

REPORT NO. 2

OBSERVATION MISSION FOR THE PARLAMENTARY ELECTIONS OF 28 SEPTEMBER 2025

OBSERVATION PERIOD: 22 JULY - 27 AUGUST, 2025

SUMMARY REPORT



EXECUTIVE SUMMARY

Legal framework. During the observation period, the legal framework was marked by changes made by the CEC to the Regulation on the status of observers and the accreditation procedure. The new requirements imposed on international organizations and observers, such as to demonstrate technical, financial capabilities and experience in the field, are not clearly defined and may generate arbitrary interpretations, which contravenes the Electoral Code and the principles of legality and proportionality. Also, the expansion of the grounds for withdrawing accreditation by vague terms such as “hampering” and “jeopardizing” raises risks of disproportionate penalties.

The CEC also initiated amendments concerning the mobile ballot box and voters lists, justified by the need to increase transparency and efficiency, including through digitization. However, they were adopted too close to voting day, contrary to the principle of stability of electoral legislation.

According to Promo-LEX, the amendment of the regulatory framework only one month before election day could affect the predictability and stability of the electoral legal framework.

Electoral bodies. During the reference period, the CEC met in a mixed format in 21 meetings and adopted 202 decisions on the organization and conduct of elections. Most of the decisions concerned the registration of competitors, the establishment and activity of hierarchically lower electoral bodies and the accreditation/confirmation of persons authorized to participate in the electoral process.

The process of accreditation of observers is intensifying. During the monitored period, 1,176 national observers and 76 international observers and experts were accredited. The Promo-LEX Association accredited 627 observers.

Most DEC's follow the schedule. Out of a total of 149 visits made during working hours, in 97% DEC's were open. At the same time, more than half (54%) of premises of DEC's are accessible / partially accessible for people with special needs, according to Promo-LEX observers.

In the context of the parliamentary elections of 28 September 2025, 2,274 polling stations were set up in due time, of which 12 PSs were organized for voters from the Transnistrian region, and 301 PSs were set up abroad, including 4 for postal voting. Compared to the 2024 presidential election, the number of polling stations established by the CEC for the Transnistrian region decreased (from 30 to 12), while the number of those organized abroad increased (from 234 to 301).

With regard to the increase in the number of polling stations by about 70 units compared to the 2024 election, the Promo-LEX OM, in principle, supports the efforts to make voting abroad accessible. However, we reiterate the position that the number of polling stations abroad will not be able to increase indefinitely, and other mechanisms for making voting abroad accessible (e.g. voting over two days) could be applied in the future.

In the case of the PSs open for the Transnistrian region, the Promo-LEX OM considers that, based only on the dynamics of participation in the last three elections, the decrease of the number of PSs by about three times seems unjustified.

The work of Promo-LEX observers was obstructed by acts of intimidation against an observer by a political actor, but also by the refusal and delay of providing electoral information by the authorities (PSA, CEC).

Appeals and electoral disputes. During the reference period, at least six complaints and three appeals were filed with the CEC, and the courts examined at least six disputes. They concerned the distribution of leaflets, defamation of electoral competitors, electoral campaigning, discriminatory treatment when presenting signatures collecting lists. The Promo-LEX OM appreciates that the CEC has started to publish in the section dedicated to elections the complaints filed by interested persons, an initiative that responds to a previous recommendation of Promo-LEX.

Designation and registration of electoral competitors in the parliamentary elections. For the parliamentary elections, the lists of candidates were registered from 4 electoral blocs (Patriotic EB, Alternative EB, Together EB, BUN EB), 13 political parties (PAS, PPDA, CUB, ALDE, PPNM, PSDE, MRM, LOC, AUR, PAM, PL, UCSM, PN) and 4 independent candidates (Andrei Năstase, Olesia Stamate, Victoria Sanduța, Tatiana Crețu).

At the same time, the CEC rejected applications for registration from 8 political parties due to non-compliance with the procedure for nominating a sufficient number of candidates, limiting the activity of the party, non-compliance with the minimum quota of representation for both sexes, or non-compliance with the statutory provisions on the designation of the list of candidates. Also, the presentation of an insufficient number of signatures led to the refusal of registration of three independent candidates.

Activity of electoral competitors. During the observation period, at least 31 activities carried out by 8 electoral competitors were observed, the majority carried out by Olesia Stamate IG (9), Victoria Sanduța (6), Dina Carpinski (5).

Despite the fact that the electoral campaign had not yet started, during the monitored period Promo-LEX observers reported at least 2,339 electoral activities, most of which were observed in the case of the Patriotic EB (57%), PAS (23%) and MRM (5%). Of the 2,339 activities, most (71%) were distribution of information materials (newspapers, leaflets, flyers, calendars, etc.), 19% were dissemination of street and online advertising, and 6% were meetings with voters.

Use of administrative resources and activities with the potential to corrupt voters. Promo-LEX observers reported at least 40 cases of misuse of administrative resources, of which 30 cases by PAS, 4 cases by the Patriotic EB, 2 cases by PSDE and LOC each, one case by MRM and PPDA each. Also, observers found five cases that can be qualified as activities with potential to corrupt voters – two cases by PPDA and one case each by Patriotic EB, Victory EB and PSDE.

Involvement of third parties in the electoral process. During the monitoring period, there were observed electoral activities carried out by at least six subjects that can be qualified as third parties: European Initiative [Inițiativa Europeană] (expenditure of at least MDL 24,399), and social media pages – Moldova Stat Liber [Moldova Free State] (expenditure of at least MDL 31,362); Opriți gruparea Hoție și Război [Stop the Theft and War Group] (MDL 82,922); Jose Perry (MDL 24,419); Esther Bush (MDL 12,111); Молдова Молдовенеск Молдовенеште [Moldova Moldovan Moldovan] (MDL 20,206); and moldovenii.md.

Observation of election and campaign financing. Of the 20 contenders for the status of independent candidates, none opened a “For the initiative group” bank account. The total income declared during the signature collection period amounted to MDL 214,501, reported by 7 contenders, most of which were declared by Andrei Năstase IG – 80% and Olesia Stamate IG – 13% of income. The ceiling of the funds that could be used was exceeded in the case of Andrei Năstase IG by MDL 115,577, which led to the application of a warning to him and the obligation to transfer to the state budget the amount that exceeded the ceiling. The electoral authority also applied other sanctions to Olesia Stamate IG and Alexandru Țvetarnîi, following the supervision and control of the financing carried out in the context of the collection of signatures.

By 27.08.2025, out of the 21 registered electoral competitors, only four did not have a treasurer confirmed. At the same time, half of the electoral competitors (10) confirmed the opening of the “Electoral Fund” account. In order to be able to transfer their own funds to the “Electoral Fund” account, five political parties submitted financial reports to the CEC with the income accumulated and expenses incurred before the beginning of the electoral period – PAS, PSDE, MRM, PCRM (member of the Patriotic EB) and MAN (member of the Alternative EB).

Hate speech. Between 21 July and 19 August 2025, at least 233 cases of hate speech, incitement to discrimination or other forms of intolerance were identified. Of these, 162 cases took place in the context of the electoral period for the parliamentary elections of 28 September 2025 and amounted to more than 2,500,000 views.

Compared to the 2021 parliamentary elections, there has been a negative evolution of hate speech, as between 21 July and 19 August 2025 alone there were about 54% of all the cases identified between 11 May and 25 July 2021.

People between the ages of 35 and 50, male, generate, promote and/or spread hate messages more often. The hate speech identified was based on different criteria, most often political affiliation (70 cases), professional activity (54 cases), health (47 cases), opinion (37 cases), sexual orientation and/or gender identity (35 cases) and sex and/or gender (35 cases). It was mainly directed against politicians, members/supporters of political parties and politically appointed public officials (128 cases), women (38 cases) and LGBT people (33 cases).

ABBREVIATIONS

para. – paragraph

ALDE – Alliance of Liberals and Democrats for Europe Political Party

ANRCETI – National Regulatory Agency for Electronic Communications and Information Technology

LPA – local public administration

art. – article

PSA – Public Services Agency

AUR – Alliance for the Union of Romanians Political Party

PEB – precinct electoral bureau

Patriotic EB – Patriotic Electoral Bloc of Socialists, Communists, Heart and Future of Moldova

BUN EB – The National Unity Electoral Bloc

BCS – Bloc of Communists and Socialists

PB – political bloc

SPPB – Special Purpose Police Brigade

BRP – Bureau for Reintegration Policies

EB – electoral bloc

AC – Audiovisual Council

CCA – Central Court of Appeal

CEC – Central Electoral Commission

DEC – second-level district electoral council

CCET – Center for Continuous Electoral Training

IC – independent candidate

SCJ – Supreme Court of Justice

ECtHR – European Court of Human Rights

CUB – Coalition for Unity and Welfare Political Party

FASM – Alternative and Rescue Force of Moldova Political Party

IG – initiative group

GPI – General Police Inspectorate

NII – National Integrity Inspectorate

lit. – letter

LGBT – lesbian, gay, bisexual, transgender

LOC – League of Cities and Communes Political Party

SCL – signatures collecting list

MFA – Ministry of Foreign Affairs

MAN – National Alternative Movement Political Party

OM – Observation Mission

MPSH – “Hope” Movement of Professionals

MRM – Respect Moldova Movement Political Party

mun. – municipality

NOI – New Historical Option Political Party

no. – number

OSCE – Organization for Security and Co-operation in Europe

TO – territorial organization

LTO – long-term observer
STO – short-term observer
PAM – Moldovans Alliance Party
PAS – Action and Solidarity Party
POCOCSC – Prosecutor's Office for Combating Organized Crime and Special Cases
PCRM – Party of Communists of the Republic of Moldova
PDMM – Modern Democratic Party of Moldova
PONA – “For People, Nature and Animals” Political Party
PNM – National Moldavian Party
PL – Liberal Party
PLDM – Liberal Democratic Party of Moldova
PN – Our Party
PPDA – Democracy at Home Political Party
PPN – Noi [We] Political Party
PPNM – National Moldavian Political Party
PPMM – Greater Moldova Political Party
PPV – Victory Political Party
PPVM – Future of Moldova Political Party
PR – Revival (Renaștere) Party
PRIM – Heart of Moldova Republican Party
PSDE – European Social Democratic Party
PSRM – Party of Socialists of the Republic of Moldova
pt. – point
d. – district
REO – Register of electoral officials
SRV – State Registry of Voters
v. – village
SAISE – State Automated Information System “Elections”
SIS – Security and Intelligence Service
Subpct. – subpoint
PS – polling station
“Financial Control” ISS – “Financial Control” Information Subsystem
ESCL ISS – “Electronic Signatures Collecting List” Information Subsystem
ITCSS – Information Technology and Cyber Security Service
UCM – Centrist Union of Moldova Political Party
UCSM – Christian Social Union of Moldova Political Party
MSU – Moldova State University
ATUG – Autonomous Territorial Unit of Gagauzia
EU – European Union