

MOLDOVA POLICY ALERT



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

Extended Version



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The Republic of Moldova will hold parliamentary elections on 28 September 2025. The result of these elections will be a determining factor of whether Moldova continues its European Integration process or faces further challenges on this path. After the 2024 presidential elections and referendum, several updates have been included in the legislation governing the Moldovan electoral processes. These include amendments regarding integrity requirements for electoral actors, identity documents, transparency and oversight of political parties, and most importantly combating electoral corruption. These changes have an impact on the elections, and are noteworthy, as not only they strengthen electoral integrity, which may affect the elections' chances of being undermined by anti-democratic and anti-EU actors, but will address key obstacles on Moldova's wider path to the European Union.

The first block of amendments put forward by [Law No. 34/2025](#), while primarily about strengthening the declaration of assets and personal interests regime, also indirectly impacts the electoral framework. They do so by tightening **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.

The second amendments pack included in the [Law No. 112/2025](#), brings the Moldovan electoral framework into alignment with a broader reform of identity documentation and population registration. The 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.

Third, the [Law No. 130/2025](#) amends Moldova's Electoral Code and the Law on Political Parties to tighten procedures, improve transparency, and strengthen oversight. **It introduces the notion of "camouflaged electoral blocs,"** refines the definition of independent candidates, expands the registry of electoral officials, and extends various deadlines for candidate registration and electoral operations. The law enhances financial controls by requiring detailed reporting and independent audits, allows independent candidates to serve as their own treasurers, and mandates publication of audit results. It also regulates ballot printing and media coverage of elections, clarifies rules for modifying candidate lists, and formalizes the registration and accountability of political blocs. Most provisions took effect on 3 June 2025, with some entering into force on 1 January 2026.

Finally, the most important updates to the electoral legislation are brought by the [Law No. 100 of 13-06-2025 for the amendment of certain normative acts \(on the effective combating of the phenomenon of electoral corruption and its related aspects\)](#). Following reports of **widespread vote buying** during the Presidential elections and referendum, the authorities moved rapidly to provide an adequate response. Six months of back-and-forth discussions and consultations, culminated in a complex law, which can be considered one of the most significant reforms to date for the protection of electoral integrity. The law makes 13 large amendments to 12 laws and codes, covering multiple fields including identity documents and data handling (Article I), protection of personal data (Article VII, Article IX), electoral corruption (Article II, Article V), philanthropy and sponsorships (Article III), countering extremism and extremist organizations (Article IV, Article V, Article XII), political parties (Article VI), public assembly rules (Article VIII), special investigative powers (Article X), electoral rules and campaign finances (Article VIII, Article XI) and intelligence surveillance powers (Article XIII).

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Amendments to the legislation governing national identification documents, criminalizing the unjustified gathering of ID copies and the online exposure of sensitive personal data (Article I)

The amendments make it illegal to a) collect copies of citizens' identity documents on a frequent or mass scale without a clear legal basis, and b) publish online copies of identity documents or personal identification details (such as the individual's state personal identification numbers, and the series/number of the IDs). These measures directly address election-related risks associated with practices used in voter manipulation schemes, as well as the growing need for safeguards against identity theft and data abuse online.

In past elections, malign actors have reportedly gathered and stored ID copies, to maintain registries of recruited voters, track payments, or monitor participation. These changes add a new layer of legal protection around voters' personal data making it harder for electoral interference networks to operate. Besides addressing specific electoral risks, these provisions also bring Moldova closer to EU-style data protection standards and respond to broader risks of identity theft or misuse in sectors like banking or micro-lending.

Amendments to the Criminal Code aimed at tightening the sanctions for electoral corruption as well as complementing the Code with provisions regarding extremist organizations and extremist propaganda (Article II)

In one regard, the article tightens the provisions on electoral corruption. The offense of vote buying now explicitly covers not only the act of offering benefits but also the mere promise of such benefits, closing a gap often exploited in practice. Penalties are substantially increased, and new aggravating circumstances have been added: harsher sanctions now apply when vote buying

- is carried out by multiple perpetrators;
- targets multiple voters;
- uses public funds;
- is linked to organized criminal groups or foreign or unconstitutional entities.

Related offenses, such as those in Articles 181³ and 182 of the Criminal Code, are brought into line with these changes, ensuring that bribery or illicit advantages in an electoral context are treated with the same seriousness.

In another regard, the article introduces new provisions on extremist organizations and materials. It defines extremist entities and criminalizes their organization, financing, and participation, as well as the dissemination of extremist materials. Although the amendments related to extremism are not formally tied to elections, in the Moldovan context where certain political networks, like those

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associated with the banned Shor Party and its proxies, pursue destabilizing or foreign-directed agendas while presenting themselves as political actors, these provisions create a legal avenue for safeguarding the electoral environment. The measures move from addressing purely electoral offenses (vote buying) toward addressing the organizational backbone of malign influence, even if conducted under the cover of a political party or an informal movement.

Taken together, these amendments strengthen the state's capacity to deter and prosecute sophisticated forms of electoral corruption and provide a parallel legal instrument to act against networks whose activities blur the line between political competition and extremist subversion. They signal an evolution in Moldova's approach: protecting the vote not only by regulating transactions around it, but also by targeting the organizational structures that threaten the integrity of the democratic process.

Provisions against the instrumentalization of philanthropy and sponsorships by politicians or electoral competitors as a campaign tool outside the regulated campaign period (Article III)

The Law on Philanthropy and Sponsorship (Law no. 1420/2002) is amended to prohibit the publicity of philanthropic or sponsorship activities when the donors or sponsors are presidents or vice-presidents of political parties, or members of the central executive bodies of political parties or electoral competitors. This ban applies to both the beneficiaries and sponsors, neither of whom can publicize the acts. Instead, the amendments provide that by 31 March each year, these persons should publish a report on the party's website detailing their philanthropic and sponsorship activities of the previous year.

The amendment seeks to create a level playing field by preventing hidden campaigning and improving transparency, thus, in part cleaning up campaign finances. In theory, the amendment has the potential to curb the practice of manipulative (and corruptive) 'sponsorship' and 'philanthropy' and limit politicians' ability to convert wealth into political credit. At the same time the amendments may generate risks of overreach, difficulties with practical enforcement, and potential conflict with freedom of expression, all of which will require careful implementation.

Provisions on countering extremism and on the oversight of extremist organizations and associated persons (Article IV)

Article IV of Law no. 100 of 13 June 2025 substantially revises the Law on Countering Extremist Activity, expanding both definitions and enforcement mechanisms. The concept of "extremist activity" is broadened to include actions by unregistered or foreign organizations and now explicitly covers acts such as profaning state

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symbols, propagating fascist or xenophobic ideologies, and engaging in separatist actions that threaten Moldova's unity. According to the new amendments, an "extremist organization" can be any domestic, foreign, or unregistered entity that, by court decision, is entered in the Register of extremist organizations and materials.

The article also reorganizes state responsibilities and strengthens enforcement powers. The Security and Intelligence Service (SIS) is designated as the lead body to prevent, detect, and suppress extremist activities, supported by the Prosecutor General's Office, the Ministry of Internal Affairs, and other agencies. The SIS is empowered to demand organizations cease extremist acts, and if they fail to comply, their activities can be suspended for six to twelve months or, in urgent cases that represent a threat to the state sovereignty or to the democratic electoral processes, their activities can be suspended immediately by court order. Courts are given tighter timelines to rule a decision, and the suspended organizations are faced with bans on conducting public events, certain financial operations, and media activities.

A further innovation is the ability to target foreign and unregistered organizations. The SIS may petition courts to classify such entities as extremist, suspend their operations in Moldova, and also seek their liquidation if violations persist.

The amendments also impose obligations on mass media, online platforms, and internet providers to remove or block extremist materials, with SIS' orders being immediately enforceable pending judicial review.

Finally, the law introduces a new category: persons associated with extremist organizations. Individuals who support, participate in, or benefit from such organizations can be listed by the SIS and are barred from employment in sensitive sectors like national security, energy infrastructure, and strategic industries. Financial institutions must report transactions carried out by persons listed as associated with extremist organizations to the SIS, and apply enhanced due diligence.

Overall, these provisions mark a decisive shift toward a preventive, approach to extremism, with clear implications for protecting Moldova's democratic institutions and electoral processes from domestic or foreign networks seeking to destabilize them. These provisions have an indirect but meaningful impact. By allowing the faster suspension or liquidation of extremist organizations, including unregistered informal groups or foreign groups, avenues often used as channels for foreign interference, coordinated disinformation, or illicit funding that can distort campaigns will be closed. These powers provide authorities with additional tools to act preventively, stopping entities before they mobilize rallies, provoke unrest, or launch online influence operations during sensitive electoral periods.

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Provisions aimed at procedural acceleration for electoral corruption cases and enhanced tools to investigate and prosecute extremist activity (Article V)

Article V of Law no. 100 introduces significant procedural reforms within the Criminal Procedure Code, aimed at making investigations and trials for electoral corruption offenses faster and more effective. In cases of vote buying and related electoral bribery (Articles 181-182 of the Criminal Code), criminal investigations must now be completed within six months, with any extensions justified in writing and reported to the Prosecutor General. Courts are also given strict deadlines: first instance proceedings must conclude within four months, and appeals within two months, with hearings scheduled promptly, starting within twenty days of assignment and grouped on consecutive or closely spaced days. These measures are intended to prevent cases from dragging on beyond the electoral cycle, which in the past has reduced accountability and deterrence.

The amendments also tighten procedural rules to limit unnecessary delays. If a defendant has multiple defense lawyers, a hearing can no longer be postponed simply because one of them is absent, as long as another is present. Certain time limits within court procedures are shortened, for example, reducing postponement windows from five to three days. These changes address a common tactic used by defendants to stall proceedings and run out the clock, ensuring that the justice system can respond in a timely manner to offenses that directly undermine fair competition.

Beyond electoral corruption, Article V also integrates the new extremist activity offense (Article 346¹ of the Criminal Code) into key investigative and prosecutorial mechanisms. Investigators are now explicitly authorized to use interceptions, audio-video surveillance, and financial monitoring in such cases, and jurisdiction is assigned to the specialized Prosecutor's Office for Organized Crime and Special Cases (PCCOCS). Although not purely electoral provisions, these tools are relevant in contexts where extremist networks, sometimes overlapping with political proxies, attempt to destabilize elections through covert funding or coordinated disruption. By aligning investigative powers with the new substantive extremism provisions in Article IV, the law strengthens the operational capacity to detect and dismantle hostile structures that could influence electoral integrity.

Taken together, these reforms represent a shift from slow and reactive procedures toward a more proactive and time-sensitive approach to offenses that threaten Moldova's democratic processes. If implemented effectively, they could make the prosecution of vote-buying cases swifter and more credible, signaling to both domestic actors and external observers that electoral corruption is being taken seriously. At the same time, the tighter timelines and expanded responsibilities will place new demands on prosecutors, investigators, and courts, making adequate resources and coordination critical for these measures to achieve their intended impact.

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Provisions reinforcing states efforts to sanitize and regulate the political party landscape in Moldova (Article VI)

Article VI is a far-reaching attempt to keep the Moldovan party system clean and transparent by closing gaps exploited for illicit influence or for re-branding of banned political structures. These amendments establish a framework that combines preventive registration rules, a more rigorous membership tracking, and sanction mechanisms in order to make the Moldovan party landscape less vulnerable to exploitation by networks engaged in vote buying, illegal funding, or coordinated foreign interference. At the same time, the breadth of these powers also demands careful judicial oversight to ensure they are not misused against legitimate political opposition.

One major innovation is the explicit *prohibition of “successor of unconstitutional parties”*, i.e. the interdiction of creating a new political party or use an existing political party as a “successor” to one that was previously declared unconstitutional. The law empowers courts 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. This prevents banned actors from quickly returning to the political scene under a new name, a tactic used before by some political actors, to bypass legal restrictions and continue undermining democratic competition.

Another important cluster of changes concerns the *transparency and traceability of party membership*. Parties are now obliged to maintain detailed and continuously updated registers of their members, including identifiers such as name, date of birth, state ID number (IDNP), and dates of joining or leaving. These registers must be shared with both the Central Electoral Commission (CEC) and the Public Services Agency (ASP), and failures to do so can result in sanctions, including a ban on participating in elections. This directly strengthens the state’s ability to verify membership lists, detect fictitious enrollments, and monitor compliance with internal governance standards, including tracing possible camouflaged blocs, and preventing emergence of “successors of unconstitutional parties”.

The law also *strengthens the state’s power to sanction parties engaged in activities that threaten electoral integrity or democratic order*. The Ministry of Justice can now seek court orders to limit a party’s activity for up to 12 months, either after a warning procedure or immediately in urgent cases where a party engages in acts that endanger sovereignty, security, or electoral processes, such as large-scale vote buying, illegal financing, disinformation campaigns, or collaboration with banned extremist actors. Courts are required to act quickly, and interim measures (such as limitation of activities) can be imposed while cases are being examined. Continuous violations after limitation can lead to dissolution, with proceedings also assigned to the Court of Appeal and subject to clear deadlines, which reduces the risk of protracted political litigation.

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The law also puts forward *additional procedural safeguards to tighten party accountability*. Parties must submit declarations confirming the accuracy of membership lists and leadership data. Changes in statutes, programs, or leadership lists must be reported promptly. The law also tightens financial integrity measures in terms of prohibiting donations from legal entities with any outstanding debts to the state or social funds. These steps aim to reduce shadow financing and prevent compromised actors from exerting hidden influence over party operations and campaigns.

Amendments regarding limits and safeguards on the collection of personal data during public gatherings (Article VII)

These amendments have added provisions to the Law on Assemblies (No. 26/2008), obligating the organizers of various public events that collect citizens' signatures for the purpose of supporting initiatives or gauging public opinion on issues of local, regional, or national interest, to ensure that the lists include only a minimal set of personal data (name, surname, year of birth, locality of residence, phone number, and signature). Furthermore, organizers are explicitly required to process these data solely for the stated purpose and in compliance with personal data protection laws. This aims to reduce opportunities for misuse of the data collected at rallies or signature gathering events, that are sometimes used for covert voter profiling or pressure.

Provisions regarding new contravention level sanctions to strengthen compliance with electoral and public assembly rules (Article VIII)

The provisions expand the definition of corruption in public events to cover not only receiving money but also accepting promises or offers, and creates a new offense (Art. 47² of the Contravention Code) penalizing paying or being paid to attend organized gatherings when the aim is to disturb public order, breach fundamental rights, or conduct disguised political advertising.

The provisions also strengthen electoral contraventions: heavier fines and added sanctions for failing to abide by or repeatedly ignore CEC decisions, penalties for unauthorized signature collection for candidates or referenda, and stricter rules on agitation, including bans on campaigning by NGOs, unions, and religious actors outside the regulated period.

Further amendments target the misuse of transportation to rallies without proper notification, the dissemination of non-compliant political advertising or philanthropic publicity, and adjust procedural articles to ensure these offenses are swiftly acted upon. Taken together, these measures reinforce the administrative backbone of the fight against electoral corruption by addressing illicit practices, such as covert paid mobilization, unregistered signature gathering, or shadow advertising.

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Provisions strengthening the powers of the National Center for Personal Data Protection to suspend risky data processing operations (Article IX)

The amendments allow the National Center for Personal Data Protection to temporarily suspend data processing operations during an inspection if such processing could endanger the fundamental rights and freedoms of a large number of data subjects, given the nature, scope, context, purpose, and scale of processing. The amendment adds a rapid response tool with judicial safeguards: any suspension decision can be appealed in court within 5 days, and the court must review the appeal within 5 days. This gives authorities a method to halt suspicious large scale illicit data processing, such as massive voter profiling or unlawful collection of supporter data, while still ensuring prompt judicial oversight.

Amendments to the Law on Special Investigative Activity that tighten internal oversight and explicitly extend investigative powers to electoral matters (Article X)

The law now requires that any request to authorize special investigative measures, such as surveillance or interception, must come from a prosecutor formally designated by the chief prosecutor or a deputy. Moreover, that designated prosecutor is required to take part in the court hearing where the request is examined. This change is intended to ensure a higher level of accountability and consistency when authorizing sensitive investigative tools.

Furthermore, the scope of situations in which special investigative measures can be applied is broadened. Beyond existing grounds, the law now explicitly includes the detection and prevention of electoral fraud and other illegal interference in electoral processes. It also covers organized crime, corruption and related offenses, money laundering, and the financing of terrorism. By naming electoral interference alongside these serious crimes, the amendment places the integrity of elections squarely within the remit of national security grade investigative responses.

These provisions are significant for electoral integrity because they enable authorities to respond more effectively to covert activities that can undermine fair competition, such as systematic vote buying, proxy financing networks, or criminally coordinated efforts to disrupt voting. At the same time, the requirement for designated prosecutorial oversight serves as a safeguard, helping to prevent misuse of these investigative powers in politically sensitive contexts. In combination, the changes reflect an attempt to strike a balance between stronger protection of elections and tighter procedural control over intrusive investigative measures.

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Amendments to the Electoral Code (Article XI)

The law implements stricter eligibility requirements and clearer information sharing. The amendments provide that anyone barred by a final court judgment or a definitive administrative act from holding public or elected office is now explicitly ineligible for electoral roles. The Ministry of Justice, the National Integrity Authority, and the Ministry of Internal Affairs must actively inform electoral bodies about such restrictions. This closes gaps that in the past allowed individuals with integrity bans to enter electoral management structures or run for office unnoticed.

The law also puts forward provisions (which shall enter into force on January 1, 2026) for more reliable formation of electoral councils, including for diaspora and Transnistrian polling stations, clarifying how members of district electoral councils are appointed, with fallback mechanisms when parties or local authorities fail to nominate candidates. Clear procedures are established for district electoral councils serving polling stations abroad and for those covering localities from the Transnistrian region, providing formal roles to courts, the Ministry of Foreign Affairs, and the State Chancellery. These changes are meant to ensure professional, balanced district electoral councils and avoid last-minute staffing problems that could disrupt election administration.

Several provisions address campaign finance and misuse of resources putting forward tighter rules on campaign conduct and finances. The new provisions tighten donations from entities with arrears on their tax or social security payments, and candidates are forbidden from using goods or services on credit without prepayment. Additionally, stricter limits are introduced on donations linking them relative to prior income.

Finally, the new amendments to the Electoral Code provide for *stronger sanctions and accountability* by empowering the Central Electoral Commission to impose harsher sanctions on repeat offenders, including cutting off allocations from the state budget for up to four years for parties repeatedly violating campaign finance rules.

Together, these changes address persistent vulnerabilities in Moldova's electoral framework: loopholes in eligibility of who can run or serve, opaque financing practices, and inconsistent staffing of electoral bodies. By improving appointment procedures (including for sensitive voting areas such as the diaspora and Transnistrian regions), tightening financial oversight, and expanding enforcement powers, the amendments aim to make the electoral process more transparent, accountable, and resistant to manipulation. If applied consistently and without political bias, these provisions can significantly improve the integrity of future elections, though their effectiveness will depend on rigorous enforcement and administrative capacity.

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Provisions regarding the mandate and surveillance powers for the Intelligence and Security Service (Articles XII and XIII)

These amendments align the law regarding the Security and Intelligence Service (SIS), with the responsibilities assigned to the SIS now being under the revised law on countering extremist activity. This ensures that its mandate explicitly covers this field. In parallel, the rules on special investigative measures are adjusted to require that the identification of subscribers or users of electronic communications networks and the conduct of visual surveillance be authorized by the SIS director or an empowered deputy, clarifying internal accountability and tightening procedural safeguards. With these in place, the SIS now has clearer legal tools to trace networks or activities that could support extremist influence or destabilization efforts during electoral periods, strengthening the preventive layer of electoral integrity.

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.

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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