

REPORT NO. 4

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# OBSERVATION MISSION FOR THE PARLIAMENTARY ELECTIONS OF 28 SEPTEMBER 2025

OBSERVATION PERIOD: 11 SEPTEMBER - 24 SEPTEMBER, 2025

## SUMMARY REPORT



## EXECUTIVE SUMMARY

**Legal framework.** On 25 September, the Central Court of Appeal ordered the restriction of the activity of the PRIM party, as a security measure, at the request of the Ministry of Justice. This decision came after the CEC raised suspicions about the party's illegal financing. Limiting PRIM's activity has direct consequences for the Patriotic EB, of which it is a part, including the risk of violating the gender quota rule of the Electoral Code if the list of candidates were changed. Since the legislation allows adjustments to the lists only at least 10 days before the elections, the bloc no longer has the legal possibility to correct any defects.

The Promo-LEX OM points out that the unlawful actions of a constituent party should not automatically lead to the cancellation of registration of the entire electoral bloc and recommends applying equal treatment, similar to the one the CEC applied to PPDA, when the electoral authority obliged the electoral competitor to repair, within 24 hours, the non-conformities related to the mandatory criteria of meeting the gender quota, reserving the right to cancel its registration otherwise. At the same time, Promo-LEX recommends that the future Parliament amend the legislation so that the lists of candidates can be adjusted even closer to voting day, in justified situations.

**Electoral bodies.** During the observation period, the CEC held ten meetings and adopted 126 decisions. We found that during this period the number of accredited international observers increased significantly. Thus, upon request, the CEC accredited an additional 397 international observers and experts and 456 national observers. During the observed period, the CEC confirmed another 66 journalists in order to cover and monitor the elections.

By a decision of 25.09.2025, the CEC decided to relocate five polling stations for voters from the left bank of the Dniester, raising concerns about the limitation of access to voting. Although the CEC invoked the security risks reported by the General Police Inspectorate, the Security and Intelligence Service, and the Bureau for Reintegration Policies, the Promo-LEX OM found this decision extraordinary, having an impact on the exercise of constitutional rights. Reserve locations were preliminarily established for six other polling stations.

Out of the total 1,418 PEBs visited by Promo-LEX observers, 96% complied with the working hours. At the same time, only 68% of (visited) PEBs made public their composition, and 90% – the working hours, thus not fully ensuring compliance with the legal obligation to inform the public about the work of the bureaus. Managerial positions in the bureaus are held mostly by women (89% of the 1,668 visited), the gender balance in the management of the electoral body being found only in 174 electoral bureaus (12%).

The difficulties reported in the work of the bureaus include the incomplete composition of the electoral body, with a deficit of 40% of members in 17 PEBs in DEC no. 36 ATUG and DEC no. 1 Chisinau. According to Promo-LEX observers, on 25 September 2025, just three days before the parliamentary elections, the situation with filling the vacant positions in precinct electoral bureaus was not yet fully resolved.

Regarding the accessibility of PEBs, Promo-LEX found that only 35% are accessible to vulnerable groups, 18% are partially accessible, and 47% are inaccessible.

According to Promo-LEX observers, at least 4,452 representatives of four electoral competitors were confirmed at the PEB level: Alternative EB – 1,306 persons; PN – 1,129 persons; Patriotic EB – 1,912 persons; and PAS – 105 persons.

**Electoral complaints and disputes.** During the observation period, 5 notifications and 41 complaints were filed regarding electoral advertising, illicit use of administrative resources, prohibited electoral activism, creation of a camouflaged electoral bloc. The Promo-LEX OM notes that many complaints about the illegal use of administrative resources submitted to the CEC are subsequently sent to the GPI according to its competence, and it is not clear what criteria the CEC uses to decide whether a complaint should be examined by the electoral authority or sent to the GPI.

The courts examined seven electoral disputes, which referred to prohibited electoral activism (two disputes), use of administrative resources (three disputes), suspension from office (one dispute), creation of a camouflaged electoral bloc (one dispute). They were examined by the courts within a period ranging from 2 to 5 days.

**Activity of electoral competitors.** In the last weeks of the campaign, Promo-LEX observers reported at least 1,984 electoral activities. Most of the activities found were carried out by PAS – 26%, and the Patriotic EB – 26%. Electoral advertising was used in at least 1,754 cases, the most active being three competitors: PAS – 27%, followed by the Patriotic EB – 24%, and PN – 23%.

Promo-LEX also observed non-compliant use of electoral advertising during the monitored period. Thus, the placement of electoral advertising in prohibited places was observed in 37 cases – by PAS (19 cases), PN (10 cases), Alternative EB (2 cases), PPDA and PSDE (1 case each); lack of full printing data – in the case of PNM, AUR, BUN; and the use of political advertising materials as electoral campaign materials – PSDE and PN (3 cases each), PAS (2 cases), IC Andrei Năstase (1 case).

**Use of administrative resources, involvement of religious faiths in the campaign, and acts of intimidation and black PR.** Promo-LEX observers reported at least 84 cases of misuse of administrative resources, of which 66 cases by PAS, 8 cases by the Patriotic EB, 5 cases by the Alternative EB, 3 cases by CUB, and 1 case each by LOC and PNM.

During the monitored period, at least six cases of active involvement of religious faiths in the electoral campaign were identified, despite the legal provisions prohibiting such actions.

There were also recorded at least six situations that can be classified as acts of intimidation and negative PR practices, especially targeting the Action and Solidarity Party (PAS), the Patriotic Electoral Bloc, as well as a public association.

**Involvement of third parties in the electoral process.** During the monitoring period, we observed activities with electoral impact carried out by at least 15 subjects that can be qualified as third parties: “Army of fake online accounts”, coordinated by the Russian Federation for the promotion of Victoria Furtună și PPM; the Project for Fair Elections; pages on social networks: Mișcarea civică Inițiativa Europeană [Civic Movement European Initiative] – MDL 9,390; Moldova: AICI ȘI ACUM [Moldova: HERE AND NOW]; Alarmativa (MDL 50,390); Opreți gruparea Hoție și Război [Stop the Theft and War Group] (MDL 94,890); De pe internet [From the internet] (MDL 24,910); Inter Moldova (MDL 17,319); Молдова Молдовенеск Молдовенеште [Moldova Moldovan Moldovan] (MDL 16,731); Valorile Familiei Moldovenești [Moldovan family values] (MDL 6,650); Vocea Moldovenilor [Voice of Moldovans] (MDL 36,875); Ruskii Korabili (MDL 10,081); YouTube and Telegram channels: Ковчег - семья и вера [Shrine - Family and Faith]; Sare și lumină [Salt and light]; and the website moldovenii.md.

The coordinated inauthentic behaviour observed in the context of the parliamentary elections was manifested in the amplification of narratives on social networks, which aim to discredit the electoral process and the institutions that organize the elections. The promoted narratives referred to: repair works on 7 bridges across the Dniester before the elections – a strategy for limiting the right to vote; closing the 12 polling stations for voters from the left bank of the Dniester under the pretext of Russian influence; the ballot papers sent for postal voting do not contain all electoral competitors; election falsification is being prepared / annulment of elections is being prepared / there are no free elections in Moldova.

**Observation of the financing of the electoral campaign.** According to the data published on the official website of the CEC, during the observation period, 22 out of the 23 electoral competitors submitted a financial report for the week until 15 September 2025, and 21 out of the 23 registered electoral competitors submitted reports for the week until 22 September.

According to the reports submitted to the CEC, the amount of income declared by electoral competitors for the period from 8 to 21 September is MDL 23,842,469, of which MDL 2,398,142 are from material donations. The most income was declared by PAS – 27% of the total, followed by the Patriotic EB – 22%, PN – 19%, and the Alternative EB – 12%.

Regarding expenses, we note that the 23 electoral competitors declared expenses totalling MDL 23,010,755, of which MDL 2,390,142 were from material donations. The most expenses were declared by PAS – 28% of the total reported expenses, followed by the Patriotic EB – 22%, the Alternative EB and PN – 14%. In terms of the destination of the reported financial expenses, the most – 44% – were for the production and dissemination of advertising spots, followed by expenses for promotional materials – 22%, online advertising – 10%, and advertising on social networks – 7%.

According to Promo-LEX OM estimates, unreported expenses amounted to at least MDL 693,243. The most unreported expenses were incurred by PAS – 43% of the total estimated expenses, followed by PPDA – 12%, LOC – 10%, and UCSM – 7%.

**Hate speech.** Between 5 and 18 September 2025, at least 72 cases of hate speech were identified, 62 of which occurred in an electoral context. About 66% of cases of hate speech were identified in mobile applications and social networks. In total, the 62 cases of hate speech were viewed by more than 2,600,000 people. Most often, hate speech was generated by men (36 cases) and people aged 35 to 50 (22 cases). The hate speech identified was based on different criteria, such as professional activity, political affiliation, opinion, sexual orientation, gender identity, health, and others.

## ABBREVIATIONS

para. – paragraph

ALDE – Alliance of Liberals and Democrats for Europe Political Party

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

PB – political bloc

SPPB – Special Purpose Police Brigade

EB – electoral bloc

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

CUB – Coalition for Unity and Welfare Political Party

GPI – General Police Inspectorate

NPSI – National Public Security Inspectorate

lit. – letter

LGBT – lesbian, gay, bisexual, transgender

LOC – League of Cities and Communes Political Party

MFA – Ministry of Foreign Affairs

OM – Observation Mission  
MRM – I Respect Moldova Political Party Movement  
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  
PNM – National Moldavian Party  
PL – Liberal Party  
PLDM – Liberal Democratic Party of Moldova  
PN – Our Party  
PPDA – Democracy at Home Political Party  
PPNM – National Moldavian Political Party  
PPMM – Greater Moldova Political 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  
subpt. – subpoint  
PS – polling station  
“Financial Control” ISS – “Financial Control” Information Subsystem  
UCSM – Christian Social Union of Moldova Political Party  
ATUG – Autonomous Territorial Unit of Gagauzia  
EU – European Union