MOLDOVA POLICY ALERT



Strengthening Moldova's Electoral Defenses: Legal Reforms Ahead of 2025 Parliamentary Elections



Petru CuleacCo-founder and Executive Director of Moldova Development Institute

The Republic of Moldova will hold parliamentary elections on 28 September 2025 and their result will be a determining factor of whether Moldova continues its European Integration process. Following the 2024 presidential elections and referendum, and the multiple hybrid attacks aimed at undermining the integrity of the electoral processes, the Moldovan authorities made several significant updates to the Moldovan legislation governing the electoral processes. The changes are noteworthy given the multi-layered approach to protect the Moldovan electoral framework, and include amendments regarding integrity requirements for electoral actors, misuse of identity data, transparency and oversight of political parties, and most importantly combating electoral corruption. These improvements not only strengthen Moldova's electoral integrity, but also will address key challenges on Moldova's path to the European Union. The context in which the upcoming parliamentary elections will take place is marked by a coordinated and multifaceted Russian effort to halt Moldova's European integration process. As mentioned by President Sandu, in her July 30 press-conference, Kremlin is actively seeking to gain control over the next Moldovan parliament. In this context, the legal amendments discussed below are part of a proactive and systemic ambition to treat electoral corruption not as an isolated offense, but as a phenomenon facilitated by legal and institutional gaps.

The first block of amendments put forward by <u>Law No. 34/2025</u>, primarily regarding strengthening the declaration of assets and personal interests, also indirectly impacts the electoral framework. The amendments demand the tightening of **integrity requirements for electoral actors**, mandating cross-checks with the National Integrity Authority (ANI), and creating stricter conditions for eligibility to hold or continue in public office, including elected positions. The amendments harmonize references across multiple electoral and public-office statutes, integrate ANI's findings into candidate verification, and establish stronger enforcement mechanisms that affect both the administration of elections and the pool of eligible candidates.

A second amendments pack included in the <u>Law No. 112/2025</u>, brings the Moldovan electoral framework into alignment with a broader reform of identity documentation and population registration. These amendments integrate the State Population Register as the primary reference for domicile and temporary residence in the State Register of Voters, **update the list of valid identity documents for voting to include the new identity card** and temporary identity card, and modify how electoral lists are compiled and verified. These changes strengthen the administrative consistency and simultaneously require the Central Electoral Commission (CEC) and related institutions to update procedures, digital systems, and voter-education materials.

Finally, the most important updates to the electoral legislation are brought by the Law No. 100 of 13-06-2025 on the effective combating of the phenomenon of electoral corruption and its related aspects. Following reports of widespread vote buying during the 2024 presidential elections and referendum, Moldova has undertaken one of its most important legislative reforms aimed at protecting electoral integrity. Adopted after six months of consultations and parliamentary debate, the Law No. 100 introduces 13 sets of amendments across 12 separate laws and codes. Despite covering a wide range of legal fields, these measures are part of a deliberate effort to combat electoral corruption and the systemic risks that enable it. The measures can be grouped into three interconnected clusters: 1) strengthening electoral integrity and accountability, 2) countering extremist influence and security risks that undermine electoral integrity, and 3) safeguarding identity and personal data against misuse. Alongside these three main thematic clusters, Law No. 100 also introduces a series of crucial procedural and institutional reforms, such as accelerated court timelines and clearer mandates for investigative authorities in electoral corruption, that are crucial enablers helping ensure that the other reforms are enforceable and not stalled by slow or ineffective procedures.

Together, these changes are aimed to consolidate a more resilient electoral framework ahead of the 2025 parliamentary elections by addressing historic vulnerabilities: from vote buying and opaque party financing, to the involvement of extremist networks and foreign interference, and to the misuse of citizens' identity documents and personal data for manipulation or coercion.



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Strengthening Electoral Integrity and Accountability

The main goal of the law is to target the most pressing and long-standing vulnerabilities facing the Moldovan electoral landscape. The law amends the Criminal Code with an expanded definition of electoral corruption which now refers not only to the acts of providing illicit benefits, but also includes the act of promising such benefits. The fines for these crimes are raised substantially and additionally, aggravating circumstances have been added such as vote-buying involving organized groups, multiple citizens, or foreign funding. In this regard, additional procedural reforms mandate tighter timelines for the investigation and trial, in order to ensure that electoral bribery cases are handled with higher urgency. Similarly, new contravention provisions regulate public gatherings, penalizing payments to attend rallies that are intended to disturb the public order or covertly advertise political actors.

A particularly significant chapter of the law aims at further sanitizing the Moldovan political party landscape to make it less vulnerable to exploitation by networks engaged in vote buying or illegal funding. One major innovation is the explicit prohibition of "successor of unconstitutional parties" entities; meaning, political actors associated with parties that have been declared unconstitutional, cannot create a new political party or use an existing political party as a "successor" to one that was previously declared unconstitutional. To enforce this, courts are empowered to look at potential links such as leadership overlap, ideological continuity, financial flows, organizational similarities, and coordinated actions, to determine whether a new entity is in fact a continuation of a banned party. Simultaneously, political parties are also required to maintain detailed, up-to-date membership records and share them with the Central Electoral Commission (CEC) and the Public Services Agency.

These requirements have the potential to improve the transparency and accountability of party membership and also strengthen the state's capacity to trace possible camouflaged blocs, and prevent the emergence of "successors of unconstitutional parties". Parties engaged in activities that threaten electoral integrity or democratic order and fail to comply with the authorities' warnings will face new and tighter sanctions that allow for temporary suspension or even dissolution. The law also addresses indirect methods of influence such as the instrumentalization of philanthropy and sponsorships by politicians or electoral competitors as a campaign tool. New amendments restrict how philanthropic and sponsorship activities can be publicized both by their beneficiaries, but, more importantly, by the political figures themselves. Instead, a standardized annual disclosure will be required. This closes yet another pathway for disguised voter bribing and pre-campaigning. Furthermore, the law bans political agitation carried out by NGOs, trade unions, and religious entities during the electoral period, and strengthens the fines for non-compliance with CEC decisions or for unauthorized signature collection.



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The last key component related to integrity and accountability is that the Law introduces a broad package of changes to Moldova's Electoral Code. These changes tighten eligibility requirements for candidates, mandate active information sharing by oversight bodies on integrity restrictions, and establish clearer rules for the appointment of district electoral councils, including for the diaspora and Transnistrian regions. Similarly, financial oversight is sharpened by restricting donations from entities with arrears on their taxes or social insurance, as well as mandating prepayment for goods and services received by candidates. Additionally, stricter limits are introduced on donations linking them relative to prior income. Finally, the Central Electoral Commission can now impose harsher sanctions on repeat offenders, including cutting off allocations from the state budget for up to four years for parties that have been repeatedly violating campaign finance rules.

Countering Extremist Influence and Security Risks that Undermine Electoral Integrity

The second cluster of amendments addresses the security dimension of electoral integrity, targeting extremist networks as well as activities having the potential to undermine elections. Amendments to the Law on Countering Extremist Activity expand the definition of extremist acts in order to also include actions by foreign or unregistered groups, such as promoting fascist symbols or attempting to destabilize the state. Most importantly, the law gives the Security and Intelligence Service (SIS) the lead role in enforcing these provisions, also empowering it to petition courts for rapid suspension or liquidation of organizations engaged in extremist conduct. Similarly, media and digital platforms are required to remove extremist content immediately upon SIS order, subject to judicial review. Complementing these changes, the law integrates the offenses linked to new extremist activity into the criminal procedure, granting investigators the authority to use interceptions, surveillance, and financial monitoring. At the same time, timelines for proceedings are shortened and excuses for procedural delays limited, thus ensuring that extremist activities linked to electoral disruption can be addressed faster. Finally, amendments to SIS's organic law clarify its mandate with regard to the extremist activities and require director-level authorization for sensitive measures like identifying network subscribers or conducting visual surveillance. This strengthens oversight while equipping SIS to better trace activities that could undermine elections.



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Safeguarding Identity and Personal Data Against Misuse

The third cluster addresses a less visible but nevertheless important vulnerability: the misuse of identity documents and personal data. New rules now prohibit the frequent or mass collection of copies of identity documents without a legal basis, and the online publication of sensitive identity data such as personal ID numbers.

Furthermore, the law limits the personal information that can be collected during public gatherings when organizers solicit signatures for initiatives or consultations, and organizers are legally bound to handle such data in compliance with privacy laws. This directly targets practices used in voter manipulation schemes that involve maintaining lists of recruited voters or tracking payments. These amendments also align Moldova's legal environment more closely with EU standards on data protection, offering broader safeguards against identity theft and misuse in sectors such as banking and micro-lending.

Conclusion

These important updates represent one the most comprehensive efforts in recent years to protect Moldova's electoral framework both from internal malpractice and external malign interference. On the positive side, these reforms represent a shift from slow and reactive procedures toward a more proactive and time-sensitive approach to threats facing Moldova's democratic processes. The Moldovan authorities significantly tightened integrity and transparency requirements for candidates and parties, modernized voter registration through better integration of identity systems, and introduced sharper tools to combat electoral corruption and extremism, as well as the misuse of personal data. However, these reforms may also raise practical challenges given the fact that they require not only rapid institutional adaptation by the CEC, ANI, SIS and the courts, but also consistent enforcement. The effectiveness of these measures will depend not only on the text of the law, but on how decisively these institutions implement them before and during the upcoming September 2025 elections.



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About the author:



Petru Culeac – co-founder and Executive Director of the Moldova Development Institute, a newly established organization dedicated to improving the social, political, and economic landscape in Moldova. With over 15 years of experience in Moldova's non-profit sector, Petru has an in-depth understanding of the country's context and its development agenda as well as extensive organizational management experience. Until 2023, Petru served as Executive Director of Soros Foundation Moldova, a renowned non-profit foundation, part of the Open Society Foundations network, recognized as a key civil society actor in the Republic of Moldova. Under Petru's leadership, the foundation expanded its portfolio and successfully implemented numerous technical assistance projects, including for Moldovan authorities in areas such as anti- corruption, justice reform, elections, and education, as well as emergency response projects at the onset of the COVID-19 pandemic.

Previously, Petru worked in areas of democracy promotion, free and fair elections, local development, citizen engagement, and youth activism, successfully cooperating with local and international organizations, such as USAID, Chemonics, East Europe Foundation, and IFC. Petru's academic background includes degrees in Business Management, and European and International Studies.



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