



ENEMO International Election Observation Mission

2024 Presidential Election and Constitutional Referendum in Moldova

STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS

21 October 2024

The 20 October elections were held against massive malign foreign interference attempts and sustained attacks on democratic values and institutions. Despite efforts of the authorities to counter misinformation and vote buying schemes, ENEMO raises utmost concerns over such attempts to sway the country away from strengthening democratic institutions and rule of law. Election management bodies managed the process transparently and professionally. Minor procedural violations or irregularities on Election Day did not affect the integrity of the process.

Following an invitation from the Central Election Commission of the Republic of Moldova, the European Network of Election Monitoring Organizations deployed an International Election Observation Mission (EOM), to observe the Presidential Elections and Constitutional Referendum. The EOM was deployed on 10 September 2024 and is composed of seven Core Team experts, based in Chisinau, and six long-term observers, deployed in three teams, based in Balti, Chisinau, and Comrat, covering the entire country. Ahead of election day, eighteen short term observers joined the Mission; the EOM formed 12 teams of two observers each to observe the voting, counting, and tabulation of results. The Mission is headed by Dritan Taulla.

This is ENEMO’s 42nd Election Observation Mission¹ and the 7th in Moldova.² The EOM’s aim is to improve the transparency of the election process and assess its integrity and compatibility with international obligations of Moldova and standards for democratic elections, as well as the domestic legislative framework. To achieve this, ENEMO observers are monitoring and assessing the overall political and electoral environment, the right to elect and stand for election, conduct of election management bodies, campaigning, gender representation, electoral dispute resolutions and other crucial aspects of the process. The EOM is paying particular attention to the fulfillment of previous recommendations of ENEMO and other international and domestic stakeholders.

This Statement of Preliminary Findings and Conclusions follows the [Interim Report](#), issued by ENEMO on 12 October. The Statement preliminarily assesses the electoral process in its entirety. Since their deployment, ENEMO observers have conducted some 280 meetings with election management bodies, political parties and candidates, state institutions and high state officials,³ media, domestic civil society organizations, and other relevant stakeholders, besides observing the work of election management bodies at all levels, as well as a number of campaign events.

While this Statement is preliminary, the EOM will remain in the country to observe post-election developments, including potential complaints and appeals and, pending certification of the results by the CEC, the second round of Presidential Elections, to be held on 3 November, as according to preliminary results no presidential candidate secured a majority of the votes cast in the first round, and issue a Statement of Preliminary Findings and Conclusions after the second-round election day. A Final Report, with more detailed analysis and complete with recommendations for potential improvements will be issued some two months after the certification of results.

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¹ The 43rd Election Observation Mission of ENEMO, being conducted in parallel with this EOM, is monitoring the 2024 Parliamentary Elections in Georgia.

² ENEMO previously observed the 2016 Presidential Elections, the 2019 Parliamentary Elections, the 2019 Local Elections, the 2020 Presidential Elections, the 2021 Parliamentary Elections, and the 2023 Local Elections in Moldova. Reports of previous elections can be found on the [webpage of ENEMO](#).

³ Including the Prime Minister and the Speaker of Parliament.

Preliminary conclusions

On 20 October, the citizens of Republic of Moldova headed to the polls to elect the President of the country for the next four years, as well as to vote on a referendum to amend the country's Constitution including in it the strategic objective of integration in the European Union. Preliminary data shows that some 51.68 percent of the electorate participated in at least one of the polls. Incumbent president Maia Sandu is leading the presidential contest, followed Alexandr Stoianoglo, indicating these two candidates will be contesting the second-round of elections. The results of the constitutional referendum show slightly over 50 percent in favor of the introduction of amendments to the Constitution of Moldova.

The country is being actively targeted by a sustained disinformation campaign, aiming to raise fear and sow division. Disinformation was ramped up closer to elections, especially targeting the Constitutional Referendum, seemingly with an aim to sway the country from its path of European integration and strengthening of democratic institutions. The repercussions of such a sustained attack on democratic values and institutions raise serious concerns for the future.

The legal framework provides a sound basis for the conduct of elections in line with international obligations and standards. The Electoral Code has been amended several times since its adoption in 2022, including in the last year. While finding most of the amendments overall necessary to strengthen election integrity, ENEMO notes that in order to ensure stability of the electoral law, frequent changes to the legal framework should be avoided to the extent possible, especially close to an election.

Election Day was generally calm and peaceful, with the management of polling stations in compliance with the legislation and performance of PEBs and DEC's positively assessed in most cases. Despite some challenges such as limited accessibility for voters with disabilities, and minor technical issues, the voting process in most observed stations proceeded smoothly, with proper procedures followed. Instances of voter potential voter influence, including organized transportation of voters were observed in the vicinity of some polling stations.

The Election Administration Bodies, at all levels, managed the electoral process professionally, efficiently and transparently. CEC sessions were open to observers and the media and live-streamed. While CEC decisions were posted promptly on the CEC's website, the minutes were often delayed, sometimes significantly. DEC decisions were also posted at their respective premises and on the websites of some second-level administrative units. Overall, the election administration enjoyed the trust of interlocutors. The CEC, along with its Centre for Continuous Electoral Training, conducted a comprehensive nationwide voter information campaign and offered training programs for various election stakeholders.

The CEC provided 1,809 ballot papers to voters registered for voting by mail. Polling stations in the three capitals assigned to receive these votes received 1,344 envelopes as of Thursday evening, which was the deadline. A thorough analysis of the piloting of voting by mail and identification of challenges remains to be conducted.

While most ENEMO interlocutors were satisfied with the accuracy of the voter lists, some expressed concerns about deceased individuals still included in them. However, none of the interlocutors considered the magnitude of this issue to be significant enough to question the integrity of the voters' list. ENEMO positively assesses the fact that voters were provided with a wide range of opportunities to check and correct inaccuracies in the voter list and commends the efforts of the authorities to facilitate the exercise of the right to vote by citizens by issuing documents required for voting on Election Day.

The right to stand for election was respected and voters were provided with a wide choice of candidates. The number of signatures required to stand as a presidential candidate is in line with good practice and, for the first time in a presidential election, voters could sign in support of more than one candidate. The signature verification process was conducted transparently. However, at odds with good practice, this process overlaps with the start of the election campaign, depriving some of the registered candidates of campaigning time.

Candidates could campaign freely. In general, the campaign was calm and low-key and the campaigning for the referendum was far less visible compared to the presidential contest. Although foreign policy and the country's geopolitical orientation were widely discussed in the public sphere, especially with the Referendum addressing these topics, they were not central to the presidential candidates' campaigns. Many of the promises and aspects of platforms of presidential candidates extended beyond the legal and constitutional powers of the presidential office.

High-ranking state officials participated in a number of institutional events as the campaign was ongoing. Concerns could be raised that these official duties and frequent reporting on such topics within the news broadcastings on various media, may have favored the ruling party. Although this is not prohibited by Moldovan law, ENEMO notes that the Government and other state bodies did not refrain from conducting activities on topics closely related to the Referendum during the campaigning period.

Besides officially registered candidates for the presidential contest and the parties campaigning for the referendum, the mission observed and received reports of activities by unregistered third parties actively involved in promoting electoral and referendum messages. Attempts to undermine election integrity and the stability of the institutional system through public and large-scale vote-buying schemes, which are currently under active investigation by the authorities, are of the utmost concern. The involvement of members of the clergy in the campaign is at odds with the Constitution.

The legal framework for campaign finance mostly aligns with the recommendations of the Venice Commission and GRECO. The CEC generally managed to efficiently process electoral contestants' campaign finance reports. However, the broader social and political landscape in Moldova continues to be significantly impacted by foreign state actors or individuals and groups involved in illegal or disruptive economic, social, and political activities, systematically attempting to undermine the country's democratic institutions and the rule of law. The electoral environment was also negatively impacted by such activities, as claimed by many ENEMO interlocutors who raised concerns about the risks of "shadow funding".

Moldovan authorities have implemented measures to restrict the rebroadcasting of certain audiovisual media outlets and blocked several websites, in an attempt to stop the spreading of disinformation. Nevertheless, misinformation and disinformation continue to spread through other information channels, mainly online, including through social media, creating false and negative narratives on the EU and the prospects of Moldova towards European integration, aiming to manipulate voters and undermine democratic institutions. While some measures were taken to contain the spread of disinformation by the authorities and companies owning these social media platforms, the risk still remains to be addressed in a systematic and efficient way.

ENEMO assesses that the reluctance of candidates to participate in media debates lowered voters' possibilities to make a fully informed choice. Findings of the Audiovisual Council monitoring of the audiovisual media did not identify significant reporting biases, violations, or trends in reporting that could have been significantly detrimental or favoring certain presidential candidates. The activity of the Audiovisual Council, especially monitoring of the campaign coverage, provided a solid foundation for balancing the audiovisual media scene and helped maintain a relatively even playing field for electoral contestants during the electoral campaign.

Generally, women are well represented in lower levels of election management bodies. Usually, the gender representation on lower level EMBs (DECs and PEBs) are in favor of women. In these elections, women make up 71 percent of the DECs, with 60 percent of chairperson positions held by women. On election day, ENEMO observers reported that women made up 89 percent of PEB members.

Contrary to international obligations and standards, individuals placed under protective measures by a court decision are still excluded from the right to vote. While ENEMO acknowledges the efforts of the authorities to provide persons living with disabilities equal opportunities to fully exercise their political rights, they still face a number of barriers and more remains to be done in this regard.

Positively, deadlines for considering complaints during the electoral period are short, within three days of submission, but no later than election day. Generally the deadlines were respected. ENEMO notes the high rate of dismissals or declarations of inadmissibility at the courts level due to procedural non-compliance. The judiciary's emphasis on procedural correctness often resulted in dismissals without substantive examination of claims, reflecting a strictly formalistic interpretation and application of legal requirements.

Preliminary findings

Background

Moldova is a parliamentary republic, with legislative authority vested in the unicameral 101 seats Parliament and executive power in the Government. The President, serving as the head of state, occupies a largely symbolic position, with constitutionally defined responsibilities.⁴

On 16 May, in accordance with legal deadlines⁵ and provisions, the Parliament of the Republic of Moldova voted to schedule the Presidential Elections on 20 October⁶ as well as to hold the constitutional referendum on the same date.⁷

The 20 October polls represent the fifth instance of direct presidential elections in the Republic of Moldova, following the re-establishment of direct presidential voting in 2016⁸. This will also be the fifth referendum held in the Republic of Moldova, though only one has been enacted into law.

In the 2020 presidential and 2021 parliamentary elections, the presidency, executive, and legislative branches have aligned around a pro-reform, anti-corruption agenda with a strong European orientation. Since June 2022, state institutions have followed the *nine recommendations* laid out by the European Commission⁹ to make progress towards the EU integration efforts. At the end of 2023, the European Commission concluded that “Moldova has made important progress on the nine steps”¹⁰, including regarding electoral reform.¹¹ Areas such as justice reform, de-oligarchization, and anti-corruption efforts are still to be addressed; however, there was some progress made in regards to fighting corruption as well.¹² In December 2023, the European Council

⁴ The President of Moldova, as head of state, ensures national sovereignty, independence, and territorial integrity, as stated in Article 77 of the Constitution. The President convenes Parliament, proposes legislation, promulgates laws, appoints the Prime Minister, represents the country abroad, commands the armed forces, and may dissolve Parliament under specific conditions. Additional duties include appointing judges, granting pardons, and suspending unlawful government acts.

⁵ 60 days before the election day and 90 days before the end of the presidential mandate.

⁶ [Decision of the Parliament of Moldova](#) to hold the Presidential Elections on 20 October.

⁷ [Decision of the Parliament of Moldova](#) to hold the Constitutional Referendum.

⁸ Both the 2016 and 2020 elections featured the same candidates in the second round. In 2016, Igor Dodon, representing the Party of Socialists of the Republic of Moldova (PSRM), gained more popular support, whereas in 2020, Maia Sandu from the Party of Action and Solidarity (PAS) won the presidency, securing 57.7 percent of the vote.

⁹ European Commission (17.6.2022), Commission Opinion on the Republic of Moldova’s application for membership of the European Union (see [here](#)).

¹⁰ European Commission (8.11.2023) 2023 Communication on EU Enlargement Policy (see [here](#)).

¹¹ The new Electoral Code, reflecting the OSCE/ODIHR and Venice Commission’s recommendations, was adopted in December 2022.

¹² According to the Nation’s in Transition report by Freedom House, the corruption rating improved from 2.25 to 2.50 due to law enforcement actions countering Ilan Shor’s “criminal group”. The Transparency International Corruption Index score increased by three points since 2022 and shows improving patterns since 2019.

approved the opening of accession talks, with a framework to be set once Moldova meets the nine recommendations.

During a visit on 9 October by EU Commission President Ursula von der Leyen, EU support for Moldova was reaffirmed.¹³ The Resolution¹⁴ of the European Parliament of 9 October further reaffirmed support for Moldova's sovereignty and EU integration, urging increased EU assistance to democratic institutions to counter hybrid threats, and bolster defense.

The Presidential Elections and the Referendum were held against the backdrop of Russia's invasion of Ukraine on 24 February, 2022. Since then, Moldova has encountered numerous challenges, including an energy crisis and an influx of refugees¹⁵. Moldovan authorities have unequivocally condemned the aggression on Ukraine. The country's economic situation has been further exacerbated by inflation, partly driven by the COVID-19 pandemic and the energy crisis, placing additional pressure on household budgets and public finances. Moldova has also been targeted by sustained disinformation campaigns, aiming to raise fear and sow division in the country. Disinformation was ramped up closer to elections, especially targeting the Constitutional Referendum, seemingly with an aim to sway the country away from its path of European integration and strengthening of democratic institutions.¹⁶

Following attempts by fugitive oligarch Ilan Shor¹⁷ to destabilize the country through violent protests in 2022 and 2023, in June 2023, the Șor Party was declared "unconstitutional" by the Constitutional Court.¹⁸ The decision was based on facts of illegal campaign financing and Russian influence in the party's activities. In April 2024, Ilan Shor formed a political bloc in Moscow, Victory-Pobeda, and continues to be actively involved in the political life of the country, by illegally campaigning for voters to select "No" in the referendum on Moldova's closer alignment with the European Union while publicly calling on voters to vote in a certain way in exchange for direct monetary benefits.

¹³ The EU will support Moldova's economy with €1.8 billion between 2025 and 2027 as part of an ambitious Growth Plan, to boost the economy, improve infrastructure, and accelerate reforms for EU integration (see [here](#)).

¹⁴ European Parliament (09.10.2024), European Parliament resolution on strengthening Moldova's resilience against Russian interference ahead of the upcoming presidential elections and a constitutional referendum on EU integration (2024/2821(RSP)), (see [here](#)).

¹⁵ Moldova was hosting the highest number of refugees per capita.

¹⁶ In February 2023, the government reported having information on Russian efforts to orchestrate a coup in Moldova.

¹⁷ Ilan Shor is a former Moldovan politician, mayor of Orhei and member of the Parliament, currently residing in Moscow. He was sentenced to 15 years in prison by the Chisinau Court of Appeal in April 2023 for involvement in a 2014 banking fraud, and continues to play a role in current electoral processes trying to organize massive vote buying and undue influence of voters. Shor is under sanctions by the United States, European Union, United Kingdom, Switzerland, as well as a number of EU countries.

¹⁸ Constitutional Court (19.06.2023) Decision no. 10 of June 19, 2023 regarding the control of the constitutionality of the "Șor" Political Party, see [here](#).

Legal framework and electoral system

Legal framework

Presidential elections and referendums are primarily regulated by the 1994 Constitution and the 2022 Electoral Code. The legal framework is further supplemented by secondary legislation adopted by the CEC, which is the primary institution in charge of implementing the electoral process.¹⁹ Applicable provisions are also included in other laws.²⁰ Moldova is a part of key international and regional documents that govern democratic standards for elections.²¹

In addition to establishing fundamental principles and guarantees, Article 78 of the Constitution also broadly regulates the election of the President. The Electoral Code provides detailed regulations for the organization and conduct of presidential elections and referendums, including the right to elect and stand for election, responsibilities and tasks of electoral bodies, campaigning and campaign finance rules, election observation and media coverage of elections, voting, counting and tabulation of results, and mechanisms for resolving electoral disputes and ensuring the integrity of the electoral process.

A new Election Code was adopted since the last Presidential Elections of 2020 (in December 2022), only with the votes of the parliamentary majority.²² The electoral reform process started in 2021, after the confirmation of the new composition of the CEC. Several rounds of consultations were held throughout the process, involving political parties, civil society organizations, and international partners, including ENEMO. The process was transparent, comprehensive and inclusive, in line with a longstanding primary recommendation by ENEMO.

Specifically, measures were introduced to enhance the transparency and stability of election management bodies, undue influence over public officials and voters, as well as potential vote-buying instances. Restrictions on misuse of administrative resources and stricter campaign finance rules were also introduced. The new Electoral Code addressed a number of previous ENEMO recommendations. ENEMO assesses that the legal framework provides a sound basis for the conduct of elections in line with international obligations and standards.

The Electoral Code has been amended seven times since its adoption, with three laws amending it in 2024. Several amendments made on the eve of the 2023 Local Elections that aimed to limit the right to stand for election of certain political actors, were later found unconstitutional by the

¹⁹ Parliament of the Republic of Moldova, Law No. 1381, dated 08/12/1997, amended, “Electoral Code of the Republic of Moldova”, Art. 22, Central Electoral Commission General Duties.

²⁰ The Law on Political Parties, Criminal Code, Contravention Code, Code on Audiovisual Media Services, Law on Advertising, etc.

²¹ Inter alia, the International Covenant on Civil and Political Rights (ICCPR); Convention on the Elimination of All Forms of Discrimination against Women (CEDAW); International Covenant on the Elimination of all Forms of Racial Discrimination (CERD); Convention on the Rights of Persons with Disabilities (CRPD); the Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR).

²² On 1 January 2023, the new [Electoral Code No. 325/2022](#) came into force.

Constitutional Court.²³ While finding most of the amendments overall necessary to strengthen election integrity, ENEMO notes that in order to ensure stability of the electoral law, frequent changes to the legal framework, especially close to an election, is a practice that should be avoided to the extent possible.

The January 2024 amendments allow the presidential election and constitutional referendum to occur simultaneously and permit scheduling the presidential election up to 90 days before the incumbent's term ends. The legislation also provides for suspending or banning political parties deemed unconstitutional.²⁴ Based on recent amendments from May 2024,²⁵ the CEC was enabled to establish the temporary District Electoral Council no. 36. This change was necessary following amendments to the Electoral Code of ATU Gagauzia by the People's Assembly of ATU Gagauzia on 26 December 2023, which dissolved the permanent Central Electoral Council of Gagauzia. In addition, in May 2024, the Parliament enacted a law²⁶, classified as an ordinary rather than organic law, to partially introduce postal voting for citizens in the United States, Canada, Norway, Sweden, Finland, and Iceland. ENEMO notes that many of the amendments were adopted without support by the parliamentary opposition.

For this electoral process, the CEC adopted six new regulations. These pertained to the postal voting,²⁷ procedures in the case of suspension of voting,²⁸ for polling stations for voters residing in Transnistria,²⁹ for polling stations established for voting abroad,³⁰ and for the preliminary registration of voters residing abroad³¹. The CEC additionally amended a number of existing regulations.

²³ The Constitutional Court of the Republic of Moldova, in its [Decision No. 226a/2023](#) from 26 March, 2024, declared several provisions of Electoral Code No. 325/2022 unconstitutional, particularly those concerning the ineligibility of individuals associated with parties declared unconstitutional. The Court found these provisions violated the principles of equality and presumption of innocence (see Art. 16 and 21 of the Constitution). The Venice Commission, in its [Joint Opinion CDL-AD\(2023\)031](#), highlighted that restrictions on the right to stand for election must be proportionate and justified by a legitimate aim. It further stressed the need for procedural safeguards to prevent arbitrary exclusions and ensure compliance with international democratic standards.

²⁴ According to Article 16 of the Electoral Code, this can occur when a party's actions, such as engaging in illegal activities or undermining democratic principles, threaten the constitutional order.

²⁵ [Law No. 109 from 26.04.2024 "On the partial implementation of postal voting"](#).

²⁶ Law no. 109, dated 26.04.2024, "[Regarding the partial implementation of postal voting](#)". For the first time, Moldovan citizens living abroad could vote by correspondence, applying specific rules for this election, without incorporating these changes into the existing Electoral Code. While the law outlines postal voting procedures, amends also the Contravention Code, and introduces new provisions related to the Electoral Code, these adjustments are not codified directly within the Electoral Code but are applied in line with it.

²⁷ Decision no. 2680 "[For the approval of the Regulation on the particularities of the organization and the implementation of postal voting](#)", from 05.04.2024.

²⁸ Decision no. 2657, "[For the approval of the Regulation on procedures in case of suspension of voting and the amendment of paragraph 76 of the Activity Regulation of the electoral bureau of the polling station, approved by the decision of the Central Electoral Commission no. 1101/2023](#)", from 30.07.2024.

²⁹ Decision no. 2544 - "[For the approval of the Regulation on the establishment of polling stations for voters from localities on the left bank of the Dniester](#)", dated 28.05.2024.

³⁰ Decision No. 2542 - "[For the approval of the Regulation on the establishment of polling stations abroad](#)", dated 28.05.2024.

³¹ Decision No. 2513 - "[For the approval of the Regulation on preliminary registration](#)", dated 10.05.2024.

Electoral system

The President is elected through a two-round majoritarian system in a single nationwide constituency. The President's term of office is four years, and no person can hold more than two consecutive mandates. For the election to be valid in the first round, at least one-third of the total registered voters must participate. If this legal requirement is not met, the first election attempt is declared null by the CEC, and the election is repeated within two weeks. If the one-third voter requirement is met in the first round of the election, a candidate must secure more than half of the valid votes cast by participating voters to win.

If no candidate wins at least half of the votes cast in the first round, a second round is held two weeks later between the two candidates with the highest number of votes. The second round is valid if one-fifth of the registered voters participate. The candidate who receives at least half of the votes cast in the second round is declared the winner and becomes the President of the Republic. The President-elect takes office within 45 days following the election.

Constitutional referendums can be initiated by at least 200,000 citizens with the right to vote,³² one third of the MPs, or the government. For a referendum to be approved, it must receive a majority of the votes cast. At least one-third of the persons on the voter lists must participate for the 20 October Referendum to be valid. The question to which voters had to answer in the Referendum was formulated as “Do you support the amendment of the Constitution to enable the accession of the Republic of Moldova to the European Union?” and if adopted will introduce changes to the preamble³³ and add one Chapter³⁴ to the Constitution.

Election Administration

The 20 October 2024 Presidential Elections and Constitutional Referendum were managed by a three-tiered election administration: The Central Electoral Commission (CEC), 37³⁵ District Electoral Councils (DECs) and some 2,219³⁶ Precinct Electoral Bureaus (PEBs). While the CEC

³² Signatures must be collected from at least half of the second level territorial-administrative units of the country, at least 20,000 signatures should be collected by each of the districts (Art. 141 of the Constitution).

³³ The Preamble shall be supplemented with two new paragraphs: "RECONFIRMING the European identity of the people of the Republic of Moldova and the non-reversibility of the European course of the Republic of Moldova, DECLARING European Union integration as a strategic objective of the Republic of Moldova,".

³⁴ The Constitution shall be supplemented with Chapter V, which stipulates the right of the Parliament to adopt the acts to accede to the constituent Treaties of the European Union, as well as to the acts revising the constituent Treaties of the European Union and stipulates that the provisions of the constituent Treaties of the European Union and other binding legal acts of the European Union shall take precedence over contrary provisions of domestic law, subject to the provisions of the Act of Accession."

³⁵ The DECs are numbered up to 38, corresponding to the [permanently established electoral districts](#), but the CEC has only set up 37 DECs, either permanently or on an *ad hoc* basis. No DEC has been established for Bender electoral district No. 3. DEC No. 37 which covers polling stations for voters residing on the left bank of the river Nistru, is responsible for voters from the Municipality of Bender.

³⁶ Within the legal deadline, 2,221 PSs were established, of which 234 for voters abroad, including three for postal voting, and 30 for voters from the left bank of Nistru River. After [decision No. 9](#) from 25.09.2024 of DEC No.38 to establish only 231 PEBs for voters abroad, as well as the CEC [decision No. 2998](#) from 02.10.2024 to establish a

and the DEC's act on a permanent basis,³⁷ PEBs are established and work only during the electoral period.³⁸

ENEMO assesses that the EMBs managed the technical preparations for the presidential elections and constitutional referendum professionally, efficiently and transparently, adhering to legal deadlines. The lower-level EMBs (Election Management Bodies) received adequate resources and logistical support from the authorities. On Election Day, Precinct Electoral Bureaus (PEBs) managed voting and counting professionally, despite challenges like limited accessibility and minor technical issues, while District Electoral Councils (DECs) handled intake and tabulation transparently, though overcrowding, tension, and limited space occasionally affected efficiency.

Central Electoral Commission (CEC)

The CEC is the hierarchically superior electoral body, with a 5-year mandate, which operates on a permanent basis. The CEC holds significant powers and responsibilities in organizing the electoral process and, in general, ensuring the integrity of the elections.³⁹ The current CEC,⁴⁰ consists of nine members: one member is appointed by the President of the Republic of Moldova and the other eight by parliamentary factions based on their representation. Of the nine CEC members, five are women, including the chairperson. Some EOM interlocutors from opposition parties and presidential candidates raised doubts on the impartiality of the CEC, especially regarding its composition, due to the fact that most of the members are appointed by the ruling majority. However, in general the CEC enjoyed the trust of interlocutors.

On 16 July, 2024, the CEC adopted the calendar⁴¹ for carrying out the actions of organizing and conducting the Presidential Elections and the Constitutional Referendum. In general, the EMBs managed to comply with the deadlines provided in this calendar.⁴²

polling station for hospitalized voters in Chisinau, and the DEC No.1 [decision No.20](#) from 04.10.2024 to establish the respective PEB, the total number of the established PEBs is 2,219.

³⁷ With the exception, as a general rule, of the District Electoral Councils No.37, for the localities situated on the left bank of Nistru River and No.38, established for the polling stations opened abroad, which are being established *ad hoc* by the CEC for each Presidential and Parliamentary Elections. For the Presidential Elections and Constitutional Referendum of 2024, the CEC had to establish *ad hoc* the DEC 36 ATU Gagauzia, by appointing the interim chairperson and other DEC members, after the termination of the permanent functioning of the CEC of ATU Gagauzia by the People's Assembly of Gagauzia.

³⁸ According to the Electoral Code, PEBs are established by the respective DEC's no later than 25 days before the Election Day (i.e., no later than 25 September).

³⁹ The CEC is responsible for creating and coordinating lower level EMBs, registering initiative groups, candidates and referendum participants, compiling and distributing voter lists, aggregating election results, deciding on complaints, overseeing campaign finances, etc.

⁴⁰ The new Electoral Code has introduced a restructured CEC with seven members: one appointed by the President, one by the Supreme Council of Magistracy, one by the Government (on the recommendation of the Ministry of Internal Affairs), and four by Parliament (two proposed by the parliamentary majority, one by the opposition, and one from civil society organizations with expertise in the electoral field). The new structure will be implemented in 2026.

⁴¹ CEC [decision No. 2633](#) of July 16, 2024.

⁴² With the exception of the [registration of the Political Party "the Will of the People"](#) as a participant in the Constitutional Referendum, taken four days after their application, not according to the Article 200, (5) of the Electoral Code, as well as the CEC [decision No. 2998](#) of 02.10.2024 to establish a polling station for hospitalized voters in

Since the start of the electoral period, 1 August up until 20 October, including on Election Day, the CEC held 51 sessions. The mission observed 29 of these sessions, starting from 10 September. The sessions have been conducted in a hybrid format, both in person and online.

The CEC operated transparently, live streaming its sessions on the official CEC Facebook page⁴³ and YouTube channel,⁴⁴ with recordings available afterward on both platforms. Sessions were open to observers and the media, and the draft agenda⁴⁵ for upcoming sessions was published in advance. However, ENEMO notes that the previous positive practice of distributing draft decisions to observers, media, and stakeholders before each session, common in past parliamentary elections, is no longer followed. While CEC decisions were posted promptly on the CEC website,⁴⁶ the minutes were often delayed, sometimes by up to two weeks.

The CEC held one briefing the day before Election Day, six on Election Day and two on 21 October, to inform the public. Additionally, the CEC provided real-time voter turnout and preliminary election results online, further increasing the transparency of the process. However, the CEC website experienced poor accessibility for extended periods after the polls closed and was completely offline for a few minutes on Election Day.

From the start of the electoral period until 20 October, including in Election Day, the CEC adopted a total of 345 decisions related to the Presidential Elections and Constitutional Referendum. Most of the decisions pertained to registration of initiative groups, presidential candidates and referendum participants; nomination of DEC members; accreditation of observers; approval of messages of public interest; and adjudication of complaints.

The CEC printed some 3,6 millions of ballots for the presidential elections and the same amount for the constitutional referendum. Some 2,8 millions of ballots were printed for polling stations in Moldova, and more than 850 thousands for voters abroad. The CEC printed 1,809 ballot papers for voters registered for voting by mail for each type of election, including for the possible second round of presidential elections.⁴⁷ For the first time,⁴⁸ the ballots were printed in six languages, in Romanian, and in five languages of ethnic minorities.⁴⁹

The CEC, along with its Centre for Continuous Electoral Training (CICDE), conducted comprehensive nationwide voter information campaigns⁵⁰ and other information events, including

Chisinau, and the DEC No.1 [decision No.20](#) of 04.10.2024 to establish the respective PEB, both taken after the deadline for the establishment of Polling Stations and PEBs.

⁴³ <https://www.facebook.com/cecmoldova>

⁴⁴ <https://www.youtube.com/@comunicareceec/streams>

⁴⁵ The CEC website: [here](#)

⁴⁶ The CEC website: [here](#)

⁴⁷ For the partial implementation of postal voting in USA, Canada, Norway, Sweden, Iceland and Finland.

⁴⁸ According to the [CEC](#)

⁴⁹ Out of the 2,819,996 ballots printed for polling stations in Moldova, 2,137,641 ballots were printed in Romanian, 676,979 in Russian, 115 in Ukrainian, 3,400 in Gagauz, 870 in Romani and 991 in Bulgarian language.

⁵⁰ Among other campaigns, the "Vote with confidence!" [election information and education campaign](#) for voters throughout the country through mobile teams was organized by the CEC, with information leaflets and the brochure "Voter's guide to the constitutional referendum and the elections for the position of President of the Republic of Moldova on October 20, 2024" in six languages: Romanian, Russian, Ukrainian, Bulgarian, Gagauz and Romani.

for young voters and people with hearing impairments, and offered training programs for various election stakeholders.⁵¹ In person training sessions for PEB members were conducted in every electoral district from September 25 to October 7, 2024, with 11,685 members attending the 341 organized training sessions. The Mission observed several training sessions for PEB members and found them to be comprehensive and effective. Webinars⁵² and online training sessions were also organized, including for members of PEBs for voters abroad.⁵³

In some of its sessions leading up to Election Day, the CEC provided sign language interpretation. The CEC also equipped polling stations with accessible voting booths for persons with disabilities (PwDs), Braille ballot templates, magnifying lenses, and secret booths for homebound voting. These measures contributed to improved accessibility for voters with disabilities in the electoral process.

District Electoral Councils (DECs)

The CEC establishes the permanent electoral districts,⁵⁴ which as a general rule, correspond to the 32 second level administrative-territorial units of Moldova, the Autonomous Territorial Unit of Gagauzia, and the municipalities of Chisinau and Balti. Under similar conditions, the Commission establishes two more electoral districts, for the polling stations opened abroad and for the localities situated on the left bank of the Nistru River.

Under the Electoral Code, DECs are permanent electoral bodies that correspond to the established electoral districts. DEC chairpersons are permanently employed, while the other DEC members are appointed *ad hoc* by the CEC for each election.

The 37 DECs consist of 402 members in total, with 286 women (71 percent) and 116 men (29 percent). This gender distribution is also reflected in the executive positions (chairpersons and secretaries), where there are 51 women (70 percent) and 22 men (30 percent). The DECs should be composed of an odd number of members, at least seven and at most eleven.⁵⁵ With the exception of DECs No. 37, which is composed of 10 members⁵⁶ and DECs No. 5 and No. 15 which are composed of 9 members, all the other DECs are composed of 11 members. The composition of

⁵¹ In person trainings, seminars and webinars were organized for judges and prosecutors, SRV registrars, representatives of Territorial Inspectorates of Police, employees of the General Carabinieri Inspectorate, signature collectors, and local councils secretaries.

⁵² A webinar for DEC chairpersons and operators; a webinar for members of polling stations for postal voting; two Youtube videoconferences, visualized 12,300 times, as the first stage of training for PEB members.

⁵³ In total, 19 online training sessions were organized from 11-13 October, which were attended by 969 members of PEBs for voters abroad.

⁵⁴ CEC [decision No. 904](#) of 31.01.2023

⁵⁵ Two members are appointed by the Court within whose jurisdiction the DEC is located; two members appointed by the second-level local council, within whose jurisdiction the DEC is located; and one member appointed by each political party represented in the Parliament.

⁵⁶ After the withdrawal of the chairperson of DEC No 37 on 16.09.2024, confirmed by the CEC [decision](#) No. 2894 of 18.09.2024, as of October 9, 2024, the DEC No. 37 was operating with 10 members and without a chairperson. On 11 October, the mission was informed that a new chairperson was selected among the DEC No. 37 members. As of Election Day, no CEC decision had been made regarding the appointment of a new member to DEC No. 37, so the DEC continued to function with 10 members.

DEC No. 37 does not comply with the Electoral Code.⁵⁷ However, the mission was informed that the even number of members has not impeded the decision-making of DEC No. 37.

The DEC's for polling stations abroad and for localities on the left bank of the Nistru River are not permanent but are instead established on an *ad hoc* basis. The Presidential Elections and Constitutional Referendum of 20 October in ATU Gagauzia were administered by a temporary DEC as well.⁵⁸ The respective amendments⁵⁹ of the Electoral Code which enabled the temporary establishment of DEC No. 36 by the CEC, were made less than one year before the elections, at odds with the principle of stability of the electoral legislation provided by the Electoral Code,⁶⁰ and do not fully align with best practice.⁶¹ However, ENEMO notes that they were necessary to ensure that the electoral process could be implemented in ATU Gagauzia, and without them holding the elections would have been extremely challenging.

The DEC's establish polling stations and PEBs and supervise their activity, train their members, distribute the funds, provide materials and electoral documents, ensure their supply with voters' list and protocol forms, ballot papers etc. The DEC's also review complaints about decisions, actions or inactions of PEBs, assist the CEC with campaign finance oversight, tabulate the election results at the district level, and transmit the documents and electoral materials to the CEC.

The CEC made 15 replacements in DEC's membership.⁶² According to DEC representatives, these replacements did not impact the functioning of the DEC's.

The CEC's decisions regarding the DEC's, along with DEC decisions, were made available in the designated section of the CEC website.⁶³ Additionally, DEC decisions were also posted at their respective premises and on the websites of some second-level administrative units.⁶⁴ Overall, the DEC's operated efficiently and transparently, with no major issues affecting their operations.

Precinct Electoral Bureaus (PEBs)

To conduct voting and vote counting, the Electoral Districts are divided into precincts and for each is established a polling station by the DEC's, based on proposals from town and village mayors at

⁵⁷ Article 35. (1) of the Electoral Code.

⁵⁸ On December 26th, 2023, the People's Assembly of Gagauzia amended the Electoral Code of ATU Gagauzia (Decree No. 5385 of the People's Assembly of Gagauzia), including the termination of the permanent functioning of the CEC of Gagauzia. As prescribed by the Electoral Code, in the event of early termination of the capacity of Chairperson or Secretary of the Central Electoral Council of Gagauzia, the nomination of the respective interim chairperson and secretary has been made by the CEC with Decision [No. 2795 of 31.08.2024](#).

⁵⁹ Art. 36 (2) 1 of the [law No. 109 of 26.04.2024](#) regarding the partial implementation of postal voting.

⁶⁰ Article 11. (1) of the [Electoral Code](#): "The electoral system and the method of constitution of electoral constituencies or electoral bodies may not be changed until at least one year before the national elections".

⁶¹ Code of Good Practice in Electoral Matters ([CDL-AD\(2002\)023rev](#), item II.2.B) states that: "The fundamental elements of electoral law, in particular the electoral system proper, membership of electoral commissions and the drawing of constituency boundaries, should not be open to amendment less than one year before an election, or should be written in the constitution or at a level higher than ordinary law."

⁶² The CEC made two replacements in each of the DEC's No. 1, No. 2, No. 32 and No. 36 and one replacement in each of the DEC's No. 8, No. 21, No. 23, No. 24, No.26, No. 28, No. 34.

⁶³ <https://a.cec.md/ro/consiliile-electorale-de-circumscripție-16216.html>

⁶⁴ Several DEC's maintain Facebook official pages, providing an additional channel for informing citizens.

least 35 days before Election Day. DEC's had to establish PEBs at least 25 days prior to Election Day. PEBs must consist of an odd number of members, no fewer than five and no more than eleven members. The local council had to appoint three PEB members, and each political party represented in Parliament had to designate one member. ENEMO observers noted a number of cases of local councils and political parties not submitting nominations for PEB candidates to the DEC's. In these cases, the DEC's appointed members from the Register of Electoral Officials, in line with the provisions of the Electoral Code.

Within the legal deadline, 2,221 PSs were established, of which 234⁶⁵ for voters abroad,⁶⁶ including 3 for postal voting,⁶⁷ and 30⁶⁸ for voters from the left bank of Nistru river.⁶⁹ After a decision⁷⁰ of the CEC to establish a polling station for hospitalized voters in Chisinau, as well as a decision⁷¹ of DEC No. 38 regarding the establishment of PEBs for voters abroad, the total number of the established PEBs was 2,219. The decision of the Ministry of Foreign Affairs not to staff three out of the five polling stations established in the Russian Federation lacked full transparency.

The mission was informed of several withdrawals of PEBs members,⁷² mainly due to personal reasons. In most cases, replacements were made with members from the Register of Electoral

⁶⁵ 84 Polling Stations more than those established by the CEC for the Early Parliamentary Elections of 2021.

⁶⁶ In 37 different countries.

⁶⁷ Introduced in 2024 through [Law No. 109/2024](#), for the first time postal voting offers an additional option for voters abroad, to participate in elections when nearby polling stations are unavailable. This option is available in countries with the necessary infrastructure and agreements, such as USA, Canada, Norway, Finland, Sweden and Iceland. Postal voters must adhere to specific procedures established by the CEC for requesting and submitting their postal ballots.

⁶⁸ 11 Polling Stations less than those established by the CEC for the Early Parliamentary Elections of 2021.

⁶⁹ A complaint has been filed by PSRM to the Chisinau Court of Appeal and subsequently to the Supreme Court of Justice, regarding the establishment of only five polling stations in Russian Federation. Both courts rejected the complaints.

⁷⁰ CEC [decision No. 2998](#) of 02.10.2024 to establish a polling station for hospitalized voters in Chisinau.

⁷¹ With its [decision](#) No. 9 of 25.09.2024, the DEC No. 38 established only 231 polling stations for voters abroad. The DEC No. 38 did not establish PEBs 38/196, 38/197, and 38/198 in Russian Federation, because the Moldovan Ministry of Foreign Affairs withdrew its candidate proposals for these PEBs, as the Moldovan Embassy in Russia could not fully meet SIS standards and requirements for conducting elections in Russia, except at the Embassy premises. A [complaint](#) regarding the DEC No. 38 decision was submitted to the CEC by PSRM. The CEC [examined and partially upheld](#) the complaint submitted by PSRM, requesting, the establishment of PEBs for polling stations in Russia (No. 38/196, 38/197, 38/198), despite the Ministry of Foreign Affairs' withdrawal of candidate proposals, and affirmed the legality of its prior decision (No. 2866/2024) regarding the organization of voting abroad, including in Russia, for the upcoming 2024 elections. Subsequently, the DEC No.38 with its [decision](#) No. 17 of 03.10.2024, decided that it was impossible to establish the 3 PEBs in Russia, as the MAE maintained their initial position. Consequently, the CEC with its [decision](#) No. 3022 of 07.10.2024 declared it impossible to proceed with setting up these PEBs, and ordered the destruction of 13,000 ballots printed for these stations, acknowledging the inability to ensure safe and functional voting in those regions. On October 8th, the PSRM filed a [prejudicial complaint](#) to the CEC regarding their decision No. 3022 of 07.10.2024. On 10.10.2024, the CEC [informed](#) PSRM that the Chisinau Court of Appeal is at first instance, as the competent body that adjudicates complaints regarding decisions of the CEC without complying with prejudicial complaint to the CEC.

⁷² On average, 10 percent of the total number of members of PEBs in each district visited by ENEMO observers.

Officials. Since all PEB members are required to be certified or have prior experience,⁷³ the CEC amended the decision regarding the 2024 training and certification plan in the electoral field⁷⁴ to offer more opportunities for interested individuals, including those nominated by political parties, to obtain certification, enabling them to serve as PEB members.

ENEMO observers found that a few PEBs were closed during their visits, potentially hindering voters from accessing information about the voter list, requesting for absentee certificates, or applying for homebound voting. However, the PEBs functioned according to the electoral calendar, with no major obstacles reported. PEB members were well-trained and prepared for Election Day.

Registration of voters

Moldovan citizens who are at least 18 years of age on election day have the right to vote, except those deprived of this right by a court ruling establishing a protective measure.⁷⁵ Deprivation from the right to vote on the basis of a mental disability is at odds with international standards and obligations.⁷⁶

Voter registration is passive; citizens are automatically included on the voter list based on data from the State Population Register. The CEC compiles the voter lists and manages the State Register of Voters,⁷⁷ cooperating with relevant central and local institutions, such as the Public Services Agency⁷⁸ and Local Public Authorities, to compile and verify the lists.⁷⁹

As of 2 October 2024, a total of 3,302,142 voters were registered in the State Register of Voters. Of these, 2,722,016 eligible voters were assigned to one of the second-level administrative units.⁸⁰ The remaining voters included 284,755 Moldovan citizens without registered residence or

⁷³According to art. 245 (5) of the Electoral Code, persons who are entered in the register of electoral officials on the date of entry into force of the Code shall be regarded as ex officio certified, with qualification certificates valid for 2 years. The subsequent certification of these persons shall be made on the basis of the general rules.

⁷⁴ The CEC [decision](#) No. 2910 of 19.09.2024 amended the [annex](#) to CEC [decision](#) No. 2243/2024 "Regarding the approval of the Plan for the organization and implementation of training/specialization certification in the electoral field in the 2024 session".

⁷⁵ Electoral Code, Article 14.

⁷⁶ Article 29 of the [Convention on the Rights of Persons with Disabilities](#) "States Parties shall guarantee to persons with disabilities political rights and the opportunity to enjoy them on an equal basis with others, and shall undertake to: [...] Ensure that persons with disabilities can effectively and fully participate in political and public life on an equal basis with others, directly or through freely chosen representatives, including the right and opportunity for persons with disabilities to vote and be elected.."

⁷⁷ A single integrated information system designed to collect, store, update and review the data on the Moldovan citizens who have the right to vote.

⁷⁸ Maintains the State Population Register, which serves as the source for data extracted for the State Register of Voters.

⁷⁹ Local public authorities assist in updating and verifying voter lists, including addressing the issue of undeclared deceased citizens, by adding a note (declared as deceased) for individuals reported as deceased by relatives, based on valid documents such as foreign death certificates not yet transcribed.

⁸⁰ Thirty-two districts, 2 municipalities and A.T.U. Gagauzia.

domicile, including those having officially emigrated abroad; 274,475 citizens eligible to vote with registered domiciles in the administrative-territorial units in the left bank of Nistru River; and 20,896 citizens abroad who pre-registered for the 20 October elections, including those opting for postal voting.

Voters residing in Transnistria and those without a registered domicile or residence were not included in the main voter list and were instead recorded in the supplementary voter list on Election Day. Eligible students and pupils without a domicile or temporary residence in their place of study could vote at any local polling station by presenting their identity document and student card.⁸¹ Voters who changed their residence or were away from their registered address on Election Day could request an absentee voting certificate from their designated PEB.⁸²

Voters unable to reach their local polling station due to health issues or other valid reasons could request to vote using a mobile ballot box.⁸³ This option was also available to individuals detained under an arrest order awaiting trial, those sentenced to prison with non-final sentences, individuals under arrest for contraventions, and those serving final prison sentences in penitentiaries.⁸⁴ The CEC informed ENEMO that for the first time in these elections, homebound voters could use a mobile secrecy booth.⁸⁵

Starting on 1 October 2024, voters were able to verify the accuracy of the voter list at their polling station⁸⁶ or online⁸⁷ and check their polling station details for the 20 October 2024 elections. Additionally, from that date, voters could request their PEBs to include or exclude them from the voter list or correct any registration errors, provided they submitted supporting documents.⁸⁸ ENEMO positively assesses the fact that voters were provided with a wide range of opportunities to check and correct inaccuracies in the voter list.

On Election Day, in order to cast their ballots, voters should present an Identity Card confirming their domicile or temporary residence at the polling station, or a temporary Identity Card verifying

⁸¹ https://a.cec.md/ro/cec-face-unele-precizari-privind-participarea-la-alegerile-din-2781_111533.html

⁸² Electoral Code, Art. 61 (7).

⁸³ According to Art. 80 (4) of the Electoral Code, by submitting a written request starting from two weeks before election day until 2:00 p.m. the day prior. [According to the CEC](#), individuals unable to submit their voting application in person may do so through a family member or a social worker, and if they cannot sign the application due to a physical disability or illness, they can submit it verbally at the polling station or by telephone if in-person submission is not possible. On election day, applications are approved by the PEB until 2:00 p.m. only if a medical certificate is presented.

⁸⁴ Electoral Code, Art. 80 (5).

⁸⁵ Article 29 of the [Convention on the Rights of Persons with Disabilities](#) “States Parties shall guarantee to persons with disabilities political rights and the opportunity to enjoy them on an equal basis with others, and shall undertake to: [...] (a), (i) Ensuring that voting procedures, facilities and materials are appropriate, accessible and easy to understand and use.

⁸⁶ According to the article 62 (1) Electoral Code, voter lists should be made available for public scrutiny no later than 20 days before Election Day.

⁸⁷ <https://verifica.cec.md/>

⁸⁸ Requests for changes should be made at least seven days before election day, and the PEB should promptly communicate these changes to the registrars in Local Public Administration, who should verify the data and update the State Register of Voters as necessary.

their Moldovan citizenship and residence, or a passport, including with expired validity. The multifunctional centers of the Public Services Agency were operating on Election Day, from 7.00 until 21.00, in order to hand over Identity Cards or issue temporary Identity Cards at the request of moldovan citizens.⁸⁹ The mission was informed that on Election Day, more than 2600 Identity Cards were issued, of which 995 were temporary. ENEMO commends the efforts of the authorities to facilitate the exercise of the right to vote by citizens.

While most ENEMO interlocutors were satisfied with the accuracy of the voter register, some expressed concerns about deceased individuals still included on the voter list. However, none of the interlocutors considered the magnitude of this issue to be significant enough to question the integrity of the voters' list. The CEC representatives stated that the centralized State Population Register ensures the reliability of the voter lists and that they address these concerns through regular updates and collaboration with other state institutions.

Registration of presidential candidates and referendum participants

Registration of candidates for President

The right to stand for presidential elections is granted to Moldovan citizens who are eligible to vote, are at least 40 years of age, have lived in Moldova for a minimum of 10 years, are proficient in Romanian language,⁹⁰ and hold a higher education degree.⁹¹ Active-duty military personnel, individuals sentenced to prison by a final court decision, those with active criminal records for intentional offenses, and individuals deprived of the right to hold public positions by a final court decision are ineligible to stand for election. ENEMO assesses that the residency requirement to be excessive and at odds with best practice.⁹²

The nomination of presidential candidates started 60 days and ended 30 days before Election Day. Candidates could be nominated by political parties, electoral blocs, or a group of voters. An initiative group needed to be formed to support the nomination, consisting of a minimum of 25 and a maximum of 100 eligible voters. Out of 18 requests to register an initiative group, the CEC approved 13.⁹³

⁸⁹ [Information](#) from the Public Services Agency

⁹⁰ The proficiency in Romanian language should be verified by the CEC, in accordance with Article 18 of the [Law on Citizenship](#).

⁹¹ Graduated with a bachelor's degree or equivalent.

⁹² Code of Good Practice in Electoral Matters ([CDL-AD\(2002\)023rev](#), Guidelines on Elections, item I, 1, 1.1, c., Residence: "iii. a length of residence requirement may be imposed on nationals solely for local or regional elections; iv. the requisite period of residence should not exceed six months; a longer period may be required only to protect national minorities; v. the right to vote and to be elected may be accorded to citizens residing abroad."

⁹³ The CEC rejected the registration of initiative groups supporting: [Valeriu Plesca](#), due to his position at the time of submission as president of a different political party, the "Christian-Social Union of Moldova", which violated constitutional court principles prohibiting camouflaged electoral blocs; [Ludmila Corsun](#), because she failed to meet the Romanian language proficiency requirement, as established by the Constitution of the Republic of Moldova and the Electoral Code, which was confirmed during her evaluation by the CEC; [Vasile Bolea](#), due to contradicts between the applicant's statements, and the fact that he is the Renaissance Party chairperson and the publicly declared candidate

To be registered by the CEC, all candidates were required to submit between 15,000 and 25,000 voter signatures.⁹⁴ The number of signatures required is in line with good practice.⁹⁵ For the first time, in these presidential elections, voters could sign in support of more than one candidate, as previously recommended by ENEMO.⁹⁶

Right to stand for election was respected. Of the thirteen registered initiative groups, twelve⁹⁷ submitted supporting signatures lists and other nominating documents. After the verification process of supporting signatures, the CEC decided to register eleven candidates⁹⁸ whose ranking on the ballot was determined by the date they submitted their supporting signature lists and nomination documents. The CEC rejected only one candidate for insufficient number of signatures.⁹⁹ The candidate appealed the decision of the CEC to the Chisinau Court of Appeals and subsequently to the Supreme Court of Justice and both courts upheld the decision of the CEC.

The signature verification process is in line with good practice and was conducted transparently.¹⁰⁰ Five of the registered candidates were supported by political parties, one by an electoral bloc, and five ran as independents.

Registration of contestants for the Referendum

Only political parties could register as election contestants for the Referendum. After the CEC published the list of eligible political parties, based on data from the Public Services Agency,

of the Political Party "Renaissance", the Political Party "CHANCE", the Political Party "Alternative and Salvation Force of Moldova" and the Political Party "VICTORIE", which had the intention of forming a bloc; [Vasile Tarlev](#), due to his status as president of the "Party for the Future of Moldova" that was deemed incompatible with his claim of being an independent candidate, which violates the legal requirement for genuine independence from political parties. Mr. Tarlev's initiative group was registered with a second decision by the CEC, as nominated by the [Political Party for the Future of Moldova](#). Two decisions to register initiative groups were rejected due to lack of votes of CEC members: of Valentin Borodachi, a member of political party PACE, and of Aurel Tabarcea, for engagement in activities of the political party "Chance".

⁹⁴ Signatures should be collected by at least half of Moldova's second-level administrative units, with a minimum of 600 signatures from each unit

⁹⁵ As per the Code of Good Practice in Electoral Matters ([CDL-AD\(2002\)023rev](#), Guidelines, item I.1.3. Submission of Signatures, ii., the number of signatures should be lower than 1 percent of the voters in the constituency concerned.

⁹⁶ OSCE/ODIHR and Venice Commission. Guidelines on Political Party Regulation. "In particular, a requirement that a citizen be allowed to sign in support of only one party should be avoided, as such a regulation would affect his/her right to freedom of association and could easily disqualify parties despite their attempts in good faith to fulfill this requirement."

⁹⁷ The initiative group supporting Alexandru Arseni did not submit supporting signatures and nominating documents.

⁹⁸ Alexandr Stoianoglo, "Party of Socialists from the Republic of Moldova"; Maia Sandu, "Action and Solidarity Party"; Renato Usatii, "Our Party"; Vasile Tarlev, "Party for the Future of Moldova"; Irina Vlah, Independent Candidate; Ion Chicu, "Party of Development and Consolidation of Moldova"; Andrei Nastase, Independent Candidate; Octavian ȚÎCU, "Together" Electoral Bloc; Victoria Furtuna, Independent candidate; Tudor Ulianoschi, Independent Candidate; Natalia Morari, independent candidates.

⁹⁹ Igor Munteanu's candidacy for President of the Republic of Moldova was rejected because the number of valid signatures collected fell below the minimum legal requirement of 15,000, and signatures were valid in fewer than half of the required administrative-territorial units. [Decision of the CEC](#).

¹⁰⁰ Code of Good Practice in Electoral Matters ([CDL-AD\(2002\)023rev](#), Guidelines I.1.3. Submission of candidatures, iii: "Checking of signatures must be governed by clear rules, particularly concerning deadlines; The checking process must in principle cover all signatures; however, once it has been established beyond doubt that the requisite number of signatures has been collected, the remaining signatures need not be checked."

political parties and electoral blocs were required to submit their registration applications to the CEC. This needed to occur no earlier than 60 days and no later than 30 days before the referendum date. In their registration applications, the parties had to declare whether they supported the “Yes” or “No” option in the referendum.

Within the deadline, 19 political parties and electoral blocs applied to register as Referendum contestants. Of these, the CEC registered 16.¹⁰¹ Subsequently, on 14 September the CEC decided to deregister the Chance¹⁰² party after the Court of Appeals of Balti decided to limit the party’s activity for a period of three months due to violations related to financial obligations, making it ineligible to participate in the referendum. After the de-registration of the Chance party, the total number of referendum contestants was reduced to 15.¹⁰³ The Decision of the CEC to register the Political Party “The Will of the People”¹⁰⁴ as a participant in the Referendum was taken four days after their application, at odds with the legal provisions.¹⁰⁵

Electoral Campaign and Campaign Finance

Electoral Campaign

The right to campaign is granted to citizens, political parties, electoral blocs, candidates and trustworthy persons of presidential candidates that have been registered by the CEC,¹⁰⁶ in accordance with the restrictions set out in the Electoral Code.¹⁰⁷ The right to campaign for referendum is granted only within the scope of two offered options, “Yes” or “No”. Beside Chapter

¹⁰¹ The ["VICTORIE"](#) Political Party was not registered as a referendum contestant because it failed to provide the requested documentation by the deadlines, and its actions were deemed an attempt to form a "camouflaged" electoral bloc, violating transparency and legality in the electoral process; the political party ["PACE"](#) was not registered as a referendum contestant because the decision to participate was made by a party body that lacked the proper authority according to its own statute, and the party failed to provide the necessary documents to clarify this issue within the established deadlines; The electoral bloc ["Victorie - Pobeda"](#) was not registered as a referendum contestant because it failed to address identified deficiencies in its application, particularly regarding the use of a name that is considered identical to an existing political party, which violated regulations set by the Central Electoral Commission.

¹⁰² [Decision No. 2864, from 14.09.2024](#) of the CEC “On the execution of the decision of the Balti Court of Appeal of 11 September 2024”.

¹⁰³ In total 14 Parties: Party of Communists of the Republic of Moldova; Green Ecologist Party; Miscarea Respect Moldova; Alliance of Liberals and Democrats for Europe; Renaissance Party; The Coalition for Unity and Welfare; Party of Action and Solidarity; National Alternative Movement; Democracy at Home; Alliance For The Union Of Romanians; Party of National Reunification "ACASĂ"; European Social Democratic Party; The Will of the People, and one electoral bloc: "Together" Electoral Bloc. While Party of Communists of the Republic of Moldova and Renaissance are registered in support of the option “NO”, the other 13 contestants are registered for the option “YES.”

¹⁰⁴ Decision no. 2945 [“regarding the application for registration of the Political Party "The Will of the People" as a participant in the constitutional republican referendum from October 20, 2024”](#), dated 24.09.2024

¹⁰⁵ Article 200, (5) of the Electoral Code: *“The Central Electoral Commission shall, within 3 days, consider the application and the attached documents and adopt a decision on the registration of the political party or of the electoral bloc of parties as a participant in the Republican Referendum or on the grounded refusal of registration.”*

¹⁰⁶ Election Code, Article 70, para. 1.

¹⁰⁷ *Ibid*, para. 2, stipulates restrictions and limitations of this right.

VIII of the 2022 Electoral Code, electoral campaigning, as well as the rights and obligations of election contestants are also regulated by various other laws.¹⁰⁸

The official campaign starts upon the registration of a candidate or electoral contestant, but not earlier than 30 days before Election Day.¹⁰⁹ For the 2024 Presidential Elections and Referendum, the campaign officially started on 20 September and continued until Friday, 18 October. The last day before Election Day was campaign silence. Campaigns could end earlier if a candidate's registration was canceled.

At odds with good practice, the signature verification process overlaps with the start of the election campaign.¹¹⁰ The nomination process for Presidential candidates starts 60 days before election day and must be completed 30 days before the election day.¹¹¹ Thus the start of the campaign overlaps with the deadline for submitting signatures (20 September in this election) and for candidates applying closer to the deadline this delays the start of the campaign, taking into account the time it takes to the CEC to decide on their candidacy and provide the necessary documents.¹¹² This overlap had direct consequences on these elections, as some candidates started campaigning later than others,¹¹³ the latest on 29 September, depriving them of a significant portion of their campaigning time.¹¹⁴

Several restrictions apply to campaigning, including organizing public events that are not campaign events,¹¹⁵ or using images of several local and foreign entities.¹¹⁶ During the entire electoral period, organizing transportation of voters to polling stations is forbidden.¹¹⁷

¹⁰⁸ Including the 2002 Criminal Code, the 2008 Contravention Code, 2018 Code on Audiovisual Media Services, the 2011 Law on Personal Data Protection, the 2007 Law on Political Parties, the 2022 Law on Advertising, the 2000 Law on Citizenship and CEC regulations.

¹⁰⁹ Article 70, para 3 of the Election Code.

¹¹⁰ As per the Code of Good Practice in Electoral Matters ([CDL-AD\(2002\)023rev](#), Guidelines, item I.1.3. Submission of Signatures, v., the validation of signatures must be completed by the start of the election campaign;

¹¹¹ ENEMO previously raised similar concerns about the overlap between the candidate registration deadline and the start of the campaign in Moldova. Candidates that are registered earlier can start campaigning before others, creating an uneven playing field. Following that, ENEMO has recommended the change of this practice and corresponding legal framework.

¹¹² The process can be delayed even further in case a candidate is rejected by the CEC, complaints to a court of law and is granted the right to stand for election later in the course of the campaign.

¹¹³ As late as 29 September.

¹¹⁴ As stipulated by candidates, the candidate Andrei Nastasse launched his campaign on 27 September, Tudor Ulianoschi on 29, while Natalia Morari launched only a Youtube campaign on 27, while her first campaign event took place on 7 October. She claimed that the reasons for this delay were also in late registration and bank account difficulties.

¹¹⁵ E.g., election contestants cannot organize concerts, competitions, or other events, cannot display slogans, messages, or distribute materials that include the contestant's symbols or other identifiers during such events[#] and are not allowed to participate in these events for political promotion purposes.

¹¹⁶ E.g., The use of imagery associated with religious cults, foreign officials, state institutions or authorities of other countries, international organizations, or symbols of political parties declared unconstitutional is also strictly banned. Additionally, the campaign must not feature symbols of foreign states, historical figures, or any images that promote defamation of the state, incite war, aggression, national or racial hatred, discrimination, territorial separatism, public violence, or pose a threat to the constitutional order.

¹¹⁷ Electoral Code of Moldova, Article 70 (5).

In general, presidential candidates and referendum contestants could campaign freely.¹¹⁸ ENEMO observers did not report any acts of violence or intimidation towards the candidates preventing them from freely presenting their views and qualifications. However, some political parties submitted formal complaints to the prosecutor's office about seizure of promotional materials, while the police were explaining these actions as part of their investigations on alleged illicit financing through organized criminal groups.¹¹⁹

Overall the election campaign was calm, and campaigning was generally low key, especially the campaigning for the Referendum. Minor violations of the law were reported and processed by law enforcement agencies and other institutions¹²⁰. Candidates primarily focused on traditional media, such as TV and radio, as well as campaigning on social media platforms. Candidates distributed campaign materials, held small meetings with voters and employees, and engaged in door-to-door canvassing. The most visible campaign activities were carried out by Maia Sandu, Alexandr Stoianoglo, Renato Usatii, and, to a lesser extent, Irina Vlah¹²¹.

A significant portion of presidential candidates' campaign messages centered on economic and social issues.¹²² Although foreign policy and the country's geopolitical orientation are widely discussed in the public space, especially with the Referendum focused on these topics, they were not central themes in the presidential candidates' campaign talking points. Many of the promises and parts of promotional platforms of presidential candidates were beyond the legal and constitutional authorities of the presidential institution.¹²³ The ruling party candidate and incumbent President frequently highlighted the European Union's financial aid, showcasing its tangible impact on various infrastructure projects within the country.

¹¹⁸ CSCE Copenhagen Document, para 7.7. "[To ensure that the will of the people serves as the basis of the authority of government, the participating States will] ensure that law and public policy work to permit political campaigning to be conducted in a fair and free atmosphere in which neither administrative action, violence nor intimidation bars the parties and the candidates from freely presenting their views and qualifications, or prevents the voters from learning and discussing them or from casting their vote free of fear of retribution;"

¹¹⁹ This refers to the case of political party "Renastere", who informed the mission on mentioned activities.

¹²⁰ As stipulated within the report of the General Police Inspectorate to the CEC, the violations mostly were referred to following legal provisions: Art. 364 para. (10) (production, distribution, supply and/or dissemination of political advertising that does not meet the conditions of the Law no. 62/2022 on advertising and the Electoral Code no. 325/2022) of the Contravention Code, Art. 50 para. (1) (displaying election campaign material or referendum support material in a place other than the established place, as well as damaging it) of the Contravention Code, Art. 50 para. (2) (Producing, distributing, supplying and/or disseminating election campaign advertising materials that do not meet the conditions of the Law no. 62/2022 on advertising and the Election Code no. 325/2022) of the Contravention Code, Art. 364 para. (2) (placing outdoor advertising on trees) of the Contravention Code, Art. 364 para. (5) (Unauthorized presentation, production or broadcasting of advertising of mass media sessions with the use of methods of psychological influence) of the Misdemeanors Code.

¹²¹ The last mainly reported to be campaigning in regions of the North and South.

¹²² These included infrastructure and economic development projects, such as industrialization, public works on road infrastructure, diaspora-related issues, youth mobility, education, job creation, fight against corruption and energy supplies, including the diversification of energy sources.

¹²³ While the President has the right to initiate legislation, which de facto gives her/him broad powers in terms of what can be proposed, the ultimate decision making on these initiatives is invested in the Parliament.

The referendum campaign mostly referred to the EU and foreign relations. However, campaign activities for the referendum were of a much lower profile both among registered parties for referendum campaigning as well as on traditional and social media.

Although a number of debates were held, not all invited candidates attended all of them, turning many into interviews with one present candidate. The reluctance of candidates to appear in TV and media debates is cause for concern. In general, ENEMO assesses that this lowered standards¹²⁴ for adequately informing citizens on programs, capacities and overall intentions of candidates, along with the requirements and duties of the presidential post. This could have limited the opportunity for citizens to make a fully informed choice.

Candidates are barred from using administrative resources during the campaign. This includes participating in or launching infrastructure projects or public procurement activities funded by the national budget, as well as using public equipment, facilities, or goods. In addition, if public officials take an active role in campaigning for candidates, some of them are required to suspend their official duties throughout the campaign. However, this rule does not apply to the Speaker of Parliament, the Prime Minister, or the President of Moldova, leaving space for high state officials to use their official duties as a means to campaign.

The mission observed that advertisements related to the campaign “Europe for You”¹²⁵ which started in July 2024 and officially ended on 18 August was still visible on most of the Government’s web pages in parallel with the campaigning for the referendum, throughout the election campaign. In addition, high-ranking state officials, including the President, ministers and the Prime Minister actively participated in a number of institutional events as the campaign was ongoing. Concerns could be raised that these official duties and frequent reporting on such topics within the news broadcastings on various media, may have tilted the playing field in favor of the ruling party and its candidate.¹²⁶ Although this is not prohibited by Moldovan law, ENEMO notes that the Government and other state bodies did not refrain from conducting activities on topics closely related with the Referendum during the campaigning period.¹²⁷

Several interlocutors of the mission further mentioned allegations about misuse of administrative resources, such as involvement of public employees in campaign activities during the working hours and involvement of public employees in collecting signatures for certain candidates.

In addition to the officially registered candidates for the presidential race and parties campaigning for the referendum, the mission observed and was informed on activities by unregistered third parties. These groups, though not formally registered, were actively engaging in efforts to promote messages related to both the referendum and the presidential campaign. There are no legal provisions regulating third party campaigning in Moldova. This lack of adequate legislation holds

¹²⁴ [International Covenant on Civil and Political Rights](#), Art. 19, para. 2: “Everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice.”

¹²⁵ Government of Moldova. see the [link](#).

¹²⁶ *Ibid.*

¹²⁷ According to the Venice Commission Code on Good Practice on Referendums ([CDL-AD\(2022\)015](#)) “Administrative authorities must observe throughout the campaign period their duty of neutrality [...] which is one of the means of ensuring that voters can form an opinion freely.”

significant risks of illicit money entering into the political processes, such as money derived from criminal activities or foreign countries. This further challenged the capacity of institutions to address these activities.

Several entities, such as the unregistered group Victory or even representatives of institutions including the Baskan (Governor) of Gagauzia, Ms Yevgenia Gugtsu¹²⁸, were openly campaigning for the “No” option in the referendum¹²⁹, even though they were not officially registered for the referendum campaign¹³⁰. According to the report of the General Police Inspectorate, the group Victory and Renastere party had the highest number of violations regarding prohibited electoral campaigning.

The most important threat posed by third parties to the electoral and referendum campaigns was the network created by Ilan Shor, whose activities were consistently and publicly aiming to undermine election integrity and the stability of the institutional system through massive vote buying schemes, which are actively investigated by the authorities.¹³¹

The mission observed a number of third parties running paid advertising on Meta’s social media platforms (Facebook and Instagram), despite not being directly connected to any officially registered contestant.¹³² However, as the campaign progressed, Meta ramped up its efforts and successfully dismantled a significant part of the disinformation network aimed at influencing public opinion on the 20 October elections.¹³³

At a press conference held on 3 October, the Head of the General Police Inspectorate, Mr. Viorel Cernateanu, and the Head of the Anti-Corruption Prosecutor’s Office, Ms. Veronica Dragalin, presented the results of a criminal investigation regarding schemes for illegal financing and vote

¹²⁸ The case of the Bashkan of Gagauzia was sent to court on April 24, 2024. According to the Anti-Corruption Prosecutor's Office, Gutsul, while working as a secretary in the unconstitutional Shor party, systematically and daily imported money from Russia to Moldova from 2019 to 2022.

¹²⁹ <https://newtv.md/toate-stirile/bascanul-gagauziei-a-indemnata-moldovenii-sa-voteze-nu-integrarii-europene-la-referendum-sa-ne-aparam-patria>

¹³⁰ Meanwhile, beside this infringement of internal campaign laws, EU Council has imposed sanctions on Yevgenia Gutsul# on 14 October, with arguments for promoting separatism in Gagauzia region and attempting to overthrow the constitutional order and threatening the sovereignty and independence of Moldova. Sanctions included travel ban to the EU and asset freeze, among other measures.

¹³¹ One of these attempts consisted in a video address on the Telegram platform, where Ilan Shor invited citizens to join his network for 500 LEI, and that after successfully voting he would pay them an additional 5000 LEI in return. The video was posted on Telegram and has since been removed as Telegram blocked several channels.

¹³² A number of these pages were removed for not following Meta’s advertising standards and the ads are not visible anymore. Thirteen of these Facebook pages seen by ENEMO have spent some 50,000 Euro throughout the campaigning period against the Referendum and the current majority. On the other hand, three Facebook pages were found by ENEMO to have spent throughout the campaigning period, some 18,000 Euro in advertising in support of the Referendum / highlighting benefits of the European Union. Many of these pages had active advertising on election day and the day before, during the period of electoral silence.

¹³³ The network employed fake identities and fabricated Russian-language news brands to disseminate biased information favoring Russia and criticize the European Union. Meta found that the network was run by individuals from Russia and Moldova, working together from the Transnistrian region. The fictitious brands, such as "Tresh Kich," "Moldovan Mole," "Insider Moldova," and "Gagauzia on Air," posed as independent news outlets but were actually spreading disinformation. According to media reports, until 11 October, the company removed a total of 7 Facebook accounts, 23 pages, 1 group, and 20 Instagram accounts. See [here](#).

buying.¹³⁴ The mission was informed that the investigation is still ongoing, and there were public announcements from the General Police Inspectorate that several registered presidential election candidates might be benefiting from this scheme. However, until Election day, there was no additional news on these alleged connections, but the GPI and Anti Corruption Prosecutor's Office continued the investigation efforts, with visible and reported activities on the ground, including seizure of electoral materials, financial means, and detention of a number of individuals in connection to alleged criminal activities.

The EOM underlines the active role of the clergy of the Russian Orthodox Church in the Republic of Moldova in promotion of several candidates, which was reported to the mission and by the media during the campaign.¹³⁵ In addition, several institutional and other interlocutors, including from political parties, informed the EOM about several other models of involvements of the same religious cult in the electoral campaign. This includes members of the clergy campaigning by using political messages regarding elections and the referendum during their official and unofficial activities, as well as unconfirmed allegations about participation in illegal financing of certain political actors. Additionally, the Metropolitan of Besarabia was calling upon citizens to go out and vote in elections and the Referendum.¹³⁶ In 2016, the Constitutional Court ruled that the participation of religious cults in elections violates the Constitution.¹³⁷

The specific nature of this electoral cycle was that the electoral campaign had been developing in parallel with the Referendum campaign. Since these are two different elections, political parties who were campaigning in both presidential and referendum campaigns were legally obliged to have separate funds and accounts, with separate process and documentation for reporting to the institutions. ENEMO deems that in the case of a referendum being held at the same time as another general election, the two campaigns should have been clearly separated. Two parties, PAS and Electoral Bloc "Together", were the only political entities which had the potential for additional benefits from double campaigning, since they were the only ones registered both for referendum and presidential election campaigning. Both of these parties and respective presidential candidates supported by them followed the rules in terms of financial reporting.

Both the CEC and Audiovisual Council confirmed to ENEMO's mission that particular attention was dedicated to monitoring the eventual overlap of the two campaigns, for Presidential candidates not registered for the Referendum, both in media and campaign activities. In accordance with this, some exemptions were made for media, where one third of candidates or their representatives's

¹³⁴ The entire scheme was organized through payments to a network of 130 coordinators and 130.000 citizens of Moldova, who were receiving approximately 100 EURO on their accounts through the application of Russian owned PSB bank (Promsvyazbank), in return for voting for a certain candidate and voting "No" in the referendum. The entire scheme discovered was worth approximately 15 million USD, with 130 coordinators receiving 45 thousand LEI on a monthly basis. See [here](#).

¹³⁵ The speeches and addressing of the clergy at the event with opposition politicians and candidates involved. Event was organized by the Russian Church in the Republic of Moldova, on 6 October, during a so-called "Peace March". See [1](#) and [2](#) links.

¹³⁶ See [here](#).

¹³⁷ Constitutional Court, Decision of the Constitutional Court nr. 28g / 2016 on the violation of the right of religious freedom and gender equality. see [here](#).

airtime broadcasted on TV or radio could be dedicated to discussing EU and foreign policy issues which might overlap with the referendum.

Campaign Finance

Campaign finance is mainly regulated by Chapter V of the Electoral Code.¹³⁸ The legal framework is further elaborated through CEC regulations, including the Regulation on the Financing of Political Parties and the Regulation on the Financing of Initiative Groups and Electoral Campaigns, both adopted in August 2023.

Significant changes to the legal framework for campaign finance were made since the last presidential elections, particularly with the adoption of the new Electoral Code in 2022. These reforms aimed to better align the regulations with international standards and the recommendations of the Venice Commission, the Group of States Against Corruption (GRECO), and both international and domestic observers. Key changes included provisions on stricter oversight of donor income, clearer financial reporting requirements, and more detailed guidelines for the CEC's control and supervision of campaign financing.

Electoral contestants in the presidential elections were required to open a dedicated bank account, known as the "Electoral Fund", within three days of their registration and to notify the CEC within 24 hours. Transfers from this Fund could only occur after the candidate's registration, but no earlier than 30 days before the Election Day. According to the CEC and mission interlocutors, several presidential candidates experienced difficulties in opening this bank account.

Some of the presidential candidates informed the EOM that they faced difficulties opening bank accounts. This included unexplained rejections by banks of their requests for opening a dedicated account, unexplained extension of the deadlines for opening their accounts, etc. These issues emphasize the previously mentioned problem of overlapping deadlines for registration of candidates and the start of the campaign.

Candidates were required to appoint a treasurer responsible for managing their campaign account. The banks provide the CEC with daily electronic reports on all transactions, while candidates had to submit an initial financial report within three days of opening the account, followed by weekly reports through the CEC's electronic "Financial Control" system. The final financial report will be due within three days after Election Day, and the CEC must publish all reports within 24 hours of receiving them. Several ENEMO interlocutors among electoral contestants expressed concerns that the enhanced financial reporting requirements are burdensome and time consuming, especially for smaller parties and independent presidential candidates lacking professional party infrastructure. Despite being understaffed, the CEC managed the supervision of campaign finance timely and efficiently.

Candidates could finance their campaigns through various sources, including their own funds, transfers from party accounts (which may include state budget subventions), membership fees, donations, and zero-interest loans. In-kind donations, free services, and voluntary activities had to

¹³⁸ Other applicable laws include Chapter V of the Electoral Code, the 2007 Law on Political Parties, the 2002 Criminal Code, the 2008 Contravention Code, and the 2022 Law on Advertising.

be reported at their market value, while cash donations had to be deposited directly into the "Electoral Fund."

According to the reports submitted to the CEC for the first three weeks of the presidential electoral campaign, spendings by the candidates were as following¹³⁹: incumbent president Maia Sandu spent 8,786,109 lei, while the second most expensive campaign was of Renato Usatii with 4,671,890 lei; Alexandr Stoianoglo spent 4,167,948 lei, while the fourth and fifth positions belonged to independent candidates Irina Vlah with 2,279,015 lei and Natalia Morari with 1,235,509 lei. Octavian Ticu with 249,600 lei and Tudor Ulianovschi with 276,828 lei were at the very end of the list of the total spendings by the candidates during the campaign.¹⁴⁰

According to the official campaign finance reports, most of the contestants registering for the Referendum did not have any income or expenses. The largest spending was reported from PAS - 1,088,825 lei, followed by PCRM - 220,903 lei and Renastere - 172,793 lei.¹⁴¹ ENEMO deems that election contestants which reported not having any income or expenses in their financial reports raises the question of the purpose of their registration to participate in the campaign.

While the CEC is the main body responsible for receiving, overseeing, and controlling financial reports on campaign financing, the Anti-Corruption Prosecutor's Office and the National Anti-Corruption Centre are tasked with overseeing different aspects of financial control in the electoral process.

In cases of non-compliance with campaign finance regulations, the CEC has a range of enforcement measures. These include issuing warnings, suspending candidates' free or paid airtime for 24 to 48 hours, and withholding state budget funds. More serious penalties can involve contravention sanctions, and in the most severe cases, the de-registration of the electoral contestant.

According to the CEC, as of the publication of this statement, no significant delays or violations in financial reporting had been noted. However, several candidates were sanctioned with warnings on the basis of minor infringements, while one presidential candidate was sanctioned by deprivation of air time for 48 hours, due to omitting to report part of direct campaign costs¹⁴². In addition, the amount of sanctions towards several electoral contestants increased as Election Day drew nearer. The party "For the Future of Moldova" which was supporting presidential candidate Mr. Vasil Tarle was sanctioned with 12 months of suspension of funding from the state funds for

¹³⁹ Promo-Lex, (15.10.2024) N.4 Monitoring report. see [here](#).

¹⁴⁰ Citizens were allowed to donate to one or more electoral contestants, with donations limited to six average monthly wages or no more than 30 percent of their annual income from the previous year, capped at 82,200 MDL (13,700 MDL x 6 months). For public servants, officials, those with special status, or employees subject to Law No. 133/2016 on the declaration of personal assets, donations were restricted to 10 percent of their annual income, but no more than six average monthly wages. Legal entities could have contributed up to twelve average monthly wages, capped at 164,400 MDL for 2024.

¹⁴¹ Central Electoral Commission, see [here](#).

¹⁴² Presidential candidates Andrei Nastase, Victoria Fortuna, Irina Vlah, Natalia Morari and the Party for the Future of Moldova who supports candidate Vasile Tarlev have been sanctioned with the warning, while the candidate Tudor Ulianovschi was sanctioned by deprivation of the free air time on media with the national coverage for 48 hours. These sanctions were published on 12 October 2024. See the [CEC webpage](#).

breaching the financial cap. According to the CEC, the party spent 1.74 percent more than calculated and allowed amount within the monitored period.¹⁴³

In May 2021, the Supreme Security Council, an advisory body to the President of Moldova, recommended that the CEC should establish an inter-agency working group,¹⁴⁴ to detect and investigate illegal campaign financing. This recommendation was put in practice during the 2023 local elections, and it was re-established during this presidential electoral cycle. As CEC higher officials informed the mission, the Working Group did not hold official sessions during these elections. However, the functions of the Inter-Institutional Working Group (IWG) were carried out through direct communication among its members whenever inter-agency cooperation was required. This was performed mostly through appointed contact persons but also through the coordinators for cooperation among certain institutions.

According to the CEC, no internal procedure has been in place or sub-laws regulating concrete cooperation among the institutions involved in the IWG. Even though some of the involved institutions expressed their satisfaction with mutual cooperation, this does not represent a solid institutional and legal ground for the continuation of good practices. In the future, this risks leaving cooperation to improvisation and personal or institutional relations, which could be potentially damaging or even dysfunctional in terms of inter-institutional cooperation aiming to protect the legality of electoral processes.

In July 2022, the CEC created a new Division of Supervision and Control of the Financing of Political Parties and Electoral Campaigns. However, this division continues to face challenges in terms of staffing. ENEMO assesses that the overall performance of this Division was satisfactory and implemented in an efficient and timely manner.

The legal framework for campaign finance mostly aligns with the recommendations of the Venice Commission and GRECO. However, the broader social and political landscape remains heavily affected by the influence of third parties. These negative influences, whether from foreign state entities or individuals and groups engaged in illegal or harmful economic, social, and political activities, continue to undermine Moldova's democratic institutions and the rule of law.

As a result, the electoral atmosphere suffered from such activities, as claimed by many ENEMO interlocutors who raised concerns about the risks of "shadow funding" in electoral campaigns, particularly from foreign sources and through illegal groups and individuals. They claimed that these funds often come in the form of cash, prepaid cards, crypto currencies, or direct bank transfer through electronic payments.

According to certain higher officials, Moldovan institutions still lack capacities and resources for efficiently fighting and timely preventing many of these illegal and anti-institutional activities of "third parties". However, various Moldovan public entities have invested significant efforts to increase the transparency of financing of the electoral and political processes in general, and to

¹⁴³ CEC Decision 18.10.2024, see [here](#).

¹⁴⁴ Consisting of representatives of the CEC, National Inspectorate of Police, Anti-Corruption Prosecutor's Office, National Anticorruption Centre, Public Services Agency, The Service for Information Technology and Cyber Security (STISC), Service for Information and security (SIS) and other relevant bodies.

prevent the consequences of these illegal actions (see Campaign section above). Aside from these efforts, ENEMO was notified of the existence of the need and willingness of several institutions to strengthen international cooperation and transfer of know-how and best practices from various international actors in this field.¹⁴⁵

Besides detailed monitoring of the spending of registered candidates and their campaign teams by several state institutions, civil society representatives are also monitoring and comparing the spending within the electoral cycle. According to the report of civil society organization Promo-Lex, some candidates are underreporting their overall spending during the electoral campaign for presidential elections, which is cause for concern.¹⁴⁶

Media

Together with the Constitution¹⁴⁷ of Moldova, the relevant provisions on freedom of expression from the UDHR and ECHR have been incorporated into the Law on Freedom of Expression (LFE). The Criminal Code¹⁴⁸ provides penalties for the intentional violation of laws related to access to information, obstruction of media activity, intimidation of journalists for criticism, and censorship. The Audiovisual Media Services Code ensures accurate information, editorial independence, regulatory autonomy, pluralism, and protects the national audiovisual space. The coverage of election campaigns and referendum in the audiovisual media is regulated by the Electoral Code¹⁴⁹ and respective CEC regulations¹⁵⁰.

The Election Code mandates equal access to political advertising for all contestants and establishes guidelines for media coverage of elections,¹⁵¹ ensuring the media's right to report without interference. Journalists accredited by mass media institutions and confirmed by the CEC are granted access to electoral body meetings, electoral operations, and electoral information. There were nine media institutions accredited with the CEC to cover the electoral process, including 59 media representatives in total.¹⁵²

¹⁴⁵ Interviews of ENEMO with higher representatives of the Central electoral Commission, Anti-Corruption Prosecutor's Office and the General Police Inspectorate.

¹⁴⁶ These claims should be compared to reports of the CEC and more details on this subject can be found in the report of Promo-LEX on the following [pages](#).

¹⁴⁷ The Constitution of the Republic of Moldova, art. 34. See [here](#).

¹⁴⁸ Criminal Code, Article 180, 180¹, 180². see [here](#).

¹⁴⁹ Articles 89 and 90.

¹⁵⁰ CEC (2024) Decision No. 2660 - regarding the particularities of media coverage of the elections for the position of President of the Republic of Moldova and the republican constitutional referendum of 20 October, 2024.

¹⁵¹ Election Code, Article 89.

¹⁵² CEC (15.10.2024), Confirmation of journalists, see [here](#)

Political parties and candidates were provided free airtime¹⁵³ on national broadcasters and could use up to 2 minutes per day for paid advertisements. Online media, however, remain largely beyond these regulations.

Until recently television was considered the most dominant and trusted medium in Moldova. However, recent years have seen a rapid increase in the number of citizens who rely on internet news media and social media for information.¹⁵⁴ This shift is supported by growing internet penetration and increasing mobile internet usage.¹⁵⁵ This development can also be attributed to the suspending of broadcasting licenses for the televisions that were accused of being part of Russia's disinformation campaign starting from 2022.¹⁵⁶

As of 2024, Moldova ranks 31st out of 180 countries in the World Press Freedom Index by Reporters Without Borders (RSF), with a "satisfactory" rating. However, media representatives, particularly investigative journalists, reported to the mission being frequent targets of cyber-harassment, while independent media outlets continue to face ongoing cyber-attacks.

Moldova currently has 59 TV channels (40 with national coverage) and 61 radio stations (six with national coverage)¹⁵⁷. Of these, 19 nationwide TV stations, one regional channel (GRT), and 13 radio stations expressed to the Audiovisual Council their intent to cover the electoral process.¹⁵⁸ Nine TV stations and seven Radio stations organized electoral debates¹⁵⁹. The mission noted also some online media¹⁶⁰ that organized debates, despite not being registered with the Audiovisual Council as they do not have a broadcasting license.

Since Russia's invasion of Ukraine in February 2022, Moldovan authorities have implemented measures to restrict the rebroadcasting of certain audiovisual media outlets¹⁶¹ and blocked several websites¹⁶² involved in spreading disinformation about the war, posing a national security risk.

¹⁵³ 5 minutes of TV airtime and 10 minutes of radio airtime for each presidential candidate and referendum participant (art. 90 (7)). In addition, the public media service providers shall grant free of charge, one minute of air time per day for electoral advertising (art. 90 (8)).

¹⁵⁴ IRI (2024) National Poll of Moldova, May-June 2024. See [here](#).

¹⁵⁵ The National Regulatory Agency for Electronic Communications and Information Technology (ANRCETI) (2023) Annual statistics. See [here](#). Fixed Internet penetration rate per 100 households (individuals) - 69.7 percent In 2023, the number of active mobile internet users grew by 2,6 percent to 2,902,946 million.

¹⁵⁶ Primul in Moldova, RTR Moldova, Accent TV, NTV Moldova, TV6, and Orhei TV in 2022; Orizont TV, ITV, Prime TV, Publika TV, Canal 2, and Canal 3 in 2023.

¹⁵⁷ Audio-Visual Council, see [here](#).

¹⁵⁸ Audio-Visual Council, Editorial Policy Statements for Coverage of the Presidential Election and Republican Constitutional Referendum of October 20, 2024, see [here](#).

¹⁵⁹ Audio-Visual Council, see [here](#).

¹⁶⁰ IPN, Nord News and Bas-TV.

¹⁶¹ Between 2022-2023, the Commission of Exceptional Situations (CES) effort to counter disinformation resulted among others in suspending the broadcast licenses of 12 TV stations (6 in December 2022 and another 6 in November 2022) on the allegation of spreading false information.

¹⁶² The latest case being of October 3, when the Intelligence and Security Service (SIS) band five Russian websites ahead of the election, with a reasoning of "national security risks".

Nevertheless, misinformation and disinformation continued to be spread through other information channels. Many portals and social media channels, particularly on Telegram¹⁶³, were under the control of Ilan Shor and pro-Kremlin business and political entities, either directly or indirectly. ENEMO observed that these platforms and channels were a source for fake news, creating false and negative narratives on the EU and the prospects of Moldova towards European integration, aiming to manipulate voters and undermine democratic institutions, including the electoral process.

However, on 10 October 2024, at the request of the National Investigation Inspectorate (INI), 15 channels and 95 Telegram chatbots linked to fugitive oligarch Ilan Şor were blocked. As stated by Moldovan authorities, these channels and chatbots were used to facilitate the illegal financing of political parties, bribe voters, and buy votes. Telegram shortly reported that the channels "cannot be shown because they have violated local laws." ENEMO positively assesses the measures shutting down these channels for contributing to lowering the level of disinformation during the electoral process.

The media service providers covering the election were obliged by the Electoral Code to publish their terms for offering advertising space and related services to electoral competitors within seven days of the start of the electoral period. These terms must be submitted to both the CEC and the Audiovisual Council, and the CEC is responsible for posting them on its official platform. Additionally, throughout the electoral period, media outlets must submit weekly reports to the CEC, detailing the income earned from political and electoral advertising for each political party, electoral bloc, or candidate.

In addition to the existing legal and institutional framework, the Audiovisual Council (AVC) is responsible for ensuring broadcasters comply with regulations throughout the electoral period. The AVC actively monitors media broadcasters to maintain fairness and balance in reporting. It also handles media-related complaints. A significant amendment to the Electoral Code has further expanded the AVC's role, tasking it with closely monitoring news programs on selected broadcast media during the pre-election period to ensure impartial coverage.

For the Presidential Elections 2024, the AVC conducted monitoring of the electronic media coverage of the presidential elections and the referendum, covering the entire campaign period with 4 reports, from 20 of September till 20 October. The monitoring methodology covered news and current affairs programs, as well as election debates, broadcasted by 18 media service providers whose editorial policy statements for the presidential elections and referendum were approved by the Audiovisual Council.¹⁶⁴

The first AVC monitoring report on media coverage of the presidential elections and referendum was released on 4 October, covering the campaign period between 20 and 29 September 2024,

¹⁶³ At the time of the publishing of the preliminary statement, the Telegram channels of Ilan Shor and those of a number of other persons or entities associated to him cannot be accessed, they were taken down, based on infringements of local legislation, as per the message the social media platform shows when one tries to access them.

¹⁶⁴ Meanwhile, on 2 October the AVC rejected complaints from presidential candidate Renato Usatii and the Chairman of the Party of Communists, Vladimir Voronin, regarding TRM's refusal to broadcast their promotional videos. TRM declined to air the videos, citing discriminatory content toward specific social groups. The AVC upheld TRM's decision in both cases.

including monitoring of 18 TV broadcasters and more than 370 election related issues that have been released. The monitoring did not find any serious violations of the media legislation within the monitored period. However, several infringements related to balance in reporting and equal treatment of candidates have been detected. The AVC decided not to take any sanctions against these broadcasters and instead the Council decided to draw the attention to mentioned violations and urge these broadcasters not to repeat them.

In their second monitoring report, covering the period 30 September to 6 October, several violations have been reported by the Audiovisual Council. Six TV stations were fined 5,000 lei each for failing to comply with the regulations on election coverage approved by the Central Electoral Commission, particularly regarding adherence to their own editorial policy statements and the inclusion of electoral topics in designated sections.¹⁶⁵ Additionally, TV N4 was fined 10,000 lei for broadcasting free of charge electoral promotion shows after the 15-day period from the start of the campaign, as stipulated by the Electoral Code.

During the examination of the monitoring report for the second week the director of the AVC expressed concerns about TV Moldova 1 not covering election subjects during the entire monitored period. Some ENEMO interlocutors from the opposition claimed that several private TV stations were biased in favor of the ruling party, mostly prior to the electoral period. The AVC also raised concerns about ethics of reporting of the GRT¹⁶⁶, especially regarding omission to report on the news related to findings of the General Police Inspectorate on illicit financing network that was revealed on 3 October. Finally, the AVC's monitoring findings detected a decrease of the quantity of reporting on electoral and referendum issues among a significant number of media broadcasters.

The third report on monitoring of the media by the AVC covered the period between 6 and 13 October, including 18 media registered for broadcasting on the electoral and referendum issues. During that period, Six TV stations¹⁶⁷ were fined 5,000 lei each for non-compliance with the Regulation on the coverage of elections by media outlets, approved by the CEC.

Findings of the AVC did not identify significant reporting biases, violations, or trends in reporting that could have been significantly detrimental or favoring certain presidential candidates. Even though the monitoring found some violations, most of the rules stipulated within the Electoral Code were generally respected. On the other hand, some violations or ethnic wrongdoings in reporting point to a lack of professionalism or intentional decrease of involvement in political and campaign reporting, in order to avoid possible violations of the law and respective sanctions. This trend in avoidance of reporting on political and campaign issues during the campaign could be improved through adequate change of legal environment, additional engagement of the AVC on education and training dedicated to the increase of professional standards among media.

¹⁶⁵ TVC 21, TVR Moldova, SOR-TV, MEDIA TV, TV Elita and Studio-L.

¹⁶⁶ Before the start of the electoral campaign, the Audiovisual Council sanctioned GRT, a radio and television broadcaster, for repeatedly violating provisions on accurate information as outlined in Article 13 of the Audiovisual Media Services Code (CSMA). Audio-visual council (30.08.2024) Regional public provider GRT fined 30,000 lei for providing misleading information in a repetitive manner between June 3-17, see [here](#).

¹⁶⁷ Pro TV Chisinau, TV 8, TVR Moldova, N4, TV Elita and R Live TV.

ENEMO assesses that the activity of the Audiovisual Council, especially monitoring of the campaign coverage, provided a solid foundation for balancing the audiovisual media scene and helped maintain a relatively even playing field for electoral contestants during the electoral campaign.

Gender Representation

Moldova has ratified key international conventions¹⁶⁸ and has enacted domestic legislation to promote gender equality¹⁶⁹ and combat violence against women¹⁷⁰. Law No. 5 (2006) ensures equal opportunities for men and women, and a 40 percent gender quota for parliamentary and local elections.

Currently, the Parliament consists of 40 percent women, while at the local level, the share of elected women councilors is 33.3 percent, and women mayors make up 24 percent.¹⁷¹ Of the 16 government ministers, only 3 are women, with one serving as a vice prime minister among three other ministers. The President of the Republic is a woman. Currently, four of the eleven presidential candidates are women (36 percent).

The patriarchal misconceptions, especially regarding the role of women in politics and in a leadership position are still prominent in society. This is reflected in only a slight increase in the share of elected women mayoral candidates since 2019 - 3.3 percent increase in villages, 5.3 percent in the cities.

Generally, women are well represented in lower levels of election management bodies. Usually, the gender representation on lower level EMBs (DECs and PEBs) are in favor of women. In these elections, women make up 71 percent of the DECs, with 60 percent of chairperson positions held by women. On election day, the ENEMO observers reported women forming 89 percent of PEB members.

As the Audiovisual Council has incorporated monitoring of hate speech and sexist language on air in their monitoring methodology, it was reported to the mission that the electoral debates have seen a relatively small number of violations of this kind.¹⁷² However, sexist remarks against female

¹⁶⁸ Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW), the Council of Europe's Convention on preventing and combating violence against women and domestic violence (Istanbul Convention).

¹⁶⁹ Law No. 5 of 09-02-2006 regarding ensuring equal opportunities between women and men.

¹⁷⁰ Law No. 45 of 01-03-2007 regarding the prevention and combating of family violence; amendments to the Criminal Code, Art 201.

¹⁷¹ As of the election results of 2023 Local Elections.

¹⁷² DECISION no. 160 of May 26, 2023 Regarding the approval of the Methodology for monitoring hate speech in audiovisual media contents.

presidential candidates were detected by the mission. Also, the topic of sexual minorities was used to mislead the voters.¹⁷³

National Minorities

In alignment with the Universal Declaration of Human Rights and other international legal acts on human rights, including the Framework Convention on the Protection of National Minorities, Moldova adopted the law “On the rights of persons belonging to national minorities and to the legal status of their organizations” in 2001.¹⁷⁴ Additionally, the Republic of Moldova ratified the International Convention on the Elimination of All Forms of Racial Discrimination on 26 January 1993.

According to the 2014 census, 75.1 percent of Moldova’s population identifies themselves Moldovan, were Moldovans, 7.0 percent – Romanians, 6.6 percent – Ukrainians, 4.6 percent – Gagauz, 4.1 percent – Russians, 1.9 percent – Bulgarians, 0.3 percent – Roma, while the other ethnicities represented 0.5 percent out of the total population.

Organizations representing the interests of various national minorities¹⁷⁵ remain active members of the Coordinating Council of Ethno-cultural Organizations. This council operates under the Agency for Interethnic Relations, as established by Article 25 of Law No. 382/2001.

The number of ballots printed for voting inside the country was 2,729,996. 76.6 percent were printed in Romanian language, 23 percent in Russian; 3,400 ballots were printed in Gagauz language, 991 in Bulgarian, 870 in Romani, and 115 in Ukrainian. The ballots delivered for the polling stations serving the voters from the left bank of Transnistria were printed equally in Romanian and Russian languages. The CEC website offers Russian and English language versions, besides the Romanian one, but they are not updated consistently. Training materials for election officials were also available in minority languages, as were voter education resources.

The mission did not notice any electoral campaigning targeting the rights and needs of the national minorities.

¹⁷³ Igor Dodon was stating that the ruling party is intending the employment quotas for the LGBTI community; Renato Usati on “banning LGBT propaganda in schools.

¹⁷⁴ Parliament of Moldova (2011) LAW No. 382 of 19-07-2001 regarding the rights of persons belonging to national minorities and the legal status of their organizations. See [here](#).

¹⁷⁵ Including Ukrainian, Russian, Gagauz, Bulgarian, Jewish, Roma, Polish, Belarusian, German, Armenian, Azeri, Georgian, Ossetian, Lithuanian, Estonian, and Greek communities.

Inclusion of Persons with Disabilities

The Republic of Moldova is a party to the Convention on the Rights of Persons with Disabilities (CRPD), and since 2012, the Law on the Social Inclusion of Persons with Disabilities, guarantees people with disabilities the right to participate fully in all areas of life.

Individuals placed under protective measures by a court decision are still excluded from the right to vote in Moldova, contrary to international standards and previous ENEMO recommendations.¹⁷⁶

The CEC has set the accessibility criteria¹⁷⁷ for polling stations, as well as other subjects involved in the electoral process to ensure the electoral rights of people with disabilities. The CEC carries out continuous¹⁷⁸ assessment of polling stations through the engagement of permanent chairpersons of the DEC. The accessibility of buildings where PSs are located are the responsibility of the local public authorities. However, only 1 percent of the buildings of polling stations are fully accessible, the majority of them being in Chisinau¹⁷⁹. Of the 160 polling stations observed on Election Day, over 52 percent of the polling stations were either deemed inaccessible or requiring minor assistance.

The CEC actively cooperates with civic organizations that specialize in helping citizens with special needs. This includes for instance assistance to prepare voter information materials in braille text. Through the Low Vision assistance, several polling stations in Chisinau were equipped with special aid machines that assist voters with impaired vision to vote. Donor assistance enables the CEC to provide sign language interpretation for voters with hearing impairments, ensuring they receive voter education closer to election day and are informed about the election results. While ENEMO acknowledges the efforts of the authorities to provide persons living with disabilities equal opportunities to fully exercise their political rights, they still face a number of barriers and more should be done in this regard.

The mission was informed by the CEC that, for the first time, home-bound voting in this election included secret voting booths, which ENEMO positively evaluated as a significant improvement to safeguard ballot secrecy. Additionally, polling stations across the country displayed QR codes with video-audio voter education materials, enhancing accessibility and offering clear, user-friendly guidance on the voting process.

¹⁷⁶ Article 29 of the CRPD requires states to “guarantee to persons with disabilities political rights and the opportunity to enjoy them on an equal basis with others”. Paragraph 48 of General Comment No. 1 to Article 12 of the CRPD states that “a person’s decision-making ability cannot be a justification for any exclusion of persons with disabilities from exercising their political rights, including the right to vote, the right to stand for election and the right to serve as a member of a jury”.

¹⁷⁷ Regulation regarding the accessibility of the electoral process for persons with disabilities, approved by the decision of the CEC no. 1187/2023 (Official Gazette of the Republic of Moldova, 2023, no. 347-350, art. 883.

¹⁷⁸ After each election.

¹⁷⁹ The CEC [website](#).

Complaints and Appeals

The right to complaint is primarily regulated by the Electoral Code and the secondary legislation adopted by the CEC, as well as other laws.¹⁸⁰ The legal framework categorizes election-related cases into three primary forms: disputes, administrative offenses as subject of criminal liability under the Contravention Code¹⁸¹, and criminal offenses under the Criminal Code¹⁸².

Complaints can be filed by voters, candidates, initiative groups, blocs of parties, electoral contestants, regarding the actions, inactions and decisions of election management bodies - to the hierarchically superior electoral bodies, as well as actions inactions of other contestants with the electoral body that registered them. Electoral officials, observers, and civil society groups seeking accreditation for observers can lodge complaints against electoral bodies having infringed their rights. In such instances, the decision can similarly be challenged before a higher level EMB. The decisions of the CEC can be challenged at the Court of Appeals of Chisinau and the decision of the latter on electoral complaints can be challenged directly with the Supreme Court of Justice. Complaints on media coverage of elections can be filed with the Audiovisual Council (see the Section on Media).

Generally, complaints during the electoral period should be filed within three days when the action was performed, inaction identified, or the decision taken. Positively, deadlines for considering complaints during the electoral period are short, within three days of the submission, but no later than election day. Courts should also follow the same deadlines when considering electoral complaints, including in appeal proceedings.

The CEC publishes the received complaints in their webpage. As per the online registry, prior to Election Day, the CEC received eleven complaints, ten related to the presidential elections¹⁸³ and one regarding the referendum.¹⁸⁴ Of the ten complaints related to the Presidential Election, the CEC rejected five as inadmissible, with only one dismissed due to non-compliance with the 3-day filing deadline.¹⁸⁵ One complaint was referred to the DEC No. 38 ordering it to establish three PEBs in the Russian Federation, following the proposal from the Ministry of Foreign Affairs.¹⁸⁶

¹⁸⁰ The CEC [Regulation on the examination procedure of appeals during the electoral period](#).

¹⁸¹ [Contravention Code of Republic of Moldova](#).

¹⁸² [Criminal Code of Republic of Moldova](#).

¹⁸³ The complaints related to the Presidential Elections are accessible here: <https://a.cec.md/ro/contestatii-depuse-la-comisia-electoral-centrala-16975.html>

¹⁸⁴ The complaints regarding the Constitutional Referendum are accessible here: <https://a.cec.md/ro/contestatii-depuse-la-comisia-electoral-centrala-16976.html>.

¹⁸⁵ CEC's Decision no. CEC-7/16482 of September 20, 2024, accessible here: https://a.cec.md/ro/cu-privire-las-esizarea-nr-cec-716482-din-20-2751_111394.html

The decision of the Court of Appeal in case no. 3-123/24, upholding the CEC Decision and rejecting the contestation, accessible here: https://cac.instante.justice.md/ro/pigd_integrare/pdf/21df86db-f556-4870-bcdd-a8f618debd0

The decision of the Supreme Court of Justice in case no. 3ra-831/24, regarding the inadmissibility of the appeal and upholding the Court of Appeal's decision, accessible here: https://jurisprudenta.csj.md/search_col_civil.php?id=76206

¹⁸⁶ CEC's Decision no. CEC-10Apr/5 of September 27, 2024, available here: https://a.cec.md/ro/cu-privire-lac-ontestatia-cererea-prealabila-nr-cec-10apr5-2751_111446.html

In this case, the CEC partially satisfied the complaint. Three complaints remain under review.¹⁸⁷ The Commission partially admitted the referendum-related complaint, addressing the misuse of electoral funds during the campaign.¹⁸⁸ The CEC adjudicated complaints with the legal deadlines.

Courts reviewed 23 contested decisions of the CEC, with 22 reviewed by the Court of Appeal and one by the first instance of the Court of Cahul.¹⁸⁹ The courts declared 20 of these cases inadmissible, affirming the CEC's decisions. Two appeals were fully accepted regarding violations involving minors, and one CEC decision was partially upheld concerning the registration of a presidential initiative group. In one case, the Supreme Court of Justice overturned the Court of Appeal's decision and ordered a retrial, citing a failure to examine all evidence thoroughly, potentially infringing the right to a fair trial. All other appeals to the Supreme Court were declared inadmissible, upholding the Court of Appeals decisions.¹⁹⁰

ENEMO notes the high rate of dismissals or declarations of inadmissibility at the courts level due to procedural non-compliance. Common reasons for inadmissibility included missed filing deadlines, lack of legal standing (*locus standi*), and failure to fulfill formal requirements as stipulated by the Electoral Code and the Administrative Code.¹⁹¹ The judiciary's emphasis on procedural correctness often resulted in dismissals without substantive examination of claims, reflecting a strict interpretation and application of legal requirements.

Although the CEC publishes decisions on complaints and appeals, it lacks an internal system for swift access to court data, relying instead on external sources for updates. This dependency leads to delays in receiving crucial information, highlighting the need for improvement, especially given the time-sensitive nature of elections. While accessibility is generally adequate, the system requires better integration and efficiency for faster and more transparent case handling.

It should be noted that there are no standardized complaint forms at the EMB level and the courts, which could potentially mitigate the risk of complainants missing obligatory formal requirements and thus rejection of complaints on formal grounds. However, the CEC would still accept complaints, despite minor deficiencies in formal requirements, as long as they met some basic prerequisites.¹⁹²

¹⁸⁷ Central Electoral Commission of the Republic of Moldova. The complaints and contestations on the Referendum are accessible here: <https://a.cec.md/ro/contestatii-depuse-la-comisia-electorala-centrala-16975.html>

¹⁸⁸ CEC's Decision no. CEC-10RR/1 of October 14, 2024, accessible here:

https://a.cec.md/ro/cu-privire-la-sesizarea-nr-cec-10rr1-din-14-2751_111774.html

¹⁸⁹ Courts Portal of the Republic of Moldova. The decisions or judgments are accessible here: <https://instante.justice.md/>. The Judgement of the Court of Cahul no. 3-106/2024, accessible here: https://jch.instante.justice.md/ro/pigd_integration/pdf/880dac47-3efb-42dd-91d2-68aa7e7a98a3

¹⁹⁰ The SCJ declared inadmissible several cases, including "Partidul Nostru (PN) vs. Maia Sandu (PAS)," "Partidul Dezvoltării și Consolidării Moldovei (PDCM) vs. Maia Sandu (PAS)," and those involving political parties such as "RENAȘTERE," "ȘANSĂ," "VICTORIE," and "Forța de Alternativă și de Salvare a Moldovei." Additional inadmissible cases included filings by Ludmila Corsun, Valeriu Pleșca together with Iurie Cazacu and the European Social Democratic Party, Vasile Bolea (in two separate instances), the second case of Avelin Tabarcea, Gheorghe Guzun, the political party "ȘANSA," the "Socialist Party of the Republic of Moldova," and Renato Usatîi (in two cases numbered 2947 and 2946).

¹⁹¹ Code of Good Practice in Electoral Matters ([CDL-AD\(2002\)023rev](#)), Guidelines on Elections, II. Conditions for implementing the criteria, 3. Procedural Guarantees, 3.3. An effective System of appeal, item b.: "The procedure must be simple and devoid of formalism, in particular concerning the admissibility of appeals."

¹⁹² E.g. elements that would identify the complainant, address where the response should be sent.

Criminal Cases and Contraventions

During the electoral period, but prior to the start of the election campaign (1 August - 19 September), law enforcement agencies registered 242 incidents affecting the electoral process, including 147 cases of unauthorized electoral advertising. Authorities issued 53 contravention reports for illegal advertising practices and initiated legal proceedings. They dismissed certain cases due to insufficient evidence and referred others to local administrations and the CEC.

Law enforcement recorded 48 violations of the legislation on public meetings, issued contravention reports, and initiated legal actions. Authorities dismissed some cases for lack of evidence and transferred others to the Anti-Corruption Prosecutor's Office and the National Transport Agency.

In 16 cases involving unauthorized collection of signatures, authorities initiated legal actions and referred matters to the National Center for Personal Data Protection. They also documented 14 instances of prohibited electoral campaigning in restricted areas or at improper times, resulting in contravention reports and legal proceedings. Investigations into 11 cases of voter bribery led to referrals to the State Tax Service and the CEC.

From 20 September to 19 October 2024, during the election campaign proper, the police documented 550 incidents, including 319 cases of passive electoral corruption involving voter bribery or undue influence. Authorities issued 201 contravention reports and referred cases to the National Anticorruption Center; several cases remain under investigation. Additionally, they addressed 81 cases of unauthorized electoral advertising by issuing contravention reports and initiating legal proceedings. Authorities also handled 52 prohibited campaigning cases and 48 violations of public meetings legislation by initiating appropriate legal measures or referring cases to relevant institutions. On Election Day the police registered 146 cases of violations.

Election day

Ahead of Election Day, the mission was reinforced by 18 short-term observers. On Election Day, ENEMO deployed 12 teams of two observers each¹⁹³ to observe the process of preparation and opening of polling stations, the voting and counting process, as well as the transfer and intake of election materials by DEC. Observers monitored the opening procedures in 12 polling stations, voting in 160 polling stations, and closing and counting in 12 polling stations. Additionally, ENEMO observed the intake of election materials in 12 DEC.

Election Day was, overall, calm and peaceful. The management of polling stations and the performance of PEBs and DEC were positively evaluated in most of the observed cases. However, some challenges were noted, including overcrowding, limited accessibility for individuals with disabilities, and minor technical issues such as temporarily malfunctioning cameras. A few locations also experienced logistical difficulties, such as insufficient space. Despite these issues, the voting process in the majority of observed polling stations ran smoothly,

¹⁹³ Nine teams of two observers each were formed with the 18 short-term observers and three teams were the long-term observers of the EOM, who observed voting, counting and tabulation on election day, along with the STOs.

with procedures being properly followed. Some instances of potential voter influence, including organized transportation of voters were observed.

In general, counting procedures were adequately followed, and any issues were handled professionally. The delivery of materials was generally smooth, transparent, and well-organized, with legal procedures adhered to. However, instances of overcrowding, tension, and narrow premises impacted efficiency at times.

Opening procedures

ENEMO observed the opening procedures in 12 polling stations.

The opening procedures started before 6:30 AM in 50 percent of the polling stations (six PSs), at 6:30 AM in 25 percent of the observed polling stations (three PSs), and after 06.30 AM in 25 percent of polling stations (three PSs). Almost all, or 91.7 percent of the observed polling stations (eleven PSs) were opened for voting at 7 AM, while one PS, or 8.3 percent, was opened between 7.00 and 7.15 AM.

All the 12 observed polling stations were equipped with all essential materials needed for the voting at the moment of opening and other informational materials.

The procedure of sealing stationary ballot boxes was followed properly in all observed polling stations. With regards to mobile ballot boxes, sealing procedures were followed properly at ten observed polling stations, while in two PS, there was no request for mobile voting.

With regards to accessibility of PSs to persons with disabilities, 41.7 percent of the observed polling stations (five PSs) were accessible, 16.7 percent (two PSs) not suitable, while in the other 41.7 percent of the polling stations (five PSs), minor assistance was required in order for PwDs to access the polling stations.

The arrangement of premises was assessed as adequate in all observed polling stations. PEBs generally conducted the opening in an orderly manner and according to the prescribed procedures. No complaints related to the opening procedures were filed at any of the observed polling stations.

ENEMO observers were able to properly monitor the opening procedures in all observed polling stations. No complaints related to the opening process were reported in any of the observed polling stations.

ENEMO observers reported that cameras were working properly in 98.1 percent of cases.

No procedural violations were observed at the polling station during the opening. In all observed polling stations, the opening procedures were assessed positively (very good or good). Observers noticed that one PS was overcrowded, while the most commented on was the lack of accessibility of PSs for persons with disabilities.

The voting process

ENEMO observers assessed the process of voting in 159 polling stations throughout 22 electoral districts. Out of the total number of observed polling stations, 8 were for voters residing in Transnistria. The voting process was assessed positively in the majority of the observed polling stations.

The environment around polling stations was assessed as regular in 98.1 percent of polling stations observed, while at 1 polling station (0.6 percent of) observers noticed the presence of campaign materials, and at 2 PSs (1.3 percent) instances an indication of organized transportation of voters.

The setup of 96.9 percent of polling stations was assessed as acceptable, while all essential materials were present in all of the observed polling stations. At almost all polling stations observed, 99.4 percent had stationary ballot boxes properly sealed, while 0.6 percent of mobile ballot boxes and 0.6 percent of stationary ballot boxes were not properly sealed. A few polling stations encountered issues, including limited voting privacy due to visibility from observers or improper setups.¹⁹⁴

At almost all polling stations (98.1 percent), observers noticed that the camera was recording during the voting process, while there were certain issues with cameras at three observed PSs (1.9 percent).

All observed polling stations were operating with the presence of at least a minimum required number of PEB members, as per the Law. Women were well represented in all PEBs, with 89 percent of PEB members being women at polling stations observed.

Voter identification procedures were followed properly in all of the observed polling stations. SAIS-E operators were working properly in almost all cases, while only in one PSs observers noticed that SAIS-E operators faced some minor technical issues, related to internet access, but coped well. At 2 (1.3 percent) observed polling stations, the secrecy of voting was violated to some extent, mostly due to inadequate set up of voting booths, particularly PwD booths.

At almost all (99.6 percent) observed polling stations, no presence of unauthorized persons was reported by observers.

In total, 47.8 percent of polling stations observed during voting were assessed as accessible for persons with disabilities, while 32.1 percent of polling stations required minor assistance, and 20.1 percent were assessed as not accessible. The most common accessibility issues at polling stations included the lack of ramps and the presence of multiple stairs, making it challenging for persons with disabilities, especially wheelchair users, to enter. Many reports highlighted that polling stations were situated in older buildings with limited special facilities, often requiring additional support to access the entrance or navigate inside. Although some locations had voting booths for persons with disabilities, the absence of ramps or steep, narrow ones made entry difficult. Observers frequently mentioned that entry was possible but required minor assistance due to high

¹⁹⁴ Additionally, some polling stations were reported to be too cold, affecting the overall voting experience.

doorsteps or other obstacles. Overall, the main challenges were related to the lack of clear access, numerous steps, and the need for infrastructural improvements to ensure inclusivity.

ENEMO observers were able to observe properly at approximately 98.7 percent of the visited polling stations, while in 2 PSs (1.3 percent), the observation was difficult due to improper arrangement of the polling station, small premises of the precinct, or overcrowded polling stations.

ENEMO observers noted the presence of other international or domestic observers in approximately 52.8 percent of polling stations.

In approximately 99.6 percent of observed polling stations, observers indicated that no formal complaints had been filed. In 0.6 percent, or only one PS, there was one minor complaint.

Essential materials for the conduct of voting were present in all observed polling stations.

The polling stations were generally managed properly, with the PEB functioning orderly in most cases (93.1 percent). Although some stations were somewhat crowded (4.4 percent), the PEB managed the situation well. In a few instances (1.3 percent), no voters were present while the team was observing. Few polling stations were assessed as small and crowded, creating long lines and limited space for voters and observers.

At around 98.1 percent of the observed polling stations, the PEB generally conducted voting in an orderly fashion and according to the procedures, whereas at 0.6 percent PS were crowded (in 1.3 percent observers did not observe voting while staying at the PS). The overall assessment of the voting process was positive (very good or good) in 99.4 percent of polling stations observed. In one (0.6 percent) of the observed polling stations, observers assessed the process as bad, due to negligence.

Most polling stations operated smoothly and in accordance with the established procedures, with frequent remarks such as "everything seems regular" and "the PEB is functioning orderly." Many stations were described as calm, well-organized, and peaceful, with no major incidents or deviations. However, some challenges were noted, including overcrowding, limited accessibility for people with disabilities, and minor technical issues such as temporarily malfunctioning cameras. A few locations also faced logistical problems, such as small spaces. Despite these issues, the voting process in most of the observed polling stations proceeded smoothly, with procedures being followed.

The counting process

ENEMO observers followed the closing and vote-counting procedures at 12 polling stations. All observed polling stations closed in time, and no voter queues were reported at any of them at the moment of closing.

All PEBs at observed polling stations were operating with enough members.

The counting process started without any delay at all polling stations observed. Video cameras were properly positioned and recording at almost all observed polling stations during the

counting process, with a possible issue at one out of 12. At all observed polling stations, counting procedures were followed properly and minutes were filled out in accordance with the law.

All observers present were able to observe, and copies of the minutes were given to all entitled individuals at all polling stations observed. No formal complaints were submitted at polling stations observed during the counting. Only in one out of 12 PSs unauthorized persons (police officers) were observed during counting. This was deemed by the observers to be due to negligence.

At all observed polling stations, election materials were packed and sealed in accordance with the law, without substantial deviation from the procedures. The assessment of PEBs during the counting was either “very good” or “good” in all observed polling stations.

Transfer of materials to DEC and DEC activity

ENEMO observers monitored the transfer of election materials and respective intake at 12 DEC. The transfer of materials was done in an orderly manner and following the procedures in all polling stations in which ENEMO observed this process.

DEC premises were assessed as spacious and adequate for the delivery of election materials in 75 percent of the observed DEC (9 out of 12), whereas 25 percent (3 out of 12) DEC were assessed as not spacious enough. At most of the observed DEC (11 out of 12), authorized observers were able to observe properly, however at 1 DEC observers could not observe properly due to the set-up of the DEC. In 7 out of 12 observations (58.3 percent), the DEC was not seen as overcrowded, in 3 out of 12 cases (25 percent) the DEC was too overcrowded and it was very difficult to move around, and in 2 out of 12 observed DEC (16.7 percent), observers noted long lines of persons, however it was easy to enter and move around.

The delivery and intake of election materials at the DEC was generally smooth, transparent, and well-organized, with procedures followed according to the law; however, in some DEC was observed overcrowding, tension due to tiredness, and limited space affected efficiency.

The evaluation of the work of DEC by ENEMO observers was positive (very good or good) in 11 out of 12 observed DEC and bad in one case (8.3 percent), due to negligence. The DEC’s work was assessed as straightforward and transparent in all observed cases.

Observers

The electoral law guarantees non-partisan observation of the election process by both domestic and international observers. Election contestants and candidates can nominate representatives or proxies.

Domestic observers can be accredited by non-governmental organizations focused on human rights or democratic values, as outlined in their statutes or internal acts. They can be accredited by the

Central Election Commission (CEC) or District Electoral Councils (DECs) upon request, provided they meet certain accreditation requirements. Domestic observers accredited by the CEC can monitor the electoral process throughout the country and in all polling stations, while those accredited by DECs can only observe within their respective Electoral District. The CEC has accredited five domestic observer organizations with 1,277 accredited observers. Among the accredited organizations, Promo-Lex (with 1,167 observers), a member of ENEMO, is conducting extensive observation at various levels.

International observers are accredited solely by the CEC and can only observe upon invitation from the CEC. They have the same rights as domestic observers, except for the right to submit complaints on irregularities, which is consistent with international practices. As of October 10, the CEC accredited 24 embassies, 14 election administrations of foreign states, and 17 international organizations, totaling 784 accredited observers.

Organizations seeking accreditation as observers must file their requests up to seven days before election day. The relevant EMB must make a decision within five days for domestic observers and within ten days for international observers, but no later than election day. Decisions to deny registration or accreditation must be justified and can be challenged at the Chisinau Court of Appeals in the case of the CEC and at the CEC in the case of DECs. The CEC rejected the accreditation of 782 observers from three domestic organizations and one public institution.¹⁹⁵

ENEMO observers have not faced any restrictions or issues in performing their observation, nor were there reported cases of similar restrictions by domestic observers.

¹⁹⁵ The CEC rejected the accreditation of 115 observers from the "[INIMI GRIJULII](#)" public association due to the organization's involvement in active political actions and its connections with international entities under EU sanctions, which were deemed incompatible with the impartiality required for election observers; of 660 from the organization "[SUFLETUL ȘI INIMA MOLDOVEI](#)" public association due to its involvement in political activities, connections with internationally sanctioned organizations that pose a threat to national security, and its president's affiliation with a political formation whose activities are restricted, all of which were deemed incompatible with the impartiality required for election observers. The CEC accredited seven observers and rejected four from the "[ADOR ORAȘUL MEU](#)" public association because they were involved in active political actions on social media, including expressing their referendum preferences, and one was suspected of attempting to falsify voting results, which conflicted with the impartiality required of election observers. The CEC also accredited six observers and excluded three from [Public Institution "Centre for continuous training in the electoral field" \(CICDE\)](#) because they were electoral officials, a status incompatible with that of an observer under the Electoral Code.

About ENEMO

The European Network of Election Monitoring Organizations (ENEMO) is an international nongovernmental organization that represents a network of national nongovernmental civic organizations founded on September 29, 2001, in Opatija, Croatia. It consists of 21 leading domestic monitoring organizations from 17 countries of Central and Eastern Europe and Central Asia. ENEMO seeks to support the international community's interest in promoting democracy in the region by assessing electoral processes and the political environment and offering accurate and impartial observation reports. ENEMO IEOMs use international benchmarks and standards for democratic elections to evaluate the electoral process and the host country's legal framework. ENEMO and all its member organizations have endorsed the 2005 Declaration of Principles for International Election Observation and the Declaration of Global Principles for Nonpartisan Election Observation and Monitoring by Citizen Organizations. Each ENEMO observer signed the Code of Conduct for International Election Observers. ENEMO member organizations have monitored more than 250 national elections and trained more than 250,000 observers.

To date, ENEMO has organized 41 international election observation missions to 11 countries: Hungary 2024, Municipal Elections; Moldova 2023, Local Elections; Serbia 2022, Presidential and Early Parliamentary Elections; Hungary 2022, Parliamentary Elections; Kosovo 2021, Local Elections; Georgia 2021, Local Elections; Moldova 2021, Parliamentary Elections; Albania 2021, Parliamentary Elections; Moldova 2020, Presidential Elections; Montenegro 2020, Parliamentary Elections; Serbia 2020, Parliamentary Elections; Ukraine 2020, Local Elections; Moldova 2019, Local Elections; Ukraine 2019, Early Parliamentary Elections; Ukraine 2019, Presidential Elections; Moldova 2018-19, Parliamentary Elections; Armenia 2018, Early Parliamentary Elections; Moldova 2016, Presidential Elections; Ukraine 2015, Regular Local Elections; Ukraine 2014, Parliamentary Elections; Ukraine 2014, Presidential Elections; Ukraine 2013 – re-run of Parliamentary Elections 2012 in 5 MECs; Kosovo 2013, Local Elections, first round; Ukraine 2012, Parliamentary Elections; Kosovo 2011, Re – run of Parliamentary Elections; Kosovo 2010, Parliamentary Elections; Kyrgyzstan 2010, Parliamentary Elections; Ukraine 2010, Presidential Elections, second round; Ukraine 2010, Presidential Elections, first round; Kosovo 2009, Local Elections; Moldova 2009, Parliamentary Elections; Georgia 2008, Presidential Elections; Kyrgyzstan 2007, Parliamentary Elections; Ukraine 2007, Parliamentary Elections; Ukraine 2006, Local Elections in Poltava, Kirovograd and Chernihiv; Ukraine 2006, Parliamentary Elections; Kazakhstan 2005, Presidential Elections; Albania 2005, Parliamentary Elections; Kyrgyzstan 2005, Presidential Elections; Kyrgyzstan 2005, Parliamentary Elections; Ukraine 2004, Presidential Elections, second round re-run; Ukraine 2004, Presidential Elections.

ENEMO member organizations are: Center for Civic Initiatives CCI, Bosnia and Herzegovina; Center for Democratic Transition – CDT, Montenegro; Centre for Monitoring and Research – CeMI, Montenegro; Center for Free Elections and Democracy – CeSID, Serbia; GONG, Croatia; International Society for Fair Elections and Democracy – ISFED, Georgia; KRIIK Association, Albania; Citizens Association MOST, Macedonia; Promo- LEX, Moldova; OPORA, Ukraine; Society for Democratic Culture SDC, Albania; Transparency International Anti-Corruption Center (TIAC), Armenia; Election Monitoring and Democratic Studies Center (EMDS), Azerbaijan; Belarussian Helsinki Committee (BHC), Belarus; FSCI, Kazakhstan; Kosovo Democratic Institute

(KDI), Kosovo; Coalition for Democracy and Civil Society, Kyrgyzstan; Center for Research, Transparency and Accountability (CRTA), Serbia; Obcianske OKO (OKO), Slovakia; Committee of Voters of Ukraine (CVU), Ukraine.