

# ANTICORRUPTION REPORT

## 2024 - 2025

Chisinau, 2026

This report was developed by the Center for Corruption Prevention and Analysis (CAPC) within the „Core support to the CAPC” project, with the support of Sweden.

The opinions expressed in it represent the position of the authors and do not necessarily represent the point of view of the donor.

# CUPRINS

ABBREVIATIONS.....	4
EXECUTIVE SUMMARY.....	5
INTRODUCTION.....	10
1. ANTICORRUPTION COMMITMENTS UNDERTAKEN BY THE REPUBLIC OF MOLDOVA IN THE PROCESS OF ACCESSION TO THE EUROPEAN UNION.....	11
1.2. Strategic framework and planning documents.....	12
1.3. Achievements and arrears in the implementation of anticorruption commitments.....	12
2. JUSTICE REFORM: PUBLIC POLICIES AND PRE-VETTING AND VETTING MECHANISMS.....	25
2.1. Justice reform strategy for 2022–2025: goals, objectives and achievements.....	25
2.2. Pre-vetting and vetting vs. justice independence.....	28
2.3. Trust barometer: public perception on justice (2021–2025).....	34
3. CHALLENGES AND LIMITATIONS OF THE WHISTLEBLOWERS' MECHANISM.....	36
3.1. National regulatory framework vs. EU Directive: evolutions and nonconformities.....	36
3.2. Efficiency of the mechanism in figures: NAC and Ombudsman practice.....	37
4. ASSET CONTROL: PROSECUTION OF UNJUSTIFIED WEALTH AND ILLICIT ENRICHMENT.....	39
4.1. Regulatory regress and impact on NIA's institutional independence.....	39
4.3. Insufficiency of sanctioning mechanisms: bottlenecks in the prosecution of unjustified wealth and illicit enrichment.....	42
5. CORRUPTION IN THE ELECTORAL PROCESS.....	44
5.1. Electoral integrity: conceptual benchmarks and general framework.....	44
5.2. Mechanisms for sanctioning electoral corruption: legislative innovations vs. asymmetries and application.....	45
6. CRIMINAL ASSETS RECOVERY.....	48
6.1. Strategic context and regulatory framework strengthening.....	48
6.2. Responsible institutions and operational performance dynamics.....	49
6.3. International cooperation and alignment to the best European practices.....	50
6.4. Strategic perspectives for 2025–2026.....	51
7. ACCESS TO INFORMATION AND TRANSPARENCY OF DECISION-MAKING PROCESS.....	53
7.1. Regulatory framework modernization: legislative evolutions and arrears.....	53
7.2. Practical application of the right of access to information of public interest.....	54
7.3. Adherence to transparency in decision-making in the activity of public authorities and Parliament.....	55
8. INTEGRITY AND TRANSPARENCY IN PUBLIC PROCUREMENTS.....	57
8.1. General context and dynamics of the public procurement market.....	57
8.2. Vulnerabilities and corruption risks in the public procurement system.....	57
8.3. Harmonization with the EU acquis, legislative reforms and digitalization challenges.....	58
9. INTEGRITY IN BUSINESS.....	61
9.1. Current context and evolution of the integrity regulatory framework in the business environment.....	61
9.2. Compliance in practice: integrity tools and standards implemented by companies.....	62

## Abbreviations

ACN	Anti-Corruption Network for Eastern Europe and Central Asia
ADJCM	Agency of Digitalization in Justice and Court Management
AGEPI	State Agency for Intellectual Property
APO	Anticorruption Prosecutor Office
BPO	Barometer of Public Opinion
CAPC	Center for Corruption Analysis and Prevention
CARA	Criminal Assets Recovery Agency
CEC	Central Electoral Commission
CILC	Center for International Legal Cooperation
CMC	Chisinau Municipal Council
ECHR	European Court of Human Rights
EPP	European People's Party Group
EU	European Union
GD	Government Decision
GRECO	Group of States against Corruption
HCM	Higher Council of Magistracy
HCP	Higher Council of Prosecutors
IEPR	Institute for European Policies and Reforms
IRI	International Republican Institute
LPA	Local Public Authorities
LRCM	Legal Resources Center of Moldova
MDL	Moldovan Leu
MF	Ministry of Finance
MH	Ministry of Health
MIA	Ministry of Internal Affairs
MIRD	Ministry of Infrastructure and Regional Development
MONEYVAL	Committee of Experts of the Council of Europe on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism
NAC	National Anticorruption Center
NIA	National Integrity Authority
NAP	National Program of Accession of the Republic of Moldova to the European Union for the period 2025-2029
NCEI	National Commission for European Integration
NIAP	National Integrity and Anticorruption Program for 2024–2028
OO	Ombudsman Office
OECD	Organization for Economic Cooperation and Development
OGP	Open Governance Partnership
PACCO	Anticorruption and Anti-Organized Crime Prosecutor Office
PAS	Action and Solidarity Party
PCA	Public Central Authorities
Rm	Roadmap
SCJ	Supreme Court of Justice

## EXECUTIVE SUMMARY

The 2024–2025 Anticorruption Report provides a comprehensive analysis of the evolutions in Moldova in the area of public integrity and corruption prevention, in a context that is strongly marked by the process of accession to the European Union. The fight against corruption has become a national priority and an essential criterion in the EU accession negotiations, as it is closely related to the negotiation chapter on justice and fundamental rights (Chapter 23) and to the EU standards in rule of law. Thus, in the last two years the anticorruption commitments undertaken towards the EU have catalyzed several structural reforms and specific actions, but they have also revealed persistent institutional deficiencies. This report reviews these progresses and arrears offering an overall image on the state of anticorruption and integrity efforts in the Republic of Moldova at the end of 2025.

### I. Anticorruption commitments undertaken by the Republic of Moldova in the process of accession to the European Union

The report ascertains moderate progress regarding the fulfilment of the anticorruption commitments undertaken in the context of accession to the European Union. Till the end of 2025 only two of the 16 actions monitored in the National Accession Plan for 2025–2029 and related strategic documents were fully completed – those on the fight against electoral corruption and legal status of gifts. Other two were partially implemented, one (the Disoligarchization Plan) remains unfulfilled, and 11 are in process of implementation, some of them without any visible progress. Many of these measures are continuous actions or have the term of application in the following years.

Civil society – including CAPC – and international partners actively contributed with independent analysis, surveys and monitoring activities, emphasizing both the positive steps (such as the improvement of the legal framework and the institution of new mechanisms), and the persistent deficiencies, such as the chronic delays or the lack of specific impact in the approved reforms.

The EU accession continues to be the most important political catalyzer for anticorruption reforms, but the report underlines that despite the achieved progress, the implementation tempo should be accelerated in order to comply with the undertaken commitments and expectation of the society and European partners.

### II. Justice reform: public policies and Pre-Vetting and Vetting mechanisms

The period of the last years has designated a complex transition stage in justice, characterized by a significant normative advance, but with a fragmented and instable application. Although the degree of implementation of the Sectoral Strategy is estimated of 62–65%, the reform impact was decreased by the frequent legislative amendments, critical arrears in digitalization and a reactive approach.

The extraordinary evaluation mechanisms (*Pre-vetting* and *Vetting*), although they have been conceived to clean the system, generated major controversies relating to frequent amendments of the law, suspicions on the integrity of some moments of the evaluation committees (conflicts of interest, political affiliations), and lack of transparency of the committee secretariats. The reform led to resignations and temporary blockages. The evaluation of the Supreme Court of Justice and prosecutors moves forward, but the decisions of the vetting commissions have generated conflicts and critics on the double standards

applied (candidates vs. evaluators), politization of the process and procedural gaps affecting the right to defense.

These vulnerabilities were directly reflected in the public perception: sociological data point out a collapse of the “firm trust” in justice (from 16% in 2021 to 3.5% in 2025), and the society migrates towards an area of prudent expectation. The strategic priority for 2025–2030 becomes the completion of the extraordinary regime and the return to the ordinary evaluation and self-management mechanisms in conditions of legislative stability.

### **III. Challenges and limitations of the whistleblowers’ mechanism**

The whistleblowers’ mechanism remains inefficient and unaligned to the European standards, despite the coming into force of Law no. 165/2023. The analysis reveals a poor transposition of the Directive (EU) 2019/1937, with gaps persisting even in the new drafts of legislative amendments, which ignore such critical aspects as the extended definition of infringements, security of reporting channels, protection of the whistle-blowers in good faith and exhaustive designation of the competent authorities. The dysfunctionality of the system is confirmed by extremely modest statistics – only 12 disclosures received by NAC and 7 protection requests registered by the Ombudsman in 2024. The insufficient data and lack of transparency in the compelled entities show a formal and inefficient application of the mechanism, with no visible impact. The review of the law, increase of the degree of institutional reporting and the effective application of the existing legal framework are recommended.

### **IV. Asset control: prosecution of unjustified wealth and illicit enrichment**

This chapter emphasizes the erosion of the mechanisms of declaration, control and sanctioning of unjustified wealth and illicit enrichment in the context of an instable and frequently emended regulatory framework that has affected the independence of NIA and allowed interferences of the management in the activity of integrity inspectors.

Although the number of control reports has increased in 2024 as compared to 2023 (201 inspections, 140 of which ascertained infringements), the level of activity is lower than in 2021. The sanctioning of non-observance of the declaration rules shows an accelerated growth, with 508 cases only in 2024. Nevertheless, of the 98 reports ascertaining obvious or substantial differences of assets issued between 2020 and July 2025, only 6 became enforceable, which compromises the effectivity of this instrument. Most cases refer to local elected officials and officials with a special status, which leads to the perception of some selective actions against the opposition or against the officials at the end of their mandate.

The fight against illicit enrichment is almost symbolic: of 110 criminal cases opened starting with 2014, only three were sent to trial and only one final conviction has been issued. In this context, the report recommends a substantial review of the regulatory framework and the impact assessment of the existing legislation, accompanied by a rigorous and coherent application of the legal provisions.

### **V. Corruption in electoral processes**

This chapter analyzes corruption in the electoral process, emphasizing the lack of a clear regulation of electoral integrity and the incoherent application of the existing norms. Although the constitutional and electoral framework stipulate that the free vote is a democratic foundation, the electoral integrity concept remains a doctrinarian one, without clear legal mechanisms, efficient sanctions or well-defined responsibilities.

The recent amendments made to the Misdemeanor Code and Criminal Code referred especially to passive electoral corruption. Over 29,000 misdemeanors were registered between 2024 and 2025 for passive electoral corruption, with sanctions applied in 64% of the cases. In contrast, only 113 offences of electoral corruption were registered in the same period, and only 10 of them were sent to trial. This unbalance emphasizes a trend to penalize the electors accepting a bribe, while the authors of the acts (active corruption) are rarely sanctioned, which raises serious concerns about the coherence and fairness of the legislative policies.

Moreover, the misdemeanor sanctions for passive corruption are disproportionately severe in comparison with other electoral misdemeanors and even with some criminal sanctions, without solid justifications. The lack of a consolidated caselaw and the often conjunctural nature of the legislative interventions may decrease the preventive effect of the sanctions and may affect public trust.

The report recommends the development of the electoral integrity concept by means of clear, coherent and enforceable legal norms, together with a balanced sanctioning system able to discourage both the offering and the acceptance of electoral bribes. The integrity of electoral process remains an essential condition for free and correct elections, which may not be ensured without independent institutions, transparent procedures and consistent legislation.

## VI. Criminal assets recovery

The criminal assets recovery domain has seen an acceleration in 2024–2025 towards the alignment to the European standards by transposing the Directive (EU) 2024/1260, legislative reforms and initiation of the mechanism of social reuse of confiscated assets. Although the legal and institutional framework was strengthened, the practical efficiency is still low: the rate of recovery of seized assets is still under 10%, much below the average level in EU of 50%, and the system performance is strongly affected by duration of judicial processes extended often for 8–10 years.

Operating activity has intensified in 2024. The value of seized assets increased, reaching approximately 1.3 billion MDL (by 152% more than in 2023), and the confiscations ordered by courts rose to approximately 74.9 million MDL, showing a growth by approximately 12.5 million MDL in comparison with 2023. In parallel, CARA received on its treasury accounts around 270 million MDL from recoveries and voluntary transfers, and the assets seized abroad are still at a high level, exceeding 1.5 billion MDL.

Nevertheless, the achieved progress is attenuated by persistent structural obstacles. International cooperation faces significant difficulties in the recognition and enforcement of confiscation decisions, especially in the jurisdictions on the territory of which the concerned assets are located. The capacity of CARA to efficiently manage large amounts of seized assets, to perform fast evaluations and apply the anticipated recovery mechanism is still limited, which affects the transformation of such assets into visible public benefits.

For the period 2025–2026, the strategic priorities envisage the transformation of CARA into an autonomous agency of the „Asset Management Office” type, the creation of an integrated IT system to keep record of and manage the assets, the expansion of parallel financial investigation and the full operationalization of social reuse.

## VII. Access to information and transparency of decision-making process

The period 2022–2025 emphasizes a major contrast between the incontestable rule making progress and the poor practical application in the area of transparency. Although the approval

of the new Law no. 148/2023 has aligned the legal framework to the EU standards, boosting the score of the Republic of Moldova in the Freedom House evaluations from 47 to 70 points, the implementation is still unequal and marked by formalism. Approximately 15% of the institutions still ignore the request for information, and the modern monitoring tools, such as the Digital Public Registry of Requests (promised for 2025), are not operational yet, thus perpetuating a culture of administrative impunity.

Transparency in decision-making is systemically flawed at all levels of power. At the Executive level, public consultations are frequently staged: although the initiation of drafts is announced, the decision-making cycle is broken at the end, and the publication of consultation results (minutes or synthesis) is ensured for only 45% of drafts. The key ministries show high rates of non-observance of deadlines, and the dialogue with stakeholders is often one-way. At a local level (LPA) the proactive transparency is blocked by the lack of capacities and digital infrastructure, 55% of local authorities do not even have an official website.

Parliament represents a critical vulnerability area, where opacity, low level of public consultation and excessive speed undermined the quality of the legislative process. The monitoring shows an abuse of the accelerated procedure – with 105 laws approved in emergency mode from April 2023 till September 2024 – which practice has been criticized by GRECO for the transformation of consultations in a purely formal exercise.

In conclusion, despite modernizing the rules of play, the institutional discipline has not kept up with the rhythm. The real progress for the next stage does not depend anymore on the approval of new laws, it depends on passing from the compliance “on paper” to operational transparency, strictly monitored and sanctioned in case of deviations.”

## VIII. Integrity and transparency in public procurements

Public procurements play a strategic role in the economy of the Republic of Moldova, having a share of 10–12% of the total public expenditure. In 2024, the volume of public procurements increased by 7.8%, reaching 13.3 billion MDL, and the number of contracts rose above 33,800. In the first quarter of 2025, an unprecedented increase of 56.6% of the procurements volume was recorded (4.5 billion MDL, in comparison with 2.9 billion MDL in the 1<sup>st</sup> quarter of 2024), and the contracts number rose by approximately 16%.

Nevertheless, the integrity of the process is still fragile. Approximately 17% of the procurement value in 2024 and 16.6% in the 1<sup>st</sup> quarter of 2025 were awarded directly, without publishing on MTender, limiting the transparency and competition. The low value procurements – where the vast majority is awarded directly (85%) – remain vulnerable to abuses.

The most frequent deficiencies relate to the inadequate planning of procurements, artificial division of contracts, infringement of the publication obligations and deadlines, and inadequate bid evaluation criteria. Moreover, the control mechanisms are inefficient – more than a half (51%) of procedures containing irregularities, identified by the Public Procurements Agency, continued without being remediated by the contracting authorities. In parallel, the lack of access to data in open format and the delay in the implementation of a complete digital system feed the systemic corruption risks.

The legislative progresses in 2024–2025 include a new law on procurements, regulations on the planning and certification of specialists, as well as digitalization projects, including the development of a new electronic system. The procurements reform should be strengthened by effective transparency, full digitalization, systematic increase of professionalism and institutional accountability, as it represents an essential pillar of the European integration process and of strengthening the rule of law.

## IX. Integrity in business

The promotion of integrity in the private sector has become a strategic objective in the context of governance reforms and European integration commitments of the Republic of Moldova. The state initiated relevant policies, such as the National Integrity and Anticorruption Program for 2024–2028, stipulating specific objectives for the decrease of corruption and increase of transparency in companies. In parallel, the legal framework was amended with regulations on corporate governance, remuneration of management bodies and transparency of beneficial owners. Nevertheless, the implementation of these measures faces major difficulties: inefficient communication, fragmentary application and low participation of companies in the monitoring mechanisms.

At an operating level, only some large companies implement integrity policies, such as codes of conduct, internal audit, whistleblowing mechanisms and compliance clauses in commercial relations. Although ISO 37001 standard is available, only two companies purchased it in the last two years, and the awarding of six companies during the 2025 edition of the “Commercial Trademark” contest (a nomination in the area of integrity) shows a still modest involvement.

In this context, the efforts to promote business integrity tools remain vital. During 2025, with the joint forces of the Center for Corruption Analysis and Prevention and Chamber of Commerce and Industry of the Republic of Moldova, five training sessions were organized in various regions of the country, gathering over 150 entrepreneurs. These initiatives, although they are useful, should be expanded and systematically supported to bring a real change in the business culture. The integration of integrity standards should become a part of the private sector DNA, actively supported by the state and international partners.

## INTRODUCTION

The annual anticorruption report for 2024–2025, developed by the Center for Corruption Analysis and Prevention (CAPC), offers an independent and documented assessment of the main evolutions, progresses and barriers in the fight against corruption in the Republic of Moldova. In the context of opening the accession negotiations with the European Union, the analysis acquires a strategic relevance, as the fight against corruption and justice reform are listed among the key priorities of the accession agenda.

The goal of the report is to provide a clear and accessible diagnosis on public integrity, based on a critical analysis of legislative reforms, institutional performance and effective application of anticorruption norms, with focus on the compliance with international standards and on the real impact of the approved measures on the level of transparency, responsibility and public trust.

The document is structured into nine thematic chapters covering the key domains of anticorruption architecture: European commitments, justice, institutional integrity, asset control, elections, asset recovery, public procurement, open governance and private sector. The report does not claim to be exhaustive of all corruption manifestations, it focuses on those areas which, according to experts and official commitments, represent “sensitive points” requiring continuous reforms. Every chapter includes a review of the relevant regulatory framework and subsequent amendments to it, an assessment of involved institutional mechanisms (including their capacity and independence), an analysis of the data and available indicators (official statistics, monitoring reports, opinion surveys) and a highlight of relevant cases or events from 2024–2025.

The applied methodology combines a qualitative analysis of the legal framework, public policy documents and institutional reports (including those of NAC, NIA, State Chancellery) with assessments formulated by international organizations, such as GRECO, OECD, European Commission, Freedom House or Transparency International. It also integrated data from opinion surveys, journalist investigations, as well as alternative reports of the local civil society (Transparency International Moldova, Institute for European Policies and Reforms – IEPR, Legal Resources Center – LRCM, Promo-LEX Association and others). CAPC also used the direct experience gathered through their own monitoring and proofing activities – for example, pre-vetting and vetting process monitoring, anticorruption proofing of some draft laws, participation in public consultations and sectoral working groups.

The report recognizes at the same time the limits relating to the incomplete access to official data for 2025 (some official data were not yet public at the moment of drafting the report), as well as the challenges to objectively quantify certain qualitative phenomena, such as the real level of independence of institutions. Where necessary, the analysis used prudent extrapolations or additional sources to outline relevant trends (i.e., opinion surveys, international ratings).

The importance of this report consists in its independent and aggregating nature. The formulated findings do not reflect the position of any official institution; they are the result of a critical corroboration of multiple and reliable sources. They may serve as a baseline for the national authorities in adjusting policies, for the political decisionmakers in obtaining an overall view on the state of anticorruption reforms, for the media in identifying topics that deserve to be investigated for the development parts in adjusting the offered support, and for the general public in understanding the real challenges of the reform.

# 1. ANTICORRUPTION COMMITMENTS UNDERTAKEN BY THE REPUBLIC OF MOLDOVA IN THE PROCESS OF ACCESSION TO THE EUROPEAN UNION

## 1.1. General context and evolution of the accession process

The fight against corruption is crystallized as a fundamental priority in the public agenda of the last years, with a decisive boost given by the process of accession of the Republic of Moldova to the European Union. This is not just a technical requirement; it represents the general pillar of alignment to the European values. During the accession negotiations, the commitment to effectively fight against corruption is directly referred to into the first negotiation chapter (Chapter 23: Reform of the judiciary and fundamental rights). According to the EU methodology, this is the first chapter to be opened and will be the last one to be closed, thus determining the general tempo of the integration process.

The European pathway of the Republic of Moldova has had a dynamic evolution, marked by successive stages of deepening the relations with the EU:

- ✓ **Association Agreement (2014):** The process started formally with the signing, on 27 June 2014, of the Association Agreement between the Republic of Moldova and the European Union (including the European Community of Atomic Energy and the member states), which document laid the basis for the political and economic alignment.
- ✓ **Status of candidate country (2022):** After the accession request submitted in March 2022, the European Council granted to the Republic of Moldova, on 23 June 2022, the status of candidate country. This decision was followed by Recommendation no. 1/2022 of the Association Council and Action Plan for the implementation of the 9 measures proposed by the European Commission.
- ✓ **Opening of negotiations (2023-2024):** On the basis of the European Commission Recommendation of 08 November 2023 and Decision of the European Council of 14 December 2023, the accession negotiations were officially launched. The reference moment was represented by the First RM-EU Intergovernmental Conference of 25 June 2024, that marked the start of the screening process (evaluation and harmonization of the national legislation with the *Acquis Communautaire*).
- ✓ **Bilateral screening process (2024-2025):** The bilateral screening process was performed in the period 10 July 2024 – 22 September 2025. It included a detailed evaluation of the national policies to identify the degree of compliance with the EU standards. The calendar of 2025 included the transmission of the first screening report on the group of fundamental policies (January 2025), the performance of the first EU-Moldova summit (July 2025) and the successful completion of the screening process in September.

The main tool used by the European Union to monitor reforms is the Enlargement Package, annually published by the European Commission. It evaluates the fulfilment of the Copenhagen Criteria: stability of democratic institutions, functional market economy and capacity to adopt the *Acquis Communautaire*.

On 4 November 2025, the European Commission published the 2025 Enlargement Package. The report relating to the Republic of Moldova<sup>1</sup> found that, in the last 12 months, the country has registered progresses on all negotiation chapters, and the general level of preparedness increased considerably. Nevertheless, the Commission has recommended the intensification of reforms in fundamental domains: rule of law, justice independence and fight against corruption.

---

<sup>1</sup> [Enlargement Report](#) of the European Commission on the Republic of Moldova, 4 November 2025

## 1.2. Strategic framework and planning documents

To implement in practice the accession objectives, the Republic of Moldova developed a complex framework of strategic documents, that evolved in time to comply with the new requirements of the negotiation process.

Initially, the anticorruption commitments were included in the Action Plan for the implementation of measures contained in the European Commission Opinion<sup>2</sup> (fulfilled till June 2023) and, subsequently, in the National Action Plan of accession for 2024-2027<sup>3</sup>.

Currently, the reference strategic document is the National Program of Accession of the Republic of Moldova to the European Union for the period 2025-2029 (NAP)<sup>4</sup>. NAP represents the main instrument for the planning, monitoring and allocation of resources necessary for legislative harmonization and institutional adaptation. Every NAP section contains a narrative part (current situation, future plans, costs) and two essential annexes: Annex A, including normative actions for the transposition of EU acquis in the national legislation, and Annex B, comprising the actions of implementation and strengthening of the administrative capacities necessary for the application of approved laws.

NAP updating is done annually to integrate the recommendations from the Progress Reports of the European Commission and the results of the screening progress. As NAP was approved in May 2025, before the bilateral screening was completed (September 2025) and before the Enlargement Report was published (November 2025), it will be substantially updated.

In parallel with NAP, the Government approved three specific documents – strategic documents drafted in the context of the negotiation framework for the accession of the Republic of Moldova to the European Union: „Rule of law” Roadmap<sup>5</sup>; „Functioning of Democratic Institutions” Roadmap<sup>6</sup>; „Public Administration Reform” Roadmap<sup>7</sup>.

Likewise, the Reform Agenda related to the Growth Plan of the Republic of Moldova for 2025-2027<sup>8</sup> includes additional measures. The synchronization of all these commitments (from the Roadmaps and Reform Agenda) in the single NAP framework represents the next procedural step, ensuring the coherence of public policies in the area of integrity and justice.

## 1.3. Achievements and arrears in the implementation of anticorruption commitments

The following section will analyze the anti-corruption commitments set forth in three national strategic documents: NAP 2025–2029, the “Rule of Law” Roadmap, and the “Functioning of Democratic Institutions” Roadmap.

This section will outline the status of the commitments in these documents pertaining to the year 2025, including: a) commitments with a completion deadline in 2025; b) commitments that are being implemented on an ongoing basis throughout 2025 or that extend beyond that date;

---

<sup>2</sup> [Action Plan](#) for the implementation of the measures proposed by the European Commission in its Opinion on the application of the Republic of Moldova for EU membership, approved by NCEI ON 4.08.2022

<sup>3</sup> [Government Decision no.829/2023](#) on the approval of the National Action Plan of accession of the Republic of Moldova to the European Union for 2024-2027

<sup>4</sup> [Government Decision no. 306/2025](#) on the approval of the National Action Plan of accession of the Republic of Moldova to the European Union for 2025-2029

<sup>5</sup> [Government Decision no.275/2025](#) for the approval of the “Rule of Law” Roadmap (reference criterion in the process of accession of the Republic of Moldova to the European Union)

<sup>6</sup> [Government Decision no.276/2025](#) for the approval of the “Functioning of Democratic Institutions” Roadmap

<sup>7</sup> [Government Decision no. 274/2025](#) for the approval of the „Public Administration Reform” Roadmap (reference criterion in the process of accession of the Republic of Moldova to the European Union)

<sup>8</sup> [Government Decision no. 260/2025](#) on the approval of the Reform Agenda related to the Growth Plan of the Republic of Moldova for 2025-2027

and c) their implementation status in 2025 – specifically, completed, partially completed, or not completed.

Action	Completion deadline	Data on completion	Conclusions
<i>NAP 2025-2029 (Cluster 1, Chapter 23, Annex A); „Rule of Law” Roadmap (Chapter II)</i>			
<i>Draft Law for the amendment of the Criminal Code (on the liability of the legal person for corruption acts in the private sector)</i>	December 2025	Draft Law for the amendment of several regulatory acts (strengthening the criminal liability of the legal person and sanctioning of the infringement of international restrictive measures)	<b>Partially completed</b>
<i>Amendment of the Criminal Code for the alignment to the EU acquis on fighting corruption in the private sector for the purpose of regulating the liability of the legal persons for corruption acts and related actions</i>			

In 2025, the Ministry of Justice submitted for public consultations a draft law on the amendment of certain legislative acts<sup>9</sup>, aimed at strengthening the criminal liability of legal entities for corruption acts in the private sector, in accordance with Council Framework Decision 2003/568/JHA of 22 July 2003 on combating corruption in the private sector and other European Union regulatory acts. The draft was published on the particip.gov.md consultation portal, with a consultation period from 16 to 31 October 2025, and includes provisions aimed at regulating the transfer of criminal liability in the event of the reorganization of legal entities and the introduction of new sanctions inspired by EU standards.

Till 15 December 2025, the draft law had not been placed on the agenda of the Parliament of the Republic of Moldova, had not been submitted for parliamentary review, and had not been adopted as regulatory act. Under these circumstances, the commitment is considered partially fulfilled: the drafting and consultation process was initiated and implemented, but was not finalized through the adoption of a law in 2025.

Action	Completion deadline	Data on completion	Conclusions
<i>NAP 2025-2029 (Cluster 1, Chapter 23, Annex A); „Rule of Law” Roadmap (Chapter II)</i>			
<i>Draft Law amending Law no.165/2023 on whistleblowers</i>	December 2025	Draft Law for the amendment of certain regulatory acts (strengthening the protection mechanism in the area of whistleblowing)	<b>Partially completed</b>
<i>Approval of the regulatory framework for the alignment to EU acquis regarding the protection of persons reporting breaches of Union law (whistleblowers)</i>			

In 2025, the Ministry of Justice initiated the legislative process to transpose Directive (EU) 2019/1937 on the protection of persons reporting breaches of Union law into national

<sup>9</sup> Draft law for the amendment of certain regulatory acts (strengthening criminal liability of legal entities and penalizing violations of international restrictive measures), published for [public consultations](#)

legislation, through a draft law amending Law No. 165/2023 on whistleblowers. The draft<sup>10</sup>, subjected to public consultations, aims to: ensure that employees consult with trade unions; establish internal reporting channels for public and private entities; protect the confidentiality of whistleblowers; periodically review procedures; extend protection to facilitators and third parties; provide the right to compensation for damages; and prohibit the sanctioning of whistleblowers for lawful disclosures.

Until 14 December 2025, the draft law has not been registered with the Parliament of the Republic of Moldova, has not been submitted for parliamentary review, and has not been adopted as a regulatory act. Therefore, although the legislative process was initiated and the public consultation stages were completed, the commitment was not finalized through the adoption of a law by the planned deadline in 2025. Consequently, this commitment is considered partially fulfilled for the year 2025.

At the same time, CAPC Proofing Report<sup>11</sup> on this draft law raises important observations and objections regarding the incomplete transposition of Directive (EU) 2019/1937 and ambiguous wording of certain provisions in the draft. It is also noted that the proposed mechanism is not coherently integrated into the national legal architecture, essential elements for practical implementation are missing (umbrella authority, common platform, clear indicators), and key standards of the Directive on the protection of whistleblowers remain unaddressed. Furthermore, the draft does not provide sufficiently detailed procedural safeguards and underestimates the resources required for implementation, which risks rendering whistleblower protection merely formal and ineffective.

Action	Completion deadline	Data on completion	Conclusions
<i>NAP 2025-2029 (Cluster 1, Chapter 23, Annex B); „Rule of Law” Roadmap (Chapter I)</i>			
<i>Completion of the external evaluation (vetting) of judges from the courts of appeal and of court presidents/deputy presidents</i>	August 2025-2026	Statistics of the Vetting Commissions as of 17.11.2025: <ul style="list-style-type: none"> <li>• 76 subjects of the Court of Appeal, and</li> <li>• 24 court presidents / deputy presidents</li> </ul>	<b>In process of completion</b>  <i>(visible progress)</i>
<i>5. External / extraordinary evaluation (vetting) of integrity of the stakeholders from the justice system completed</i>  <i>5.1.1. Progress registered on the external evaluation (vetting) of judges from the courts of appeal and of court presidents/deputy presidents</i>	December 2025		

The implementation of the action on the external evaluation (vetting) of judges from the courts of appeal and of court presidents/deputy presidents, scheduled for 2025–2026, made some progress during 2025. According to the data<sup>12</sup> published by the Evaluation Commission on 17 November 2025, 76 candidates (63 judges and 13 candidates) were evaluated in the courts of appeal. Of these, 38 resigned or withdrew before the procedure was completed, 19 passed the evaluation, and 12 failed. One case was still under review, and five were undergoing a re-evaluation. Regarding the evaluation of court presidents and deputy presidents, the process

<sup>10</sup> Draft Law for the amendment of certain regulatory acts (strengthening the protection mechanism in the area of whistleblowing), published for [public consultations](#)

<sup>11</sup> CAPC [Proofing Report](#) to Draft Law for the amendment of certain regulatory acts (strengthening the protection mechanism in the area of whistleblowing), published on 6.10.2025

<sup>12</sup> See section “[Statistics per category of subjects](#)” on the website of the Vetting Commission

involved 24 candidates. As of the same date, 10 judges had resigned, 4 had passed the evaluation, 5 were under review, and reports for another 5 cases remained pending.

Action	Completion deadline	Data on completion	Conclusions
<i>NAP 2025-2029 (Cluster 1, Chapter 23, Annex B); „Rule of Law” Roadmap (Chapter I)</i>			
<i>External evaluation (vetting) of prosecutors within the Specialized Prosecutor Offices, chief prosecutors of the subdivisions of General Prosecutor Office, and chief prosecutors and their deputies in the territorial prosecutor offices</i>	August 2025-2026	Information on the website of the Prosecutor Evaluation Commission on 17.11.2025: <ul style="list-style-type: none"> <li>• 19 persons interviewed</li> <li>• 8 evaluation report published</li> </ul>	<b>In process of completion</b> <i>(visible progress)</i>
<i>5. External / extraordinary evaluation (vetting) of integrity of the stakeholders from the justice system completed</i>  <i>5.2.1. Progresses on the external evaluation (vetting) of prosecutors within the Specialized Prosecutor Offices, chief prosecutors of the subdivisions of General Prosecutor Office, and chief prosecutors and their deputies in the territorial prosecutor offices</i>	December 2025		

The external evaluation (vetting) of prosecutors within the Specialized Prosecutor Offices, chief prosecutors of the subdivisions of General Prosecutor Office, and chief prosecutors and their deputies in the territorial prosecutor offices is ongoing, but official data available for 2025 is limited.

Throughout 2025, the Prosecutor Evaluation Commission published specific information on its website regarding the interviews<sup>13</sup> that took place, listing 19 individuals who were interviewed, most of whom were from the Anticorruption Prosecutor Office and the management structures of the Prosecutor Office. At the same time, 8 evaluation reports<sup>14</sup> adopted during 2025 were posted on the website, confirming the progress of the process.

Apart from this information, there are no updated cumulative statistical data regarding the total number of prosecutors subject to evaluation, the proportion of those subjected to interviews, or the consolidated results of the process (passed/failed, withdrawals, final reports) during 2025. The latest report of the commission<sup>15</sup> refers to the period 2024 – 31 March 2025. The absence of an updated statistical overview limits a comprehensive assessment of progress.

Overall, the action can be classified as “In process of implementation,” as the vetting process for prosecutors has been initiated and is advancing, but has not yet been completed.

<sup>13</sup> See section “[Interviews](#)” on the website of the Vetting Commission

<sup>14</sup> See section “[Evaluation Reports](#)” on the website of the Vetting Commission

<sup>15</sup> Activity [Report](#) of the Prosecutor Evaluation Commission to the Parliament of the Republic of Moldova, 31 March 2025

Action	Completion deadline	Data on completion	Conclusions
<i>NAP 2025-2029 (Cluster 1, Chapter 23, Annex B and Chapter 24 Annex B); „Rule of Law” Roadmap (Chapter IX)</i>			
<i>Continuation of implementation of the GRECO recommendations from the fifth round of the evaluation report of the Republic of Moldova</i>	2025-2027	<ul style="list-style-type: none"> <li>The annual report monitoring the degree of implementation is not public</li> <li>Certain measures were completed, others are in progress, some are non-completed</li> </ul>	<p><b>In process of implementation</b></p> <p><i>(no visible progress)</i></p>
<i>Implementation and monitoring of the GRECO recommendations from the fifth round of the evaluation regarding the law enforcement authorities</i>	December 2025		

GRECO published the 5<sup>th</sup> Round Evaluation Report<sup>16</sup> which identifies detailed recommendations for the Republic of Moldova regarding corruption prevention and promotion of integrity in senior executive positions and in law enforcement agencies (including the Police and Border Police). Moldova was invited to report on the measures taken in response to the recommendations by 30 June 2025. Subsequently, GRECO was to evaluate this information and adopt a Compliance Report in the third or fourth quarter of 2025 (a specific monitoring procedure), accompanied by a decision on the degree of compliance. As of the present time (16 December 2025), there is no published Compliance Report in public sources regarding the implementation of the recommendations from the 5<sup>th</sup> evaluation. Furthermore, there are no public reports from national authorities documenting the individual or consolidated implementation of the GRECO recommendations in this report.

An analysis of the status of the 25 recommendations in the GRECO report reveals a complex picture, characterized by certain changes to the regulatory framework (e.g., the adoption of the new Law on Access to Information of Public Interest and the strengthening of powers of the Anticorruption Prosecutor Office), measures that directly address key GRECO recommendations, but an uneven practical implementation. However, major arrears persist in sensitive areas, such as lobbying regulation, confidential advisory mechanisms, and the control of post-employment restrictions, which may lead to assessments of “partial implementation” or “non-implementation” in the GRECO compliance report. In the law enforcement sector (Police and Border Police), although there is progress in gender equality and digitalization, structural challenges remain regarding salaries, management stability, and whistleblower protection.

Given that some measures have been initiated and others are currently being implemented, that the completion deadline set in the NAP is 2025–2027, and that the actual level of compliance with GRECO recommendations from the 5<sup>th</sup> round has not yet been officially documented, it can be concluded that the action is In process of implementation. However, no specific results have been publicly reported for 2025, which does not allow for an assessment of the substance of the progress made and the impact of the measures undertaken.

<sup>16</sup> Evaluation [Report](#), 5<sup>th</sup> Round of evaluation. Prevention of Corruption and Promotion of Integrity at the Central Level (Executive Leadership Positions) and at the Level of Law Enforcement Institutions, GRECO, 1.12.2023

Action	Completion deadline	Data on completion	Conclusions
<i>NAP 2025-2029 (Cluster 1, Chapter 23, Annex B); „Rule of Law” Roadmap (Chapter II)</i>			
<i>Monitoring the implementation of the National Integrity and Anticorruption Program for 2024-2028 and progress analysis, identification of deficiencies and remediation measures</i>	2025-2027	The Monitoring <a href="#">Report</a> on the implementation of the Action Plan of the National Integrity and Anticorruption Program for 2024–2028 (reporting period: 1 <sup>st</sup> half of 2025)	<b>In process of implementation</b> <i>(visible progress)</i>
<i>1.5. Monitoring the implementation of the National Integrity and Anticorruption Program for 2024-2028 and progress analysis, identification of deficiencies and remediation measures</i>			

The [Report](#)<sup>17</sup> for the first half of 2025 was prepared and published by the Secretariat of the NAC Monitoring Group, and its content complies with the requirements set forth in paragraph 65 of Parliament Decision No. 442/2023: collecting reports from implementing entities, presenting progress made, identifying deficiencies, and formulating corrective measures. The monitoring process was carried out in accordance with the Methodology for Monitoring and Evaluation of the NIAP and the Action Plan for 2024–2028<sup>18</sup>. The responsible entities submitted their reports, and the Secretariat aggregated the information into a single document, confirming the functionality of the institutional reporting mechanism.

The preparation of the annual report for 2025 follows the standard timeline established by the regulatory framework and will take place in the first month of 2026; therefore, its absence at this time does not indicate an arrear.

Under these circumstances, the action can be assessed as In process of implementation: the semi-annual monitoring was carried out in accordance with procedures, the data collection and analysis mechanism is functioning, and the process of identifying deficiencies is active. Subsequent monitoring stages will continue in 2026–2027, in accordance with the schedule set forth in the NIAP.

Action	Completion deadline	Data on completion	Conclusions
<i>NAP 2025-2029 (Cluster 1, Chapter 23, Annex B); „Rule of Law” Roadmap (Chapter II)</i>			
<i>Monitoring the implementation of the Plan of measures to limit the excessive influence of private interests on the economic, political and public life (Disoligarchization Plan)</i>	2025-2026	No information	<b>Not completed</b>

In its Opinion on the Republic of Moldova’s application for membership in the European Union, dated 17 June 2022, the European Commission recommended that the Republic of Moldova “implement its commitment to “disoligarchization” by eliminating the excessive influence of

<sup>17</sup> Monitoring [Report](#) on the Implementation of the Action Plan of the National Integrity and Anticorruption Program for 2024–2028, reporting period: first half of 2025, NAC

<sup>18</sup> [Order](#) of NAC Director no. 30 of 24.06.2024 on the approval of the Methodology for monitoring and evaluating the implementation of the National Integrity and Anticorruption Program and the Action Plan for 2024-2028

private interests on economic, political, and public life.” To this end, an Action Plan was developed and several measures were implemented. Building on the efforts already undertaken, on 26 May 2023, the Disoligarchization Plan<sup>19</sup> was approved by the National Commission for European Integration (NCEI)<sup>20</sup>. The document covers key areas: public property management, beneficial owner transparency, anti-money laundering, prevention of economic concentration, asset recovery, risk management in the financial sector, political financing transparency, and strengthening the legal and institutional framework.

The reporting mechanism requires the responsible authorities to submit monthly reports on the implementation of measures to the State Chancellery, which then prepares consolidated quarterly reports for NCEI. To coordinate implementation, the Working Group on Disoligarchization was established by the Decision of the Prime-Minister no. 127/2023, which ensures monitoring, data aggregation, and submission of quarterly reports.

However, following an analysis of the official websites of the State Chancellery and the Presidency, no published quarterly reports on the progress of the Plan implementation were identified, although the outcome indicator in the NAP expressly provides for their preparation and submission. In the absence of such reports, the action must be assessed as *not completed*.”

Action	Completion deadline	Data on completion	Conclusions
<i>NAP 2025-2029 (Cluster 1, Chapter 23, Annex B); „Rule of Law” Roadmap (Chapter II)</i>			
<i>Continuation of monitoring the implementation of the OECD performance indicators of the Anticorruption Network for Eastern Europe and Central Asia of the 5<sup>th</sup> Monitoring Round of the Istanbul Anticorruption Plan</i>	2025-2027	No information	<b>In process of implementation</b> <i>(no visible progress)</i>

In 2025, the Republic of Moldova fully participated in the monitoring process conducted by the OECD/ACN within the framework of the fifth round of the Istanbul Anticorruption Action Plan. The 2025 follow-up assessment, which followed the initial assessment in 2023, was conducted using a methodology based on performance indicators, and the report<sup>21</sup> adopted by the ACN plenary on 08 July 2025 highlights both significant progress (in areas such as anticorruption policies, whistleblower protection, integrity in procurement, and the independence of the judiciary and the prosecution service) as well as stagnation or regression (specialized anticorruption institutions, law enforcement in corruption cases, and integrity in the business environment). Civil society, including CAPC<sup>22</sup>, made a significant contribution to the assessment, both through national surveys and by participating in consultations and submitting written comments.

Regarding the internal monitoring provided for in the NAP, which assigns NAC the responsibility of preparing an annual report on the degree of implementation of the OECD/ACN performance indicators and recommendations, as of 16 December 2025 no such report had been published.

<sup>19</sup> [Plan](#) of measures to limit the excessive influence of private interests on the economic, political and public life (Disoligarchization Plan)

<sup>20</sup> Decree of the President of the Republic of Moldova no.441-IX of 22 April 2022, amended by the [Decree](#) of the President of the Republic of Moldova no.429-X of 10 November 2025

<sup>21</sup> Monitoring [Report](#) for Moldova – 5<sup>th</sup> Round of the Istanbul Anticorruption Action Plan, a document approved at the OECD/ACN Plenary on 08 July 2025

<sup>22</sup> See [Analytical Note](#): CAPC Comments and Recommendations on the OECD/ACN Evaluation of the Republic of Moldova Regarding Anticorruption Reforms (5<sup>th</sup> Monitoring Round, 2025)

Following the release of the OECD/ACN report on 18 September 2025, no analyses, summaries, or official positions from NAC regarding national progress against the ACN indicators have been made public.

Given that the international evaluation round has been fully completed, but the NAC institutional output required by the NAP has not yet been published, and considering that the implementation period for this action is 2025–2027, it can be classified as *in process of implementation*, with no publicly documented results for the year 2025.

Action	Completion deadline	Data on completion	Conclusions
<i>NAP 2025-2029 (Cluster 1, Chapter 23, Annex B; Cluster 1, Chapter 24, Annex B)</i>			
<i>Ensuring the continuous training of civil servants and managers of public entities on institutional integrity requirements and whistleblower protection in accordance with EU standards</i>	2025-2027		<b>In process of implementation</b> <i>(visible progress)</i>
<i>Training of civil servants on whistleblowing for public interest and protection of whistleblowers, as well as of the civil servants responsible for the management of whistleblowers in public entities</i>			

The action is in process of implementation, with a substantial number of activities implemented in 2025 by NAC, OO and MIA. Public statements from these institutions indicate that numerous training sessions have been conducted on institutional integrity, professional ethics, corruption prevention, and the whistleblower mechanism. NAC conducted training sessions in all key sectors (education, health, police, prisons, justice, and the state-owned economic sector), reaching a considerable number of participants in 2025. OO conducted specialized training sessions dedicated to the whistleblower mechanism, involving approximately 470 MIA employees.

The training topics are fully in line with the NAP requirements and standards of the EU Whistleblower Protection Directive. These activities are ongoing and are carried out in collaboration with the responsible institutions.

At the same time, there is still no centralized reporting mechanism; statistical data on the total number of trained individuals are not aggregated at the national level; and the quantitative indicators set out in NAP (including the figure of 15,000 civil servants trained annually through the OO e-learning platform) cannot be verified at this time. There is no information on whether the OO e-learning platform launched in 2020 (the “Whistleblowers” course) is still operational; at least on the Ombudsman website, it cannot be accessed.

Given that the action is scheduled for 2025–2027, and activities visibly began in 2025, with institutions already implementing large-scale training, the action can be considered: In process of implementation, with substantial progress, with the aggregation, reporting, and e-learning mechanisms to be consolidated in 2026–2027.

Action	Completion deadline	Data on completion	Conclusions
<i>NAP 2025-2029 (Cluster 1, Chapter 23, Annex B)</i>			
<i>Ensuring the control of assets and personal interests based on the harmonized methodology</i>	2025-2027	No information	<b>In process of implementation</b> <i>(no visible progress)</i>

The action in NAP provides for ensuring the control of personal assets and interests “based on the harmonized methodology” for the period 2025–2027. The corresponding indicator in the NAP (“number of annual checks of personal assets and interests”) measures the volume of checks but does not allow for a direct assessment of the stated objective – the existence and application of a harmonized methodology. In this regard, the indicator is not fully aligned with the action and does not reflect the qualitative dimension of the process.

NAP does not define the concept of “harmonized methodology”. In the absence of a European Union acquis on asset control, the most reasonable interpretation is the harmonization of the NIA methodology with the amendments made to the relevant legislation (Laws no. 132/2016 and no. 133/2016) and with the recommendations made in international evaluations (GRECO, OECD/ACN).

NIA 2025 Work Plan includes the action to adjust the existing methodology, with a completion deadline in December 2025 and clear indicators (“methodology adjusted and approved; methodology implemented”). The Methodology for Conducting Verifications and Controls<sup>23</sup> is published on NIA website, and is in force at the moment of evaluation. To date, no information has been published regarding the progress or completion of the adjustment to the existing methodology. The difference between the NAP timeframe (2025-2027) and the timeframe planned by NIA (2025) can be interpreted as a natural phasing: the revision of the methodology in 2025, followed by its application and consolidation in control activities in 2026–2027.

In the absence of public data on the adjustment of the methodology in 2025 and given that the implementation period is multiannual, the action can be considered in process of implementation, with the caveat that a full assessment will only be possible after the publication of results regarding the modification of the methodology and its application in the coming years.

Action	Completion deadline	Data on completion	Conclusions
<i>NAP 2025-2029 (Cluster 1, Chapter 23, Annex B)</i>			
<i>Improvement of interinstitutional cooperation, communication and coordination between the law enforcement authorities in the investigation of corruption cases</i>	2025-2027	<ul style="list-style-type: none"> <li>• Multilateral agreement (February 2025) on asset recovery</li> <li>• Interinstitutional agreement on support for APO (detachments)</li> <li>• Memorandum for the implementation of the national antifraud system</li> <li>• NAC sectorial agreements (i. e. AGEPI)</li> </ul>	<b>In process of implementation</b> <i>(visible progress)</i>

<sup>23</sup> Methodology for conducting verifications and checks by integrity inspectors, approved by [Order no.8/2024](#)

The reform delineating the competences of APO and NAC, implemented in 2024, led to an increase in operational interdependence between the two institutions and amplified the need for formal and functional cooperation mechanisms. In 2024-2025, APO saw an increase in the number of cases sent to trial, including high-profile cases, while NAC intensified its investigations into systemic corruption and asset recovery, confirming the practical effectiveness of interinstitutional cooperation.

Significant progress has been made in terms of the formal framework: multilateral [agreement](#) of February 2025 on asset recovery, interinstitutional [agreement](#) on support for APO, including detachment mechanisms (December 2024), Interinstitutional Cooperation [Memorandum](#) – a joint commitment of prosecutor offices and SFCI for the implementation of the national antifraud system, as well as NAC sectorial agreement (i.e., with [AGEPI](#)). These instruments cover the indicator “number of agreements concluded” and form the basis for standardized APO-NAC coordination.

At the operational level, cooperation remains hampered by structural factors: a severe staff shortage in the APO caused by vetting, resignations, recruitment difficulties, underfunding, lack of adequate office space, as well as delays resulting from the redistribution of cases following the separation of powers. The massive transfer of cases to the NAC and territorial prosecutor offices has led to procedural confusion and the restarting of some investigations almost from scratch. Furthermore, legislative instability (including the AOCPO<sup>24</sup> initiative) affects institutional coherence and the predictability of the reform.

In this context, APO-NAC cooperation in investigating cases is functional and utilized in practice (joint teams, analytical support, parallel financial investigations), but its effectiveness depends on APO operational resources, the full implementation of the detachment mechanism, and institutional stability. Given the tangible progress on the regulatory side, the formalization of institutional partnerships, and persistent operational constraints, the action is classified as in process of implementation, with a need to strengthen capacities and stability during 2026-2027.

Action	Completion deadline	Data on completion	Conclusions
<i>NAP 2025-2029 (Cluster 1, Chapter 23, Annex B); „Rule of Law” Roadmap (Chapter II)</i>			
<i>Performance of strategic analysis on risks for the purpose of combating corruption in the most vulnerable sectors, such as public procurement, state owned enterprises, customs and taxation, justice and law enforcement, infrastructure</i>	2025-2027	No information	<b>In process of implementation</b> <i>(no visible progress)</i>
<i>4.1. Performance of strategic analysis on risks for the purpose of combating corruption in the most vulnerable sectors, such as public procurement, state owned enterprises, customs and taxation, justice and law enforcement, infrastructure</i>			

<sup>24</sup> See [draft law](#) no.40 of 12.02.2025 on the Anticorruption and Organized Crime Prosecutor Office

In 2025, no new strategic analyses prepared by the NAC were publicly identified. Strategic analyses are published on the website of the institution only for previous years (2022-2023), and for 2024 NAC Annual Report mentions the existence of *nine strategic analyses* conducted in areas such as public procurement, public financial management, mineral resources, or financial flows, but these are not publicly available. For 2025 NAC has not published any strategic analyses, and there is no official information regarding their completion.

The current situation allows for two interpretations: either the analyses were prepared but have not yet been published; or they were not conducted in 2025, despite the obligation under NAP. In the absence of any public records or reports, the achievement of the indicator for 2025 cannot be confirmed.

Action status: in process of implementation, given the multiannual timeframe of 2025-2027, but with no public evidence of progress for 2025.

Action	Completion deadline	Data on completion	Conclusions
<i>NAP 2025-2029 (Cluster 1, Chapter 23, Annex B); „Rule of Law” Roadmap (Chapter II)</i>			
<i>Performance of institutional integrity evaluations in the most vulnerable sectors and monitoring the enforcement of recommendations to increase responsibility and to strengthen the integrity climate</i>	2025-2027	No information	<b>In process of implementation</b> <i>(no visible progress)</i>
<i>4.2. Performance of institutional integrity evaluations in the most vulnerable sectors and monitoring the enforcement of recommendations to increase responsibility and to strengthen the integrity climate</i>			

For 2025, there is no institutional integrity evaluation report published on NAC website, and the institution has not publicly reported the completion of such evaluations during the period under review. According to Law no. 325/2013 and Law no. 82/2017, reports on institutional integrity evaluations must be made public, and the evaluated entities must adopt and implement integrity plans within a maximum of three months from receiving the report.

The CNA 2024 annual report indicates the completion of comprehensive evaluations (National Road Transport Agency, Chisinau City Hall, district administration offices, CMC departments, State Tax Service), noting that the reports were submitted to the evaluated entities and published. However, such documents are not available on NAC website, contrary to the legal obligation and the communications of the institution.

For 2025 there is no information whatsoever regarding the initiation of new institutional integrity evaluations; the publication of reports; the adoption and implementation of integrity plans by the evaluated entities; or the monitoring of previously issued recommendations.

It cannot be ruled out that certain evaluations were conducted but not made public. At the same time, the total lack of transparency suggests the absence of visible results in 2025 regarding this action.

Action status: in process of implementation, given the multiannual timeframe of 2025-2027, but with no publicly verifiable progress for 2025.

Action	Completion deadline	Data on completion	Conclusions
<i>NAP 2025-2029 (Cluster 1, Chapter 24, Annex B)</i>			
<i>Ensuring the operation and promotion of specialized hotlines for combating corruption within the public entities</i>	2025-2027	NIAP Report – 1 <sup>st</sup> half of 2025: <ul style="list-style-type: none"> <li>• 76 entities reported;</li> <li>• 55 have specialized hotlines;</li> <li>• ~770 calls, 64 of which on alleged corruption acts;</li> <li>• non-uniform operation, NAC – 0 calls.</li> </ul>	<b>In process of implementation</b> <i>(limited progress)</i>

Data from the NIAP Report – first half of 2025 show that the mechanism of specialized anticorruption hotlines is implemented unevenly at the level of the central public administration. Of the 76 entities that reported, 55 (72.4%) have specialized anticorruption hotlines or institutional hotlines, while 21 entities have not implemented a separate channel, and five of these are planning to establish one in the future.

In total, public institutions reported over 770 calls to the specialized hotlines in the first half of 2025, but most were of an advisory nature. Only 64 calls concerned alleged corruption acts.

The data show that the infrastructure for specialized hotlines formally exists in most institutions, but their use for reporting corruption acts remains low, and the quality of the collected data is inconsistent. The NAC report (0 calls) indicates a lack of visibility for the main institutional channel, which raises questions regarding the promotion and effective operation of the mechanism.

Given that this action has a target completion date of 2025-2027, and that in 2025 there is partial implementation and inconsistent operation, the status can be assessed as in process of implementation, with limited progress and a need to strengthen existing mechanisms.

Action	Completion deadline	Data on completion	Conclusions
<i>„Rule of Law” Roadmap (Chapter II)</i>			
<i>1.3. Approval and implementation of an efficient penalization mechanism for the prevention and combating of electoral corruption cases, including those that may affect national security, in accordance with the European standards</i>	June 2025	<ul style="list-style-type: none"> <li>• Law no.100/2025</li> <li>• Law no. 130/2025</li> </ul>	<b>Completed</b>

In 2025, the Parliament adopted a comprehensive set of legislative amendments (Law no.100/2025<sup>25</sup> and Law no. 130/2025<sup>26</sup>) that strengthened the mechanisms for penalizing electoral corruption, including by increasing penalties for voter corruption, expanding the political financing oversight regime, and updating the Misdemeanor Code, which was supplemented with an article on passive electoral corruption. In addition, CEC adjusted its relevant procedural regulations.

<sup>25</sup> [Law no.100/2025](#) for the amendment of certain regulatory acts (efficient combating of electoral corruption and related aspects)

<sup>26</sup> [Law no.130/2025](#) for the amendment of certain regulatory acts

In 2025, thousands of administrative penalties have already been imposed, demonstrating the activation of the penalizing mechanism, although this raises questions regarding proportionality and consistency with European standards. Among other constraints highlighted in the public sphere, we note: the lack of consultation with the Venice Commission regarding certain legislative initiatives related to electoral corruption, the persistence of the practice of fictitious donors, CEC limited capacity at the local level, and the absence of consolidated case law regarding the application of the new rules. Moreover, there are disparities between administrative and criminal penalties, as well as a lack of clear justification for the different legal treatment of the passive versus active aspects of electoral corruption.

Despite these reservations, given the adoption of the legislative package, the adjustment of CEC regulations, and the implementation of the new penalization mechanisms, the action can be considered completed, as the main objective – the introduction and operationalization of an expanded and modernized penalization mechanism – was achieved within the prescribed timeframe. Monitoring the impact and further alignment with EU and Venice Commission standards are priorities for the next stages.

Action	Completion deadline	Data on completion	Conclusions
<i>„Rule of Law” Roadmap (Chapter II)</i>			
<i>1.6. Amendment of the regulatory framework on the legal regime of gifts in relation to the gifts that are inadmissible according to Law on integrity no. 82/2017</i>	December 2025	<ul style="list-style-type: none"> <li>• Government Decision no. 580/2025</li> </ul>	<b>Completed</b>

In September 2025, the Government<sup>27</sup> amended the Regulation on the legal regime of gifts. The new provisions clarify the definition of perishable goods, the procedure for handling inadmissible gifts, and the responsibilities of entities in relation to NAC. The amendments eliminate regulatory contradictions and implement GRECO recommendations. The action is completed.

<sup>27</sup> [Government Decision no.580/2025](#) amending the Regulation on the legal regime of gifts, approved by Government Decision no. 116/2020

## II. JUSTICE REFORM: PUBLIC POLICIES AND PRE-VETTING AND VETTING MECHANISMS

This subchapter provides a concise analysis of the progress of justice sector reform during 2022-2025, with a focus on pre-vetting and vetting processes – tools that, in theory, were intended to restore trust and integrity in the judicial system, but which in practice have yielded mixed results and sparked considerable controversy. The text combines official data, independent assessments, and public perceptions to outline a realistic picture of how the Strategy for Ensuring the Independence and Integrity of the Justice Sector 2022-2025 was implemented, highlighting the gaps between legislative reforms and their actual implementation.

### 2.1. Justice reform strategy for 2022–2025: goals, objectives and achievements

The adoption of the Strategy for Ensuring the Independence and Integrity of the Justice Sector for 2022-2025<sup>28</sup> marked another step in the effort of the Republic of Moldova to rebuild the trust in the judicial system and ensure an independent, efficient, and predictable justice system.

According to those who promote the document, the Strategy was conceived against a backdrop of a crisis of legitimacy in the judiciary, marked by low public trust and numerous signs of corruption and institutional inefficiency. At the heart of the Strategy lies the overarching objective of *strengthening the independence, integrity, and accountability of the judicial system*, so that it becomes a pillar of stability and democratic balance. The Strategy is consistent with Chapters 23 and 24 of the EU acquis, as well as with the recommendations issued by the European Commission, GRECO, the Council of Europe, and the Venice Commission.

The Action Plan for the implementation of the Strategy lists 127 actions, grouped into three strategic directions:

#### *I. Independence, accountability, and integrity of justice sector actors*

The Strategy aimed to strengthen functional and financial safeguards for judges and prosecutors, reform self-governance mechanisms (the Superior Council of Magistracy, the Superior Council of Prosecutors), introduce external integrity assessments, and reform the Supreme Court of Justice. The goal was to eliminate political influence and strengthen disciplinary mechanisms. Among the major actions included are:

- amending the Constitution to strengthen the independence of judges (amendments adopted in 2022);
- reforming the Supreme Court of Justice and reducing the number of judges from 33 to 20 (the new Law<sup>29</sup> on the Supreme Court of Justice was adopted in 2023);
- amending the laws governing the activities of the Superior Council of Magistracy (SCM) and the Superior Council of Prosecutors (SCP), as well as their respective colleges, by introducing clearer selection criteria and incompatibility rules, etc. It is important to note that both laws were amended repeatedly during the reference period. For example, the SCM Law<sup>30</sup> was amended 13 times.

#### *II. Access to justice and quality of the judicial process*

---

<sup>28</sup> [Law no. 211/2021](#) approving the Strategy on Ensuring the Independence and Integrity of the Justice Sector for 2022–2025 and the Action Plan for its implementation

<sup>29</sup> [Law no.64/2023](#) on the Supreme Court of Justice

<sup>30</sup> [Law no.947/1996](#) on the Superior Council of Magistracy

The strategy aimed to improve the access of the citizens to justice, enhance the quality of the judicial process, and strengthen the human rights protection system. Direction II focused on modernizing legal services, developing alternative dispute resolution mechanisms, and expanding state-guaranteed legal aid services for vulnerable groups.

Among the major actions included in the Action Plan were:

- developing and strengthening paralegal services at the local level, including ongoing training for paralegals;
- revising the regulatory framework on mediation, arbitration, and conciliation, with the aim of encouraging the amicable resolution of disputes;
- improving protection mechanisms for victims of domestic violence and vulnerable groups, including through digital tools and integrated support centers;
- strengthening the capacities of the Ombudsman Office and the Council for the Prevention of Torture;
- measures to reduce financial and procedural barriers to access to justice, including expanding the possibility of submitting applications and procedural documents online.

According to the monitoring reports of the Ministry of Justice for 2024<sup>31</sup>, of the total 23 actions planned in this area, 14 have been completed, 8 are ongoing, and 1 has not been initiated. Although moderate progress has been made in the areas of alternative dispute resolution and legal aid, the impact of the reforms remains limited. The effective implementation of quality standards for the judicial process has been slow, and the unification of judicial practice remains an incompletely achieved objective.

Overall, Direction II of the Strategy reflects uneven evolution: more visible results in actions with clear indicators (number of paralegals, cases assisted, mediation agreements), but delays in areas requiring inter-institutional coordination and consistent financial resources. The quality of judicial process has not significantly improved in public perception, and the mechanisms for internal control and performance evaluation of the courts remain only partially operational.

### *III. Efficient and modern administration of the justice sector*

This strategic direction was aimed at strengthening institutional management, optimizing the network of courts and prosecutor offices, and modernizing support infrastructure. The strategy provided measures to increase administrative efficiency, develop analytical, planning, and monitoring capacities within the Ministry of Justice and subordinated authorities, and gradually integrate digital solutions into work processes.

Among the main actions outlined in the Action Plan were:

- ✓ revising the judicial map and optimizing the location of courts and prosecutor offices;
- ✓ modernizing and digitalizing the judicial infrastructure, including the implementation of the e-Case File system and the interconnection of databases;
- ✓ strengthening the administrative capacities of the Ministry of Justice, the Court Administration Agency, and the National Institute of Justice;
- ✓ developing and implementing institutional performance management tools;
- ✓ developing staff competencies through thematic training, including in the areas of project management, governance, and professional ethics.

---

<sup>31</sup> See the [list](#) of monitoring reports on the website of the Ministry of Justice

According to the 2024 monitoring reports, 25 actions were tracked for this area, of which 17 were completed, 5 are in progress, and 3 were not completed. The most significant progress concerned the strengthening of administrative capacities and the launch of IT infrastructure projects, but the digitalization of judicial processes remained fragmented. The integrated court management system, planned for 2024, is not yet operational, and the interoperability of judicial registries with other government systems continues to be deficient.

Overall, Direction III has made numerical progress, but with qualitative gaps: many activities were formally checked off without a direct impact on the efficiency of the system. Independent evaluations (IEPR Report, 2024)<sup>32</sup> confirm that digitalization remains the most delayed component of the Strategy, while the modernization of institutional management has not translated into stable and sustainable processes. There is still dependence on external projects, and the internal reforms of the Ministry of Justice and ADJCM have not yet been consolidated through sustainable planning and control mechanisms.

According to the 2024 monitoring report of the Ministry of Justice, the average implementation rate of the Strategy is estimated at **approximately 62-65%**. The level of implementation varies significantly among the three strategic directions:

- ✓ *Direction I. Independence, accountability, and integrity of justice sector actors:* approximately 70% implementation rate. The most visible results relate to the reform of the Superior Council of Magistracy and the Superior Council of Prosecutors, the restructuring of the Supreme Court of Justice, and the launch of external evaluation processes (pre-vetting). However, frequent changes to the underlying legislation and uncertainties regarding the composition of the self-governing bodies have diminished the coherence of the reform and created the impression of a “reform in constant revision”.
- ✓ *Direction II. Access to justice and the quality of the judicial process:* approximately 55-58% implementation rate. Specific actions have been taken regarding state-guaranteed legal aid and the promotion of alternative dispute resolution mechanisms, but indicators regarding the quality of justice and the uniformity of judicial practice have not shown notable progress. Significant differences persist among courts in the application of standards for reasoning and in the management of trial duration.
- ✓ *Direction III. Efficient and modern administration of the justice sector:* approximately 60% implementation rate, with more visible results in strengthening administrative capacities and modernizing court infrastructure. However, the major objective regarding the digitalization of judicial processes has not been fully achieved – projects such as the e-Case File and the integrated court management system are still in pilot or testing phases, and the interoperability of IT systems remains limited.

The IEPR Report (2024) ascertains that overall progress is “moderate, with significant gaps between legislative reforms and practical implementation,” while the CLRM Analytical Note of June<sup>33</sup> underlines that “the reform remains vulnerable to institutional instability and fragmentation”.

International assessments confirm the same trend – regulatory progress, but partial and uneven implementation at an institutional level:

---

<sup>32</sup> [Alternative Monitoring Report](#) on the implementation of the Strategy for ensuring the independence and integrity of the justice sector for 2022-2025, monitoring period: 1.01.2022-31.12.2023, IEPR

<sup>33</sup> [Analytical Note](#) “Justice Reform at the end of the 11<sup>th</sup> Legislature: between real structural progress and critical arrears (2021-2025)”, CLRM

- The European Commission, in its 2024 Enlargement Report<sup>34</sup>, noted that the Republic of Moldova “*has continued to implement judicial reform in line with the 2022-2025 Strategy, but challenges remain in strengthening administrative capacity and ensuring coherence between integrity and performance evaluations*”;
- GRECO, in the 5<sup>th</sup> Evaluation Round (2023)<sup>35</sup>, welcomed the adoption of the strategic framework and the vetting effort, but noted “*the urgent need to ensure transparency and objective criteria in appointment and promotion procedures*”;
- The European Parliament Resolution of 05 October 2023<sup>36</sup> on the rule of law in the Republic of Moldova noted that “*legislative reforms are promising, but their success will depend on consistent implementation and avoiding the use of extraordinary mechanisms as political tools*”.

The 2022-2025 justice reform is, in essence, a transitional reform – with a broad regulatory framework but fragmented and often reactive implementation. Although there has been progress in specific areas (reform of the Supreme Court of Justice, ensuring the operationalization of the new SCM/SCP, introduction of external evaluation mechanisms), the pace and coherence of the reform have been affected by repeated legislative changes, a lack of effective public communication, and weak interinstitutional coordination.

One of the most sensitive and decisive components of the Strategy was the implementation of external integrity evaluation mechanisms, known as pre-vetting and vetting. These processes were not separate initiatives, but were designed as practical tools for implementing the strategic direction regarding the independence and integrity of the judiciary. The following section outlines the evolution of these mechanisms, public perception, and their implications on the credibility of the judicial system.

## 2.2. Pre-vetting and vetting vs. justice independence

There was no broad consensus in society regarding the appropriateness of the pre-vetting process, and the framework law<sup>37</sup> in this area drew criticism.

Several recommendations from the Venice Commission and the Council of Europe were not adequately addressed by the authorities: lack of broad political consensus for the extraordinary reform; lack of evidence of a real crisis in the judiciary, relying solely on political arguments; the composition of the Commission did not comply with international standards regarding the majority presence of judges; the integrity criteria were vague, open to interpretation, and applied arbitrarily; the decision-making process within the Commission was opaque; lack of transparency and fair access to justice in the appeal mechanism.

The law underwent several amendments, with evaluation criteria being changed even during the evaluation process. Consequently, the term of activity of the pre-vetting Commission was repeatedly extended, and fixed deadlines for verifying the gathered information were eliminated. Following the constitutional review<sup>38</sup> several provisions of such law were declared unconstitutional. The Court also ruled on the Supreme Court of Justice authority to order the re-evaluation of unsuccessful candidates in cases of serious procedural errors and the existence of circumstances that could have led to the candidate’s passing the evaluation.

<sup>34</sup> [Report for 2024](#) on the Republic of Moldova, European Commission, SWD(2024) 698 final, 30.10.2024

<sup>35</sup> [Evaluation Report](#) on the Republic of Moldova – 5<sup>th</sup> Evaluation Round, GRECO, 1.12.2023

<sup>36</sup> [European Parliament Resolution](#) of 5 October 2023 on the assessment of the progress made by Moldova towards EU accession

<sup>37</sup> [Law no.26/2022](#) on certain measures regarding the selection of candidates for membership in the self-governing bodies of judges and prosecutors

<sup>38</sup> Decisions of the Constitutional Court [no.9/2022](#) and [no.5/2023](#)

Following the interpretation<sup>39</sup> of certain provisions of Law No. 26/2022, the Pre-vetting Commission was excluded from the scope of the Misdemeanors Code. At the same time, absolute immunity was introduced for members of the Commission and the Secretariat, the composition of the Secretariat was kept secret, and the destruction of evaluation materials was mandated, the latter being perceived as an attempt to cover up traces of possible abuses.

The Regulations<sup>40</sup> of the Pre-vetting Commission were not subject to consultations, and their substance is of unsatisfactory quality. Several provisions in the Regulations exceed the provisions of Law 26/2022, thereby *de facto* establishing primary legal norms.

A Parliament Decision<sup>41</sup> confirmed the nominal composition of the Pre-vetting Commission, consisting of 6 members: 3 members – nominated by parliamentary fractions, and 3 members – nominated by development partners. The Pre-Vetting Commission had a Secretariat – a structure without legal personality, formed on an ad hoc basis, declared independent from any public authority, and which operated exclusively to assist the Pre-Vetting Commission in the exercise of its duties. The names of the Secretariat members were not disclosed to the subjects being evaluated. The “Pre-Vetting” Commission held its sessions at the National Institute of Justice, with satisfactory conditions provided for the public and media outlets to attend the meetings. The meetings were conducted in Romanian with simultaneous or consecutive interpretation into English.

The only published study on pre-vetting<sup>42</sup> showed that the integrity of the Pre-vetting Commission members was the weak link in the entire evaluation process, as Law 26/2022 did not establish clear and rigorous criteria, but only the vague requirement of “impeccable reputation.” Thus, a major discrepancy arose between the strict standards imposed on candidates and the lower standards applied to Commission members and the secretariate. Specific cases raised serious doubts about integrity: an international member, the president of Commission, had previously appeared in the international press facing allegations of mismanagement and fraud; he violated the incompatibility rules by holding a public office in the Netherlands and refused to resign; the other members did not act to exclude him, although they had a legal obligation to do so; a national member of the Commission was publicly associated with repeated convictions of Moldova at the ECHR and appeared in wiretaps from the “Banking Fraud” and “Laundromat” cases. He resigned.

At the same time, the study showed that the pre-vetting mechanism, created to verify the integrity of judges and prosecutors, was affected by certain procedural deficiencies: extending liability to candidates for the actions of their closed persons; requesting hard-to-obtain evidence within unreasonable timeframes (2-3 days); the burden of proof placed exclusively on the candidates; the disregard of fundamental principles – such as *res judicata* and the presumption of innocence; the retroactive application of obligations that did not previously exist; the right to defense rendered meaningless, and appeals were purely formal in nature. The court had no power to amend the decisions of the Commission, but only to confirm them or return them for reevaluation. The SCM formed after the pre-vetting process initiated disciplinary proceedings against SCJ judges who had invalidated the decisions of the Commission. The mandate of the Commission ended without all cases being finalized; these were taken over by a new body – the Vetting Commission.

---

<sup>39</sup> Law no.180/2023 on the interpretation of certain provisions of Law No. 26/2022 on certain measures related to the selection of candidates for membership in the self-governing bodies of judges and prosecutors and Law No. 65/2023 on the external evaluation of judges and candidates for the office of judge of the Supreme Court of Justice

<sup>40</sup> See [list](#) of regulations on the website of the Pre-Vetting Commission

<sup>41</sup> [Parliament Decision no. 88 of 04.04.2022](#) on the confirmation of the nominal composition of the Independent Commission for the assessment of the integrity of candidates for membership in the self-governing bodies of judges and prosecutors

<sup>42</sup> [Study](#) “Stages of Pre-Vetting: The unseen side of justice reform”, AALM, 2025

According to the study, the questioning of candidates – judges and prosecutors who failed the evaluation highlighted several systemic problems and procedural irregularities: unreasonably short deadlines for responses and limited access to information necessary for the defense; requests for inaccessible evidence, biased interpretations of statements, and discriminatory or humiliating treatment; illegal access to personal data, including that of family members, which created a climate of fear and insecurity; the secrecy surrounding the composition of the Secretariat, the lack of full access to one’s own files, and the involvement of detached judges in reviewing appeals; pressure and sanctions against judges who ruled in favor of the candidates.

## Vetting

The evaluation of candidates for the office of SCJ judge is governed by Law no.65 of 30.03.2023<sup>43</sup> and by the Regulations on the organization and functioning of the Commission<sup>44</sup>. Both regulatory acts have been subject to frequent amendments. Thus, Law 65/2023 was amended and supplemented 7 times within a relatively short period following its adoption. At the same time, on 07 July 2023 Parliament adopted Law no.180<sup>45</sup> for the interpretation of certain provisions of Law 26/2022 and Law 65/2023, thereby providing some clarifications regarding the status of the Evaluation Commission and the requirements for membership therein. An analysis of the practical implications of Law 180/2023 indicates that the law essentially established new regulations, and this is contrary to Article 71 of Law 100/2017 on regulatory acts. A summary of the revision process for Law 65/2023 demonstrates that the amendments were primarily promoted through legislative initiatives by members of Parliament, who intervened “*on the fly and mid-process.*” An analysis of the Vetting Commission Regulations shows that they largely replicate the provisions of Law 65/2023 and do not provide more detailed provisions, particularly regarding the composition of the Secretariat, the criteria, and the method for staff selection.

The Vetting Commission is not a public authority within the meaning of the Administrative Code, and the activity of the Commission is not public, with certain exceptions established by Law 65/2023 and the Regulations on the organization and functioning of the Evaluation Commission. The Evaluation Commission has broad powers to ensure a comprehensive and objective evaluation of the subjects, with access to multiple sources of information and the authority to request information and interview the relevant parties.

Parliament Decision no.155/2023<sup>46</sup> confirmed the nominal composition of the External Evaluation Commission for the ethical and financial integrity of judges and candidates for the office of judge of the Supreme Court of Justice: Andrei BIVOL, proposed by the “Action and Solidarity Party” faction; Lilian ENCIU, nominated by the parliamentary faction of the Bloc of Communists and Socialists; Iurie GAȚCAN, nominated by the “Action and Solidarity Party” faction; Scott BALES, Maria Giuliana CIVININI, and Lavly PERLING, nominated by development partners.

---

<sup>43</sup> [Law no.65 of 30.03.2023](#) on the external evaluation of judges and candidates for the office of judge of the Supreme Court of Justice (vetting)

<sup>44</sup> [Regulations](#) on the organization and operation of the independent commission for the external evaluation of judges and candidates for the office of judge of the Supreme Court of Justice

<sup>45</sup> [Law no.180/2023](#) on the interpretation of certain provisions of Law No. 26/2022 regarding certain measures related to the selection of candidates for membership in the self-governing bodies of judges and prosecutors and Law No. 65/2023 on the external evaluation of judges and candidates for the office of judge of the Supreme Court of Justice

<sup>46</sup> [Parliament Decision no.155/2023](#) on the confirmation of the nominal composition of the Commission for the external evaluation of the ethical and financial integrity of judges and candidates for the office of judge of the Supreme Court of Justice

By Parliament Decision no.89/2024<sup>47</sup> the Parliament confirmed the termination of Ms. Maria Giuliana CIVININI's membership in the Vetting Commission as of 15 May 2024, based on her resignation request. On 18.07.2024 the Parliament appointed a new member of the Vetting Commission<sup>48</sup>, nominated by the development partners – Mr. Willem BROUWER.

On 14.08.2024 Vetting Commission established the panels responsible for evaluating judges of the courts of appeal, presidents and deputy presidents of the courts, as well as other subjects.

On 10.07.2025 the composition of the Vetting Commission was expanded by three additional members: Messrs. Gerrit-Marc SPRENGER and Marcel van de WETERING were appointed as members of the Vetting Commission by Parliament Decision no.208<sup>49</sup> and Mr. Iulian RUSU was appointed by Parliament Decision no.209<sup>50</sup>.

Law 65/2023 stipulates that members of the Evaluation Commission must meet the following requirements: higher education; impeccable reputation; at least 10 years of experience in one or more of the following fields: law, economics, taxation, finance; not currently holding and not having held the position of Member of Parliament or member of the Government in the last 3 years; not having been a member of a political party in the last 3 years; has not held the position of judge or prosecutor in the Republic of Moldova in the last 3 years; has sufficient knowledge of English to perform the tasks of the Evaluation Commission.

2 members of the Vetting Commission (Lavly PERLING and Scott BALES), nominated by development partners, did not meet the *requirement of not having been a member of a political party in the past 3 years* at the time of their appointment. Parliament attempted to “resolve this major blunder” through an interpretive law that, in fact, amended Law 65/2023 and rendered the condition of political non-affiliation inapplicable to international members, since the international members of the Vetting Commission, by definition, cannot be members of any political party in the Republic of Moldova, since they do not meet the requirement of being citizens of the Republic of Moldova. In any case, the reaction of the Parliament is proof that those international members, at the time of their appointment, did not in fact meet the requirement of political non-affiliation.

2 members of the Vetting Commission (Iurie GAȚCAN and Lilian ENCIU) did not meet the requirement set forth in art. 7 of Law 65/2023 regarding *at least 10 years of experience in the field of law* at the time of their appointment.

One member of the Vetting Commission does not meet the requirement for Vetting Commission members regarding an *impeccable reputation*: Iurie GAȚCAN, prior to his appointment to the Vetting Commission, served for 1 year as a senior analyst in the Pre-Vetting Commission. In his capacity as an employee of the Pre-Vetting Commission secretariat, Iurie GAȚCAN did not request information from the Anticorruption Prosecutor Office regarding Iulian MUNTEAN, as he did in the case of other candidates. Regarding Iulian Muntean, we note that he passed the Pre-Vetting Commission evaluation, becoming a member of the SCM on 14 August 2023, and subsequently information emerged in the public domain that Iulian MUNTEAN was the subject of a criminal corruption case (bribery), and the NAC employee who in 2018 drafted the operational analysis report, including regarding Iulian Muntean, is an employee of the Pre-

---

<sup>47</sup> [Parliament Decision n.89/2024](#) on the termination of membership in the External Evaluation Commission for the ethical and financial integrity of judges and candidates for the office of judge of the Supreme Court of Justice

<sup>48</sup> [Parliament Decision no.183/2024](#) on the appointment of a member to the External Evaluation Commission for the ethical and financial integrity of judges and candidates for the office of judge of the Supreme Court of Justice and the amendment of Parliament Decision No. 155/2023 on the confirmation of the nominal composition of the External Evaluation Commission for the ethical and financial integrity of judges and candidates for the office of judge of the Supreme Court of Justice

<sup>49</sup> [Parliament Decision no.208/2025](#) on the appointment of members to the External Evaluation Commission for the ethical and financial integrity of judges and candidates for the office of judge of the Supreme Court of Justice

<sup>50</sup> [Parliament Decision no.209/2025](#) on the appointment of members to the External Evaluation Commission for the ethical and financial integrity of judges and candidates for the office of judge of the Supreme Court of Justice

Vetting Commission secretariat – Iurie GAȚCAN (currently a member of the Vetting Commission).

The appointment of 4 members of the Vetting Commission violates the provisions of art. 5, paragraph 1, of Law 65/2023, which concerns the *independence of the Vetting Commission from parliamentary factions*:

- Lavly PERLING is the leader of the Parempooled Political Party, which is a member of the European People's Party Group (EPP Group), of which PAS is also an associate member at the European level. Thus, Lavly PERLING is the leader of a party that is a “political ally” at the European level with the majority parliamentary faction in the Parliament of the Republic of Moldova, which appointed her to the Vetting Commission.
- Andrei BIVOL is a practicing attorney. Both prior to and after his appointment to the Vetting Commission, the Bar Association through which Mr. Andrei BIVOL continues to practice signed at least four legal assistance contracts, under which it undertook to represent the interests of the Government outside the Republic of Moldova, with a cumulative value of \$274,000 and €125,000. The Government is the emanation of the parliamentary majority, and attorney Andrei BIVOL's membership in the Vetting Commission is at odds with the independence of the Commission from parliamentary factions.
- Iurie GAȚCAN worked at the NAC from 2007 to June 2022 in various positions: senior inspector in the Analytical Directorate, Head of the Operational Analysis and Information Records Directorate, and Head of the Operational Analysis Section, Analytical Directorate. From Iurie GAȚCAN's CV, published on the website of the Vetting Commission, it is unclear whether he continues to maintain an employment relationship with NAC. According to Law No. 1104-XV of 06.06.2002 on the National Anticorruption Center, the activities of the Center are subject to parliamentary oversight, and the NAC Director is appointed by Parliament with a majority vote of elected deputies. Taking into account that the current Director of NAC was appointed, without a competition, by the parliamentary majority of the 11<sup>th</sup> Legislature, that the exercise of functional duties within NAC is based on subordination, that Iurie GAȚCAN was (and likely still is) the head of a NAC subdivision, and that Iurie GAȚCAN was nominated to the Vetting Commission by the PAS parliamentary faction, compliance with the provisions of paragraph 1 of art. 5 of Law 65/2023, which pertains to the *independence of the Vetting Commission from parliamentary factions*, is questionable.
- Iulian Rusu, former State Secretary at the Ministry of Justice (2021-2022) and former Director of the National Anticorruption Center (2022-2023), was appointed to office by Parliament without a competition, by a majority vote of the elected deputies. Given that Iulian Rusu was nominated to the Vetting Commission by the PAS parliamentary faction, compliance with the provisions of paragraph 1 of art. 5 of Law 65/2023, which pertains to the *independence of the Vetting Commission from parliamentary factions*, is questionable.

The appointment of 2 members of the Vetting Commission contradicts the *purpose* of Law 65/2023, as stated in the preamble: *ensuring the integrity of the judges of the Supreme Court of Justice and increasing public trust in its work and in the justice system*:

- Andrei BIVOL – the fact that a member of the Vetting Commission is an attorney could create the perception that the decisions of future SCJ judges (who have already been evaluated) might be adopted under pressure or influenced by attorneys or by the interests of their clients.

- Iurie GAȚCAN - the fact that the member of the Vetting Commission heads a subdivision of NAC could create the perception that the decisions of future Supreme Court of Justice (SCJ) judges (who have already been evaluated) might be adopted under pressure or influenced by potential personal/professional interests, conflicts of interest (involvement in certain cases that are subsequently subject to adjudication), and potential perceptions of bias.

The Evaluation Commission has a secretariat, which is a structure without legal personality and reports exclusively to the Commission.

The website of the Vetting Commission<sup>51</sup> contains no information whatsoever regarding the staff of the Vetting Commission Secretariat or the head of the Secretariat. This affects the *right of candidates under evaluation to challenge* the members of the Secretariat, which cannot be exercised unless the subjects of the evaluation know the identity of the Secretariat members.

According to Law 65/2023, the Secretariat is independent of any public authority or institution and operates exclusively to assist the Evaluation Commission. The hiring of Secretariat staff is carried out by the Center for International Legal Cooperation (CILC), which also hires legal analysts for the SCM. The job duties assigned to SCM legal analysts, combined with the fact that they share the same employer as the staff of the Vetting Commission Secretariat, create a “single decision-making chain,” which is contrary to the status of SCM as a judicial self-governing body and its independence.

The members of the Secretariat have the same duties/competences as the members of the Vetting Commission, with the exception of participating, either in person or via videoconference, in the meetings of the Vetting Commission. The Secretariat has access to all information regarding candidates for the purpose of analyzing, processing, and preparing materials for Commission members. The Secretariat enjoys the same functional immunity as the members of the Vetting Commission.

Unlike the members of the Vetting Commission, who must meet certain legal requirements for appointment, no recruitment/hiring criteria are specified for Secretariat members. The possibility of delegating/detaching employees from public authorities to assist the Evaluation Commission is expressly provided for in art. 9 of Law 65/2023. This raises concerns regarding:

- a) ensuring the independence of the Vetting Commission, given that the leadership of all public authorities is appointed by the current parliamentary majority, and their employees continue to maintain an “employment” relationship with the respective authority;
- b) the perception of the professionalism of the secretariat, particularly if the decision was made, even partially, to delegate or detach employees from anticorruption authorities, given that the need to establish the Vetting Commission (an entity parallel to those legally empowered with similar duties) was dictated, in part, by the professional failure of the activities of anticorruption authorities.

All reports/decisions of the Vetting Commission regarding the candidates evaluated are published on the website of the Vetting Commission. In general, the candidate evaluation reports are comprehensive, containing all the required elements (relevant facts, reasons, and the conclusion regarding whether the candidate passed or failed the evaluation). The text of the reports is clear; the conclusion appears to be derived from the relevant facts noted, using specific and individualized wording based on the particular circumstances of the case. However, an analysis of the separate opinions issued by Maria Giuliana CIVININI (the Commission member who resigned in 2024) indicates that the practice of evaluating candidates has certain shortcomings regarding the:

---

<sup>51</sup> See the website [www.vettingmd.eu](http://www.vettingmd.eu), last accessed on 26.01.2026

- a) Application of the average household expenditure indicator without taking income into account, assuming that it is necessarily higher than what is declared - in the case of candidates who were not state employees. The current evaluation method and the lack of an individualized approach exclude from the competition for the office of judge of the Supreme Court of Justice those who have never held public office and had an income lower than the statistical sample established by the Vetting Commission.
- b) Assessment of the arbitrary nature of judicial decisions, contrary to mandatory provisions of the law or the ECHR, adopted by or in the adoption of which the candidate participated. The current evaluation method and the lack of an individualized approach, based on the characteristics of the specific cases adopted by or in the adoption of which the candidate participated, will result in a judiciary that will be “afraid” to administer justice.

The pre-vetting and vetting processes, though different in scope, share the same strategic goal: restoring professional integrity and creating a merit-based judiciary.

Beyond legal and institutional controversies, these mechanisms have exerted unprecedented pressure on the system and have become a major test for the ability of the state to implement substantive reforms. Tracking public perception of these efforts thus offers an essential perspective for understanding the real impact of the justice reform.

### 2.3. Trust barometer: public perception on justice (2021–2025)

The analysis of the level of public trust in the justice system is an indispensable indicator of the efficiency of the reform. While institutional strategies and mechanisms can be measured in numbers and actions, their legitimacy is most clearly reflected in the perceptions of the citizens. Data from the Public Opinion Barometer and IRI surveys provide an in-depth look at how society perceived changes in the judiciary during the 2021-2025 period.

Regarding trust in the judiciary, the Public Opinion Barometer recorded the following results in 2021<sup>52</sup> and 2025<sup>53</sup>.

Period	No trust at all	Not so much trust	Some trust	A lot of trust	Don't know/don't answer
June 2021	44 %	32 %	2 %	16 %	N/A
September 2025	40.3 %	25.6%	24 %	3.5 %	6.7 %

*Source: Developed by the author based on the POB results*

Public Opinion Barometer data indicate that, in both 2021 and 2025, the judiciary remained at the bottom of the ranking of public trust in state institutions, consistently ranking fourth from the bottom. In 2021, the level of trust in the judiciary was higher only than that in the Government, political parties, and Parliament, and in 2025 – higher than that in trade unions, the Prosecutor Office, and political parties.

Thus, data from the Public Opinion Barometer (BOP) for 2021 and 2025 indicate a slow but structurally fragile evolution in the level of trust of the population in the judiciary. Although the share of those who say they have no trust at all or not so much trust in the justice system has fallen from 76% in 2021 to 65.9% in 2025, firm trust has dropped sharply, from 16% to 3.5%. The following key trends can be observed: a slight reduction in absolute distrust, suggesting a relative easing of extreme negative perceptions; a significant increase in the moderate trust segment (from 2% to 24%), which may indicate a cautious openness among the population; the

<sup>52</sup> Public Opinion Barometer, June 2021, IPP and IData

<sup>53</sup> Public Opinion Barometer 2025, CBS-Research

drastic erosion of firm trust, from 16% to 3.5%, signals the fragility of the judiciary's legitimacy and the possible disappointment of the population with the results of reforms.

Over the past four years, the surveys conducted by the International Republican Institute (IRI)<sup>54</sup> have consistently provided data on how Moldovan citizens view the justice system and reforms in this sector.

In the March 2021 IRI survey, only 12% of respondents stated that they had "high trust" in the judicial system, while 68% said they had "very little" or "no" trust. At that time, only 19% of citizens believed that "justice reform is moving in the right direction," and over half (54%) perceived it as "ineffective" or "merely formal." The lack of visible results and the perception of stagnation in reforms were the main reasons cited for mistrust.

Four years later, according to the IRI survey from May 2025, the overall situation has changed, indicating a modest but steady improvement in perceptions regarding the direction of the reform (+7 percentage points over four years). Thus, the percentage of those who believe that "judicial reform is heading in the right direction" has risen slightly, to 26%, while 40% continue to believe that the system remains "heavily politically influenced." At the same time, only 22% of respondents stated that they observe "an improvement in court operations" or "an increase in the accountability of judges," while over half (52%) perceive no tangible change in how the justice system functions.

This stagnation in public perception indicates that, despite structural progress, judicial reform has not yet succeeded in producing an impact felt by citizens. Trust in judicial institutions remains among the lowest in the region, surpassed only by the level of distrust in political parties and Parliament. However, the slight increase in the segment that considers the direction "rather correct" suggests a tentative trend toward rebuilding hope, possibly associated with the visibility of vetting processes and the reform of the Supreme Court of Justice.

The data presented above reconfirm once again that the transformation of the justice system is not measured solely by laws and institutions, but by the ability to change citizens' perceptions. For the coming period (2025-2030), the focus should shift to:

- completing the vetting process (extraordinary evaluation) and resuming ordinary periodic evaluation mechanisms, taking into account institutional reforms within the judiciary and the prosecution service;
- completing the digitization of the judiciary and fully interconnecting databases;
- the ongoing professionalization of support staff and the strengthening of the administrative capacity of SCM and SCP;
- proactive public communication regarding the results of the reform, to increase trust in and the legitimacy of the system.

---

<sup>54</sup> See the surveys on the [website](#) of the International Republican Institute (IRI)

## 3. CHALLENGES AND LIMITATIONS OF THE WHISTLEBLOWERS' MECHANISM

### 3.1. National regulatory framework vs. EU Directive: evolutions and nonconformities

On 26 October 2023 the Law on whistleblowers<sup>55</sup> came into force. It regulates: the procedure for receiving, examining, and resolving disclosures regarding violations of the law within public and private entities; the rights and obligations of persons making disclosures, as well as measures to protect them; the obligations of employers; the duties of the competent authority for examining external and public disclosures; and the duties of the authorities responsible for protecting whistleblowers. The national law in this area was intended to partially transpose Directive (EU) 2019/1937 on the protection of persons reporting breaches of Union law<sup>56</sup>.

From the perspective of the EU Directive, Law No. 165/2023 contains several problematic aspects, acknowledged by the authorities.

Recently, the Ministry of Justice initiated a draft law aimed at strengthening the protection mechanism in the field of whistleblowing.<sup>57</sup> The draft law was developed to implement Action No. 210 of the National Regulatory Plan for 2025<sup>58</sup>, with the objective of fully transposing Directive (EU) 2019/1937. Amendments are proposed to several relevant provisions of: the Misdemeanors Code of the Republic of Moldova<sup>59</sup>; Law on the Ombudsman<sup>60</sup>; Law on whistleblowers.

Although the full transposition of the European act has been declared, the draft law ignores several provisions of Directive (EU) 2019/1937, namely:

- **Article 5(1)** – The concept of “violation of the law” should also include any action/inaction that is contrary to the object or purpose of the legal provisions. In the current wording of Article 3 of Law No. 165/2023, the concept of “violation of the law” covers only the action/inaction of non-compliance with legal provisions.
- **Article 6(1)** – Reporting persons must benefit from protection, provided that: (a) they had reasonable grounds to believe that the information regarding the reported violations was true at the time of reporting and that such information fell within the scope of the Directive; (b) they reported the matter, either internally or externally, or disclosed it publicly. The current wording of Article 20 of Law No. 165/2023 imposes additional conditions for the protection of whistleblowers.
- **Article 9(1)(c)** – Internal reporting and follow-up procedures should ensure that the designated person or department maintains communication with the reporting person and, where appropriate, requests additional information from them.
- **Article 9(1)(g)** – Internal reporting and follow-up procedures should include the provision of clear and easily accessible information regarding external reporting procedures to the competent authorities.
- **Article 11** – It is important to designate (expressly and exhaustively list) all competent authorities. Law No. 165/2023, as currently drafted, specifies only the National Anticorruption Center (NAC), although its jurisdiction does not cover all violations falling

<sup>55</sup> [Law no. 165/2023](#) on whistleblowers

<sup>56</sup> [Directive \(EU\) 2019/1937](#) on the protection of persons reporting breaches of Union law

<sup>57</sup> [Draft law](#) amending certain legislative acts (strengthening the protection mechanism in the field of whistleblowing)

<sup>58</sup> [Government Decision no. 841/2024](#) on the approval of the National Regulatory Plan for 2025

<sup>59</sup> [Misdemeanors Code](#) of the Republic of Moldova no. 218/2008

under the scope of the law. This gap is critical, as not all potential competent authorities are required to establish external reporting channels or take subsequent actions. Clearly, it is important not only to specify these authorities but also to ensure they have adequate resources.

- **Article 12(1)(a)** – External reporting channels must be designed to ensure the comprehensiveness, integrity, and confidentiality of information. Under the current wording of art. 5(6) of Law No. 165/2023, the only requirement imposed on internal and external reporting channels is the security requirement.
- **Article 20(3)** – It would be important to examine the advisability of either establishing an information center or a single independent authority or delegating these powers to an authority other than the one acting as the competent authority. This measure would strengthen the supervisory mechanism, including by monitoring the compliance of entities with the law, collecting data on the application of legal provisions, and standardizing and harmonizing practices.
- **Article 23** – The penalization regime remains flawed, as the penalties are not effective, proportionate, or dissuasive.

### 3.2. Efficiency of the mechanism in figures: NAC and Ombudsman practice

Regarding practices for enforcing national law in this area, the statistics are modest.

These entities do not provide, in their activity reports, information regarding the establishment and operation of (internal and external) channels for reporting violations of the law. The only authority that provides, ex officio, data on requests for protection is the Ombudsman.

From the data provided, upon request, by NAC, it appears that, since the coming into force of Law No. 165/2023, NAC has received 12 disclosures, of which one was an internal disclosure and 11 were external disclosures.

The violation alleged in the internal disclosure was not confirmed.

Of the 11 external disclosures: one disclosure was forwarded, in accordance with jurisdiction, to the Anticorruption Prosecutor Office and the Ombudsman; in the case of 5 disclosures, the alleged violations were not confirmed; 5 disclosures are still under review.

Although requested to do so, NAC did not disaggregate the data. Thus, we do not have information confirming the receipt of disclosures from employees of private entities, nor the receipt / examination / resolution of anonymous disclosures.

With regard to requests for protection, according to the Ombudsman Report for 2024<sup>61</sup>, during the reference period, the Ombudsman received 7 requests from individuals who considered themselves whistleblowers and sought protection from the institution. Of these, one request was returned due to failure to meet formal legal requirements, and another was rejected because there was no legal basis for an investigation, as it fell under NAC jurisdiction. The remaining 5 requests were accepted for investigation. In one of the cases, the investigation was subsequently closed, while the other 4 requests are still under review. Among the issues cited by the petitioners as forms of retaliation were unlawful dismissal, interference in work activities, acts of intimidation, etc.

For comparison, in 2023, the Ombudsman received 5 requests for protection; however, according to the authority, none met the criteria and requirements set forth by the whistleblowing mechanism, which made it impossible to grant the requested protection.

---

<sup>61</sup> [Report](#) on the observance of human rights and freedoms in the Republic of Moldova in 2024

In conclusion, the statistical data regarding the implementation of Law No. 165/2023 are so limited that they do not allow us to conclude that the whistleblower protection regime in the Republic of Moldova is being effectively and efficiently implemented.

To encourage this, the following would be recommended:

- ✓ a fundamental revision of Law no. 165/2023 in light of Directive (EU) 2019/1937;
- ✓ the effective enforcement of legal provisions;
- ✓ the inclusion of information regarding the operation of internal and external reporting channels in the annual activity reports of entities covered by the law.

## 4. ASSET CONTROL: PROSECUTION OF UNJUSTIFIED WEALTH AND ILLICIT ENRICHMENT

### 4.1. Regulatory regress and impact on NIA's institutional independence

The control of the assets of public officials falls under the jurisdiction of the National Integrity Authority (NIA). The basic laws in this area are the Law on the National Integrity Authority<sup>62</sup> and the Law on the declaration of assets and personal interests<sup>63</sup>. Law no. 132/2016 regulates the mission, functions, powers, organization, and operation of NIA, as well as the procedure for asset control. Law no. 133/2016 regulates the obligation and procedure for declaring assets and personal interests by the declarant and family members, their cohabiting partner, as well as the control mechanism.

The regulatory framework is neither stable nor coherent. Between 2024 and 2025, Law no. 132/2016 was amended three times, and Law no. 133/2016 seven times. Surprisingly, certain members of Parliament, at the end of their mandate, as authors of legislative initiatives, proposed the exclusion of certain provisions that they themselves had proposed for inclusion at the beginning of their mandate.<sup>64</sup>

The regulatory framework in this area has deteriorated, with several provisions intended to ensure the institutional independence of NIA being excluded.

In its current version, Law no. 132/2016 provides that NIA is headed by a president, assisted by a deputy president. The NIA president is appointed by the President of the Republic of Moldova, upon the recommendation of the Integrity Council. The deputy president of NIA is appointed by the President of the Republic of Moldova, upon the recommendation of NIA president. The competition procedure applies only to the office of NIA president and consists of a single stage – a public interview. Initially, both offices could be filled through a competition process consisting of a written exam and an interview, with candidates undergoing a simulated behavioral test (polygraph).

Provisions regarding the status of integrity inspectors have also been weakened. The NIA President has been assigned functions directly related to control activities, such as:

- generalizing the practice of integrity inspectors regarding verification and control, as well as taking measures to standardize it;
- verifying inspection files, documents, materials, and other information regarding the activities carried out;
- issuing written, reasoned instructions to integrity inspectors;
- revoking, by a reasoned decision, the minutes of refusal to initiate an inspection and the findings reports of integrity inspectors;
- ordering the resumption of the inspection in the event of the revocation of the findings report.

NIA Deputy President may also intervene in the actual inspection activities of integrity inspectors, acquiring monitoring and supervisory functions.

Furthermore, the chief integrity inspector has been expressly entrusted with the function of organizing, controlling, monitoring, and evaluating the activities of integrity inspectors.

---

<sup>62</sup> [Law no.132/2016](#) on the National Integrity Authority

<sup>63</sup> [Law no.133/2016](#) on the declaration of assets and personal interests

<sup>64</sup> See CAPC [Proofing Report](#) on the Draft Law for the amendment of certain regulatory acts (declaration of assets and personal interests)

## 4.2. Dynamics of the control activity: priority on assets and administrative sanctions

In 2024, integrity inspectors prepared 201 control reports.<sup>65</sup> The number of control reports is increasing compared to 2023, though it has not yet reached the level of 2021.

### NIA: Control reports

Year	2018	2019	2020	2021	2022	2023	2024
<b>Assets</b>	1	54	82	140	158	67	97
<b>Conflicts of interests</b>	24	65	145	209	130	63	61
<b>Incompatibilities</b>	11	27	112	79	66	17	33
<b>Restrictions and limitations</b>	2	1	8	5	4	7	10
<b>Total</b>	38	147	347	433	358	154	201

*Source: Prepared by the author based on NIA activity reports*

In 2024, most control reports (97) focused on asset control. This trend has persisted for the third consecutive year and may be attributed to the completion of several procedures initiated in previous years. Asset control is typically more time-consuming than the control of compliance with regulations regarding conflicts of interest, incompatibilities, restrictions and limitations. This can be explained by the complexity of the procedures and the need to collect and cross-check various pieces of information, as the perspectives of the control are often unclear at the moment of its initiation. Until 2021, controls of compliance with conflict-of-interest regulations were the most common. It is worth noting the low number of controls regarding compliance with restrictions and limitations. This may be due to the unavailability of information that would allow NIA to identify such violations on its own initiative.

Of the total 201 control reports prepared by the integrity inspectors, 140 are reports of violations, while 61 constitute reports of no violations. It should be noted that reports of violations outnumbered reports of no violations, with the exception of 2021 and 2022, when the ratio was reversed.

In 2024, the reports of violations of the asset regime outnumbered the reports of violations of the regimes governing conflicts of interest, incompatibilities, restrictions and limitations, accounting for 58 out of 140 reports. Previously, reports of violations of the conflict of interest regime had been the most common.

### NIA: Reports of violations

Year	2018	2019	2020	2021	2022	2023	2024
<b>Assets</b>	0	10	14	32	49	32	58
<b>Conflicts of interests</b>	18	60	110	138	91	61	51
<b>Incompatibilities</b>	9	23	81	45	22	9	27
<b>Restrictions and limitations</b>	2	1	5	1	3	3	4
<b>Total</b>	29	94	210	216	165	105	140

*Source: Prepared by the author based on NIA activity reports*

The trend is also the same in case of reports of no violations, and it is maintained throughout the entire period of NIA activity. In 2024, of the total of 61 reports of no violations, 39 reports related to the asset regime.

### NIA: Reports of no violations

Year	2018	2019	2020	2021	2022	2023	2024
------	------	------	------	------	------	------	------

<sup>65</sup> See NIA Annual [Report](#), 2024

<b>Assets</b>	1	44	68	108	109	35	39
<b>Conflicts of interests</b>	6	5	35	71	39	2	10
<b>Incompatibilities</b>	2	4	31	34	44	8	6
<b>Restrictions and limitations</b>	0	0	3	4	1	4	6
<b>Total</b>	9	53	137	217	193	49	61

Source: Prepared by the author based on NIA activity reports

As for the sanctions applied for violations, the number of cases of violation of rules on the declaration of assets and personal interests is constantly increasing (art. 330/2 of the Misdemeanors Code of the Republic of Moldova no. 218/2008). Such trend should be treated with seriousness, as it may prove that the training workshops and awareness raising campaigns done by NIA are not efficient.

#### NIA: Misdemeanor cases

<b>Year</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
<b>Art. 330/2 of the Misdemeanors Code</b>	36	72	210	73	91	318	508

Source: Prepared by the author based on NIA activity reports

Constantly, also in 2024 the share of local elected officials is high among the concerned subjects. This may be explained by their essential share among other categories of declarants, as well as by their insufficient knowledge of the legal framework relating to the offices held by them.

A distinct role is given to NIA in the prosecution of unjustified wealth. According to the information provided by NIA on demand, 98 findings reports were issued in which, inclusively, obvious/substantial differences were found.

#### NIA: Reports of finding an obvious/substantial difference

Anul 2020	Anul 2021	Anul 2022	Anul 2023	Anul 2024	Anul 2025 (January-July)	Total
4	19	15	22	30	8	98

Source: Prepared by the author based on the information provided by NIA

The reports of finding an obvious/substantial difference related to 99 persons, 63 of which held offices of member of Parliament, local elected official, employee of a subdivision of the Ministry of Internal Affairs (MIA) and of a subdivision of the Ministry of Finance (MF). Such data reconfirms the vulnerability of such offices. Nevertheless, regarding the members of Parliament, the control procedures are initiated after the termination of the mandates or are initiated in relation to the members of parliament from the parliamentary opposition. The situation is practically similar in the case of local elected officials representing, in most cases, other parties than the governing party. Thus the citizens may perceive the control procedures as selective and the independence of NIA integrity inspectors as insufficient.

Of 98 reports finding an obvious/substantial difference only 6 reports, representing 6% of the total, are final and binding (enforceable) including one report that became final and binding by non-contestation.

#### NIA: Status of the reports of finding an obvious/substantial difference

Pending at Centru District Court	Pending at Chisinau Court of Appeal	Pending at the Supreme Court of Justice	Cancelled (including, partially cancelled)	Final and binding (including, not contested)	Total

1	47	40	4	6	98
---	----	----	---	---	----

Source: Prepared by the author based on the information provided by NIA

The 6 reports remaining final and binding found obvious differences amounting to MDL 2,556,461.97 and substantial differences amount to MDL 3,924,084.78.

#### NIA: Final and binding (enforceable) reports of finding an obvious/substantial difference

No. o/o	Findings report (number, date)	(Concerned person - office)	Obvious difference found (MDL)	Substantial difference found (MDL)
1.	Nr. 280/11, 08.09.2021	local elected official	1,658,640.00	269,451.00
2.	Nr. 425/15, 29.12.2021	civil servant, State Tax Service, MF		500,049.31
3.	Nr. 92/18, 02.03.2022	civil servant with special status, General Inspectorate for Emergency Situations, MIA		189,779.24
4.	Nr. 18, 13.02.2023	civil servant with special status, Customs Service, MF		295,853.59
5.	Nr. 9, 23.01.2024	civil servant with special status, National Penitentiary Administration, Ministry of Justice	844,667.14	2,668,951.64
6.	Nr. 138, 20.09.2024	civil servant, State Labor Inspectorate, Ministry of Labor and Social Protection	53,154.83	
<b>Total</b>			<b>2,556,461.97</b>	<b>3,924,084.78</b>

Source: Prepared by the author based on the information provided by NIA

Issuing from the information available on the official website of the Supreme Court of Justice<sup>66</sup>, the listed findings reports have become final and binding quite recently. For this reason, the conclusions on the applicability of the institute of unjustified wealth confiscation are premature. Nevertheless, it is to note the low speed of examination of the cases, which undermines the effectiveness and efficiency of the instrument.

#### 4.3. Insufficiency of sanctioning mechanisms: bottlenecks in the prosecution of unjustified wealth and illicit enrichment

The results of the activity of combating illicit enrichment are even more modest. According to the information provided on demand by MIA, starting with 2014 and till 01.08.2025, 105 criminal cases were recorded in the Registry of forensic and criminological information on the basis of art. 330/2 of the Criminal Code of the Republic of Moldova no. 985/2002, incriminating the offence of illicit enrichment.

##### Criminal cases (art. 330/2 of the Criminal Code – Illicit enrichment)

Year	Registered	Referred to courts	Terminated	Closed	Suspended	Referred to other states
2014	-	-	-	-	-	-
2015	1	-	-	1	-	-
2016	5	-	-	-	-	-
2017	5	-	-	-	-	-
2018	6	-	-	-	-	-
2019	5	-	-	-	-	-

<sup>66</sup> See [Database](#) of decisions of the Civil, Commercial and Administrative Panel of the Supreme Court of Justice

2020	5	-	-	2	-	-
2021	12	-	-	-	-	-
2022	54	2	-	2	-	-
2023	8	-	-	2	-	-
2024	5	1	-	-	-	-
7 months of 2025	4	-	-	-	-	-
<b>Total</b>	<b>110</b>	<b>3</b>	<b>-</b>	<b>7</b>	<b>-</b>	<b>-</b>

Source: Prepared by the author based on the information provided by MIA

The results of the criminal investigation are disheartening. Of the 110 criminal cases registered, 100 are currently being handled by the criminal investigation authorities, 7 have been closed, and 3 have been referred to the courts.

As for court rulings, the only conviction that appears to have become final and binding concerns the former head of the Radiology and Computer Tomography Department at the Republican Medical Diagnostic Center, who pleaded guilty to several crimes, including illicit enrichment.<sup>67</sup> Given these circumstances, this case cannot serve as evidence of any practices regarding the prosecution and penalization of illicit enrichment.

In conclusion, the declaration and control of assets remain a futile exercise as long as there is no effective prosecution into unjustified wealth and illicit enrichment. The ineffectiveness of these measures stems from several causes, which the authorities should address responsibly.<sup>68</sup>

The lack of results in the implementation of these two instruments may be due to the uncertainty surrounding the regulations. Although the regulatory framework has undergone changes, these have not strengthened the practices for implementing the instruments. Moreover, despite the extensive case law of the Constitutional Court, the instruments have had no impact. The High Court has upheld the constitutionality of the regulations, but the arguments presented in their favor do not seem to encourage the competent authorities, particularly the courts, to persist in their application.

It would be advisable for Parliament, in the exercise of its parliamentary control function, to conduct an ex-post impact assessment of the rules governing the determination of unjustified wealth and combating illicit enrichment.

These provisions cannot be improved without a comprehensive review of all related principles and concepts, in particular: the presumption of the lawful nature of the acquisition of property (art. 46, paras. (3) and (4) of the Constitution of the Republic of Moldova); and the presumption of innocence (art. 21 of the Constitution).

The process of amending the regulatory framework must be conducted in accordance with all legislative standards, following a thorough and multifaceted analysis, with genuine consultation of stakeholders, particularly the public authorities responsible for enforcement.

<sup>67</sup> For more details see [Profile of the case on the National Courts Portal](#)

<sup>68</sup> For more details see: [Transparency International – Moldova, Ascertaining the unjustified nature of wealth and combating illicit enrichment: the case of the Republic of Moldova](#), Chisinau, 2025.

## 5. CORRUPTION IN THE ELECTORAL PROCESS

### 5.1. Electoral integrity: conceptual benchmarks and general framework

The Constitution of the Republic of Moldova<sup>69</sup> declares the will of the people to be the basis of state power. This will is expressed through free elections, which take place periodically by universal, equal, direct, secret, and freely expressed suffrage.

These constitutional guarantees are reaffirmed in the Electoral Code of the Republic of Moldova<sup>70</sup>, which elaborates on the principles of participation in elections. Thus, citizens of the Republic of Moldova participate in elections through universal, equal, direct, secret, and freely expressed voting. Participation in elections is free and voluntary. No one has the right to exert pressure on a voter with the aim of forcing them to participate or not to participate in elections, nor on the voter's expression of their free will.

Given the principles of participation in elections, particularly that of freely expressed vote, the integrity of the electoral process (electoral integrity) constitutes an essential precondition for free elections.

The concept of electoral integrity is not addressed in legislation. The Law on integrity<sup>71</sup> addresses issues related to political integrity, which is understood to mean the ability of electoral candidates, trusted representatives of electoral competitors, and persons holding an elective office or an exclusively political office to conduct their activities ethically, free from manifestations of corruption, while respecting the public interest, the supremacy of the Constitution of the Republic of Moldova, and the law.

The cited regulatory act identifies the fostering of a climate of political integrity, alongside the fostering of a climate of institutional integrity within public entities, as a means of promoting integrity in the public sector. It is stipulated that a climate of political integrity strengthens public trust in the institutional integrity of public entities established through electoral processes and in the professional integrity of public officials holding elective offices and exclusively political offices.

At the same time, the Law on integrity specifies two measures to ensure political integrity:

- ✓ ensuring transparency in the financing of political parties and election campaigns;
- ✓ ensuring the professional ethics and integrity of individuals holding an elected office or an exclusively political office.

As the framework law in this area, the aforementioned regulatory act provides only general guidelines for implementing measures to ensure political integrity, referring generally to: electoral legislation; legislation on political parties; legislation on the prevention and combating of money laundering and terrorism financing; legislation related to anticorruption instruments; other special legislation.

The provisions regarding responsibilities and sanctions are equally general. Responsibility for fostering political integrity is assigned to electoral candidates, political parties, and individuals holding an elected office or an exclusively political office. It is stated that failure to implement measures to ensure political integrity leads to undermining the climate of political integrity and integrity in the public sector, to the emergence of corruption, and to harm to the public interest. It is provided that failure to implement measures to ensure integrity in the public sector entails the liability of electoral candidates, political parties, and persons holding an elective office or

<sup>69</sup> See art. 38 para. (1) din [Constitution](#) of the Republic of Moldova,

<sup>70</sup> See art. 2-7 din [Electoral Code](#) of the Republic of Moldova no.325/2022

<sup>71</sup> See art. 3 and 6-9 [Law on integrity](#) no. 82/2017

an exclusively political office, in the manner provided by electoral legislation, legislation on political parties, and chapter VI of the Law on integrity.

Based on the cited provisions, particularly the definition of the concept of political integrity, one might infer a connection between the concept of electoral integrity and that of political integrity.

However, until the concept of electoral integrity is further developed in legislation, it remains a doctrinal one. In general terms, the integrity of the electoral process primarily refers to the integrity of the individuals and entities participating in the electoral process. The electoral process constitutes the activity of individuals (in particular, voters and electoral officials) and entities (in particular, electoral bodies and political parties), regulated by law, carried out with the aim of forming the representative bodies of state power through elections.

Integrity is an indispensable value of the electoral process. Major international organizations, as well as the national lawmaker, have established standards designed to ensure electoral integrity.

Among the international standards, the following are noteworthy:

- ✓ Code of good practice in electoral matters (Venice Commission);
- ✓ Common guidelines on preventing and combating the abuse of administrative resources in electoral processes (Venice Commission);
- ✓ Recommendation Rec (2003) 4 of the Committee of Ministers of the Council of Europe on common rules against corruption in the financing of political parties and election campaigns.

The national standards in this area are set forth, in particular, in: the Constitution of the Republic of Moldova; the Electoral Code; the Law on integrity; and the Law on political parties<sup>72</sup>.

## 5.2. Mechanisms for sanctioning electoral corruption: legislative innovations vs. asymmetries and application

Liability for violations of electoral legislation, including violations of requirements designed to ensure electoral integrity, is set forth in the Electoral Code (legal liability), the Misdemeanors Code (administrative liability), and the Criminal Code of the Republic of Moldova (criminal liability)<sup>73</sup>.

Among recent legislative developments, it is worth noting the addition<sup>74</sup> in the Misdemeanors Code of the Republic of Moldova of art. 47/1, which introduced a new misdemeanor component – passive electoral corruption.<sup>75</sup>

Although recently introduced, the Legislative authority intervened with amendments<sup>76</sup> to the text of the component, while also revising the criminal component of electoral corruption criminalized under art. 181/1 of the Criminal Code of the Republic of Moldova.

Obviously, these legislative changes were driven by the context – the 2024 presidential elections and referendum, as well as the 2025 parliamentary elections.<sup>77</sup>

<sup>72</sup> [Law no. 294/2007](#) on political parties

<sup>73</sup> [Criminal Code](#) of the Republic of Moldova no. 985/2002

<sup>74</sup> [Law no.230/2024](#) for the amendment of certain regulatory acts

<sup>75</sup> For the legal analysis of the misdemeanor component, see: Mariana Kalughin, [Passive electoral corruption – legal analysis of the misdemeanor component](#), Continuous Training Center in the Electoral Area (CTCEA), Chisinau, XIII edition, June 2025, p. 7-16.

<sup>76</sup> [Law no.100/2025](#) for the amendment of certain regulatory acts (efficient combating of electoral corruption and related aspects)

<sup>77</sup> CAPC [Proofing Report](#) to the draft law for the amendment of certain regulatory acts (efficient combating of electoral corruption and related aspects)

Between 2024 and 2025, according to information provided by the Ministry of Internal Affairs (MIA), based on the State Register of Misdemeanors, 29,251 misdemeanors of passive electoral corruption were recorded. In 18,649 cases, constituting 64% of the total, sanctions were imposed.

#### Passive electoral corruption (art. 47/1 of the Misdemeanors Code)

	Registered misdemeanors	Penalties applied	Terminated/closed	Referred to other authorities
<b>Year 2024</b>				
Art. 47/1 para. (1)	1983	221	227/ 1	1534
Art. 47/1 para. (3)	669	0	101	568
<b>Year 2025 (10 months)</b>				
Art. 47/1 para. (1)	20865	18428	1429/ 995	13
Art. 47/1 para. (3)	5734	0	5716/ 1	7

Source: Prepared by the author based on the information provided by MIA

In a paradoxical way, the number of registered electoral corruption offences is much lower. It seems that the authorities insist on penalizing the passive side of electoral corruption, without persisting in penalizing its active side.

According to the information provided by MIA, making reference to the Registry of forensic and criminological information of the Republic of Moldova, in the period of the years 2024-2025, 113 electoral corruption offences were registered. On 13 criminal cases, accounting for 11.5% of the total, criminal prosecution has been completed, 10 cases were referred to the court and 3 cases were closed.

#### Electoral corruption (art. 181/1 of the Criminal Code)

Period	Registered criminal cases	Total criminal cases on which criminal prosecution has been completed	Of the criminal cases on which criminal prosecution has been completed				
			Referred to courts	Terminated	Closed	Suspended	Referred to other states
Anul 2024	75	7	6	0	1	0	0
10 months of 2025	38	6	4	0	2	0	0

Source: Prepared by the author based on the information provided by

As long as there is no established case law on the matter, no conclusions can be drawn regarding the effectiveness and efficiency of administrative and criminal penalties for electoral corruption.

Penalization mechanisms may lack a preventive impact if they are perceived as ad-hoc, disproportionate, and unfair. Any legislative intervention must be promoted and adopted in accordance with the requirements of the legislative process. Recent legislative initiatives targeting electoral corruption have not been sufficiently substantiated.<sup>78</sup>

It is unclear why it was decided to impose administrative penalties for the passive aspect of electoral corruption, while the active aspect remains subject to criminal penalties. However, in both cases, the same social values are harmed or are subject to harm, as the legal object of the acts is the same – generally, social relations concerning the exercise by citizens of their political

<sup>78</sup> [Draft law](#) on the amendment of the Misdemeanors Code of the Republic of Moldova no. 218/2008 (art. 47/1, 401) and [Draft law](#) for the amendment of certain regulatory acts (efficient combating of electoral corruption and related aspects)

rights, and, in particular, social relations concerning the exercise by citizens of their electoral rights.

At the same time, if it has been decided to treat passive electoral corruption as a misdemeanor, it is unclear why the applicable penalties are much higher than those provided for other misdemeanors that infringe upon political rights. For example, the unlawful use of administrative resources, including facilitating or consenting to the illegal use of administrative resources, during election periods, if it does not constitute a criminal offense, is punishable by a fine amounting from 90 to 300 conventional units and the deprivation of the right to hold certain offices or engage in certain activities for a period from 3 months to one year.

Nor are the conditions under which passive electoral corruption would constitute a crime clear. The Criminal Code criminalizes only the active aspect of electoral corruption.

Nor is it justified to exempt the perpetrator from administrative liability if they have self-reported and/or actively contributed to the discovery or prevention of the commission of the act of electoral corruption.

A legislative action can also be compromised by the context in which it was proposed and adopted. The Misdemeanors Code was amended to include passive electoral corruption, which is to be punished with severe penalties, shortly after the substantial reduction, again, without sufficient justification, of penalties for corruption offenses in the public sphere, as provided by Law No. 136/2024 amending certain regulatory acts.<sup>79</sup> Thus, even in relation to criminal law, the penalties for passive electoral corruption are disproportionate.

The concept of electoral integrity should be enshrined in legal provisions within the Law on integrity. Electoral integrity is an essential prerequisite for free elections, but it is impossible without consistent and fair laws, independent and impartial institutions, and clear and enforced procedures.

---

<sup>79</sup> [Draft law](#) for the amendment of certain regulatory acts (amendment of the Criminal Code and Misdemeanors Code)

## 6. CRIMINAL ASSETS RECOVERY

### 6.1. Strategic context and regulatory framework strengthening

Criminal assets recovery has emerged in recent years as an essential pillar of the anticorruption policies of Moldova, being perceived not only as a legal mechanism for restoring fairness but also as an indicator of the effectiveness of the state in combating corruption and financial crime.

Since 2022, national authorities have stepped up their efforts to align with European standards, in line with EU accession commitments and the recommendations of GRECO, MONEYVAL, and the European Commission. A recent regulatory milestone is Directive (EU) 2024/1260<sup>80</sup>, which established minimum standards for the tracing, freezing, confiscation, and management of assets that are proceeds of crimes, expanding the obligations of the Member States to strengthen asset recovery offices and enhance cross-border cooperation.

Although the national regulatory framework has improved in recent years, its practical effectiveness remains limited. An analysis of recent developments shows a transition from the institutional development phase to a results-oriented phase, but with persistent challenges: (i) a recovery rate for seized assets of less than 10%, compared to the EU average of approximately 50%; (ii) slow and fragmented judicial procedures; (iii) insufficient administrative capacity of CARA to manage assets; (iv) lack of transparency regarding the destination of confiscated assets.

Overall, the 2024-2025 period marks the transition from building the legal framework to the stage where results matter: operational efficiency, transparency, and social impact. Asset recovery thus becomes a test of credibility of the state – to the extent that it can transform illicit assets into tangible public benefits and strengthen the trust of citizens and European partners.

In the last years, the Republic of Moldova has made significant progress in strengthening mechanisms for the criminal assets recovery through legislative updates and coordination measures among key institutions, aimed at harmonization with the EU acquis and at the implementation of international commitments.

The Parliament has approved the National Criminal Assets Recovery Program for 2023-2027<sup>81</sup>, which sets out objectives, indicators, and responsibilities for streamlining the process of identifying, seizing, and disposing of assets. In December 2023, the National Coordination [Platform](#) was created, with its secretariat at CARA, bringing together NAC, the General Prosecutor Office, the Ministry of Justice, the Ministry of Internal Affairs, the Ministry of Finance, and the SCM, to eliminate bottlenecks and harmonize actions.

In March 2025, the Parliament adopted the Law<sup>82</sup> amending the Criminal Code, Criminal Procedure Code, and other regulatory acts, partially transposing Directive (EU) 2024/1260 and Regulation (EU) 2018/1805. Among the key elements of the law improving the mechanism for the confiscation of criminal assets, we note: (i) the confiscation of equivalent property or its value when direct confiscation is not possible; (ii) the extension of confiscation to indirect benefits and to third parties who acted in bad faith; (iii) the repatriation of confiscated assets from abroad; (iv) clarification of the reference period for calculating acquired assets (5 years before and after the offense).

<sup>80</sup> [Directive \(EU\) 2024/1260](#) of the European Parliament and Council of 24 April 2024 on assets recovery and confiscation

<sup>81</sup> [Parliament Decision no. 342/2022](#) on the approval of the National Asset Recovery Program for 2023–2027

<sup>82</sup> [Law no.35/2025](#) for the amendment of certain regulatory acts (improvement of the criminal asset confiscation mechanism)

In July 2025, the Government approved the draft law<sup>83</sup> establishing the mechanism for the use of confiscated assets for social and public interest purposes, in accordance with art. 18 and 19 of Directive (EU) 2024/1260. The draft provides, among other things: (i) the publication by CARA of a list of available assets; (ii) the possibility for public institutions and NGOs to request free use for a specified period; (iii) the establishment of a management committee (under the auspices of the Ministry of Justice) to ensure transparency in decision-making; (iv) a formula for the distribution of confiscated funds (state budget / social projects / public services).

Overall, regulatory progress has been substantial. However, the results depend crucially on implementation: institutional capacity, system interoperability, and transparent monitoring.

## 6.2. Responsible institutions and operational performance dynamics

Criminal assets recovery is managed through an interagency mechanism centered on CARA, NAC, and the Anticorruption Prosecutor Office (APO). Thus, CARA<sup>84</sup> is responsible for identifying, seizing, administering, and disposing of assets, including through parallel financial investigations and freezing orders. NAC coordinates anticorruption policies and manages the National Integrity and Anticorruption Program for 2024-2028<sup>85</sup>, reporting annually to Parliament. APO supports the prosecution in cases involving special or extended confiscation and the enforcement of final judgments. Complementary roles are assigned to the State Tax Service (valuation and accounting) and the Ministry of Justice, which will oversee the mechanism for the social use of confiscated assets.

In 2024, there was a significant increase in operational activity<sup>86</sup>:

- ✓ CARA imposed 330 seizures on assets amounting to approximately 1.3 billion MDL, compared to 516 million MDL in 2023;
- ✓ Assets frozen abroad remained at a high level (over 1.5 billion MDL);
- ✓ Approximately 34 freezing orders were issued in 2024, targeting assets worth over 46 million MDL;
- ✓ Approximately 270 million MDL from asset sales and voluntary transfers were deposited into the treasury accounts of CARA (pursuant to Government Decision nr. 684/2018);
- ✓ Courts ordered confiscations amounting to approximately 74.9 million MDL in 2024, an increase from 2023 (approx. 12.5 million MDL). It is noted that a significant portion of the confiscations stem from cases such as smuggling and money laundering;
- ✓ Parallel financial investigations have intensified (approx. 190 delegations in 2024, compared to 120 in 2023).

### Comparative evolution (2022-2024)

Indicator	2022	2023	2024	Evolution
<b>Seized assets</b>	6.2 billion MDL	516 mil. MDL	1.3 billion MDL	↓79%, then +152%
<b>Frozen assets</b>	6.2 billion MDL	1.9 billion MDL	≈2.0 billion MDL	Stabilization
<b>Confiscations</b>	33 million MDL	12.5 million MDL	74.9 million MDL	+600% compared to 2023
<b>Freezing orders</b>	n/a	34	≈40	Moderate increase
<b>Parallel investigations</b>	n/a	120	190	+58%
<b>Recovery/seizure ratio</b>	0,5%	9%	<10%	Under EU average

<sup>83</sup> [Draft Law](#) on the use of confiscated assets for social purposes or public interest

<sup>84</sup> [Law no.48/2017](#) on the Criminal Assets Recovery Agency. [Source web](#).

<sup>85</sup> [Parliament Decision No.442/2023](#) on the National Integrity and Anticorruption Program for 2024-2028 and of the Action Plan for the implementation of the National Integrity and Anticorruption Program for 2024-2028

<sup>86</sup> Ibidem. NAC Activity [Report](#) for 2024

The 2022-2024 data series suggest a strengthening of the operational capacity of the institutions involved, reflected in the increase in asset freezing activities, the intensification of parallel financial investigations, and the rise in amounts confiscated in 2024. At the same time, the exceptionally high figures from 2022 must be interpreted separately, as they are significantly influenced by proceedings related to the bank fraud case (“The Billion Theft”), largely tied to the assets of the banks involved.

The “Billion Theft” case remains the largest and most symbolic illicit asset recovery process. According to CARA data (confirmed in the NAC Report for 2023<sup>87</sup>), Spanish authorities approved the seizure of assets worth 1.13 billion MDL held by individuals involved in the case, and outside of this case, overseas seizures were carried out on assets worth an additional 311 million MDL. Although this cooperation yielded the highest results on record, the pace of recoveries slowed compared to the 2018-2019 period; in 2023-2024, annual recoveries stood at around 110-120 million MDL, and only approximately 12% came from final court decisions, with the remainder resulting from administrative recoveries (liquidators/CARA).

However, the overall picture remains mixed: despite increased activity and a rise in confiscations, the actual performance of the system remains modest when measured by the ratio of seized assets to those actually recovered. The recovery rate of seized assets remains below 10%, compared to the EU average of 50%.

Despite the intensification of activity, the efficiency of recovery remains hampered by several structural constraints. First, the excessive length of judicial proceedings – which in many cases span 8-10 years – significantly reduces the recovery rate, including through asset depreciation, and erodes public trust in the ability of the state to act promptly. Second, the mechanism for anticipated recovery, although provided for in Article 207<sup>1</sup> of the Code of Criminal Procedure, is applied only to a limited extent, which hinders the fast management of perishable goods or of those with unstable commercial value.

These internal bottlenecks are compounded by persistent difficulties in international cooperation, particularly regarding the recognition and enforcement of confiscation orders in the jurisdictions where the assets are located, a vulnerability exacerbated by the still-limited institutional capacity of CARA to manage large volumes of seized assets and conduct rapid valuations.

Finally, the initiative for the social use of confiscated assets can increase the transparency and public utility of recovered assets, but its impact depends on clear secondary rules (selection, evaluation, monitoring) and functional coordination between the Ministry of Justice, NAC, CARA, and the State Tax Service.

For the next phase, the priorities are: consistent application of anticipated recovery, strengthening international cooperation for the repatriation of assets from abroad, and ensuring transparency (including through the operationalization of social use), so that reforms translate into tangible results and increased public trust in asset recovery.

### 6.3. International cooperation and alignment to the best European practices

In practice, asset recovery depends crucially on cross-border cooperation: assets are frequently located in other jurisdictions, and the success of cases is measured by the ability of the authorities to quickly obtain information, impose freezing measures, and ensure the recognition and enforcement of confiscation orders. For the Republic of Moldova, this aspect

---

<sup>87</sup> NAC Activity [Report](#) for 2023

is all the more important in the context of the process of harmonization with the EU acquis and the intensification of cooperation with European partners.

The experience of EU member states points to a set of operational solutions that increase recovery rates:

- establishing an Asset Recovery Office and a unit dedicated to the management of confiscated assets;
- conducting a cost-benefit analysis of asset seizure to prevent loss of value;
- using confiscated assets for social purposes to increase transparency and legitimacy;
- effective cross-border cooperation, with rapid information exchange and recognition of confiscation decisions.

Republic of Moldova has made progress by strengthening the regulatory framework<sup>88</sup> and by participating in relevant international networks (such as CARIN and StAR), as well as by establishing a framework for the social use of confiscated assets. However, results are limited by several structural shortcomings: limited capacity for asset management and recovery, the lack of an integrated registry/IT system, lengthy judicial procedures, and public reporting that is still fragmented.

The degree of alignment of Moldova with European best practices is mixed:

- **strong points:** growing international cooperation and gradual regulatory alignment;
- **medium points:** extended confiscation, anticipated recovery, centralized management, transparency and reporting;
- **persistent weaknesses:** low recovery rate, lengthy procedures, and insufficient administrative capacity to manage seized/confiscated assets;
- **„in progress” areas:** social use (framework initiated, but impact dependent on secondary rules and implementation).

Overall, the level of alignment can be assessed as moderate (≈45-50% compared to EU standards), with more visible progress in terms of instruments and cooperation, but with delays in implementation and the effective conversion of assets into public revenue/benefits.

#### 6.4. Strategic perspectives for 2025–2026

- ✓ Institutional consolidation: transforming CARA into an autonomous entity of the “Asset Management Office” type and creating an integrated IT system for asset tracking.
- ✓ Streamlining procedures: consistent application of early disposal, expansion of parallel financial investigations, and introduction of performance indicators for the duration of processes.
- ✓ Transparency and accountability: quarterly publication of lists of managed assets, creation of a public portal for confiscated assets, and annual reporting to the Parliament.
- ✓ Social and European dimension: effective implementation of social reuse and full harmonization with Directive (EU) 2024/1260, including common management and reporting standards.

---

<sup>88</sup> See [Law no.190/2022](#) for the amendment of certain regulatory acts (freezing and confiscation of assets that are proceeds of crime); [Law no.245/2023](#) for the amendment of certain regulatory acts (amendment of the Criminal Procedure Code and Misdemeanors Code); Ibidem... Law 190/2022, Law 245/2023, Law 35/2025

Criminal assets recovery remains a critical domain: legislative progress is real, but its value will be measured in 2026 by the capacity of the state to produce quantifiable, visible, and publicly credible results.

## 7. ACCESS TO INFORMATION AND TRANSPARENCY OF DECISION-MAKING PROCESS

### 7.1. Regulatory framework modernization: legislative evolutions and arrears

Access to public information and transparency in decision-making are essential components of open government, being directly linked to the degree of institutional integrity and citizens' trust in public authorities. Between 2022 and 2025, the Republic of Moldova made notable progress in modernizing the legislative framework governing these areas, though systemic shortcomings persisted at the level of practical implementation.

Although the process of harmonization with European standards has been accelerated, particularly through the adoption of a new law on access to public information and the partial revision of public consultation mechanisms, the impact on transparency in decision-making remains limited by the administrative culture and the lack of a coherent monitoring system.

The purpose of this section is to assess the status of implementation of the rules on access to information and transparency in decision-making for the period 2022-2025, based on relevant national and international reports.

During the reference period, the regulatory framework in the area of transparency and access to information was founded on three pillars: the rules on transparency in the decision-making process<sup>89</sup>, the consultation mechanism at governmental level<sup>90</sup> and the new law on access to information of public interest<sup>91</sup>. The major development is Law no. 148/2023 on access to information of public interest, which replaced the previous framework and expanded the obligations of institutions towards a proactive publication of a minimum set of information (budget, annual reports, institutional structure, administrative decisions, etc.), clearer response deadlines, and a more predictable regime for unjustified refusals.

The State Chancellery is the key institution responsible for coordinating transparency in decision-making at a governmental level, while Parliament applies its own transparency rules through its Regulations<sup>92</sup>. The report of the State Chancellery on transparency in decision-making for 2024<sup>93</sup> highlights a consistent pattern: the initial stages are generally visible, but public consultation and feedback mechanisms remain unevenly applied, and the final stages – including the publication of adopted decisions – require additional efforts and a more consistent approach.

At the same time, the Open Governance Action Plan for 2023–2025<sup>94</sup> structures the open governance agenda into five priority areas: access to information of public interest, open government institutions, open budgets, public procurement, and capacity building (integrated across all areas). The framework was further supplemented by provisions on open data, and the State Chancellery issued guidelines and methodological materials<sup>95</sup> to standardize institutional practices. However, in the absence of effective accountability and sanctioning mechanisms for non-compliance with obligations, the impact of these instruments remains limited, and compliance is at risk of being more formal than substantive.

---

<sup>89</sup> [Law no.239/2008](#) on transparency in the decision-making process

<sup>90</sup> [Government Decision no. 967/2016 on the mechanism of public consultation with the civil society in decision-making](#)

<sup>91</sup> [Law no. 148/2023](#) on access to information of public interest

<sup>92</sup> [Law no. 797/1996](#) for the approval of Parliament Regulations

<sup>93</sup> [Report](#) of the State Chancellery on transparency in decision-making for 2024

<sup>94</sup> Open Governance Action Plan 2023-2025, approved by [Government Resolution no. 158-d of 03.11.2023](#)

<sup>95</sup> See on the [website](#) of the State Chancellery more methodological support documents

## 7.2. Practical application of the right of access to information of public interest

International evaluations indicate a noticeable improvement in the performance of the Republic of Moldova in the area of access to information, especially following the coming into force of Law no. 148/2023. According to Freedom House<sup>96</sup>, which measured the access to information index, the score rose from 47/100 (2022) to 59/100 (2023) and 70/100 (2024). At the same time, the evaluation highlights significant differences between institutions: while some respond fully and on time (approx. 1/3), others respond incompletely or not at all (15%).

The Reports of the State Chancellery<sup>97</sup> confirm the persistence of inconsistent practices, particularly in local public administration and in some subordinated institutions. The issues are primarily operational: difficulties in correctly identifying and classifying requests (as opposed to ordinary petitions), an incomplete understanding of the concept of “information of public interest,” the lack of record-keeping in some institutions, reporting errors (discrepancies between the total number and the breakdown by submission channel/deadline), and confusion between grounds for refusal and those for rejection/non-examination. A major obstacle remains proactive transparency at the local level, including due to the lack of official websites (reported by a significant portion of LPAs – 55 %), which limits the practical implementation of legal obligations. Furthermore, access to training on the application of the new law remains insufficient.

The Ombudsman’s Report for 2024<sup>98</sup> adds to the diagnosis: limited human resources, insufficiently developed monitoring and control instruments, and a small number of complaints handled directly on this subject (in 2024, the Ombudsman received 7 requests from petitioners alleging various violations of the right of access to information). The Ombudsman reiterated the need to revise the language regime for the communication of information (art. 21) to avoid limiting access in practice.

In the context of implementing the OGP Action Plan 2023-2025, the State Chancellery initiated the process of creating a public registry of information requests. It was scheduled to become operational in 2025 and enable automatic reporting of deadlines and responses. An analysis of the websites, as of the date of this report (20.11.2025), did not indicate that this Registry had been launched. The absence of this mechanism to date makes it impossible to conduct a centralized assessment of the compliance of public institutions.

At the local level, vulnerabilities are most pronounced. The evaluations made by Freedom House<sup>99</sup> and studies conducted in partnership with the Council of Europe and the State Chancellery (in cooperation with CALM)<sup>100</sup> indicate a weaker institutional culture of transparency in LPAs, limited administrative capacities, and confusion between formal publication and actual compliance with obligations. The result is a systemic gap between regulation and practice, and LPAs remain the most vulnerable link, lacking an effective monitoring mechanism and support from central authorities.

*Intermediary conclusion:* the 2022-2025 period confirms significant regulatory progress and an improvement in international evaluations, but institutional performance remains inconsistent, particularly at the local level and within independent authorities. The critical issue is no longer

---

<sup>96</sup> [Access to information index](#): measurement of public institution transparency in the Republic of Moldova, Freedom House, 2024 Edition

<sup>97</sup> [Report of the State Chancellery](#) on the settlement of requests for communication of information of public interest in 2024

<sup>98</sup> Annual [Report](#) on the observance of human rights and freedoms in the Republic of Moldova in 2024

<sup>99</sup> [Access to information index](#): measurement of public institution transparency in the Republic of Moldova, Freedom House, 2023 Edition

<sup>100</sup> [Report](#) on practical aspects of ensuring transparency in the decision-making processes of CPAs and LPAs”, Council of Europe, 2024

the lack of rules, but rather operational discipline and the strengthening of monitoring and sanctioning mechanisms.

### 7.3. Adherence to transparency in decision-making in the activity of public authorities and Parliament

Transparency in decision-making was continuously monitored during 2022-2025 by the State Chancellery, Promo-LEX, CAPC, and GRECO. Although the rules are well known, their application is still inconsistent across institutions and, especially, across stages of the decision-making process.

According to the Report of the State Chancellery for 2024<sup>101</sup>, the publication of results of the consultations (minutes/summaries) was ensured on average for 45% of draft decisions (36% for draft laws; 48% for Government Decisions), and the level of information provided upon the completion of the decision-making process reached 50%. At the same time, materials related to the drafts subject to consultation were sent to stakeholders in 68% of cases.

Independent monitoring confirms and details these shortcomings. CAPC analysis, on the basis of a monitoring [system/on-line platform](#) (based on the automatic collection of data from [particip.gov.md](#) and [gov.md](#)), emphasizes a high rate of violations, particularly regarding the minimum consultation period and the announcement of initiation of the consultations, including cases of non-existent or strictly formal consultations:

- a) of the 2,791 articles analyzed, 50% (1,383) recorded various types of violations, such as: violation of consultation deadlines (40.24%), complete absence of public consultations (0.68%);
- b) The Ministry of Finance (MF), the Ministry of Infrastructure and Regional Development (MIRD), and the Ministry of Health (MH) recorded the most violations;
- c) 8.53% of the articles did not comply with the deadline for announcing the initiation of the decision-making process. The most delays were identified at the Ministry of Finance (39%), MIA (32%), and MA (26%);
- d) 40.24% of draft decisions did not comply with the minimum 15-day consultation period, and some drafts were approved without consultation, including by the Ministry of Justice (9 cases).

The report prepared with the support of the Council of Europe<sup>102</sup> confirms that, at the level of central authorities, there are tabs dedicated to transparency; however, these do not fully meet legal requirements, are structured inconsistently, and do not facilitate access to information. There are no tabs for withdrawing drafts from consultation and for publishing adopted decisions. Although the publication of stakeholder lists is a positive step, regular updating remains a vulnerability. Furthermore, discrepancies between reported information and what is actually published undermine the credibility of the reporting. There is a high risk that central authorities will not publish all mandatory high-impact drafts on [particip.gov.md](#), and the differences between what the State Chancellery reports and what actually appears on the portal undermine the credibility of the reporting.

Across the LPAs of 2<sup>nd</sup> level, transparency is uneven: only about half of the district councils publish information on draft initiation, and short consultation periods reduce participation. At the 1<sup>st</sup> level LPAs, the situation is more serious: most do not ensure real transparency, and only

<sup>101</sup> [Report](#) of the State Chancellery on the ensuring of transparency in decision-making processes in 2024 by CPAs

<sup>102</sup> [Report](#) on practical aspects of ensuring transparency in the decision-making processes of CPAs and LPAs”, Council of Europe, 2024

33% comply with the requirements for publishing draft decisions, with reports often being incomplete.

The survey conducted during the preparation of this report shows that transparency in decision-making is perceived as “low” particularly at the local level (1<sup>st</sup> level LPAs – 40%, 2<sup>nd</sup> level LPAs – 33%), while 25% consider it “very low” at the level of the Government/CPAs. Most respondents believe that citizens are rarely or never involved in decision-making.

Parliament remains one of the most sensitive areas regarding transparency in decision-making. According to the Promo-LEX Report<sup>103</sup>, transparency in decision-making remains patchy and, at certain stages, even severely compromised, including due to the lack of documents related to consultations and a low rate of public consultations, especially for legislative initiatives by members of Parliament.

The report noted that some draft laws were adopted without essential opinions (from the General Legal Directorate, the Government, or without corruption proofing) and that the recommendations of these stakeholders are frequently not reviewed or not accompanied by published summaries, which reduces the transparency of tracking amendments and arguments. Monitoring also indicates an increasingly formal nature of the opinions of permanent committees and a pronounced imbalance between the majority and the opposition in the “promotion rate” of initiatives, including by the fact that opposition drafts were not adopted. Furthermore, repeated changes to the agenda and the pace of plenary sessions affect the predictability of the legislative process and, implicitly, the ability of the citizens to follow and influence deliberations.

In its third Compliance Report (2024), GRECO<sup>104</sup> notes that the recommendation on the transparency of the legislative process remains only partially implemented, particularly regarding the publication of amendments and grounding documents, as well as the limitation of the emergency procedure. GRECO emphasizes the need for additional measures, including the modernization of the public information tools of the Parliament (updating the website and operationalizing the e-Parliament and e-Legislation portals) and the organization of genuine public consultations, in which the contributions received are appropriately reflected in the decision-making process. The report also draws attention to the frequent use of the accelerated procedure: between April 2023 and September 2024, 105 draft laws were adopted through this procedure, which, combined with incomplete documentation of consultations and the low level of public consultations (especially for parliamentary initiatives), undermines the transparency and quality of the legislative process. In conclusion, GRECO considers the use of urgency as a standard practice to be a cause for concern, as it becomes a major obstacle to genuine public consultation.

*Final conclusions:* Overall, the legislative progress made between 2022 and 2025 has not been followed by comparable institutional improvements: access to information and transparency in decision-making remain below European standards, and administrative practices are changing slowly. Transparency is often treated as a formality, as evidenced by superficial consultations and key documents that are missing or published incompletely. In Parliament, the frequent use of the fast-track procedure undermines predictability and meaningful consultation, and at the local level, opacity is exacerbated by insufficient administrative capacity and digital infrastructure. At this stage, progress depends less on new rules and more on consistent implementation, monitoring, and accountability.

---

<sup>103</sup> [Report](#) on monitoring the activity of the Parliament in the 11<sup>th</sup> Legislature, August 2023 – July 2024, Promo-LEX

<sup>104</sup> Third Compliance [Report](#) for the Republic of Moldova, GRECO, 2024

## 8. INTEGRITY AND TRANSPARENCY IN PUBLIC PROCUREMENTS

### 8.1. General context and dynamics of the public procurement market

Public procurements are a strategic area: they directly influence the efficiency of public spending, economic competition, the trust of the citizens in institutions, and the ability of the state to promote open and sustainable governance. The economic impact of public procurement stems from the volume of public financial resources circulating through this system and the significant share it holds in the public expenditure system of the Republic of Moldova (10-12%), which explains why procurement remains a sector constantly exposed to corruption risks.

At the same time, procurement integrity is treated as a priority in anticorruption policies, including in the National Integrity and Anticorruption Program for 2024-2028<sup>105</sup> and in the agenda of law enforcement agencies – one of the current priorities of the National Anticorruption Center is combating corruption in public procurement<sup>106</sup>. However, the results of the fight against corruption in procurement remain limited: institutional data indicate that, in recent years, a significant portion of criminal cases initiated for procurement-related offenses have been closed, and only a small number are referred to the courts.

The latest OECD Monitoring Report<sup>107</sup> (September 2025) shows an improvement in the public procurement integrity score. The Republic of Moldova achieved a public procurement integrity score of 44.3 (average performance), up from the previous period (30.3).

A positive trend was recorded in 2024<sup>108</sup> both in terms of total value (13.3 billion MDL, up 7.8% from 2023) and in terms of the number of contracts (33,802, up 5% from 2023). Statistical data for the first quarter of 2025<sup>109</sup> show a dramatic, unprecedented 56.6% increase in procurement volume (4.5 billion MDL, compared to 2.9 billion MDL in the first quarter of 2024). The increase in the number of procurements carried out by public authorities is similar, amounting to approximately 57% (2,332 vs. 1,480). However, based on the number of contracts concluded (10,343 vs. 8,910), the growth is more moderate, at just 16%. The largest contribution to this growth came from works procurement, which recorded a dramatic increase, both in terms of volume (1.6 billion MDL in Q1 2025, up 128% compared to Q1 I 2024) and as a share of the total (36.5% compared to 25.6% in Q1 2024). The evolution of works procurement reflects the increase in public investment, including in infrastructure projects, regional and local development, energy efficiency, etc.

### 8.2. Vulnerabilities and corruption risks in the public procurement system

One indicator of corruption risks in the procurement system is the share of contracts awarded through direct award or without publication on MTender (with post-facto reporting of contract data). Statistical data show that an overwhelming majority of low-value contracts were awarded directly, meaning without publication, transparency, or competitive bidding. Thus, during 2024, low-value procurement contracts totaling 2.6 billion MDL were concluded, of which 2.3 billion were awarded through direct contracting (without transparency or competition), representing 86%. If we compare this to the total volume of procurements in 2024 (13.3 billion), we find that approximately 17% of the value of public procurement contracts

<sup>105</sup> [Parliament Decision no.442/2023](#) on the National Integrity and Anticorruption Program for 2024–2028 and of the Action Plan for the implementation of the National Integrity and Anticorruption Program for 2024–2028

<sup>106</sup> [Report](#) for 2024, National Anticorruption Center (The priority domains in the activity of corruption prevention and combating were established for the reporting period, on 26.01.2024, by College Decision no. 1)

<sup>107</sup> Monitoring [Report](#) for Moldova – 5<sup>th</sup> Round of the Istanbul Anticorruption Action Plan, a document approved in the Plenary of OECD/ACN on 8 July 2025

<sup>108</sup> [Report](#) of activity in the area of public and sectorial procurements for 2024, Public Procurement Agency

<sup>109</sup> [Report](#) of activity in the area of public and sectorial procurements for the 1<sup>st</sup> quarter of 2025, Public Procurement Agency

was awarded directly or without publication in the electronic system, lacking transparency and competition. The figures are similar for the first quarter of 2025, a period in which the share of low-value procurements through direct contracting is 88% of all low-value procurements and approximately 16.6% of the total volume of public procurements.

Clearly, these figures translate into corruption risks, including abuse, favoritism, conflicts of interest, and, consequently, inefficiency or even the misappropriation of public budgets. The lack of an effective mechanism to monitor the implementation of the new rules on low-value procurement, as well as the lack of data on progress and performance, are also findings of the Report issued by the European Commission. For certain thresholds, the use and publication of the procurement in MTender is mandatory, while for others, only quarterly reporting of data on contracts awarded directly without publication is required. Consequently, there is a lack of clarity regarding both the monitoring methodology applied by the authorities and the results of such monitoring, which would determine whether or not the authorities are complying with these rules. This high proportion of directly awarded contracts signals a risk of abusive use of legal exceptions, artificial splitting of contracts, and a lack of genuine competition.

The results of procurement monitoring – a function assigned to the Public Procurement Agency by law – confirm the persistence of violations committed by public authorities in procurement processes and, in many cases, the awarding of contracts without rectifying these violations. The data of the Agency show that, out of a total of 193 monitored procurement procedures in which violations of the law were found, approximately 51% remained unaddressed by the authorities. Consequently, the process of awarding procurement contracts continued despite the identified violations. In conclusion, we can observe a poor implementation of corrective measures and a lack of internal accountability at the level of contracting authorities.

The most common irregularities identified are: inadequate procurement planning, splitting procurements to avoid tenders and procedures with publication, violations of legal deadlines and publication obligations, and unclear bid evaluation criteria. These deficiencies are direct indicators of corruption risk, especially in the absence of control and monitoring tools as well as effective sanctioning mechanisms.

At the same time, the sanctions imposed by the Public Procurement Agency are insufficient to have a deterrent effect. The OECD anticorruption monitoring report highlights that gaps persist regarding the sanctioning of violations of conflict-of-interest rules, both at the legislative level and in practice. Furthermore, the legal provisions regarding the mandatory exclusion from public procurement procedures of natural and legal persons convicted of corruption are not being effectively enforced.

### 8.3. Harmonization with the EU acquis, legislative reforms and digitalization challenges

During the period 2024-2025, progress continued on reforming the public procurement system in the Republic of Moldova, particularly in the context of commitments arising from its status as a candidate country for accession to the European Union. The main progress has been made in the legislative sphere, with the most significant developments including (i) the drafting of a new law on public procurement to be approved by Parliament; (ii) the approval of the new Regulations on procurement planning; (iii) the approval of the Regulations on the certification of procurement specialists and the Adult Professional Training Program in procurement. The recent European Commission Report on the progress of the Republic of Moldova from September 2024 to September 2025<sup>110</sup> underlines that the legislative framework on public procurement is, for the most part, aligned with the European Union acquis. The institutional framework is functional, while the capacity to manage public procurement processes remains

<sup>110</sup> [Report](#) on the progresses of the Republic of Moldova for 2025, European Commission

limited and requires improvement and development, particularly in terms of expertise and ensuring the implementation of the recently approved certification mechanism.

Despite progress in legislation and the alignment of policies with the EU acquis, systemic vulnerabilities persist in the public procurement system that can give rise to risks of corruption, conflicts of interest, and inefficient use of public resources. The recent report of the European Commission notes that the public procurement sector remains vulnerable to corruption risks, a finding confirmed by audits and monitoring activities conducted by the relevant institutions, as well as by investigations by the media and civil society. Accordingly, it recommends improving transparency by ensuring broader access to procurement documentation and, in particular, to procurement plans. Thus, the corruption risks associated with procurement stem from ineffective anticorruption measures, limited transparency coupled with a lack of access to open/machine-readable data, as well as inadequate digitalization that does not fully cover procurement processes.

Regarding digitalization, we note a lack of progress in implementing the new electronic procurement system, although certain actions were taken during 2025. Although the introduction of the MTender system has contributed to increased transparency, the procurement process remains only partially digitized, with many processes still dependent on human intervention – namely, planning, evaluation, contract awarding and execution. Both the European Commission Report (November 2025) and the OECD Monitoring Report (September 2025) emphasize that one of the main obstacles to the implementation of public procurement processes is the electronic procurement system (MTender). The current system does not fully support the progress made in aligning national legislation with the EU acquis, does not allow for the use of all available tools, and does not cover all procurement methods provided by law.

In March 2024, the multi-donor trust fund “Moldova – Growth, Resilience, and Opportunities for Wellbeing” ([M-GROW](#)) was launched, managed by the World Bank with an initial budget of \$23.8 million. The objective of the fund is to support the Government of the Republic of Moldova in making essential investments and strengthening state institutions towards competitive, resilient, and inclusive development, while also supporting the path of Moldova towards EU accession. Among the priorities of M-GROW are support for increasing competitiveness, energy efficiency, and strengthening the institutional and governance framework. A grant of \$4.3 million was approved from this fund for “Supporting Public Procurement Efficiency and Value for Money in Moldova,” implemented by the Ministry of Finance. The project aims to develop a new electronic public procurement system and support procurement centralization activities. According to the Report on the Implementation of the National Public Procurement Development Program for 2023-2027<sup>111</sup>, the action aimed at reengineering the electronic procurement system for the entire procurement cycle has been replaced by the action “development of business processes,” with an implementation deadline set for quarter IV of 2025.<sup>112</sup>

In 2024 and 2025, Republic of Moldova took specific steps towards modernizing the legal framework and aligning it with the EU acquis. A notable achievement is the approval of the Regulation on the certification of procurement specialists and the Adult Professional Training Program in procurement. Measures were also taken to digitalize public procurements, specifically by advancing the development of a new electronic procurement system to ensure transparency and access to open data in accordance with OCDS standards.

---

<sup>111</sup> [Government Decision no.265/2023](#) on the approval of the National Plan for the development of the public procurement system for 2023-2027

<sup>112</sup> [Report](#) on the fulfillment of the Action Plan for the implementation of the National Plan for the development of the public procurement system for 2023-2026

However, the integrity of public procurements remains vulnerable despite sustained efforts to improve legislation. To ensure alignment with European standards of integrity and governance, the Republic of Moldova must orient public procurement reform towards transparency, digitalization, accountability, and effective control of corruption. Digitalizing processes, strengthening integrity and reducing corruption, professionalization and certification, and implementing effective control measures must become the top priority of the Government. These measures and instruments have the potential to enhance institutional capacity and accountability, as well as transparency, and consequently, to mitigate corruption risks. Public procurement reform remains an essential pillar of the European integration process and a key condition for strengthening the rule of law, the trust of citizens in public institutions, and the fight against corruption.

## 9. INTEGRITY IN BUSINESS

### 9.1. Current context and evolution of the integrity regulatory framework in the business environment

Promoting integrity in the private sector is an essential prerequisite for the development of a competitive economy, as its absence generates market distortion, undermines fair competition, increases business costs, and compromises the investment climate.

Entrepreneurship in the Republic of Moldova is dominated by small and medium enterprises, which account for approximately 98% of all active economic entities. For these companies to effectively implement ethical principles, anticorruption standards, and a robust corporate governance system, individual efforts are not sufficient. Institutional support from the state is needed, along with the involvement of business associations and development partners, who can help foster a genuine culture of integrity in the business environment.

With regard to government policies and the legal framework, several regulations have been introduced in recent years. Parliament approved the National Integrity and Anticorruption Program for 2024-2028 and the Action Plan for the implementation of the Program<sup>113</sup>, which includes “General Objective 3. Fostering integrity and reducing acts of corruption in the private sector” with four specific objectives and targets to be achieved: increasing transparency in 70% of entities with full or majority state ownership; reducing the number of corruption-related incidents in the private sector by 25%.

The monitoring report on the implementation of the Action Plan for the first half of 2025<sup>114</sup> indicates that the state has promoted amendments to the regulatory framework regarding remuneration policies for the management and supervisory bodies of public enterprises. Thus, new regulations were approved regarding the selection and remuneration of members of boards of directors<sup>115</sup>, as well as regarding the selection of members of audit committees and supervisory boards<sup>116</sup> within state-owned entities. Both regulations establish the basic principles for determining the remuneration of members of the aforementioned bodies, as well as and the maximum ceiling for annual compensation, tailored to each individual performing state representation duties.

At the same time, pursuant to Government Decision no. 820/2023<sup>117</sup>, the Public Property Agency approved Corporate Governance Codes for commercial companies and state-owned enterprises.

Additionally, the amendments<sup>118</sup> to Law no. 1134/1997 on joint-stock companies, amended aspects related to the to the application of the policy of remuneration of persons holding important positions in the company.

Other relevant regulations concern the obligation of legal entities, including non-commercial organizations, individual entrepreneurs, and farming households, to submit and/or update

<sup>113</sup> [Parliament Decision no.442/2023](#) on the National Integrity and Anticorruption Program for 2024–2028 and of the Action Plan for the implementation of the National Integrity and Anticorruption Program for 2024–2028

<sup>114</sup> Monitoring [Report](#) on the implementation of the Action Plan to the National Integrity and Anticorruption Program for 2024–2028, reporting period: 1<sup>st</sup> half of 2025, NAC

<sup>115</sup> [Government Decision no.209/2023](#) on the approval of the Regulations on the selection of candidates for the position of member of the board of state-owned enterprises and commercial companies with full/majority state capital and the conditions for their remuneration

<sup>116</sup> [Government Decision no.210/2023](#) on the approval of the Regulations on the selection of candidates for the position of member of the audit committee for entities of public interest with state capital and of the board of auditors/auditor of state-owned enterprises and commercial companies with full/majority state capital, and the conditions for their remuneration

<sup>117</sup> [Government Decision no.820/2023](#) approving the Model Code of Corporate Governance for state-owned enterprises/municipal enterprises and joint-stock companies/limited liability companies with full/majority public capital

<sup>118</sup> [Law no.36/2025](#) for the amendment of Law no. 1134/1997 on joint-stock companies (aspects related to the application of the policy of remuneration of persons holding important positions in the company)

information regarding the beneficial owner to the Public Services Agency. This obligation was introduced following the Recommendations of the Financial Action Task Force, through amendments<sup>119</sup> to Law no. 308/2017 on the prevention and combating of money laundering and terrorism financing, Law no. 75/2020 on the procedure for establishing violations in the field of preventing money laundering and terrorism financing and the manner of applying sanctions, Law no. 220/2007 on the state registration of legal entities and individual entrepreneurs, and the Misdemeanors Code. The amendments were introduced to ensure the alignment of national legislation in the field of preventing and combating money laundering and terrorism financing with EU legislation, reflecting also the commitment of the country in the EU accession process.

However, at the insistence of the business community, the government was compelled to extend the deadline for submitting information on beneficial owners by one year. The extension of the deadline to 31 December 2025 highlighted communication and coordination shortcomings on the part of the authorities in implementing the new regulations affecting the business community, which generated uncertainty and risks regarding the predictability of economic activity.

From an institutional perspective, a significant step was the establishment of the Monitoring Group for the National Integrity and Anti-Corruption Program for 2024-2028, which includes the Chamber of Commerce and Industry and two representatives from civil society organizations selected through a competition<sup>120</sup>. It should be noted that the National Anticorruption Center launched the competition to select representatives from civil society and the private sector; however, even after the application deadline was extended, only two individuals applied and were subsequently selected. This result reflects low interest from the private sector in participating in the monitoring of anticorruption policies and highlights the need to strengthen public-private dialogue, as well as to intensify communication efforts with the business community. The first meeting of the Monitoring Group took place on 15 April 2025, during which the 2024 Progress Report<sup>121</sup>, prepared by NAC, was reviewed and approved.

## 9.2. Compliance in practice: integrity tools and standards implemented by companies

With regard to integrity tools implemented by companies, the situation analysis and interviews with entrepreneurs reveal that, particularly within large enterprises, a series of procedures and mechanisms have been integrated that contribute to corporate responsibility.

Thus, among the few companies that have implemented integrity programs, the most commonly used tool is the Code of Conduct, a document that establishes the ethical principles and integrity standards applicable to employees and business partners. Typically, the code or an excerpt from it is published on the website of the company website to show transparency and public accountability.

Along with the Code, companies also publish an Anticorruption Policy that expresses a zero-tolerance stance towards corruption. Some companies also implement a Gifts and Hospitality Policy.

Companies develop a Risk Register and identify vulnerable departments or functions with high exposure and sensitive procedures. The Risk Register includes preventive measures or control mechanisms such as internal audits. At the same time, some large companies appoint

---

<sup>119</sup> [Law nr.268/2024](#) for the amendment of certain regulatory acts (additional implementation in the internal regulatory framework of the Recommendations of the Financial Action Task Force)

<sup>120</sup> See on NAC [website](#) the Members of the Monitoring Group for the National Integrity and Anticorruption Program for 2024-2028

<sup>121</sup> Progress [Report](#) on the implementation of the National Integrity and Anticorruption Program for 2024-2028, for the reporting period: 2024

compliance officers or ethics committees, whose role is to monitor compliance with internal procedures and review reported cases.

In this context, the internal mechanism for reporting non-compliance is of particular importance, as it allows employees to report unethical behavior, suspected fraud, corruption, or influence peddling. Procedures for alerting, identifying, and managing conflicts of interest are formalized through declarations of personal interests, questionnaires for affiliated persons, and forms for reporting situations of incompatibility. These mechanisms typically include dedicated email addresses or online forms, procedures for review, and safeguards for the protection of whistleblowers.

Some companies include compliance clauses in contracts with partners and suppliers to ensure adherence to the same integrity and anticorruption standards, and apply due diligence procedures to verify their reputation, compliance history, and potential integrity risks.

Companies that implement this set of tools may opt for certification under the ISO 37001 standard – Anti-Bribery Management System, and are recognized in the annual awards organized by the Chamber of Commerce and Industry and the National Anticorruption Center, supported by development partners.

The integrity nomination was introduced for the first time in 2020 as part of the “Trademark of the Year” awards, with the aim of promoting integrity principles in the business environment. In the 2025 edition, the award was given to six companies in the telecommunications and commerce sectors. Unlike other nominations in the awards, participation in this category has remained relatively constant, indicating a need to stimulate interest and increase company involvement in the coming years.

To this end, through the joint efforts of the Center for Corruption Analysis and Prevention and the Chamber of Commerce and Industry of the Republic of Moldova, 5 training sessions were organized throughout 2025 for entrepreneurs from various regions of the country, dedicated to promoting business integrity tools.

Over 150 representatives participated in the sessions dedicated to promoting an ethical culture and integrity in business, and were made aware of the importance of implementing integrity tools in the private sector. Topics covered included the development of integrity policies, managing conflicts of interest, rules regarding the giving and receiving of gifts, and the establishment of internal whistleblowing mechanisms. The activities were organized as part of the “Core Support to the CAPC” project, implemented with the support of Sweden.

Such initiatives must be continued and strengthened through the joint efforts of all stakeholders to ensure a lasting impact and real change in the business environment. According to data from the Institute of Standardization of Moldova, in the last two years only two companies have obtained ISO 37001 certification – Anti-Bribery Management System, which confirms the need to intensify awareness-raising and implementation of integrity standards in the private sector.