for the entire cycle" needs to reach 70 percent.

The re-engineering of electronic procurement is an essential component of the development of the public procurement sector through the implementation of an efficient and transparent electronic system for the execution, recording, and control of public procurement in the Republic of Moldova. The main objective is to increase transparency in the public procurement process, obtain value for public money (the "value for money" principle), facilitating the work of contracting authorities in initiating and conducting public procurement procedures, improving access for small and medium-sized enterprises to the public procurement market and, implicitly, competition, but also reducing transaction costs for all parties involved, thus contributing to ensuring a competitive and sustainable public procurement system.

At the same time, the efficiency and transparency of the procurement system must be ensured by increasing its value for money, through free access to all information related to the procurement process for all participants and stakeholders, and through ex-ante and ex-post controls that contribute to the efficiency and objectivity of the process, prevent risks and losses, guarantee legality, and minimize the negative impact of previously unidentified problems and risks, with the application of the necessary remedial measures.

The national programme for the development of the public procurement system for 2023-2026 includes a number of relevant indicators in this regard, which need be achieved by 2025:

- reducing the share of cancelled procedures from 12.62 percent to 11 percent;
- reducing the percentage of agreements to extend contract execution deadlines;
- increasing the percentage of procurement procedures applying award criteria other than the lowest price from 7.49 percent to 10 percent;
- reducing the percentage of procurement procedures in which only one bid was submitted from 22.7 percent to 20 percent;
- reduction in the value of purchases made through non-competitive procedures – from 12.04 percent to 11 percent;
- achieving a 70 percent rate in the execution of procurement contracts;
- achieving a 40 percent level of planned strategic procurement.

In this context, according to the Report on the implementation of the Action Plan for the implementation of the National Public Procurement System Development Programme for 2023-2026 and the information presented by the Ministry of Finance, the following actions were carried out:

- In May 2025, a grant agreement was signed between the International Bank for Reconstruction and Development, the International Development Association, and the Government of the Republic of Moldova for the implementation of the Multi-Donor Trust Fund Programme "Growth, Resilience, and Opportunities for Well-being in Moldova (M-GROW)," to finance the project "Supporting Public

Procurement Efficiency and Value for Money in Moldova," which will fund activities related to the re-engineering of the electronic procurement system.

- On 12 May 2025, the IP "Technical Assistance Programme Management Office," as the project implementation unit, published the announcement for the procurement of a consultant to develop technical specifications for the electronic procurement system, with a deadline for submission of expressions of interest by 27 May 2025.
- According to the Ministry of Finance, there was initiated the development of the new Regulation on the planning of public procurement contracts.
- Development/adjustment of model technical specifications with sustainability criteria.
- Implementation by the Public Procurement Agency of activities to monitor public procurement procedures, with recommendations to the contracting authorities, evaluation of their implementation, and application of measures in accordance with their powers.

Constraints

1. There are significant delays in the implementation of several actions that would increase the transparency and efficiency of public and sectoral procurement, such as:
    - re-engineering of the electronic procurement system;
    - adjusting/amending model contracts for public/sectoral procurement;
    - assessment of the actual situation regarding the implementation of procurement contracts;
    - developing, strengthening the capacities and professionalizing the staff responsible for procurement, including through the development, approval and implementation of a certification mechanism for public procurement specialists.
2. The progress reports on the implementation of the Programme, the report on the implementation of the Ministry of Finance's Action Plan, and the reports of the Public Procurement Agency do not provide comprehensive information in terms of the indicators mentioned in the Programme.
3. The draft new Law on Public Procurement provides for a significant increase in the thresholds for public procurement procedures. Given the problems with the efficiency of the mechanisms for monitoring, preventing, and controlling the procurement process, this will affect the transparency and efficiency of procurement.
4. Since the first quarter of 2024, the open data portal on public and sectoral procurement procedures on mtender.gov.md[222] has not updated the data, despite public requests to the Government by civil society to ensure the publicity of data from the electronic procurement system.
5. In May 2025, Parliament adopted amendments to the Public Procurement Law, the Law on Procurement in the Energy, Water, Transport, and Postal Services Sectors, the Law on Works and Service Concessions and the State Tax Law, introducing a state fee for lodging appeals in public and sectoral procurement procedures. This amendment limits SMEs' access to justice, is disproportionate, contravenes the national and European legal framework, and will lead to an increase in the cost of public and sectoral procurement, including due to the restriction of competition and the budgeting of the fee in the cost of the tender. The changes made are criticized by civil society and are inconsistent with the objectives of the Public Procurement System Development Programme.

Priorities

1. Implement actions to re-engineer the electronic procurement system and implement public and sectoral procurement through the new system.
2. Harmonize the national legal framework in the field of public and sectoral procurement with the EU acquis, with a review of the secondary legal framework, including the adjustment/repeal of rules that contradict the EU acquis.

[222] https://mtender.gov.md/public/open-data.

3. Implement the measures necessary to achieve the efficiency and transparency indicators set out in the Programme and present the information, including in terms of indicators, in the progress/activity reports prepared by the Ministry of Finance and the Public Procurement Agency.
4. Accelerate efforts to develop the capacities and certification of procurement staff.

Statistics

Average rating:	**3.5 out of 5 points**

Recommendation: ***Ensure the National Bureau of Statistics (NBS) has adequate staffing and financial resources.***

Score	**3 out of 5 points**

Main developments

In terms of **providing the NBS with adequate financial resources**, the main actions carried out between July 2024 and May 2025 were the following:

- In 2024 and 2025, allocation from the state budget of circa MDL 4 million (approx. 190 thousand EUR) annually for the maintenance and modernization of the NBS IT infrastructure – procurement of network equipment for data transport; renewal of computers, procurement of licensed software, strengthening of cyber security;
- In 2025, an additional allocation from the state budget of MDL 2.6 million (approx. 133 thousand EUR) to partially cover the costs of three new household surveys to be conducted by the NBS – European Health Survey/EHIS, Pilot Survey on Gender-Based Violence against Women and Other Forms of Interpersonal Violence (EU-GBV), and the Module on Unpaid Care Work in the Labour Force Survey (LFS);
- Increase in the budget for training NBS staff and study visits abroad in 2025 (by MDL 2.4 million or approximately EUR 123,000). The financial resources allocated will be directed as a priority towards studying data analysis applications and English language training, which are necessary in the context of implementing the EU acquis.

With regard to **staffing the NBS**, the main developments included:

- Staff recruitment activities – in 2024, 39 people were hired at the National Bureau of Statistics (BNS), and in January-May 2025, 17 people were hired;
- Training activities – During 2024-2025, a total of 19 training sessions were organized (by Eurostat and international organizations), attended by 82 employees from BNS and other institutions responsible for producing official statistics. 75 employees are enrolled in English language courses, and 112 employees have been trained on various competency subjects;
- Remuneration – Starting January 2025, salaries for BNS employees involved in developing statistical research and methodologies (mainly from the institution's central apparatus) were increased by approximately 13% compared to 2024;[223]
- Adjustment of BNS structure – On 16 July 2025, a Government Decision[224] was approved providing for an increase of 10 staff units in the BNS Central Apparatus, by redistributing positions from territorial subdivisions, for: (i) the creation of the Statistical Training Center as a structural subdivision of BNS; (ii) strengthening the Directorate of National Accounts and the Directorate of Agricultural and Environmental Statistics.

Constraints

Financial

[223] It should be noted that in the first quarter of 2025, the average gross monthly wage in the country increased by 11% compared to the first quarter of 2024, and average consumer prices rose by 9% in January 2025 compared to January 2024.
[224] https://gov.md/sites/default/files/media/documents/sedinte-de-guvern/2025-07/25-Actele%20adoptate%20%C8%99i%20deciziile%20luate%20%C3%AEn%20%C8%98G%20din%2016.07.2025.pdf

Although the European Union has provided financial support for the conduct of the 2024 Population and Housing Census, the NBS's current activities covered by the state budget remain underfunded. Excluding specific expenditure for the conduct of the Census, which increased sharply in 2023- 2024, the dynamics of the budget allocated to the NBS during 2021-2025 was on the rise, with the budget allocated in 2025 being 50 percent higher than in 2021. However, the cumulative increase in consumer prices during 2021-2025, according to the forecast, was 55 percent compared to the situation at the end of 2021. Thus, the financial resources allocated to the NBS from the state budget are, in fact, stagnating in real terms (Table 2).

Table 2. NBS budget financed from the state budget, thousand MDL

	2021	2022	2023	2024	2025
Total expenses and non-financial assets	**109,591**	**117,085**	**157,543**	**339,412**	**166,017**
Statistical policy and management	*47,380*	*51,378*	*57,339*	*68,072*	*78,825*
Statistical work	*58,936*	*68,173*	*72,187*	*75,898*	*81,540*
Conducting censuses	*2,400*	*2,400*	*29,264*	*198,330*	*5,652*
Total, excluding census	**106,316**	**119,551**	**129,526**	**143,970**	**160,365**
Cumulative increase in the NBS budget (excluding censuses), 2021=1	1.00	1.12	1.22	1.35	1.50
Cumulative CPI at the end of the year, 2021=1	1.00	1.30	1.36	1.45	1.55 (estimate)

Source: Annual state budget laws

Human resources

Despite all efforts to recruit staff, as of 1 June 2025, there were 98 vacant positions (out of a total of 484 units) within the NBS, which accounts for 20 percent of the authorized staff. The level of remuneration of NBS employees remains uncompetitive both in relation to other public institutions and private sector.

The prospects for renewing the NBS staff with young specialists remain uncertain. Since 2017, no new groups of students have been admitted to statistics programmes at higher education institutions in the Republic of Moldova. Currently, the Academy of Economic Studies of Moldova admits students to the “Data Analysis and Econometrics” programme (cycle I), and USM to the “Artificial Intelligence and Data Science” programme (cycle II). This means that the NBS will have to compete increasingly with the private sector for data science specialists, which requires a substantial review of salary levels.

Priorities

1. Revision of the NBS salary system to ensure competitiveness in retaining and attracting specialists in relation to other public and private sector institutions;
2. Active state involvement in training young specialists in statistics, for example by offering more state-funded study places;
3. Effective increase in budget allocations to the NBS, which should be substantial in real terms and cover the growing needs related to the alignment of statistics with EU standards and the achievement of the objectives set out in *the National Statistical System Development Programme for 2023-2026*;
4. Implementation of the Government Decision providing for the adjustment of the NBS structure (creation of the Statistical Training Centre as a structural subdivision of the NBS, strengthening of directorates, redistribution of staff between territorial subdivisions and the central apparatus).

Recommendation: ***Further align sectoral data with EU standards to enhance comparability by improving the use of both administrative and privately held data.***

Score:	**4 out of 5 points**

Main developments

According to information provided by the NBS, between July 2024 and May 2025, the following actions were taken to implement the recommendation to align sectoral data with EU standards:

- The NBS has completed the data processing for the Population and Housing Census (PHC). In January 2025, the preliminary results of the 2024 PHC were disseminated. The concise final results of the 2024 PHC are expected to be presented in July–August 2025, while the detailed results will be available by early 2026;
- In November 2024, a bilateral screening meeting took place on Chapter 18 "Statistics," where the level of Moldova's compliance with the EU statistical acquis, as set out in the Compendium of Statistical Requirements, was presented, along with challenges and plans for harmonization with European standards;
- Within the framework of the National Program for Moldova's Accession to the EU for 2025–2029 (PNA), approved by Government Decision No. 306/2025, priorities and actions were defined under Chapter 18 "Statistics" to align with EU statistical requirements;
- The NBS continued to integrate administrative data sources (ADS) and private data sources (PDS) into the process of compiling official statistics. The list of alternative data sources used for statistical purposes was supplemented with: (1) additional data from the State Tax Service to replace the survey on monthly turnover, to perform experimental calculations for statistics on wages and number of employees, and to compile the consumer price index (CPI); (2) private data on electricity, gas, and heating consumption, used for the compilation of energy statistics, as well as in the 2024 PHC 2024. Currently, the NBS uses 45 alternative data sources (administrative and private) for statistical purposes, 29 of which provide the NBS with access to individual data;
- In 2024, in order to produce annual statistics on migration flows and population estimates in accordance with the usual residence definition, the NBS expanded the use of border crossing data from the Information System of the Border Police, particularly for estimating the over-coverage rate of the 2024 PHC;
- The 2025 Annual Statistical Works Program (ASWP) was supplemented with an additional chapter on activities related to experimental statistics carried out by the NBS (ten activities);
- New/revised methodologies and statistical research: (1) From January 2025, a new sampling frame for household surveys has been implemented, based on PHC 2024 data; (2) in December 2024, the methodology and statistical tools for job vacancy statistics were approved and the quarterly production and dissemination of statistics on job vacancies was launched; (3) The methodology was revised to ensure better alignment with EU Regulations. (4) in December 2024, the Methodology for calculating annual and monthly statistical indicators in the energy sector and the Methodology for calculating statistical indicators on natural gas and electricity prices were approved in the field of energy statistics; (5) from January 2025, the renewed statistical questionnaire "Innovation in industry and services" was implemented, developed in accordance with Regulation (EU) 2022/1092 on the technical specifications of the data requirements for the topic "Innovation"; (6) from January 2025, the renewed questionnaire "Information and communication technology in enterprises", developed in accordance with Regulation (EU) 2024/1883 on the technical specifications of the data requirements and the deadlines for the transmission of metadata and quality reports for the subject "Use of information and communication technologies and e-commerce"; (7) in 2025, with the support of the TAIEX programme, the following new work were carried out in accordance with EU requirements: (i) pilot survey on Global Value Chains in enterprises; (ii) experimental calculations on foreign affiliate statistics (FATS); (iii) pilot survey on "Road freight transport" (ASTRM); (8) taking

into account Eurostat recommendations, the NBS launched the development of experimental calculations on relative poverty estimation by calculating the at-risk-of-poverty rate[225]; currently, experimental calculations for the Harmonised Index of Consumer Prices (HICP) are being developed; starting from January 2025, in the Household Budget Survey, data are collected using a new questionnaire developed in accordance with Regulations (EU) 2019/1700 and 2023/126; the data collection process was digitalised; a new classification of household expenditure, developed in accordance with COICOP 2018 (Classification of Individual Consumption by Purpose), has been adopted and implemented;

- In January 2025, the NBS reconfirmed its alignment with international standards ISO/IEC 27701:2019 on information security and ISO/IEC 27001:2013 on personal data protection, including the updated version of standard 27001:2022;
- In 2024, new datasets were transmitted to Eurostat, including information on energy, population, international migration, mortality, healthcare expenditures, CPI, transport, and the related metadata were completed/updated. Starting from January 2025, the NBS began transmitting data on international trade in goods, and in March 2025, data and metadata were submitted regarding medical equipment, human resources in healthcare, and healthcare utilization, in accordance with Commission Regulation (EU) 2022/2294;
- The NBM developed experimental calculations of financial accounts and published them on its website.;
- Following the TAIEX mission to assess capacity of alignment with the Balance of Payments Vademecum, in January 2025, the NBM Executive Board approved the Roadmap for aligning the Republic of Moldova's balance of payments, international investment position, and external debt statistics with EU requirements.

Constraints

Statistics related to the Excessive Deficit Procedure Statistics are not yet produced, but in February 2025 representatives of the NBS, the Ministry of Finance, and the NBM participated in the TAIEX technical assistance mission to transfer good practices in this area. The harmonized consumer price index is also not yet calculated. By 2030, preparations for the 2030 round of the general agricultural census are to be completed in the Republic of Moldova.

Challenges related to the fulfilment of these tasks include:

- Inadequate data sources in certain areas for producing statistics in line with EU acquis requirements;
- A high number of vacancies at the NBS and difficulty attracting qualified specialists due to non-competitive salary levels;
- Financial resources allocated for the current activities of the NBS are limited in relation to the growing needs for aligning national statistics with EU standards;
- Risk of political interference in the work of the NBS – one example being the criticism expressed by certain politicians regarding the methodologies used by the NBS in connection with the publication, in spring 2025, of monetary poverty indicators.

Priorities

1. Presentation of the final detailed results of the 2024 PHC at the beginning of 2026, including data dissemination;
2. Carrying out preparatory work for the Agricultural Census – 2030 round;

[225] https://statistica.gov.md/ro/nota-informativa-privind-statisticile-experimentale-elaborate-de-biroul-national-10083_61797.html.

3. Alignment of external sector statistics with EU standards: balance of payments, international investment position, and international trade in services statistics – by January 2027, and all other external sector statistics – by 2030;
4. Signing and implementation of the Memorandum of Understanding between the NBS, NBM, and the Ministry of Finance on inter-institutional cooperation in the production and compilation of public finance statistics and excessive deficit procedure statistics;
5. Full implementation of the National Statistical System Development Program 2023–2026 and the National Programme for the Accession of the Republic of Moldova to the European Union 2025–2029, Chapter 18 "Statistics", including the allocation of adequate resources and strengthening of institutional capacities for its implementation;
6. Continued efforts to increase the volume of data produced and transmitted to Eurostat;
7. Further improvement of disaggregated data collection, particularly regarding gender and disability;
8. Addressing staffing issues within the NBS and ensuring adequate funding for activities aimed at aligning national statistics with EU standards;
9. Ensuring compliance with the European Statistics Code of Practice[226] and Law No. 93/2017 on official statistics,[227] in particular the principle of independence of statistical authorities from political or other external interference in the development, production, and dissemination of statistics;
10. Amending Law No. 93/2017 to align with the new amendments to Regulation (EC) No. 223/2009 concerning governance, access to private and administrative data sources, crisis response mechanisms, innovation promotion, interoperability, and the strengthening of professional independence.

[226] https://ec.europa.eu/eurostat/web/quality/european-quality-standards/european-statistics-code-of-practice?utm_source=chatgpt.com
[227] https://www.legis.md/cautare/getResults?doc_id=147964&lang=ro

Financial control

Average score:	3.8 out of 5 points

Recommendation: ***Implement the Court of Accounts Development Strategy.***

Score	4.5 out of 5

Main developments

According to the information provided by the Court of Accounts in letter No. 2/5-585-25 of 13 June 2025, as well as in the publications[228] on its website, with regard to the institution's Development Strategy for 2024, 52 actions were planned, of which 50 were implemented during 2024 and the rest were transferred to 2025.

Among the achievements in 2024, the following should be mentioned:

- Continuing efforts to strengthen institutional capacities, develop the regulatory and methodological framework, and increase the impact of audit work.
- Improving the methodological aspects of performance auditing and the methodological framework for other types of audits carried out by the Court of Accounts of Republic of Moldova (CARM), with a view to bringing them into line with international best practices.
- By Decision No. 35 of 25 June 2024, the CARM approved the Quality Management System Guide, which introduced the obligation to set quality objectives and ensure the assessment of quality risks related to all elements of a quality system.
- On 17 December 2024, the Court of Accounts approved the Audit Strategy for 2025-2027, with a focus on audits in areas of major interest to society and on optimizing the use of public resources and evaluating the effectiveness of public policies, including through the identification by public authorities of opportunities to improve the management of public funds.
- A new version of the Performance Audit Manual was drafted and approved for testing.
- Efforts have been made to strengthen the functional capacities for execution of performance audits by increasing the number of staff assigned exclusively to these external public audit tasks, starting in February 2025, in order to ensure the possibility of performing complex and multidimensional audits, as provided for in the new Audit Strategy.
- Through the Court of Accounts Decision of 30 June 2024, there was revised the Compliance Audit Manual and approved the extension of its testing period.
- During 2024, representatives of the Court of Accounts participated in all meetings of the working groups set up to coordinate the European integration process in the areas of financial control, public administration reform, and budgetary and financial provisions, as well as in public presentations of strategic documents such as the Public Finance Management Development Strategy.
- In order to increase the impact of external public audit, the Court of Accounts monitored the implementation of audit recommendations and held information sessions for audited entities on the possibilities and facilities offered by the digital tool used by the institution in the process of monitoring recommendations.

Constraints

- Insufficient autonomy in the management of financial resources.
- Insufficient qualified audit staff, staff turnover due to insufficient remuneration in relation to the complexity and volume of functional tasks (31 vacancies recorded at the end of 2024).

[228] Bi-annual report (2023-2024) on the implementation of the Court of Auditors' Development Strategy 2021-2025.

- Insufficient implementation of audit recommendations, including due to objective constraints and insufficient resources allocated.
- Insufficient communication and cooperation with audited entities and law enforcement agencies.

Priorities

1. Continuous improvement of the recruitment, development, and retention of highly qualified staff.
2. Digitization of audit processes to streamline planning and reporting activities, as well as quality control.
3. Continue efforts to increase the implementation rate of the CARM recommendations by audited entities.
4. Implement the measures in the Quality Management System Guide.
5. Strengthen performance and IT audits, including with the support of development partners.
6. Increase efficiency in cooperation and communication with competent bodies to investigate risks of fraud and corruption.
7. Strengthening communication with audited entities and law enforcement bodies, as well as increasing institutional visibility.

Recommendation: ***Ratify the 1929 Geneva Convention on the Suppression of Counterfeiting Currency.***

Score:	**4.5 out of 5 points**

Key developments

This recommendation by the European Commission is reflected in both its 2023 Report and its latest 2024 Report, being part of the National Action Plan for the Republic of Moldova's accession to the European Union for the years 2024-2027, approved by Government Decision No. 829 of October 2023,[229] as well as in the Government's Action Plan for 2024.[230] Meanwhile, in December 2024, the draft law necessary for accession to the International Convention on the Suppression of Counterfeiting Currency, promoted legislatively by the Presidency and with the Ministry of Internal Affairs (MIA) as the responsible institution, reached the agenda of the Legislature and was voted,[231] becoming law.[232]

With the approval of this law, the Government and other state institutions needs to take the necessary measures to implement the provisions of the Convention, while the Ministry of Foreign Affairs needs to submit the instrument of accession to the depositary. From an institutional point of view, the greatest effort to ensure the implementation of the provisions of the Convention is related to the establishment of a Specialized Contact Point.

In the Republic of Moldova, responsibility for managing this point has been taken over by the Ministry of Internal Affairs[233] through the establishment of a National Central Office within the specialized directorate for counterfeiting of currency at the National Investigation Inspectorate of the General Police Inspectorate.

This Office will facilitate the exchange of information with other signatory states to the Convention, coordinate investigations into cases of counterfeiting and contribute to the prevention and combating of this phenomenon.

Constraints

The main constraint to the implementation of the Convention is limited institutional capacity and resources. The establishment and effective functioning of the National Central Office within the National Investigation Inspectorate requires the allocation of adequate human and financial resources. The lack of specialized personnel and modern equipment may affect the ability to detect and investigate cases of counterfeiting. At the same time, the necessary pace needs to be maintained to harmonize national legislation with the provisions of the Convention.

Priorities

1. Strengthen institutional capacities through budget allocations necessary for the functioning of the office, namely the recruitment of qualified staff and the acquisition of modern equipment and technologies.
2. Review and update national legislation to fully reflect the provisions of the Convention.
3. Establish effective channels of communication and cooperation with the central offices of other signatory states to the Convention.

[229] https://www.legis.md/cautare/getResults?doc_id=141820&lang=en.
[230] https://gov.md/sites/default/files/document/attachments/subiect-02-nu-948-cs-2023.pdf.
[231]
[232] https://www.legis.md/cautare/getResults?doc_id=146480&lang=en.
[233] https://mai.gov.md/ro/node/9375.

Recommendation: ***Appoint an anti-fraud coordination body and develop an anti-fraud coordination network.***

Score:	2 out of 5 points

Main developments

EU Member States, in accordance with Article 12 of EU Regulation No. 883/2013, are required to designate an anti-fraud coordination body. This is to facilitate effective cooperation and exchange of information, including operational information, with the European Anti-Fraud Office (OLAF). The designation of an anti-fraud coordination body is essential to ensure compliance with EU rules, to effectively support OLAF in its mission, and to protect the financial interests of the European Union.

In this context, on 7 May 2025, by Government Decision No. 271/2025 on the organization and functioning of the National Anti-Fraud System,[234] the National Anti-Fraud Network was approved, including the list of its member authorities, the list of reporting entities, and the Rules of Organization and Functioning of the National Anti-Fraud System. The State Financial Control Inspectorate was designated as the national contact point responsible for cooperation and information exchange with the European Anti-Fraud Office (OLAF).

At the same time, draft law no. 48/MF/2025 was registered, amending certain legislative acts and proposing the amendment of Article 78 of Law no. 181/2014 on public finance and budgetary and fiscal responsibility. The proposed amendments aim to introduce provisions on external public financial control of external assistance funds and anti-fraud coordination. According to the Bureau for European Integration, the draft law was approved at the Government meeting on July 2, 2025, and was subsequently adopted in the first reading by the Parliament.

Constraints

- The primary and secondary legal framework is not adjusted for the effective implementation of the National Anti-Fraud System.
- Insufficient human resources[235] and other institutional resources of the State Financial Control Inspectorate, including for the implementation of its current tasks.
- The low level of staff remuneration of the State Financial Control Inspectorate (SFCI)[236] may jeopardize efforts to attract and retain qualified and honest personnel.
- In the event of insufficient development or coordination of the national anti-fraud network, the EU may decide to withhold, reduce, or withdraw funding for projects and programmes implemented by the state concerned if there are indications that fraud is not being effectively managed.

Priorities

1. Develop and adopt the legal framework setting out the obligations of authorities in the context of implementing the National Anti-Fraud System, including reporting arrangements.
2. Clarify how anti-fraud coordination will be carried out by the State Financial Control Inspectorate, adjusting the regulatory framework governing the Inspectorate's activities.
3. Ensure that qualified staff and sufficient resources are available to effectively implement the tasks related to anti-fraud coordination and control of European funds, including a review of the remuneration system in line with the new tasks and responsibilities.

[234] HG271/2025.
[235] activity_report_of_the_state_financial_control_inspectorate_for_the_year_2024_.pdf.
[236] The ICFS salary fund approved for 2025 is MDL 20.9 million, which is lower than in 2024.

Recommendation: ***Grant full organizational, functional, and financial independence to the Court of Accounts.***

Score	4 out of 5 points

Key developments

In 2024, with the support of SIGMA experts and in collaboration with the State Chancellery, the Court of Accounts drafted and promoted a bill amending Law No. 158/2008 on public service and the status of civil servants, which granted it the right to approve its own staffing levels, taking into account the advisory opinion of the State Chancellery on the application of the regulatory framework governing the management of the civil service and civil servants. Following these amendments, the CARM approved a new organizational structure, which is implemented from February 2025.

According to the authority, further actions are planned to align with best practices for recognizing and respecting the full independence of the Court of Accounts, from an organizational and functional point of view.

In terms of financial independence, in the second quarter of 2025, following the commitments made during the bilateral screening meeting in October 2024, the Court of Accounts, in collaboration with the Ministry of Finance, initiated the process of amending Law No. 260/2017 on the organization and functioning of the Court of Accounts of the Republic of Moldova. Once voted on, the amendments will change the way the Court's budget is prepared and approved, which (the budget) will be reviewed and approved by Parliament. According to the information provided, the draft law is currently undergoing anti-corruption and legal review.

Constraints

- The need to align with best practices regarding the recognition and full respect of the independence of the Court of Accounts as the supreme audit institution of the state.
- The implementation of the amendments to Law No. 260/2017 will not ensure the institution's full financial independence, nor will it facilitate the implementation of priorities outlined in strategic documents, particularly those related to attracting and retaining personnel, given the existing legal framework on the remuneration of civil servants.
- In its activity, the institution is not fully protected from political interference or that of the Legislature, especially in matters related to the management of resources and the annual audit programme. Moreover, its mandate is legally restricted in terms of planning and conducting audits of political parties and certain public authorities (such as NARE and the NBM) that have responsibilities in areas of major economic and social impact.

Priorities

1. Increase organizational and functional independence, including from political influence, in setting audit priorities and appointing members of the Court of Accounts.
2. Promote and approve by law provisions that will guarantee the financial independence of the Court.

Social policies and employment

Average score:	**3.5 out of 5 points**

Recommendation: ***Further implement the measures set out in the concept paper on reforming the National Employment Agency to ensure adequate capacity.***

Score	**3.8 out of 5 points**

Main developments

During the monitoring period, the National Employment Agency of Moldova (NEAM) focused on implementing the actions set out in the Reform Concept on improving the services provided by the Agency for 2023-2026 and in its Activity Plans for 2024 and 2025.

According to the Activity Report of the National Employment Agency for 2024, several measures and activities were undertaken during the year to improve performance in working with job seekers and employers. These actions contributed to a 50 percent increase in the number of people placed in employment (from 11,000 in 2023 to 16,700 in 2024), increased the number of job vacancies managed by territorial subdivisions from 32,000 in 2023 to 33,000 in 2024, and increased their occupancy rate to 80.9 percent.

In the first four months of 2025, the Agency's territorial structures worked with 26,388 job seekers, including those who had been registered in 2024, or 11.2 percent more than in the same period of the previous year. There was also a 14 percent increase in the number of job vacancies compared to the same period last year. At the same time, since the beginning of 2025, 8,177 job seekers have been placed in employment, which is about 26 percent more than in the same period last year.

It is worth noting that, in order to strengthen its operational capacities, the National Employment Agency (NEAM) has benefited from the support of several international organisations. With the assistance of the International Labour Organization (ILO), a functional assessment of the Agency was carried out, and improvements were initiated to the profiling model implemented by NEAM, which is currently undergoing pilot testing. With ILO support, three territorial subdivisions of NEAM (STOFM) were equipped with vehicles and ten self-service spaces for jobseekers within territorial offices, aimed at increasing the efficiency of identifying unemployed individuals and facilitating their employment. Currently, there are 26 mobile teams equipped with vehicles and technical equipment—provided with the support of partners such as GIZ, UNDP, and ILO—that conduct outreach and awareness-raising activities.

In addition, with the support of the ILO and ETF, three impact evaluation studies were carried out on active labour market measures, such as professional internships, vocational training, and subsidised employment.

Furthermore, donor support has led to improved labour market information and the organisation of job fairs, recruitment events, and various information seminars.

Regarding the provision of vocational training vouchers, in 2024 alone, 587 unemployed individuals benefited from this new active labour market measure. With support from partners such as ADA, CEDA, and ILO, an electronic platform for the voucher-based training system for the unemployed was launched in April this year.

With regard to the Agency's staff, by Government Decision No. 617 of September 4, 2024, amendments were made to Government Decision No. 990/2018 on the organization and functioning of NEAM, which

entered into force on 1 January 2025, and resulted in a redistribution of staff. Thus, at the central level, the Agency's maximum staff was increased by six units (from 50 to 56), while at the territorial level it was reduced by six positions (from 195 to 189 units). Some of the Agency's tasks and its structure have also been changed to clarify the division of responsibilities within the institution.

In order to increase motivation within the Agency, as of 2 August 2024, Law No. 205 of 25 July 2024, amending Law No. 418/2023 on the state budget for 2024 and Law No. 270/2018 on the unified salary system in the budgetary sector, the reference value for calculating the salaries of NEAM employees was increased from MDL 2,100 to MDL 2,500.

Constraints

1. The available budget is insufficient to finance active employment measures, including those focusing on vocational training/retraining for the unemployed. An analysis of data on the budget allocated for the provision of employment services shows that in 2023, the amount executed was MDL 50.6 million, while for 2024 and 2025, the annual amount approved was only MDL 34.1 million.
2. The imbalance between labour supply and demand, both in terms of geography and profession, also plays a role. Vacancies are mainly found in urban areas, while the workforce is concentrated in rural areas. At the same time, around 60 percent of registered unemployed people have no professional qualifications, having only primary/secondary education (61.8 percent in 2024 and 58.1 percent in the first four months of 2025). Under these conditions, finding employment is impossible without initial vocational training.
3. The high proportion of inactive people who are not motivated to enter the labour market—in 2024, people with no work experience accounted for 22 percent of the unemployed.
4. The lack of an efficient information system and the need to digitize the services provided by NEAM.

Priorities

1. Increase the budget available for financing employment measures, especially active measures, to encourage the integration of vulnerable groups into the labour market.
2. Informing the population and economic agents about the services offered by the Agency and its territorial structures.
3. Increase staffing levels and adjust the salaries of NEAM and its territorial structures on an annual basis to ensure continuity and institutional memory by retaining qualified staff.

Recommendation: ***Continue the reform of social assistance, including its digitalisation*.**

Score:	**3.5 out of 5 points**

Main developments

The primary goal of the RESTART reform in the field of social assistance is to promote and respect the right to social protection and assistance of vulnerable groups in the Republic of Moldova, in accordance with international human rights standards.

Following the improvement of the national legal framework in the field of social assistance, in April 2025 there was a tenfold increase in the number of cases under management compared to April 2024 – from 3,400 to 40,386 cases.

To ensure effective case management, an information system was implemented, and social assistance workers were provided with IT equipment to facilitate the digitization of services and improve their efficiency. The equipment was provided thanks to the support of external donors, who supported the purchase of cars and uniforms for employees of the "Mobile Team" service, which was expanded in all raions to cover the home social assistance needs of people with severe disabilities, children with special needs, and the elderly through multidisciplinary teams of psychologists, speech therapists, physical therapists, and social workers.

With a view to the professional development of staff involved in the provision of social assistance, the Ministry of Labour and Social Protection, with the support of development partners and civil society organizations, there was established the "RESTART Learning Laboratory." To this end, the Ministry signed a "Joint Commitment to Support the RESTART Learning Laboratory" with 22 organizations.

Government Decision No. 39/20285 approved the Concept of the "e-Social" Information System—a unified platform in the field of integrated social protection, as part of the e-government infrastructure of the Republic of Moldova. The system is designed to store and process social and economic information on social service beneficiaries, their families, and the institutions involved in providing these services, as well as data on social services and benefits provided that are not recorded in other state registers.

In terms of staff motivation, as of January 1, social assistance employees received an increase of 4.8 percent in the reference value used to calculate salaries.

Furthermore, in March 2025, one-off payments were made to social assistance specialists who are key actors in the implementation of the RESTART reform. Employees of social institutions received one-off payments of MDL 2,500 (social workers) and MDL 8,000 (community social workers, members of mobile teams , professional parental assistants from the Social Service "Professional Parental Assistance" and the foster parents within the Social Service "Family-Type Children's Home."

Constraints

Although the employees involved in providing social assistance have benefited from an increase in the reference value used for salary calculations, their remuneration remains insufficient relative to the increased workload caused by the growth in the number of case managements—and does not reflect the real value of their work.

According to the Audit Report of the Court of Accounts on the consolidated financial statements of the Ministry of Labour and Social Protection as of 31 December 2024, at that date the Ministry recorded a balance of financial resources of MDL 51.6 million, unused during the reporting period. This amount resulted

from the low absorption of financial resources on several budget expenditure items, and the MLSP's explanations indicate that this situation was caused by various factors (vacant positions, staff turnover, lengthy public procurement processes, failure of beneficiaries to collect payments, and the return of financial resources by post offices, etc.).

Priorities

1. Increase the staffing levels and salaries of social assistance personnel by effectively increasing the basic salary, rather than through one-off payments.
2. Inform vulnerable people about the types of social assistance services available and ensure digital access to the services provided.
3. Financial coverage of social assistance measures from the state budget, with a focus on services available to all eligible applicants.

Recommendation: ***Take concrete steps to strengthen the mandate and administrative and institutional capacity of the State Labour Inspectorate in line with ILO standards.***

Score:	**3.5 out of 5 points**

Key developments

Following a complaint lodged by the People's Advocate, the Constitutional Court, by Decision No. 3 of 1 April 2025, declared unconstitutional Article 9^1 paragraph (3) of Law No. 140 of May 10, 2001, on the State Labour Inspectorate, according to which a person who, in the last five years, has founded entities specified in paragraph (1) (private external protection and prevention services, commercial companies providing business and management consulting services or any other related services), could not hold management or executive positions in the field of control of compliance with labour and occupational safety and health legislation.

With the amendments made to Article 30 of Law No. 289/2004 on temporary incapacity benefits and other social insurance benefits, by Law No. 25 of February 20, 2025, amending certain legislative acts (in force since April 17, 2025), control over the correctness of the determination, calculation, and payment of social insurance benefits provided for in Article 5(1)(a) of Law No. 289/2004 (benefits for temporary incapacity to work caused by ordinary illnesses or accidents) (1) letter a) of Law No. 289/2004 (allowance for temporary incapacity for work caused by ordinary illnesses or accidents not related to work), paid from the employer's funds, shall be exercised by the State Labour Inspectorate.

As a result of the amendment made to Article 63^3(3) of Law No. 105/2018 on the promotion of employment and unemployment insurance, by Law No. 25 of February 20, 2025, amending certain legislative acts (in force since April 17, 2025), the State Labour Inspectorate will initiate unannounced inspections of the activities of private agencies or unlicensed intermediaries on the basis of complaints, self-referrals, or petitions submitted by persons seeking employment abroad or by migrant workers placed in employment, in accordance with the provisions of Article 19(1) and (2) of Law No. 131/2012 on state control, only if the information they contain, when analysed on the basis of a risk assessment, reasonably indicates a possible violation related to trafficking in human beings, forced labour, work in harmful conditions, work in dangerous conditions, as well as other forms of labour exploitation or sexual exploitation, and only if proven.

On 20 May 2025, Law No. 74 of 31 March 2023, amending certain legislative acts, brought into force the amendments made to Law No. 140 of May 10, 2001, on the State Labour Inspectorate. These amendments added to the duties of labour inspectors the task of verifying, at the level of the unit, the regulation of procedures for preventing and combating discrimination and sexual harassment in the workplace, as well as the application by employers of measures to prevent and combat cases of discrimination and sexual harassment in the workplace, and the annual report on the activities of the SLI is to include analytical data on violations in the field of preventing and combating sexual harassment.

On 20 March 2025, the Ministry of Labour and Social Protection, together with the State Labour Inspectorate and with the support of the International Labour Organization, launched a platform for reporting violations related to undeclared work - lucrezlegal.md , through which anyone working in the country can submit a free and accessible petition to report violations they encounter in the workplace.

With the help of the World Bank, five cars were purchased for the State Labour Inspectorate, along with 60 laptops and five printers, which will facilitate the work of labour inspectors in the field and improve the efficiency and performance of the services provided by the Inspectorate.

On 30 September 2024, as part of the EU-funded and ILO-implemented project "EU Support for a More Inclusive Labour Market in the Republic of Moldova," the State Labour Inspectorate was donated a set of 30 body cameras and related equipment with the aim of strengthening the operational capacities of the SLI by providing an additional tool to improve the conduct of unannounced inspections.

The following activities were carried out under the same project:

1) launch of a new official website to increase access to information and transparency of the institution;
2) training of 77 labour inspectors on gender discrimination prevention in the workplace, strategic planning, and combating undeclared work;
3) organization of a study visit to the Labour Conditions Authority in Lisbon, Portugal, to exchange good practices;
4) initiating the modernization of a new SLI office in Chisinau.

Also, with the support of the Council of Europe project "Strengthening the Right to Work in the Republic of Moldova", a SLI identity manual was developed, covering both the SLI website and all identification and promotional materials currently used by the SLI.

Overall, donor support has focused on supporting measures to combat undeclared work, implemented by labour inspectors in line with the priorities of the National Programme for the Reduction of Undeclared Work for 2024-2025.

Following a consultation process with social partners in the Republic of Moldova, the Decent Work Country Programme for 2025-2027 was developed, which also provides for technical advice on legislative reforms, including the mandatory register of employees, strengthening the capacity of the SLI, and promoting holistic approaches. On 3 June 2025, in Geneva, a Memorandum of Understanding was signed between the Government of the Republic of Moldova, the National Confederation of Employers of the Republic of Moldova, the National Trade Union Confederation of Moldova, and the International Labour Organization on the Decent Work Country Programme for 2025-2027.

Constraints

1. To date, the national legal framework for labour inspection – Law on State Control No. 131/2012 and Law on the State Labour Inspectorate No. 140/2001 – has not been aligned with international standards in this area (ILO Conventions No. 81 on labour inspection in industry and commerce and No. 129 on labour inspection in agriculture). This prevents the SLI from functioning properly, i.e. carrying out unannounced inspections in the field of labour relations and occupational safety and health (OSH), as required by international standards in this area. Currently, unannounced inspections are only permitted following a risk assessment and only if there is information/evidence of undeclared work, payment of wages or other payments not reflected in the accounts, human trafficking or labour exploitation by the employer.
2. Failure to implement, to date, the provisions of ILO Convention No. 161 on occupational health services, ratified by Law No. 18 of March 4, 2021.
3. Additional tasks: control of the correctness of the determination, calculation, and payment of temporary incapacity benefits caused by common illnesses or non-work-related accidents, paid from the employer's funds; unannounced checks on the activities of private agencies or unlicensed intermediaries on the basis of complaints, self-referrals or petitions submitted by persons seeking employment abroad or by migrant workers placed in employment; verifying, at the unit level, the regulation of procedures for preventing and combating discrimination and sexual harassment at work, as well as the employer's implementation of measures to prevent and combat cases of discrimination and sexual harassment at work; insufficient number of labour inspectors to carry out the new tasks effectively.

Priorities

1. Align as soon as possible Law No. 131/2012 on state control and Law No. 140/2001 on the State Labour Inspectorate with the provisions of ILO Conventions No. 81 on labour inspection in industry and commerce and No. 129 "On Labour Inspection in Agriculture", namely, excluding the State Labour Inspectorate from the scope of Law No. 131/2012.
2. Strengthen the institutional capacities of the State Labour Inspectorate (increasing the number of labour inspectors, computing equipment, information systems, etc.) in order to increase the number of units subject to visits and inspections, especially unannounced ones.
3. Develop the national regulatory framework in the field of OSH by continuing to transpose European directives and creating the conditions for compliance with and enforcement of the provisions of these directives.
4. Implement the electronic register of employees in the real sector.
5. Implement the Programme for improving OSH in areas with high risks of accidents and illness (construction, agriculture, manufacturing, transport, and storage) for the period 2024-2028.
6. Revitalise the activity of multidisciplinary teams, made up of representatives of the State Tax Service, the State Labour Inspectorate, the General Police Inspectorate, and the National Confederation of Trade Unions of Moldova, with a view to carrying out joint inspections at economic units.
7. Inform employees and employers about the dangers that exist in workplaces where OSH requirements are not met, about the phenomenon of accidents and illnesses at work, as well as about the direct and indirect damage resulting from accidents at work and occupational diseases.

Recommendation: ***Assess the implementation of the Government's commitment to consult social partners on all social and economic legislation and strengthen tripartite consultation (strengthening the capacity of social partners).***

Score:	**3 out of 5 points**

Main developments

During the reference period, the regulatory framework for social dialogue was not amended/improved. This is despite the fact that the National Trade Union Confederation of Moldova (CNSM) and the National Confederation of Employers of Moldova (CNPM), as social partners at national level, came up with initiatives in this regard (*e.g., ensuring the rotation of the chairmanship of the National Commission for Consultation and Collective Bargaining (NCCCB) by the coordinators of the parties, promoting bipartite social partnership and creating conditions for its development, etc.).*

In order to implement the provisions of the NCCCB Regulation and to eliminate the existing gaps and ambiguities therein, at the initiative of the CNSM and the CNPM, the NCCCB Decision of 13 August 2024, approved amendments to the *NCCCB* Regulation.

During the monitoring period, seven NCCCB meetings were organized, ensuring its continuous operation in accordance with the provisions of the legal framework, of which two meetings were held in the second half of 2024 and five meetings in the first five months of 2025. Unfortunately, the bad practice of examining draft legislation and issuing the opinion of the National Commission for Consultation and Collective Bargaining (as provided for in Article 5 of Law No. 245/2006 on the organization and functioning of the NCCCB) and of the commissions for consultation and collective bargaining at branch and territorial level after these drafts have already been adopted by the Government, despite the fact that the trade unions have requested in writing that they be examined prior to approval. The most recent case concerns the draft law amending certain legislative acts (on the regulation of relationships related to the provision of work through a temporary work agency, occupational safety and health for certain categories of workers, certain aspects of employment relations, administrative liability, etc.) (unique number 455/MLSP/2025). This was approved by the Government at its meeting on 24 June 2025, while the Commission was convened on June 25, and the trade unions' request to examine the draft law before the Executive meeting had been sent to the MLSP on 20 June 2025.

At the insistence of the trade unions and thanks to negotiations initiated during 2024, as well as the discussion of the issue of reviewing the national minimum wage at each meeting of the NCCCB, by Government Decision No. 846 of 18 December 2024, on establishing the national minimum wage for 2025, starting 1 January 2025, the national minimum wage was set at MDL 5,500, an increase of 10 percent. The issue of the minimum wage review has been included and examined at each NCCCB meeting in 2025. Although the trade unions present all the arguments and possible options for ensuring a minimum decent wage, the Ministry of Labour and Social Protection has not presented a clear position on the prospect of its review to date.

Through the bipartite collective agreement (national level) No. 1 of 28 November 2024 “On the establishment of the minimum wage for units in the real sector of the national economy,” concluded between the CNSM and the CNPM, for units in the real sector of the national economy, starting 1 January 2025, the minimum wage was set at MDL 6,000.

With regard to sectoral social dialogue, there are still some shortcomings in its development and promotion in several areas, both in the public and real sectors.

The CNSM took the initiative and, with the support of the International Labour Organization (ILO), developed an Action Plan on the promotion of collective bargaining and increasing the coverage of

employees by collective bargaining for the years 2025-2030 (*its overall objective is to ensure a regulatory and institutional framework and favourable to collective bargaining and to increase the rate of employees covered by collective bargaining to 80 percent by 2030).* The plan was presented at a public event organized by the CNSM on 31 January 2025, and subsequently submitted to the Ministry of Labour and Social Protection (MLSP) for consideration. On 29 April, the MLSP organized a tripartite working meeting to discuss the draft Action Plan prepared by the CNSM, as well as a draft plan prepared by the MLSP experts. Following the discussions, it was agreed that the MLSP would compile the respective drafts into a single document and, as soon as possible, submit it to the social partners for coordination.

Following a consultation process with the social partners in the Republic of Moldova, the Country Programme for Decent Work 2025-2027 was developed, which includes among its priorities the strengthening of social dialogue at all levels *(Priority 1).* On 3 June 2025, in Geneva, a Memorandum of Understanding was signed between the Government of the Republic of Moldova, the National Confederation of Employers of the Republic of Moldova, the National Confederation of Trade Unions of Moldova, and the International Labour Organization on the Decent Work Country Programme for 2025-2027.

Constraints

1. The limited capacity of the NCCCB and its Secretariat to review and approve draft legislation in the labour and socio-economic fields, as well as the inactivity of the NCCCB's specialized councils.
2. The lack, in some sectors of the economy, of specialized public administration structures as partners for collective bargaining, frequent changes in the leadership of specialized central public administration authorities, and the lack of consolidated employer structures at the sectoral level.
3. The absence at the territorial level of a social partner (employers' organizations), frequent changes in the leadership of local public administration authorities and, as a result, the absence in some districts and municipalities of territorial commissions for consultation and collective bargaining.
4. Frequent disregard, in the process of drafting and improving labour legislation, of social partnership standards and principles and of the voice of trade unions.
5. Cases of non-recognition of collective labour agreements and collective agreements by state control bodies.
6. Lack of constructive and regular social dialogue: failure to convene the NCCCB at the frequency proposed by its president and agreed by the social partners—once every three weeks; the MMPS's evasion of the tripartite working group set up under the auspices of the Ministry and empowered to examine proposals for amendments to the Labour Code; failure to convene the sectoral committees for consultation and collective bargaining in some sectors with the regularity provided for by law.

Priorities

1. Effective implementation of the Decent Work Country Programme 2025-2027.
2. Promoting the urgent approval of the Action Plan to increase the coverage of collective bargaining to 80 percent of employees.
3. Amend the existing regulatory framework to ensure the rotation of the chairmanship of the NCCCB by the coordinators of the parties and to create conditions for the development of bipartite social partnership.
4. Strengthening the capacities of the NCCCB and, in particular, its Secretariat with regard to the examination and approval of draft legislation in the labour and socio-economic fields, as well as reforming and revitalizing the NCCCB 's specialized councils.
5. Non-admission of the Economic Council to the Prime Minister's Office to undermine the status and role of the NCCCB, as well as the role of social partners in the development of state policy in the field of labour and socio-economic affairs.

6. Negotiating and concluding collective agreements (at national level), including in a bipartite format, on various issues in the labour and socio-economic fields that are not regulated or require additional regulation.
7. Promoting the establishment of an Economic and Social Council in the Republic of Moldova.
8. Promoting the creation of commissions for consultation and collective bargaining in all sectors of the national economy and in all districts and municipalities, as well as revitalizing the activities of existing ones.
9. Creation of an open information base of sectoral and territorial collective agreements.
10. Creation of an open information base of collective labour agreements.