

Monitoring Reforms in the Areas of Anti-Corruption and Justice Reform

Interim Alternative Assessment of the Implementation of the Commitments Undertaken
by the Republic of Moldova under the 2025–2027 Reform Agenda associated with the
Growth Plan for the Republic of Moldova

ACRONYMS	3
EXECUTIVE SUMMARY	4
1. INTRODUCTION	9
1.1. Context	9
1.2. Purpose and objectives of the Report	11
1.3. Methodology	11
2. PREVENTION AND COMBATING OF CORRUPTION	14
3. REFORM OF THE JUSTICE AND PROSECUTION SYSTEMS ..	33
4. GENERAL FINDINGS	50
4.1. Overall level of implementation of the commitments	50
4.2. Progress and verifiable results	51
4.3. Cross-cutting shortcomings and risks	52
5. RECOMMENDATIONS	55
Annex No. 1. Consolidated Monitoring Matrix on the Implementation of Commitments	58
Annex No. 2. List of Documents and Public Sources Analysed	60

ACRONYMS

ADJAJ	Agency for Digitalisation in Justice and Court Administration
AGE	Electronic Governance Agency
ANI	National Integrity Authority
CAPC	Centre for Analysis and Prevention of Corruption
CNA	National Anti-Corruption Centre
CSJ	Supreme Court of Justice
CSM	Superior Council of Magistracy
INJ	National Institute of Justice
MJ	Ministry of Justice
PA	Anti-Corruption Prosecutor's Office
PIGD	Integrated Case Management Programme
PNIA	National Integrity and Anti-Corruption Programme
SIA	Automated Information System
STISC	Information Technology and Cyber Security Service
TAIEX	Technical Assistance and Information Exchange Instrument of the European Union
EU	European Union

EXECUTIVE SUMMARY

This report provides an **interim alternative assessment of the implementation of the commitments undertaken by the Republic of Moldova under the Reform Agenda associated with the Growth Plan for the Republic of Moldova for 2025–2027**, approved by [Government Decision No.260/2025](#).

The report was prepared by CAPC within the project “*Assessment of the Performance of Anti-Corruption Authorities in the Republic of Moldova: Efficiency and Impact in Combating Corruption*”, implemented with the support of the Soros Foundation Moldova.

The assessment covers two sub-areas under Policy Area 7, “Fundamentals”:

- **Sub-area 7.1. Fight against corruption;**
- **Sub-area 7.2. Reform of the justice and prosecution systems.**

A total of **11 measures and payment conditions** were examined: five concerning the prevention and combating of corruption and six concerning the reform of the justice and prosecution systems. The report does not constitute an exhaustive assessment of all policies in these areas, nor does it substitute the European Commission’s official assessment of compliance with the payment conditions. It provides an independent perspective on the state of implementation, verifiable interim results, and risks that may affect the timely fulfilment of the commitments.

The **cut-off date for the assessment is 31 July 2026**. As of that date, only two of the deadlines examined had expired, while the remaining conditions are due to be fulfilled in December 2026 or during 2027. For this reason, the report does not provide definitive assessments of processes that are still ongoing, but examines whether they are progressing at a pace and in a direction consistent with the achievement of the agreed results.

The report applies a **methodological approach based on compliance and performance**, adapted to the interim nature of the assessment. For measures whose deadlines had expired, full compliance with the payment condition was verified, while for measures still under implementation, the assessment examined the state of implementation, verifiable interim results, and risks that may affect their timely completion. The analysis distinguishes between activities undertaken, administrative outputs, and the actual result required by the Reform Agenda.

Based on the findings and available evidence, six ratings were assigned to the measures: **Completed; Ongoing (on schedule); Ongoing (at risk of non-completion); Partially completed; Not completed; and Insufficient data for assessment**. Where a condition comprises several components, the rating reflects the status of the measure as a whole.

As of the cut-off date, **only one measure was assessed as fully completed**: the completion of the extraordinary evaluation of judges of the courts of appeal, as provided for under measure 7.2.2.

Three measures are ongoing and on schedule: implementation of the CNA recommendations aimed at mitigating corruption risks in draft normative acts, under measure 7.1.3; implementation of recommendations arising from institutional integrity assessments, under measure 7.1.4; and adoption and implementation of the Strategic Plan of the National Institute of Justice, under measure 7.2.4.

Five measures are ongoing but face a significant risk of non-completion. These concern:

- results in the investigation, prosecution, and adjudication of corruption cases;
- implementation of the new version of the “e-Integrity” Automated Information System;
- the duration and resolution rate of corruption cases;
- filling vacancies at the courts of appeal and the Supreme Court of Justice;
- expansion of e-Case File and interoperability of the Integrated Case Management Programme.

The establishment of the specialised boards of the Superior Council of Magistracy is assessed as **Partially completed**, while the available information on the measure concerning court efficiency and case resolution rates is **insufficient for a substantiated assessment**. No measure was rated as not completed.

The overall picture is not one of a process lacking activity, but rather one in which most final results have yet to be achieved or cannot yet be demonstrated in the form required by the verification indicators. The main signal emerging from the assessment is that five measures are ongoing but face a significant risk of non-completion.

Sub-area 7.1. Fight against corruption

Implementation of all five measures has commenced and verifiable progress has been made. As of the assessment date, the deadlines applicable to these payment conditions had not yet expired, and the assessment is therefore interim in nature. Two measures show results consistent with timely fulfilment of the conditions, while three face significant risks of non-completion or of failure to demonstrate the agreed results.

With regard to the **investigation, prosecution, and adjudication of corruption cases**, publicly available data indicate some quantitative developments but do not demonstrate an overall positive and comparable trend across the entire procedural chain. Successive changes in jurisdiction have resulted in breaks in the statistical series, while the high-level corruption component cannot be tracked separately on the basis of a uniform definition. Under these circumstances, the measure is assessed as **Ongoing (at risk of non-completion)**.

Implementation of the new version of the “**e-Integrity**” **Automated Information System** has progressed through the development of technical requirements and the conduct of procurement procedures. However, there is no publicly available evidence demonstrating acceptance and deployment of the system into production, the operation of automated risk analysis, random allocation of declarations, or interoperability with all the registers envisaged. The remaining technical stages and the December 2026 deadline justify the assessment **Ongoing (at risk of non-completion)**.

Regarding **recommendations arising from anti-corruption proofing**, the acceptance rate of 76.34% presented in the CNA Annual Activity Report for 2025 cannot be directly compared with the 100% target, as the two indicators measure different elements. The annual rate refers to recommendations accepted, whereas the payment condition covers both accepted recommendations and recommendations not accepted for which the author of the draft provided written justification. CNA Board Decision No. 3 of 17 July 2026 presents the results of the separate mechanism for monitoring the payment condition. According to the Decision, all 699 recommendations issued in 2025 and all 263 recommendations issued between January and June 2026 were addressed by the authors of the draft acts, while recommendations that were not accepted were accompanied by written justifications. These interim data indicate progress consistent with achievement of the target; accordingly, the measure is assessed as **Ongoing (on schedule)**.

A favourable development is also observed with regard to **recommendations arising from institutional integrity assessments**. CNA data confirm that 99–100% of recommendations were incorporated into integrity plans, exceeding the 95% threshold established by the Agenda. Furthermore, CNA Board Decision No. 4 of 17 July 2026 and the disaggregated data subsequently provided to CAPC indicate implementation rates exceeding the 85% threshold for the entities included in the calculation base. Since the deadline for the condition had not expired as of the cut-off date and monitoring of integrity plans is ongoing, the measure is assessed as **Ongoing (on schedule)**.

With regard to the **duration and resolution rate of corruption cases**, the reported data suggest that the quantitative targets have been achieved. However, direct comparability with the baseline has not been fully demonstrated, and the specialised judicial mechanism was not operational as of the assessment date. Low participation in recruitment competitions creates an additional risk; consequently, the measure is assessed as **Ongoing (at risk of non-completion)**.

Sub-area 7.2. Reform of the justice and prosecution systems

The results of the six measures are uneven. One condition has been fully completed, one partially completed, one is progressing according to schedule, two face risks of non-completion, and for one measure the data required to assess the level of fulfilment are lacking.

The **extraordinary evaluation of judges of the courts of appeal** was completed for the entire group covered by the payment condition and is the only measure assessed as **Completed**. This rating confirms that the entire group was covered and does not constitute a general assessment of the quality of the procedure or of its effects on court capacity.

The establishment of the **specialised boards of the CSM** is assessed as **Partially completed**. The Board for the Selection and Evaluation of Judges has been fully constituted, while the Disciplinary Board continued to operate with five of its seven members after the deadline had expired.

Regarding the **filling of vacancies**, appointments to the Supreme Court of Justice have resulted in visible progress. At the courts of appeal, however, the number of filled positions increased only marginally compared with the baseline, while temporary transfers cannot be counted as permanent appointments. Low participation in recruitment competitions and the time required for selection, evaluation, and appointment result in the rating **Ongoing (at risk of non-completion)**.

The National Institute of Justice **Strategic Plan for 2026–2031** was approved following consultation with the European Commission. The next stage is to demonstrate implementation of a significant part of the Plan by December 2026. As of the assessment date, no delays incompatible with this deadline had been identified; accordingly, the measure is assessed as **Ongoing (on schedule)**.

In the area of digitalisation, the **e-Case File** pilot was extended to all courts and some access barriers were removed. However, the system was still in the pilot phase, and publicly available data did not allow calculation of the proportion of cases filed and processed electronically or verification of the status of the seven interconnections of the Integrated Case Management Programme. The measure is assessed as **Ongoing (at risk of non-completion)**.

For the measure concerning **case duration and resolution rates**, the infrastructure required for collecting statistics is in place, but complete, up-to-date and comparable data series for the five indicators concerned have not been published. In the absence of this information, it is not possible to determine

whether the trend is favourable or whether there is a risk of non-completion. The rating assigned is **Insufficient data for assessment**.

The analysis of the two sub-areas highlights several common issues:

- **A gap persists between reported activities and the results required.** Organising a recruitment competition is not equivalent to making an appointment; piloting is not equivalent to operational use; and drafting a document does not demonstrate its implementation.
- **Data are not always comparable or reproducible.** Some statistics use different definitions, periods, or categories without sufficient explanation of the methodology. In the absence of the numerator, denominator, and a comparable data series, a figure may suggest progress but cannot demonstrate it.
- **The risk of non-completion sometimes overlaps with the risk of failure to demonstrate results.** Some results may have been partially achieved but cannot be verified due to the absence of consolidated records. In other cases, the lack of evidence coincides with technical or institutional stages that remain incomplete.
- **Digitalisation remains in transition between development and routine operation.** Critical stages still include testing, security, data migration, deployment into production, user training, and measurement of actual use.
- **Staff shortages affect the capacity of the justice system.** Completion of the extraordinary evaluation does not automatically translate into fully functional courts if vacancies remain unfilled.
- **Responsibilities are fragmented.** Several conditions depend on coordinated action by different institutions, while the common result is not always tracked through a consolidated mechanism.
- **The December 2026 deadlines create immediate pressure.** For these measures, continuation of preparatory activities is no longer sufficient; final or decisive interim results must be achieved and demonstrated.

The **recommendations** were prioritised according to the proximity of the deadline, the rating assigned to the measure, the complexity of the remaining stages, the possibility of recovering delays, and the need to produce verifiable evidence.

Priority P1 covers immediate interventions, including conditions whose deadlines have expired, measures due in December 2026, and situations where the gap against the target or the identified risk requires urgent action.

Priority P2 concerns consolidating progress and preventing the accumulation of delays for measures due in 2027.

The main recommendations are:

- **establish a single public monitoring dashboard for the 11 measures**, including the baseline, target, current value, methodology, supporting evidence, and date of the latest update;
- **develop acceleration plans for measures 7.1.2 and 7.1.5**, setting out monthly milestones, responsibilities, resources, and the evidence through which fulfilment of the condition will be demonstrated;
- **publish harmonised statistical series and calculation methodologies** for the results of corruption investigation and sanctioning, case duration, and resolution rates;

- **publish the critical timeline for operationalising the new version of the “e-Integrity” Automated Information System**, covering contracting, acceptance, testing, security, migration, interoperability, and deployment into production;
- **periodically publish, in a consolidated and verifiable format**, the results of the CNA mechanisms for monitoring recommendations arising both from anti-corruption proofing and from institutional integrity assessments, including the calculation base and data on how recommendations were addressed or implemented;
- **publish the INJ Strategic Plan and its implementation matrix**, identifying the results that will demonstrate implementation of a significant part of the Plan by December 2026;
- **complete the process of filling the membership of the CSM Disciplinary Board** and adopt an operational catch-up plan for filling vacancies at the courts of appeal and the Supreme Court of Justice;
- **adopt a roadmap for transitioning e-Case File from the pilot phase to operational use**, including interim uptake rates, exit criteria for the pilot phase, and the status of the seven interconnections of the Integrated Case Management Programme.

Implementation of these recommendations does not require the creation of a parallel reporting mechanism. Rather, it seeks to bring together information already produced by the authorities in a format that enables the link between activities, indicators, and payment conditions to be clearly traced.

The next stage should focus on consolidating and demonstrating results. Reforms will not be assessed by the number of documents produced, meetings held, or procedures initiated, but by verifiable changes in institutional functioning, the effectiveness of anti-corruption mechanisms, the capacity of the courts, and the quality of publicly available data.

1. INTRODUCTION

1.1. Context

This report was prepared by the Centre for Analysis and Prevention of Corruption (CAPC) within the project **“Assessment of the Performance of Anti-Corruption Authorities in the Republic of Moldova: Efficiency and Impact in Combating Corruption”**, implemented with the support of the Soros Foundation Moldova. Activity 2.5 of the project provides for the preparation and submission of alternative reports to international bodies, including the European Commission, GRECO, the OECD and United Nations mechanisms, with a view to assessing how the Republic of Moldova translates international standards in the areas of preventing and combating corruption and the rule of law into practice, as well as formulating recommendations for improving the regulatory framework and public policies.

In this context, CAPC decided that its first independent monitoring report would focus on the implementation of the **Reform Agenda associated with the Growth Plan for the Republic of Moldova for 2025–2027** (hereinafter – the Reform Agenda), approved by Government Decision No. 260/2025. This choice is not incidental. The Reform Agenda plays a central role both in the implementation mechanism of the [Reform and Growth Facility for the Republic of Moldova](#) and in the broader process of accession to the European Union.

The Reform Agenda is the document through which the Republic of Moldova has committed to implementing a broad set of priority reforms and investments aimed at supporting the country’s economic and institutional development, strengthening its resilience, and bringing the functioning of national institutions closer to European Union standards. Implementation of the reforms is directly linked to access to EU financial support, while progress is assessed against the measures, payment conditions, deadlines and verification indicators set out in the document. The Reform Agenda is structured around seven policy areas:

- I. Economic Competitiveness / Private Sector Development;**
- II. Connectivity and Digital Infrastructure;**
- III. Economic Governance;**
- IV. Social Capital;**
- V. Green Transition and Natural Capital;**
- VI. Energy; and**
- VII. Fundamentals.**

Each policy area is organised into sub-areas and reforms, with corresponding measures and payment conditions, implementation deadlines, responsible institutions and verification indicators.

This report focuses on **Policy Area 7. Fundamentals**, which brings together reforms concerning the fight against corruption, the justice and prosecution systems, the fight against money laundering and organised crime, fundamental rights, visa policy, and the development of statistical capacities. In view of CAPC’s institutional mandate, its experience in monitoring anti-corruption policies and justice sector reforms, as well as the objectives of the project under which this report was prepared, the assessment covers two sub-areas:

- **Sub-area 7.1. Fight against corruption; and**
- **Sub-area 7.2. Reform of the justice and prosecution systems.**

Both are crucial to the functioning of the rule of law: the first concerns the capacity of institutions to prevent, investigate and sanction corruption, while the second focuses on the independence, integrity and efficiency of the system responsible for ensuring the enforcement of the law.

The report constitutes an **interim alternative assessment**. As of the cut-off date of the analysis, the implementation deadlines for a significant proportion of the measures assessed had not yet expired, with some due to be completed by December 2026 and others during 2027. Accordingly, the report does not seek to deliver definitive conclusions on processes that are still ongoing. Rather, it seeks to capture the actual state of implementation, the pace at which the measures are progressing, the interim results that can already be verified, and the risks that may prevent the payment conditions from being fulfilled within the established deadlines.

Such an assessment is particularly useful before the deadlines expire. A delay identified at the end of the process can be recorded, but can hardly be prevented. Early identification of delays, institutional bottlenecks, coordination shortcomings, or discrepancies between reported activities and the results sought can provide the necessary space to adjust the course and pace of implementation. The report therefore assumes not only the role of documenting the state of implementation, but also that of providing guidance and, where necessary, encouraging the acceleration of reforms.

The civil society perspective is, by its very nature, external to the governmental reporting mechanism. It does not substitute the assessments carried out by national authorities or the European Commission's official assessment of compliance with the payment conditions. It can, however, complement the official picture by examining whether the actions undertaken have moved beyond the preparatory stage and have begun to produce the results for which they were designed. In a reform process, the adoption of a normative act, the development of a plan, or the launch of an information system are necessary steps, but do not always constitute evidence that the reform has achieved its intended objectives.

The report is therefore not conceived solely as a critical exercise. Independent monitoring can exert legitimate and constructive public pressure, but it can equally provide the authorities with useful benchmarks, highlight areas where additional intervention is required, and contribute to identifying solutions before difficulties turn into delays. The objectivity pursued by the authors does not imply a position-free neutrality, but rather the formulation of reasoned, cautious and verifiable assessments oriented towards the public interest and the effective implementation of reforms.

The report is addressed primarily to the public authorities responsible for implementing the measures and to the government structures involved in coordinating and monitoring the Reform Agenda. It is also intended for the Parliament of the Republic of Moldova, the European Commission, the Delegation of the European Union to the Republic of Moldova, development partners, civil society organisations, experts, and media representatives interested in the progress of reforms in the areas of the fight against corruption and the justice and prosecution systems. The report seeks to provide these stakeholders not only with an overview of progress and challenges, but also with a basis for informed dialogue on what has been achieved, what remains to be done, and what measures could help keep the reforms on the agreed trajectory.

1.2. Purpose and Objectives of the Report

The purpose of this report is to assess the state of implementation of the measures and payment conditions under Sub-area 7.1. Fight against corruption and Sub-area 7.2. Reform of the justice and prosecution systems of the Reform Agenda, and to formulate recommendations aimed at supporting their implementation within the established deadlines and under the conditions set out therein.

To this end, the report seeks to:

- assess the compliance of the actions undertaken by public authorities with the measures, deadlines and verification indicators set out in the Reform Agenda;
- analyse the progress achieved and the verifiable interim results for each measure;
- identify difficulties, delays and risks that may affect the fulfilment of the payment conditions;
- assess, to the extent permitted by the state of implementation and the information available, the effectiveness of the measures and their effects in practice;
- formulate recommendations aimed at addressing the shortcomings identified and keeping the reforms on the agreed trajectory.

The assessment is limited to the measures and payment conditions set out in the two selected sub-areas. The report does not provide an exhaustive analysis of all policies and developments in the areas of preventing and combating corruption or the reform of the justice and prosecution systems. Processes and actions that are not directly included in the measures assessed are examined only insofar as they affect their implementation or are necessary for understanding the implementation context.

1.3. Methodology

This report uses an assessment approach based on **compliance and performance**, adapted to its interim nature. The analysis examines, on the one hand, the extent to which the actions undertaken by public authorities correspond to the content of the measures, deadlines and verification indicators set out in the Reform Agenda and, on the other hand, the results achieved or emerging as of the cut-off date.

The interim nature of the assessment entails two distinct analytical perspectives. For measures whose deadlines have expired, the report verifies whether the measure and the payment condition have been fulfilled in full, on time and in accordance with the verification indicators. For measures whose deadlines have not yet expired, the assessment examines the state and pace of implementation, verifiable interim results, and whether there are reasonable grounds to expect the condition to be fulfilled on time. Thus, the analysis considers not only where a reform currently stands, but also the direction in which it is progressing.

The assessment covers the measures and payment conditions under **Sub-area 7.1. Fight against corruption** and **Sub-area 7.2. Reform of the justice and prosecution systems** of the Reform Agenda associated with the Growth Plan for the Republic of Moldova for 2025–2027, approved by Government Decision No. 260/2025.

For each measure, the following elements are analysed:

- its content and intended result;
- the implementation deadline;
- the responsible institutions;

- the indicators and sources of verification set out in the Reform Agenda;
- the actions undertaken by the competent authorities;
- officially reported progress;
- the interim or final results identified;
- the difficulties and risks that may affect fulfilment of the payment condition;
- the sufficiency and verifiability of the available evidence.

Throughout the assessment, a distinction is maintained between **activities carried out, administrative outputs produced**, and **the actual result required by the Reform Agenda**. The adoption of a normative act, the development of a plan, the initiation of a procedure, or the development of an IT solution may constitute important steps, but do not, in themselves, demonstrate fulfilment of the payment condition. The assessment thus avoids substituting the final result with a mere enumeration of preparatory activities.

The report is based on the principles of independence, impartiality, objectivity, transparency, and verifiability of information. The analysis uses data triangulation, cross-checking information from multiple sources. These include the Reform Agenda, relevant legislation and policy documents, normative and administrative acts adopted for the implementation of the measures, reports and statistics of public authorities, information published by the responsible institutions, documents of the European Commission and other international organisations, as well as studies and reports produced by civil society organisations.

Where authorities report quantitative results or implementation percentages, the report verifies, to the extent permitted by the available data, the reference period, methodology used, unit of measurement, numerator and denominator of the indicator, and whether the reported result is preliminary or final. Where these elements are unavailable, the reported figures are presented with the appropriate methodological caveats. The narrative findings also distinguish between facts demonstrated by the sources analysed and assessments made by the evaluation team.

For each sub-area, an introductory table provides a concise overview of the measures, deadlines, responsible institutions, and intended results. Following the narrative analysis of each measure, a summary assessment matrix brings together the main findings, ratings assigned, and priority recommendations.

Table No. 1. Ratings used in the assessment

Rating	Description
Completed	The measure and payment condition have been fulfilled in full, on time and in accordance with the verification indicators.
Ongoing (on schedule)	The deadline has not expired, and the verifiable interim data available as of the cut-off date indicate a trajectory consistent with fulfilment of the condition on time.
Ongoing (at risk of non-completion or failure to demonstrate results)	The deadline has not expired, but the situation identified as of the cut-off date indicates a significant risk that the condition will not be fulfilled on time; or activities or results may exist but are not supported by sufficient publicly available data to verify fulfilment of the payment condition.
Partially completed	Relevant actions have been undertaken, but implementation remains incomplete or the results achieved are insufficient.

Not completed	The measure has not been implemented or progress is insignificant, and the deadline has expired.
Insufficient data for assessment	The available information does not allow for a substantiated assessment.

The ratings are assigned in accordance with a **rule of caution**. For measures whose deadlines have not yet expired, the two **Ongoing** ratings are used where the available information allows the implementation trajectory to be assessed. The **Completed** rating is assigned only where all components of the measure and payment condition have been fulfilled in full, on time and in accordance with the verification indicators. **Not completed** is used only where the deadline has expired and the measure has not been implemented or the progress achieved is insignificant.

For the purposes of this report, “**significant risk**” means the existence of objective and verifiable circumstances indicating that, unless the pace or manner of implementation changes, the condition is unlikely to be fulfilled on time. Such risk may arise from delays against intermediate milestones, failure to initiate essential actions, lack of the necessary resources, dependence on decisions that have yet to be adopted, insufficient interim results, or a disproportion between the time remaining and the volume of outstanding activities.

Where a condition comprises several components or thresholds, the rating reflects fulfilment of the condition as a whole. Completion of a single component, even where significant, does not automatically result in a **Completed** rating if the other requirements remain unfulfilled. Similarly, the volume of activities undertaken cannot compensate for the absence of the result required by the indicator.

The ratings represent CAPC’s independent and interim assessment of the situation identified as of the cut-off date. They neither substitute nor prejudge the European Commission’s official assessment of fulfilment of the payment conditions.

For the purpose of verifying the information and supplementing the documentary evidence, the preliminary version of the report will be submitted to the responsible public authorities. Any comments and additional documents received will be analysed and incorporated insofar as they are relevant and supported by verifiable evidence, without affecting the independence of the findings, ratings, and recommendations formulated by the authors.

The report reflects information available up to the assessment cut-off date of **31 July 2026**. Any limitations regarding access to information, the absence of up-to-date data, or the inability to verify certain results are identified in the analysis of the respective measures and taken into account when assigning the rating.

2. PREVENTION AND COMBATING OF CORRUPTION

Sub-area 7.1 of the Reform Agenda aims to improve the effectiveness of preventing and combating corruption, including by strengthening the institutional and legislative framework. The reform encompasses both measures related to the investigation and sanctioning of corruption offences and preventive instruments aimed at verifying assets, mitigating corruption risks in normative acts, and strengthening the integrity of public institutions.

Within this framework, the effectiveness of the fight against corruption is not measured solely by the existence of institutions or the volume of activities carried out. The Agenda requires results that can be tracked throughout the entire chain: investigations, criminal prosecutions, final judgments, the functioning of mechanisms for verifying asset declarations, the addressing of recommendations arising from CNA anti-corruption proofing, the implementation of integrity measures, and the reduction of the time required to examine corruption cases.

The reform comprises **five measures and payment conditions**. The first concerns improving the results of the investigation, criminal prosecution, and judicial examination of corruption cases. The next three concern the preventive components of the system: operationalising the new version of the “e-Integrity” Automated Information System, addressing recommendations formulated as part of anti-corruption proofing, and implementing recommendations resulting from institutional integrity assessments. The final measure seeks to reduce the duration and increase the resolution rate of corruption and corruption-related cases.

The five measures vary in complexity. Some depend on the capacity of a single institution to develop and operationalise an information system, while others require changes in the practices of a large number of public authorities. Measures concerning the results of criminal prosecution and judicial examination also require comparable statistical data, stable calculation criteria, and cooperation between several institutions.

This report uses the deadlines established in the Reform Agenda.

Table No. 2. Matrix of Measures under Sub-area 7.1

#	Measure	Deadline	Responsible institutions	Intended result
7.1.1.	Improving the results of investigations, criminal prosecutions, and final judgments in corruption cases, including high-level corruption cases	June 2027	Ministry of Justice; Prosecutor General's Office	Demonstration of an overall positive trend and harmonisation of statistical definitions
7.1.2.	Full implementation of the new version of the “e-Integrity” Automated Information System	December 2026	National Integrity Authority	Full electronic submission, risk-based verification, random allocation, and interoperability
7.1.3.	Implementation of CNA recommendations on mitigating corruption	December 2026	National Anti-	Addressing 100% of CNA recommendations: full or partial acceptance or, where a

	risks in draft normative acts		Corruption Centre	recommendation is not accepted, provision of a written and reasoned justification
7.1.4.	Implementation of recommendations formulated as part of institutional integrity assessments	December 2026	National Anti-Corruption Centre	Inclusion in integrity plans of at least 95% of the recommendations formulated by CNA and implementation of at least 85% of the recommendations
7.1.5.	Reducing the duration of the examination of corruption cases and increasing the resolution rate	December 2026	Ministry of Justice	A 40% reduction in duration and a 10% increase in the resolution rate of corruption and corruption-related cases, in correlation with the specialised examination mechanism

The following sections present the progress made on each measure established by the Reform Agenda, the rating assigned, and recommendations for optimising or accelerating the actions required to achieve the intended result.

Measure 7.1.1. Improving the results of investigations, criminal prosecutions and final judgments in corruption cases

Element	Content
Deadline	June 2027
Responsible institutions	Ministry of Justice; Prosecutor General's Office
Payment condition and intended result	Improving the results of investigations, criminal prosecutions and final judgments in corruption cases, including high-level corruption cases. Demonstrating an overall positive trend throughout the entire chain of investigation, criminal prosecution and judicial examination. Reviewing and aligning the statistical definitions of different categories of offences with international standards, EU legislation and relevant UN and Council of Europe instruments.
Baseline	Average for 2021–2023: 395 investigations, 199 indictments and 158 final judgments per year in corruption cases, including high-level corruption cases.
Source of verification provided for in the Reform Agenda	Data from the electronic platform, including data for 2025, and documents confirming the review and harmonisation of statistical definitions

CNA data indicate a significant quantitative increase over the period 2023–2025. The total number of offences detected by investigation officers increased from 511 in 2023 to 847 in 2025, representing an increase of approximately 65.8%. Within this total, the number of corruption and corruption-related offences increased from 429 to 792, or by approximately 84.6%.

The comparability of CNA data is, however, affected by a statistical inconsistency. The [2024 Annual Report](#) presents the total of 749 offences as comprising 629 corruption and corruption-related offences and 120 offences in other categories. The [2025 Annual Report](#) reproduces the same total for 2024 but breaks it

down into 701 corruption and corruption-related offences and 48 offences in other categories. In the absence of a reconciliation note, it is not possible to determine whether the difference of 72 offences results from reclassification, changes in statistical definitions, or corrections to the data initially reported. In any event, the CNA reports do not define the methodology used for presenting the data.

[Data for the first half of 2026](#) do not confirm a continuation of the upward trend. CNA reported 447 detected offences, of which 411 were corruption and corruption-related offences, compared with 479 and 412, respectively, in the first half of 2025. The overall number decreased by approximately 6.7%, while the corruption and corruption-related component remained virtually unchanged. This development does not, in itself, constitute an established negative trend, but it shows that the upward trajectory observed during 2023–2025 did not continue in the first half of 2026. However, these indicators do not necessarily appear to provide a qualitative assessment. The aggregate increase masks a shift in activity towards less serious offences. The share of serious and particularly serious offences in the total number of offences detected by CNA decreased from 79.4% in 2024 to 46.8% in 2025, while the number of minor offences tripled.

This shift is also reflected in the breakdown by offence: in 2025, active bribery cases increased by 33% compared with 2024 (265 compared with 199 detected offences), while passive bribery cases decreased by 14% (206 compared with 241).

The reported statistical indicators show that, following the procedural separation of CNA from the Anti-Corruption Prosecutor's Office (PA), CNA appears to have focused more heavily on investigating active bribery offences, with the number of detected offences increasing from 62 in 2023 to 265 in 2025 (an increase of approximately 327%, or 4.3 times).

Data from the Anti-Corruption Prosecutor's Office require an additional degree of caution, as changes in jurisdiction have substantially altered the institution's statistical activity indicators. The [2024 Annual Report](#) indicates that, in 2023, 409 criminal investigations were initiated and 173 cases were referred to court, including both cases handled directly and cases in which PA supervised criminal investigations conducted by CNA's criminal investigation body. The [2025 Annual Report](#), looking retrospectively at the same year, reports only 98 criminal investigations initiated and 35 cases referred to court.

When considered on the basis of the full series, the number of cases referred to court decreased from 173 in 2023 to 38 in 2025. When compared on the basis of the jurisdiction applicable in 2025, their number evolved from 35 in 2023 to 55 in 2024 and 38 in 2025. The number of cases in 2025 was approximately 8.6% higher than in 2023, but approximately 30.9% lower than in 2024. The number of criminal investigations initiated by prosecutors remained relatively stable, from 98 in 2023 to 96 in 2025. These data indicate a mixed trend and do not justify attributing the entire decline in the broader statistical series to a decrease in the institution's efficiency.

At the same time, the number of criminal cases in which PA represented the state prosecution decreased from 513 cases as of 1 January 2024 to 398 cases as of 1 January 2025 and 213 cases as of 1 January 2026. This reduction may reflect both the resolution of cases and changes in jurisdiction and the resulting decrease in the inflow of new cases; it therefore cannot automatically be characterised as either progress or regression.

Although the number of cases in which CNA criminal investigation officers proposed referral to court and which prosecutors accepted for trial amounted to 305 in 2024 and 315 in 2025, to which should be added

55 and 38 cases, respectively, referred directly to court by the Anti-Corruption Prosecutor's Office, these figures significantly exceed the baseline of 199 indictments per year. Nevertheless, these indicators may remain of limited relevance, given that a substantial proportion of these cases may not fall within the category of "**high-level corruption**", a category that appears to correspond more closely to the jurisdiction of PA prior to the amendments to the Criminal Procedure Code that entered into force on 24 June 2026, according to the [classification used by the European Commission for accession countries](#).

Accordingly, the high-level corruption component cannot be demonstrated separately on the basis of publicly available data. CNA's classification relating to employees of supreme state authorities covers only some of the persons who could fall within this category, while PA reports do not provide a consolidated statistical series of high-level corruption cases compiled according to the definition used by the [e-platform](#). *(Note: the electronic platform for collecting data on the "track record" in the areas of organised crime, corruption, money laundering and other serious offences for countries involved in the accession process.)*

The annual reports of the Anti-Corruption Prosecutor's Office allow for a partial assessment of high-level corruption cases through data on high-ranking persons, special categories of persons, and "high-profile cases". In 2023, 18 high-ranking persons were referred to court, while special categories of persons accounted for 66% of the total (175 out of 264), compared with 9 high-ranking persons and 45% special categories of persons (51 out of 113) in 2024. In 2025, PA no longer published the comparative table, but reported 44 persons referred to court, including four judges, and 18 high-profile cases, of which 10 entries concerned the illegal financing of political parties.

The qualitative composition of the offences detected by CNA changed significantly. The share of serious and particularly serious offences decreased from 79.4% in 2024 to 46.8% in 2025, while the number of minor and less serious offences increased. This development cannot be interpreted exclusively as an institutional shift towards less serious cases, since **Law No. 136/2024** amended the penalties and the classification of certain offences by degree of seriousness.

The results concerning the representation of the state prosecution also present a mixed picture. In cases in which PA represented the state prosecution, 202 first-instance judgments concerning 349 persons were delivered in 2025. Of these, 128 were convictions concerning 181 persons, 50 were judgments terminating criminal proceedings concerning 104 persons, and 24 were acquittals concerning 64 persons. The conviction rate was 63.4% when calculated by case (excluding judgments terminating criminal proceedings on non-rehabilitating grounds) and 51.9% when calculated by number of persons.

The number of persons in respect of whom criminal proceedings were terminated due to the expiry of the limitation period increased from 68 in 2024 to 85 in 2025. At the same time, the share of cases examined for more than five years increased from 16.9% to 21.7%, while the share of cases resolved in less than one year decreased from 21.8% to 19.3%. *(Note: these results concern judgments delivered at first instance.)* These results cannot directly affect the payment condition, but they indicate risks to the efficiency and finality of the judicial response.

Given the available data, the increase in the number of proceedings terminated as a result of the expiry of the criminal limitation period cannot be attributed entirely to Law No. 136/2024. This increase may also be attributable to the duration of criminal investigations and the examination of cases.

Future comparability may also be affected by **Law No. 111 of 11 June 2026**, which reconfigured the jurisdiction of CNA, PA, PCCOCS and other criminal investigation bodies. The reallocation of procedural

jurisdiction could result in another break in the statistical series unless the data are recalculated using a uniform methodology and a definition of high-level corruption aligned with the European Commission's criteria.

CAPC assessment and rating

Publicly available data indicate a significant quantitative increase in corruption and corruption-related offences detected by CNA during 2023–2025, but do not demonstrate a comparable overall positive trend across all three stages covered by the indicator: investigations, indictments and final judgments. The trend in PA results is mixed and heavily influenced by changes in jurisdiction; the high-level corruption component cannot be assessed separately; and data for the first half of 2026 indicate stagnation in the corruption and corruption-related component.

The inaccessibility of the e-platform and the lack of comparability of the data do not warrant the rating **“Insufficient data for assessment”**, since the publicly available information is sufficient to identify an implementation trajectory exposed to significant risk. It is not, however, sufficient to establish formal fulfilment of the payment condition.

An objective assessment of the commitment requires the publication of a uniform statistical series for the period 2021–2026, disaggregated by high-level corruption and other forms of corruption, by institution and by procedural stage. The series should distinguish between final judgments resulting in conviction, acquittal and termination of proceedings. The revision of statistical definitions should be accompanied by a methodology for aligning the data and recalculating the 2021–2023 baseline. CNA should also publish a reconciliation note regarding the different figures reported for 2024.

Although the implementation deadline has not yet expired, the situation identified as of the cut-off date indicates a significant risk that the condition will not be fulfilled on time. This risk arises from the absence of a publicly available and comparable statistical series, the lack of evidence demonstrating the high-level corruption component, the stagnation of CNA indicators in the first half of 2026, and judicial results affected by the duration of proceedings and limitation periods.

Rating: **Ongoing (at risk of non-completion)**

Recommendations

- the institutions responsible for combating corruption should develop and adopt a single statistical methodology aligned with the European Commission's definition of **“high-level corruption”**, including criteria for distinguishing systemic corruption from petty corruption;
- the annual reports of CNA and PA should include data on criminal cases that meet the data-collection criteria established for the e-platform, disaggregated by category of persons concerned, procedural stage and final outcome of the case;
- the volume and complexity of cases handled by CNA and PA should be periodically assessed and, based on the findings, concrete plans should be adopted for filling vacancies, increasing specialised staffing levels, and allocating the budgetary, technical and analytical resources required for investigating high-level corruption;
- the Prosecutor General's Office should adopt, in the form of an instruction issued by the Prosecutor General, a practical methodological guide on the investigation of corruption offences, addressing the distinction between active bribery, passive bribery and trading in influence, the

extension of investigations beyond detection in flagrante, and verification of the involvement of decision-makers;

- a thematic analysis should be conducted of trading-in-influence cases handled by CNA in order to determine the extent to which criminal investigations verify whether the alleged influence is real or purported, the identity of the public official or person holding a position of public dignity over whom influence is claimed to be exercised, and that person's possible involvement, as well as the reasons why investigations may be limited to the person trading in influence or to intermediaries;
- an early-warning mechanism should be established to identify cases at risk of becoming time-barred, through periodic inventories of old cases, the establishment of priority timetables for their examination, and analysis of the reasons for adjournments in cases pending for more than five years.

Measure 7.1.2. Full Implementation of the New Version of the "e-Integrity" Automated Information System

Element	Content
Deadline	December 2026
Responsible institutions	National Integrity Authority
Payment condition and intended result	Electronic submission, through the new version of the "e-Integrity" Automated Information System, of 100% of asset and personal interest declarations. Automated verification of declarations based on risk criteria, flagging of declarations presenting risks, and their automatic and random allocation to integrity inspectors. Ensuring interoperability through MConnect with the national registers specified in the Reform Agenda.
Baseline	There is no information system that automatically verifies declarations, identifies risks and allocates them to integrity inspectors.
Source of verification provided for in the Reform Agenda	Implementation report of the project for the development and implementation of the new version of the "e-Integrity" Automated Information System.

The payment condition does not concern merely maintaining the current declaration submission system in operation, but rather the full implementation of a **new version** of the "e-Integrity" Automated Information System. It must cumulatively ensure the electronic submission of all asset and personal interest declarations, their automated verification based on risk criteria, the flagging of declarations presenting risks, their automatic and random allocation to integrity inspectors, and data exchange, through the MConnect platform, with the registers of the State Tax Service, vehicles, legal entities, population and immovable property.

Accordingly, the existence of a functioning electronic portal constitutes only the starting point for the measure. Fulfilment of the condition requires evidence that the new version is operational and that all the required functionalities are actually in use, rather than merely designed, contracted or tested in a separate environment.

The “e-Integrity” Automated Information System continued to ensure the electronic submission of declarations during the period under review. In April 2025, [National Integrity Authority informed declarants](#) that the system allowed data to be retrieved from previously submitted declarations, while in [March 2026](#) it specified that an electronic declaration is deemed received if it appears in the declarant’s account, is published on the declarations portal, and is confirmed by the electronic receipt sent to the declarant. This information confirms the operation of the declaration submission and publication component within the existing version of the system.

The current operation of the portal does not, however, demonstrate fulfilment of the payment condition. The Reform Agenda requires fully electronic submission to be ensured **through the new version**, together with automated risk-analysis mechanisms and automatic and random allocation. Consequently, the continued operation of the existing system is necessary for ANI’s activities, but cannot be regarded as sufficient evidence of the implementation of the new architecture.

The first procurement procedure, launched on 1 August 2025, [did not result in the award of a contract](#). The repeated procedure, launched on 25 August 2025, progressed to the [selection of a service provider](#); however, as of the cut-off date, no publicly available evidence was identified regarding the performance and acceptance of the services or the full deployment of the new version.

The publicly available procurement documentation predominantly uses the terms **“adjustment”, “improvement” and “modernisation” of the existing Automated Information System**, whereas the Reform Agenda requires the full implementation of a **new version**. This terminological difference does not in itself demonstrate that the scope of the procurement is insufficient. For verification purposes, however, National Integrity Authority should provide a correspondence matrix mapping the functionalities developed under the contract against each component of the payment condition.

In particular, the publicly available documents identified do not make it possible to confirm that the contracted modernisation included and operationalised:

- an automated mechanism for applying risk criteria to all submitted declarations;
- automatic flagging of declarations presenting risks;
- automatic transmission of flagged declarations to integrity inspectors;
- random allocation without discretionary administrative intervention;
- functional interoperability with each of the five categories of registers specified in the Reform Agenda.

With regard to interoperability, the mere technical possibility of connecting through MConnect is not sufficient. [MConnect is the government interoperability infrastructure](#) through which public authorities can exchange data in real time; however, fulfilment of the condition requires the existence and actual use of the data-exchange services needed by the “e-Integrity” Automated Information System. For each register, it should be specified whether the interconnection has been designed, tested or deployed into production, what data are retrieved, and whether those data are used in the automated risk-analysis process.

The [ANI Annual Activity Report for 2025](#) states, with regard to the e-Integrity information system, that the Authority benefits from assistance provided by the International Development Law Organization (IDLO); that between February and September 2025, the technical specifications for the development of the new version of the “e-Integrity” Automated Information System were prepared and submitted for coordination with the Electronic Governance Agency and the Information Technology and Cyber Security

Service; that on 23 September 2025, the procurement procedure for selecting a service provider for the development and implementation of the system was conducted; and that, in December 2025, evaluation of the bids submitted under the tender procedure commenced.

In April 2026, following the hearing in plenary session of ANI's 2025 Annual Activity Report, Parliament [issued recommendations](#) concerning the modernisation of the e-Integrity system and improving the effectiveness of controls through risk analysis. This does not establish the precise technical stage reached by the project, but supports the conclusion that, during the first part of 2026, modernisation of the system and operationalisation of risk analysis remained objectives requiring further action.

At the same time, ANI's webpage for submitting declarations and the institution's communications from March 2026 continued to describe the operation of the existing electronic service, without announcing the launch of a new version capable of automatically conducting risk-based verification and allocating declarations.

CAPC assessment and rating

As of the cut-off date, two elements can be confirmed. First, the existing system continues to ensure the electronic submission and publication of declarations. Second, ANI conducted a procurement procedure and selected a service provider for the adjustment and modernisation of the "e-Integrity" Automated Information System.

These results demonstrate that the measure is under implementation, but they are insufficient to confirm the full operationalisation of the new version. Publicly available sources provide no evidence regarding the acceptance and deployment of the system into production, the operation of automated risk analysis, random allocation, or the status of each interconnection required by the Reform Agenda.

Rating: **Ongoing (at risk of non-completion)**

Recommendations

ANI should publish an interim implementation report specifying the contract concluded, the deliverables accepted, the timeline for the remaining stages, and the status of each functionality required by the payment condition.

The ANI report should explicitly distinguish between:

- the functionalities of the existing system and those developed as part of the new version;
- technical completion and deployment into production;
- technical connection to a register and the actual use of its data;
- the existence of risk criteria and their automated application to declarations;
- testing of random allocation and its actual use by integrity inspectors.

Before the measure is declared completed, ANI should provide verifiable evidence regarding acceptance of the system, security testing, data migration, the operation of automated risk criteria, random allocation, and operational interoperability with each register specified in the Reform Agenda.

Measure 7.1.3. Implementation of CNA Recommendations on Mitigating Corruption Risks in Draft Normative Acts

Element	Content
Deadline	December 2026
Responsible institutions	National Anti-Corruption Centre
Payment condition and intended result	The authors of draft normative acts are to address 100% of the recommendations formulated by CNA for mitigating corruption risks. Recommendations may be accepted in full or in part or may not be accepted, provided that a written and reasoned justification is included in the summary of objections and proposals.
Baseline	During 2020–2024, 76% of CNA recommendations were incorporated into the final versions of draft legislation.
Source of verification provided for in the Reform Agenda	The summary of objections and proposals relating to the draft and the final version of the normative act published in the Official Gazette of the Republic of Moldova.

The payment condition seeks to ensure the effective use of anti-corruption proofing in the process of drafting and adopting normative acts. By December 2026, all recommendations formulated by CNA for mitigating corruption risks must be addressed by the author of the draft in the final version. The condition does not require the automatic acceptance of every recommendation. The author may accept it in full or in part or reject it, but where a recommendation is not accepted, a written and reasoned justification must be provided in the summary accompanying the draft.

This distinction is essential for assessing the measure. The 100% target established by the Reform Agenda refers to **addressing all recommendations**, rather than accepting all of them in full. A recommendation may be considered addressed both when it is reflected in the draft and when its non-acceptance is explained through a reasoned justification. Accordingly, the source of verification specified in the Reform Agenda is documentary: the summary of objections and proposals relating to the draft, examined together with the final version of the normative act published in the Official Gazette.

In [2025](#), CNA's Legislation and Anti-Corruption Proofing Directorate received 1,054 drafts from public authorities and examined 1,045 drafts, including 37 drafts that had remained under examination from the previous year. Of these, 151 drafts underwent the endorsement procedure, while anti-corruption proofing reports were prepared for 894 drafts. The drafts subjected to anti-corruption proofing included 253 draft laws and 641 draft Government decisions.

As a result of examining the drafts, CNA identified 2,496 corruption risk factors. The [Annual Activity Report](#) describes the impact of anti-corruption proofing as relatively stable and indicates a recommendation acceptance rate of approximately **76.34%**.

By comparison, in [2024 CNA reported](#) 2,566 corruption risk factors and an acceptance rate of approximately 77%. At the same time, the 2024 report specifies that, following the amendment of **Law No. 100/2017 on Normative Acts**, as of 5 July 2024 CNA intervenes only at the stage of anti-corruption proofing of drafts, following the endorsement stage. This procedural change should be taken into account when comparing the volume of activity across different periods.

The 76.34% acceptance rate reflects the share of recommendations accepted within CNA's overall anti-corruption proofing activity. It cannot be compared directly with the 100% target established by the Reform Agenda, because the payment condition concerns the **addressing of recommendations**. For the purposes of the Reform Agenda, a recommendation is addressed both when it is accepted in full or in part and when it is not accepted but the author of the draft provides a written and reasoned justification.

For the purpose of assessing this condition, CNA applied a separate monitoring mechanism, distinct from the general indicators presented in its Annual Activity Report. The monitoring results were approved by [CNA Board Decision No. 3 of 17 July 2026](#).

The monitoring was carried out by examining materials from Government meetings, approved draft normative acts, anti-corruption proofing reports, and the summaries of objections and proposals relating to the drafts. For each period, CNA determined the number of drafts subjected to anti-corruption proofing, the number of recommendations formulated, the share of recommendations addressed in the summaries, and the share of recommendations accepted and incorporated by the authors of the drafts.

The data set out in the CNA Board Decision show that all 962 recommendations formulated during the periods monitored were addressed by the authors of the drafts. Of these, 814 recommendations were accepted and incorporated, while 148 were not accepted but, according to CNA's findings, were accompanied by written justifications in the summaries of objections and proposals.

The Reform Agenda designates CNA as the institution responsible for the measure; however, responsibility for addressing the recommendations and providing justification where they are not accepted rests with the authors of the draft normative acts. The mechanism applied by CNA makes it possible to verify how the authors reflected the recommendations in the summaries of objections and proposals. Fulfilment of the condition therefore depends both on the continuity of CNA's monitoring and on compliance by the initiating authorities with their obligation to examine each recommendation and provide reasons for their position.

CAPC assessment and rating

As of the cut-off date, the deadline for implementing the measure had not yet expired. Data from the separate monitoring mechanism applied by CNA indicate that, in 2025 and during the period January–June 2026, all recommendations formulated in relation to the drafts monitored were addressed by their authors. According to CNA, recommendations that were not accepted were accompanied by written justifications in the summaries of objections and proposals.

These results cannot be inferred from the general acceptance rate of 76.34%, but are demonstrated by the separate data approved by CNA Board Decision No. 3 of 17 July 2026. They indicate a trajectory consistent with achievement of the 100% target, provided that monitoring continues and this level of performance is maintained until the deadline for the measure expires.

The annexes to the Decision present consolidated data by Government meeting. To strengthen public verifiability, it would be useful to maintain records that allow, where appropriate, the anti-corruption proofing report, the author's position, and the final version of the draft to be cross-referenced. This observation concerns transparency and the possibility of independent verification and does not call into question the interim results reported by CNA.

Rating: **Ongoing (on schedule)**

Recommendations

CNA should continue applying the separate monitoring mechanism until the deadline for the measure expires and periodically publish consolidated data on:

- the number of drafts monitored;
- the number of recommendations formulated;
- the number and proportion of recommendations addressed;
- recommendations accepted in full or in part;
- recommendations not accepted and accompanied by written justifications;
- the period covered and the calculation base used.

The State Chancellery and the authorities drafting normative acts should ensure that the summaries of objections and proposals expressly indicate how CNA recommendations were addressed and, where a recommendation is not accepted, provide justification for the approach taken.

At the end of the implementation period, CNA should publish a final consolidated overview allowing the result achieved to be compared with the 100% target established by the Reform Agenda.

Measure 7.1.4. Implementation of Recommendations formulated within institutional integrity assessments

Element	Content
Deadline	December 2026
Responsible institutions	National Anti-Corruption Centre
Payment condition and intended result	Inclusion in the integrity plans of the assessed entities of at least 95% of the recommendations formulated by CNA and full implementation of at least 85% of the recommendations.
Baseline	During 2020–2024, 75% of the recommendations formulated within institutional integrity assessments were implemented by the assessed institutions.
Source of verification provided for in the Reform Agenda	CNA report on accepted and implemented recommendations, published on the institution's official website.

The measure seeks to translate the findings of institutional integrity assessments into effective changes within the assessed public entities. The payment condition comprises two cumulative components: the inclusion in integrity plans of at least 95% of the recommendations formulated by CNA and the implementation of at least 85% of those recommendations by December 2026.

The two components correspond to different stages. Inclusion of a recommendation in an integrity plan demonstrates the formal commitment to undertake the remedial measure. Implementation entails carrying out the measures through which the recommendation was translated into the integrity plan, confirming the result through supporting evidence and, where appropriate, demonstrating the mitigation or elimination of the vulnerability that gave rise to the recommendation.

Under **Law No. 325/2013**, where an assessment report identifies corruption risks, the assessed entity must adopt an integrity plan within 30 days of receiving the report. CNA subsequently [monitors implementation of the plan](#) and assesses the progress achieved.

In [2025](#), CNA completed institutional integrity assessments of four entities: the Civil Aviation Authority, the Competition Council, the State Tax Service and the State Labour Inspectorate. The respective reports contained a total of **462 recommendations or minimum requirements** for eliminating corruption risks.

The [degree of integration](#) of the recommendations into the approved plans was as follows:

- Civil Aviation Authority – 86 recommendations, 100% integrated;
- Competition Council – 117 recommendations, 100% integrated;
- State Tax Service – 182 recommendations, translated into 179 actions, with an integration rate of 99%;
- State Labour Inspectorate – 77 recommendations, translated into 72 actions, with an integration rate of 100%.

These results exceed the 95% threshold established by the Reform Agenda. CNA also concluded that the first component of the payment condition had been fulfilled in terms of the integration of recommendations.

The situation is [also confirmed by the sectoral assessment](#) carried out in relation to local public administration in Chişinău municipality. Chişinău City Hall, the five sector-level administrations and nine general directorates approved 15 integrity plans, which incorporated in full all 339 recommendations formulated by CNA. Accordingly, the data available as of the cut-off date indicate that the 95% threshold for inclusion of recommendations in integrity plans has been exceeded. The results constitute verifiable interim progress that should be maintained and confirmed in the final reporting relating to the payment condition.

The second component of the condition, concerning the implementation of at least 85% of the recommendations, requires a separate analysis.

[CNA Board Decision No. 4 of 17 July 2026](#) presented the results of the separate mechanism for monitoring the measure. As of the date on which the Decision was adopted, CNA had reported the preparation of 31 semi-annual and final reports on the implementation of integrity plans.

For the purpose of assessing the second component of the payment condition, CNA took into account the results of monitoring 15 entities within the local public administration of Chişinău municipality and the National Road Transport Agency. The disaggregated information subsequently provided to CAPC makes it possible to distinguish between the recommendations formulated and the actions included in the integrity plans.

Calculations based on the data provided by CNA indicate the full implementation of 1,341 out of 1,467 recommendations, representing approximately 91.4%. All 16 entities included in the calculation base recorded individual recommendation implementation rates ranging from 86% to 98%, above the 85% threshold established by the Reform Agenda.

The aggregate rate of actions fully completed is similar, at approximately 91.5%. However, for the purpose of assessing the payment condition, the rate calculated at the level of recommendations is the relevant indicator, since the Reform Agenda expressly refers to their implementation.

In most cases, recommendations were translated directly into actions under the integrity plans. For some entities, however, the number of recommendations differs from the number of actions. These differences result from the consolidation of several recommendations with similar objectives into a single action or, conversely, from the division of one recommendation into several actions.

In such cases, CNA indicated that it maintains separate records of the recommendations and monitors their implementation even where the correspondence between a recommendation and an action is not one-to-one. The additional information provided to CAPC makes it possible to calculate the indicator directly at the level of recommendations and removes the principal limitation identified in the initial version of the report.

An additional difficulty arises from the fact that CNA reports primarily assess whether the action provided for in the plan has been carried out. For some measures — such as approving a regulation, designating a responsible person or organising a training session — implementation can be demonstrated relatively easily. For recommendations aimed at changing institutional practices, reducing discretion or mitigating an operational risk, it is also necessary to verify the effect produced, rather than merely the existence of an act or activity. According to the clarifications provided by CNA, monitoring of integrity plans is not limited to formal verification of whether actions have been carried out. Impact indicators are used for the actions included in the plans, and the assessment of their implementation is based on supporting evidence submitted by the monitored entities. Depending on the circumstances, this evidence may demonstrate changes in institutional practices, mitigation of identified vulnerabilities and achievement of the effect intended by the recommendation.

To strengthen transparency, public reports could present more explicitly the impact indicators used and the categories of supporting evidence on which the finding of implementation was based, particularly for recommendations aimed at changing institutional practices or mitigating an operational risk.

CAPC assessment and rating

As of the cut-off date, the deadline for the measure had not yet expired. The available data indicate a favourable trajectory for both components of the payment condition.

With regard to the first component, the recommendations formulated by CNA were included in integrity plans at rates of 99–100%, exceeding the 95% threshold established by the Reform Agenda.

For the second component, the disaggregated data provided by CNA indicate the full implementation of 1,341 out of 1,467 recommendations, representing approximately 91.4%. All entities included in the calculation base recorded individual rates above 85%.

CNA Board Decision No. 4 of 17 July 2026 finds that the 95% integration threshold has been exceeded and the 85% implementation threshold has been achieved. Since CAPC's assessment is interim in nature and monitoring of the integrity plans is ongoing, these results are assessed as indicating a trajectory consistent with fulfilment of the condition within the deadline.

Rating: **Ongoing (on schedule)**

Recommendations

CNA should continue monitoring the integrity plans in accordance with the approved timelines and periodically update the data on the integration and implementation of recommendations.

To strengthen public verifiability, CNA should publish, in consolidated form:

- the entities and integrity plans included in the calculation base;
- the number of recommendations formulated and integrated into the plans;
- the number of recommendations fully implemented;
- the calculation formula used;
- explanations of cases in which recommendations were consolidated into a single action or divided into several actions;
- the impact indicators and categories of supporting evidence used in the monitoring process.

Publication of these data would not entail establishing a parallel reporting mechanism, but rather presenting, in an accessible and verifiable form, information already collected and used by CNA.

Measure 7.1.4. Reducing the duration of corruption cases and increasing the resolution rate

Element	Content
Deadline	December 2026
Responsible institutions	Ministry of Justice
Payment condition and intended result	A 40% reduction in the duration of case resolution for corruption and corruption-related cases compared with 2024, and a 10% increase in the resolution rate of these cases, through strengthening the legal framework for the specialised mechanism for examining corruption cases.
Baseline	In 2024, the average duration of case resolution for corruption cases at Chişinău Court was 775.28 days, while the resolution rate was 30.1%.
Source of verification provided for in the Reform Agenda	Annual Activity Report of Chişinău Court and CSM decisions on the periodic monitoring of court cases.

The measure seeks to reduce the duration of the examination of corruption and corruption-related cases and increase their resolution rate by strengthening the legal framework for the specialised infrastructure for examining such cases. The Reform Agenda includes conflict of interest and abuse of office among corruption-related offences.

This is one of the measures for which the distinction between a normative reform and its practical result is particularly important. The adoption of legislative amendments or the establishment of specialised judicial panels may create the necessary conditions, but does not automatically demonstrate a reduction in case duration or an increase in the resolution rate.

The deadline remains open; however, the absence of a publicly available methodology and interim data does not allow confirmation of a trajectory consistent with achievement of the targets by December 2026.

The payment condition requires a 40% reduction in the resolution time of corruption and corruption-related cases compared with the duration of 775.28 days recorded at Chişinău Court in 2024. The resulting target is no more than 465.17 days. At the same time, the resolution rate must increase by 10% from the baseline of 30.1%, without the Reform Agenda specifying whether this means a relative increase to 33.11% or an increase of 10 percentage points, to 40.1%.

The [general report shows that, at the beginning of 2026](#), the courts had 450 pending cases concerning the main corruption and corruption-related offences in the public sector. During the first quarter, a further 184 cases were registered and 135 were examined, resulting in an increase in the pending caseload to 499 cases, or by 10.9%. The ratio of cases examined to incoming cases was 73.4%, while the ratio of cases examined to the entire caseload under consideration produces a rate of 21.3%. Neither figure can be reliably compared with the 30.1% baseline until the formula used to establish that baseline is published.

The data also indicate a significant age profile of the pending caseload. Interpreting the columns in the report as distinct age intervals, approximately 45.3% of pending cases were more than 12 months old, while 22% had been pending for more than 36 months.

At the beginning of 2026, 66% of pending passive bribery cases, 86.7% of cases concerning abuse of power or abuse of office, 80% of cases concerning excess of authority, and all illicit enrichment cases had been pending for more than 12 months.

At the same time, 108 of the 184 new cases concerned active bribery, while another 55 concerned trading in influence. Together, these represented 88.6% of the inflow of new cases. This composition may improve the aggregate indicator due to the predominance of cases that can be resolved more quickly, without the duration of proceedings in complex cases concerning the conduct of public officials decreasing to the same extent.

Based on the pace recorded during the first quarter, the indicative time required to clear the pending caseload would be approximately 337 days, below the target of 465.17 days. This does not, however, demonstrate fulfilment of the condition, since it concerns all courts, is calculated on the basis of a single quarter, and is influenced by the composition of the caseload. Disaggregated data indicate an indicative duration of approximately 415 days for passive bribery, but more than 1,000 days for abuse of power or abuse of office, 608 days for excess of authority, and 730 days for illicit enrichment.

The [report on the adjudication of criminal cases concerning natural persons](#) shows that, in 2025, of the 496 cases examined, 398 resulted in convictions, 56 in acquittals and 42 in the termination of criminal proceedings. In passive bribery cases, of 85 cases examined, only 45 resulted in convictions, 19 in acquittals and 21 in the termination of criminal proceedings.

However, the [Chişinău Court Annual Activity Report for 2025](#), presented at a CSM meeting, provides direct data on achievement of the quantitative component of the condition. According to the report, the time required to clear the pending caseload of corruption and corruption-related cases decreased from 1,234 days in 2023 to 360 days in 2025, while the resolution rate increased from 22% to more than 50%.

Compared with the 2024 baseline of 775.28 days, a duration of 360 days represents a reduction of approximately 53.6% and exceeds the 40% reduction target, corresponding to a maximum duration of 465.17 days.

A resolution rate of more than 50% exceeds both the target of 33.11%, resulting from a relative increase of 10%, and the target of 40.1%, resulting from an increase of 10 percentage points. The CSM data therefore indicate that both quantitative targets had already been achieved in 2025.

Even though these quantitative indicators have been achieved, the manner in which the payment condition is formulated raises the issue of attribution of the results, since they were not achieved through a specialised anti-corruption adjudication infrastructure. CSM indicates that the progress was influenced by the specialisation of judges who were already examining corruption cases, whereas the specialised anti-corruption board established by Law No. 192/2025 had not become operational. The reduction in duration and increase in the resolution rate were therefore achieved through the existing structure rather than through the dedicated infrastructure whose strengthening constitutes one of the elements of the payment condition.

With regard to the judicial architecture, the indicator recorded normative progress through the adoption of **Law No. 192 of 10 July 2025**, but the specialised infrastructure is not yet operational.

According to [CSM Decision No. 334/21 of 21 July 2026](#), following four recruitment competitions organised for the 15 positions within the specialised anti-corruption board, only two candidates reached the performance evaluation stage, and no judge had been appointed. On 21 July 2026, CSM announced a new competition for all 15 positions.

[CSM Decision No. 335/21](#) of the same date shows that, for the six positions on the specialised panels of the Central Court of Appeal, there is only one candidate whose application was declared admissible. Admission of the application does not amount to an appointment, as the candidate must still undergo external evaluation and an interview. The remaining five positions were re-advertised. The persistent shortage of candidates substantially reduces the time remaining for appointments, organisation of the work, transfer of cases, and achievement of results that can be attributed to the new infrastructure by December 2026.

The statistical data indicate a possible improvement in aggregate case duration, but do not allow the targets to be verified specifically for Chişinău Court. At the same time, the pending caseload increased during the first quarter of 2026, complex cases have a significant age profile, and the inflow of new cases is dominated by active bribery and trading-in-influence cases. This may result in a reduction in overall case duration due to the lower complexity of these cases. However, an increase in the pending court caseload through the addition of less complex cases could affect other payment conditions relating to the adjudication of high-level corruption cases.

The legal framework for specialisation has been adopted, but repeated recruitment difficulties make it unlikely that the specialised infrastructure will operate for a sufficient period to produce measurable results attributable to it by the established deadline.

An objective assessment of the commitment requires the publication of a uniform statistical series for Chişinău Court covering the period 2024–2026 and calculated using the same list of offences and the same methodology. The Ministry of Justice and CSM should clarify the formula used to calculate the resolution

rate and the meaning of the “10%” increase, while CSM should publish a concrete timetable for the selection of judges, provision of auxiliary staff, and transfer of cases to the specialised structures.

CAPC assessment and rating

The implementation deadline has not yet expired, and CSM data indicate that the targets for reducing case duration and increasing the resolution rate were already achieved in 2025. However, the condition is not limited to achieving these statistical results, but links them to the functioning of a dedicated anti-corruption adjudication infrastructure. The specialised anti-corruption board and the specialised panels of the Central Court of Appeal are not yet operational, while the small number of candidates and the remaining stages of the selection process create a significant risk that the mechanism will not become operational by December 2026.

The rating therefore reflects the risk of non-completion of the institutional component and the risk of failure to demonstrate the link between that component and the results achieved, even though the quantitative statistical indicators have been met.

Rating: **Ongoing (at risk of non-completion)**

Recommendations

- CSM should conduct a study to identify the reasons for the low level of participation in the announced recruitment competitions;
- the profile of candidates for judicial positions should be diversified;
- administrative measures should be implemented to ensure that the new judicial structures become operational once the required number of judges has been appointed.

SUMMARY ASSESSMENT MATRIX FOR SUB-AREA 7.1

#	Key findings	CAPC Rating	Priority recommendation
7.1.1	The data do not demonstrate a comparable overall positive trend across all three stages, while the high-level corruption component cannot be tracked separately.	Ongoing (at risk of non-completion)	Develop a single statistical methodology and publish a comparable statistical series for 2021–2026, including separate data on high-level corruption.
7.1.2	Procurement and technical preparations have progressed, but deployment into production and the operation of the essential components have not been demonstrated.	Ongoing (at risk of non-completion)	Publish an implementation timetable and evidence demonstrating the operation of all components.
7.1.3	The separate monitoring mechanism applied by CNA indicates that all 699 recommendations formulated in 2025 and all 263 recommendations formulated during January–June 2026 were addressed. According to CNA,	Ongoing (on schedule)	Continue the monitoring mechanism and periodically publish consolidated data on recommendations addressed, accepted, and

	recommendations that were not accepted were accompanied by written justifications.		not accepted with written justification.
7.1.4	Recommendations were included in integrity plans at rates of 99–100%, while the disaggregated data provided by CNA indicate the full implementation of 1,341 out of 1,467 recommendations, or approximately 91.4%.	Ongoing (on schedule)	Publish the calculation base and consolidated data on recommendations integrated and implemented, including explanations of differences between recommendations and actions under the integrity plans.
7.1.5	Reported data indicate an improvement in the quantitative indicators, but their comparability has not been fully demonstrated, while the specialised mechanism is not yet operational.	Ongoing (at risk of non-completion)	Clarify the methodology for the indicators and establish a firm timetable for operationalising the specialised mechanism for examining corruption cases.

Conclusions on the implementation of Reform 7.1

The interim analysis shows that implementation of the measures under Sub-area 7.1 has commenced across all five areas and that verifiable progress has been made. However, progress remains uneven and, as of the cut-off date, none of the payment conditions can be considered fully fulfilled.

With regard to the results of investigations, criminal prosecutions and judicial examination of corruption cases, publicly available data indicate certain quantitative developments, but do not demonstrate an overall positive and comparable trend across all three stages of the indicator. Changes in jurisdiction, differences between statistical series, and the inability to separately track high-level corruption cases create a significant risk to demonstrating fulfilment of the condition by June 2027.

Implementation of the new version of the “e-Integrity” Automated Information System has progressed through the development of technical requirements and the conduct of procurement procedures. However, deployment of the system into production, the operation of automated risk analysis, random allocation, and interoperability with the registers specified in the Reform Agenda have not yet been demonstrated. The remaining technical stages and the proximity of the December 2026 deadline justify maintaining the rating “**Ongoing (at risk of non-completion)**”.

With regard to anti-corruption proofing of draft normative acts, the general acceptance rate of 76.34% cannot be compared directly with the 100% target, since the latter concerns the addressing of recommendations rather than only their acceptance. The data approved by CNA Board Decision No. 3 of 17 July 2026 indicate that all 699 recommendations formulated in 2025 and all 263 recommendations formulated during January–June 2026 were addressed by the authors of the drafts. According to CNA, recommendations that were not accepted were accompanied by written justifications. These results indicate a trajectory consistent with achievement of the target, provided that monitoring continues until the deadline for the measure expires.

A favourable trend is also observed with regard to recommendations formulated within institutional integrity assessments. CNA data indicate that recommendations were included in integrity plans at rates of 99–100%, exceeding the 95% threshold established by the Reform Agenda. For the second component, the disaggregated data provided by CNA indicate the full implementation of 1,341 out of 1,467 recommendations, or approximately 91.4%. All entities included in the calculation base individually exceed the 85% threshold. Since the deadline had not expired as of the cut-off date and monitoring is ongoing, the results are consistent with fulfilment of the condition within the deadline.

With regard to the duration and resolution rate of corruption cases, data reported by Chişinău Court and CSM indicate a substantial improvement and suggest that the quantitative targets have been achieved. Direct comparability with the baseline should, however, be confirmed by clarifying the methodology, the formulas used, and the categories of cases included. At the same time, the specialised judicial structures provided for under the new legal framework were not yet operational, while the low level of participation in recruitment competitions creates a risk to the mechanism becoming operational by the deadline.

Overall, of the five measures under Sub-area 7.1, two are assessed as **“Ongoing (on schedule)”**, while three are assessed as **“Ongoing (at risk of non-completion)”**. The main vulnerabilities concern not the absence of activities, but rather the gap between the activities undertaken and the results that must be demonstrated. In particular, these relate to the absence of comparable statistical series, delays in operationalising systems and institutional structures, and the inconsistent presentation of data through which results can be independently verified. In the case of Measures 7.1.3 and 7.1.4, the additional information provided by CNA clarified a significant part of the limitations identified during the initial stage of the assessment.

The priority for the next period should be to translate administrative and normative progress into measurable, comparable and verifiable results. For measures with a December 2026 deadline, this transition can no longer be delayed without affecting the ability to demonstrate fulfilment of the conditions within the established timeframe.

3. REFORM OF THE JUSTICE AND PROSECUTION SYSTEMS

Sub-area 7.2 of the Reform Agenda is dedicated to strengthening the independence, accountability, integrity and efficiency of the justice system. The reform is based on the recognition that the functioning of the sector is affected by a combination of structural, regulatory and institutional challenges, compounded by shortages of human resources, the duration of proceedings, insufficiently developed technical infrastructure and the still low level of public trust.

The Reform Agenda thus links the integrity of the system to its capacity to function effectively. The extraordinary evaluation of judges, the completion of the self-governing bodies and the filling of vacancies are accompanied by measures concerning professional training, digitalisation, case management and the reduction of the duration of proceedings. The reform seeks not only to ensure a judiciary composed of individuals who meet integrity standards, but also a system capable of examining cases within a reasonable time and providing accessible and predictable services.

The Sub-area comprises six measures and payment conditions established under Pillar No. 7 of Annex No. 1 to **Government Decision No. 260 of 7 May 2025**. The first four concern strengthening the independence and integrity of the system: completing the composition of the specialised boards of the Superior Council of Magistracy, completing the extraordinary evaluation of judges of the courts of appeal, filling vacancies at the courts of appeal and the Supreme Court of Justice, and adopting a new Strategic Plan for the National Institute of Justice. The final two measures seek to modernise the administration of justice by expanding e-Case File, developing the interoperability of information systems, and improving court efficiency indicators.

The six measures are closely interconnected. Extraordinary evaluation can contribute to strengthening the integrity of the judiciary, but resignations and lengthy procedures may, at least temporarily, exacerbate staff shortages. Digitalisation can reduce the administrative burden, but only if IT solutions move beyond the pilot stage and are effectively used. Similarly, the adoption of strategies or the organisation of recruitment competitions are necessary steps, but do not always constitute the final result required by the Reform Agenda.

The assessment applies the deadlines and payment conditions established in the Reform Agenda.

#	Measure	Deadline	Responsible institutions	Intended result
7.2.1.	Full constitution of the specialised boards of the CSM with members who have passed the extraordinary evaluation	June 2026	Ministry of Justice; Superior Council of Magistracy	Appointment of all members of the two specialised boards
7.2.2.	Completion of the extraordinary evaluation of judges of the courts of appeal	December 2025	Ministry of Justice, with the involvement of the Evaluation Commission and the CSM	Evaluation of all serving judges of the three courts of appeal
7.2.3.	Filling vacancies at the courts of appeal and the Supreme	June 2027	Ministry of Justice;	Filling at least 50% of vacancies at the courts of

	Court of Justice with evaluated judges		Superior Council of Magistracy	appeal and appointment of 18 judges to the Supreme Court of Justice
7.2.4.	Adoption and implementation of the National Institute of Justice Strategic Plan	December 2026	National Institute of Justice; Ministry of Justice	Adoption of a plan aligned with the TAIEX recommendations and implementation of a significant part thereof
7.2.5.	Expansion of e-Case File and interoperability of the Integrated Case Management Programme	December 2027	Ministry of Justice; Agency for Digitalisation in Justice and Court Administration	e-Case File operational in all first-instance courts, with a usage rate of at least 15%, full electronic coverage and seven interconnections
7.2.6.	Increasing the efficiency of and access to justice by reducing case duration and increasing resolution rates	December 2027	Superior Council of Magistracy	A 30% reduction in the duration of administrative cases and achievement of the resolution rates established by the Reform Agenda

Measure 7.2.1. Full constitution of the specialised Boards of the Superior Council of Magistracy with members who have passed the extraordinary evaluation

Element	Content
Deadline	June 2026
Responsible institutions	Ministry of Justice; Superior Council of Magistracy
Payment condition and intended result	Appointment of all members of the specialised boards of the CSM following successful completion of the extraordinary evaluation: seven members of the Disciplinary Board and nine members of the Board for the Selection and Evaluation of Judges.
Baseline	In April 2025, the Disciplinary Board had five evaluated members out of seven, while the Board for the Selection and Evaluation of Judges had six evaluated members out of nine.
Source of verification provided for in the Reform Agenda	Decisions and reports of the evaluation commissions on the vetting results and CSM decisions concerning the organisation of competitions and the selection and appointment of candidates.

The specialised boards of the CSM play a direct role in the selection, evaluation and disciplinary accountability of judges. The Reform Agenda requires the full constitution of both structures: the Disciplinary Board, composed of seven members, and the Board for the selection and evaluation of judges, composed of nine members. The condition is formulated in absolute terms and requires both the appointment of all members and their successful completion of the extraordinary evaluation.

According to the information analysed, the Board for the selection and evaluation of judges reached its full composition of nine members, with the final members appointed during the first months of 2026. The

composition of the Disciplinary Board, however, remained incomplete. The CSM webpage updated in July 2026 listed five members, while the extension of a competition to fill a position reserved for civil society confirmed that the process of completing the Board continued beyond the deadline.

Completing the composition of one of the boards represents significant progress, while the operation of the other with a partial composition demonstrates that the mechanism has not been entirely blocked. Nevertheless, the condition does not concern the minimum functioning of the boards, but their full constitution. In this case, an almost complete composition cannot be regarded as equivalent to a complete one.

Full verification of the condition also requires the appointment act and the evaluation result for each member to be presented in an accessible form. The mere inclusion of a person's name on an institution's webpage does not always allow all requirements to be fully traced and verified.

CAPC assessment and rating

The payment condition requires that, by June 2026, all nine members of the Board for the Selection and Evaluation of Judges and all seven members of the Disciplinary Board be appointed following successful completion of the external evaluation. This is a results-based indicator; therefore, the organisation of competitions, the existence of a quorum, or the operation of the boards with an incomplete composition does not substitute for the requirement to appoint all members.

According to [information published by the CSM](#), the Board for the Selection and Evaluation of Judges is composed of nine members. Six members were appointed in December 2024, two more on 20 January 2026, and the final member, Tatiana Rotaru, on 31 March 2026. This component of the condition was therefore completed before the deadline.

The situation is different for the Disciplinary Board. The [composition published by the CSM](#), updated as of 24 July 2026, includes only five members: four judges and one representative of civil society. The situation therefore remained unchanged compared with the April 2025 baseline, when the Reform Agenda likewise recorded five members out of a total of seven.

The [Disciplinary Board Decision of 31 March 2025](#) demonstrates that the Board was able to function and established two panels to examine appeals. However, both panels included the same civil society representative, who was designated as an ad hoc member in one of them. Operation under such an arrangement represents institutional progress, but does not amount to fulfilment of the indicator requiring a full composition.

Efforts to fill the two vacant positions continued but did not produce the required result within the deadline. The candidate selected following the interview of 2 April 2026 [withdrew during the evaluation](#), with withdrawal being equivalent to failure to pass the evaluation. Another candidate passed the interview of 12 June 2026, but [the evaluation procedure was initiated only on 22 June 2026](#) and had not been completed as of the cut-off date. For the other vacant position, the Ministry of Justice had to [extend the competition until 12 August 2026](#), as no applications had been submitted.

As of the cut-off date, 14 of the 16 positions covered by the indicator had been filled. The Board for the Selection and Evaluation of Judges had reached its full composition, but the Disciplinary Board continued to operate with only five of its seven members, with no increase compared with the April 2025 baseline.

The ongoing evaluation procedure and the extension of the competition beyond the deadline confirm that implementation efforts are continuing, but do not allow the condition to be considered fully fulfilled.

Rating: **Partially completed**

Recommendations

- the evaluation of the candidate currently undergoing the procedure should be completed as a matter of priority and, if the candidate successfully passes the evaluation, the appointment should follow without additional administrative delays;
- a competition for vacant positions should remain open or be organised periodically, so that restarting the procedure does not depend on issuing a new call after each withdrawal or failure to pass the evaluation;
- a reserve list should be established comprising civil society candidates who have successfully passed the evaluation provided for under Law No. 26/2022 and who may be appointed when a vacancy arises, subject to compliance with the competitive procedure;
- the reasons for the low level of participation in competitions should be analysed and conditions that may discourage eligible candidates should be reviewed, including remuneration, incompatibility requirements, workload and the administrative support provided to members;
- the Ministry of Justice and the CSM should publish a consolidated record of positions within the specialised boards, indicating, for each position, the status of the competition, evaluation and appointment process.

Measure 7.2.2. Completion of the extraordinary evaluation of judges of the Courts of Appeal

Element	Content
Deadline	December 2025
Responsible institutions	Ministry of Justice, with the involvement of the Evaluation Commission and the CSM
Payment condition and intended result	Evaluation of 100% of the serving judges of the three courts of appeal, with a view to their subsequent confirmation in office.
Baseline	In February 2025, one judge of the courts of appeal had already been evaluated, while 26 serving judges remained to be evaluated: 18 from the Chişinău Court of Appeal and eight from the other two courts of appeal
Source of verification provided for in the Reform Agenda	Decisions of the Judicial Evaluation Commission and CSM decisions concerning the examination of the evaluation results and, where applicable, subsequent procedures

The extraordinary evaluation is intended to verify the ethical and financial integrity of judges of the courts of appeal under Law No. 252/2023. The reports of the Evaluation Commission are examined by the CSM, and the results of the process affect both continuation in office and the subsequent stages of appointment and filling of vacancies.

The European Union dashboard indicates the measure as completed. The public data analysed covered judges and candidates for positions at the courts of appeal, with the procedures resulting in successful or unsuccessful evaluation, resignation, withdrawal or other final procedural outcomes.

Completion of the evaluation constitutes a distinct and important result. However, it should not be conflated with the resolution of all the issues generated or brought to light by the process. The significant number of resignations and withdrawals resulted in vacancies and shifted the pressure from integrity verification to the operational capacity of the courts.

Moreover, the rating assigned to the condition concerns completion of the procedure and does not constitute an overall validation of the manner in which it was conducted. Issues concerning transparency, the reasoning of decisions, consistency of practice and the duration of the evaluation remain relevant to the legitimacy of the process and public confidence in its results.

CAPC assessment and rating

The payment condition required that, by December 2025, 100% of the serving judges of the three courts of appeal be evaluated, with a view to their subsequent confirmation in office. According to the February 2025 baseline, the relevant group comprised 27 judges: one judge who had previously been evaluated, 18 judges of the Central Court of Appeal undergoing evaluation, and eight judges of the Northern and Southern Courts of Appeal.

The statistical data published by the Evaluation Commission should be interpreted by reference to this group, since the [overall statistics concerning the courts of appeal](#) cover 76 subjects, comprising 63 serving judges and 13 candidates for vacant judicial positions. Of the 63 judges initially notified, 36 resigned — 21 from the Central Court of Appeal, 12 from the Northern Court of Appeal and three from the Southern Court of Appeal. This left 27 judges, including one who had previously passed the pre-vetting procedure, corresponding exactly to the group established in the Reform Agenda.

With regard to the Central Court of Appeal, following the 21 resignations and the exclusion of the judge who had passed pre-vetting, 18 judges underwent the external evaluation. On [16 June 2025](#), the Commission announced that it had submitted the final report to the CSM, recording nine recommendations to pass the evaluation and nine recommendations not to pass. Subsequently, some reports were returned by the CSM for re-evaluation. The [status update published on 31 December 2025](#) confirms that the evaluation of all 18 judges had been completed, although one case had re-entered the re-evaluation procedure. The [Commission's Annual Report 2025-2026](#) records, following the re-evaluations carried out, eight recommendations to pass, nine recommendations not to pass, and one pending re-evaluation.

In the case of the Northern and Southern Courts of Appeal, of the 23 judges initially notified, 15 resigned, while the eight who remained in office underwent the full evaluation procedure. By [21 October 2025](#), the CSM had examined and accepted all the reports concerning these judges: five containing recommendations to pass the evaluation and three containing recommendations not to pass.

Accordingly, by the deadline, all 27 judges included in the baseline had been evaluated: one through the pre-vetting procedure and 26 through the external evaluation conducted by the Judicial Evaluation Commission. The wording of the condition distinguishes evaluation from subsequent confirmation in office. Therefore, the existence of re-evaluation procedures, examination by the CSM or appeals before the Supreme Court of Justice does not affect full achievement of the indicator concerning coverage of the relevant group.

Rating: **Completed**

The rating confirms completion of the evaluation, without removing the need for a separate analysis of the quality of the procedure and its effects on the functioning of the courts.

Recommendations

The Ministry of Justice, the CSM and the Evaluation Commission should:

- publish a final consolidated register of persons subject to evaluation in relation to the courts of appeal;
- indicate the final status of each procedure and the relevant acts, while ensuring the protection of personal data;
- correlate the evaluation results with the situation regarding vacancies and the planning of recruitment competitions;
- present the impact of the process on the operational capacity of each court of appeal.

Measure 7.2.3. Filling Vacancies at the Courts of Appeal and the Supreme Court of Justice

Element	Content
Deadline	June 2027
Responsible institutions	Ministry of Justice; Superior Council of Magistracy
Payment condition and intended result	Filling at least 50% of the vacancies at the courts of appeal with evaluated judges and appointing 18 judges to the Supreme Court of Justice from among evaluated candidates.
Baseline	In April 2025, there were 70 vacancies out of 97 positions at the courts of appeal: 32 vacancies out of 40 positions at the Northern and Southern Courts of Appeal and 38 vacancies out of 57 positions at the Central Court of Appeal. At the Supreme Court of Justice, five evaluated permanent judges had been appointed out of a total of 20 positions, leaving 15 vacancies.
Source of verification provided for in the Reform Agenda	Decisions of the Evaluation Commission and CSM decisions concerning the organisation of competitions and the selection and appointment of candidates

The condition seeks to translate the results of the extraordinary evaluation into effective institutional capacity. The integrity of the persons appointed is essential, but the system cannot function sustainably if the courts continue to have a large number of unfilled positions. The Reform Agenda establishes two targets: filling at least half of the vacancies at the courts of appeal with evaluated judges and appointing 18 judges to the Supreme Court of Justice from among evaluated candidates.

Competitions, evaluations and appointments continued during 2025–2026. CSM data indicate new appointments to the Supreme Court of Justice in July 2026 and a reduction in the staffing deficit compared with the baseline. These developments represent tangible results and show that the process has moved beyond an exclusively procedural stage.

Nevertheless, the information is dispersed across decisions, lists and public announcements. There is no single overview showing, for each court of appeal, the number of approved, filled and vacant positions, together with the evaluation status of the persons appointed. In the case of the Supreme Court of Justice, the publicly available list does not always allow immediate verification of the relationship between the

total number of positions, permanent appointments, temporary transfers and candidates who have passed the evaluation.

In the absence of a formal amendment to the indicator, the target concerning the courts of appeal should be calculated against the 70 vacancies established in the baseline, which requires at least 35 of those vacancies to be filled. Accordingly, the number of filled positions would have to increase from 27 to at least 62. According to [CSM Decision No. 333/21 of 21 July 2026](#), following an increase of six positions in the staffing establishment of the Central Court of Appeal, the three courts of appeal have a total of 103 positions, of which only 29 are filled and 74 are vacant: 42 at the Central Court of Appeal, 19 at the Northern Court of Appeal and 13 at the Southern Court of Appeal. Thus, compared with the baseline, the net number of filled positions has increased by only two, and at least 33 additional appointments are required to reach the target, without taking into account the six positions created subsequently.

The temporary transfer of 32 judges to the courts of appeal — 15 to the Central Court of Appeal, 11 to the Northern Court of Appeal and six to the Southern Court of Appeal — has helped sustain their current operations, but cannot be counted as filling vacancies. The CSM decision expressly retains these positions in the category of vacancies and specifies that the transfers apply only until the positions are filled through competition. At the same time, the competitions organised have not generated a number of candidates commensurate with staffing needs. Only two applications were submitted in the competition announced on 22 April 2026, both for the Central Court of Appeal. The situation is also confirmed by the [competitions for the six positions on the specialised anti-corruption panels of the Central Court of Appeal](#), which successively attracted either no candidates or only one candidate. Re-launching competitions constitutes a relevant action but, at present, does not indicate a trajectory consistent with filling at least 35 positions by June 2027.

In the case of the Supreme Court of Justice, progress is more substantial. [CSM Decision No. 332/21 of 21 July 2026](#) records that 12 of the 20 positions had been filled, eight by judges from within the judicial system and four by professionals from outside the judiciary. Cross-checking this information against the [data of the Judicial Evaluation Commission](#) allows the 12 persons to be counted as evaluated candidates. Compared with the baseline, seven additional appointments have been made, while a further six judges must be appointed to reach the target of 18. However, the competitions of 3 February and 26 May 2026 each attracted only one candidate, and the CSM expressly notes the insufficient number of candidates and uncertainty regarding the duration and outcomes of the external evaluation.

The June 2027 deadline still leaves time for the process to continue. However, maintaining sufficient momentum is essential. Vetting can pave the way for renewal of the system, but it cannot substitute for the effective filling of vacancies and the capacity of the courts to adjudicate cases.

CAPC assessment and rating

Verifiable results have been recorded, particularly at the Supreme Court of Justice. However, as of the cut-off date, the overall progress of the measure is not consistent with achievement of both components within the deadline.

The payment condition requires that, by June 2027, at least 50% of the vacancies at the courts of appeal be filled with evaluated judges and that 18 judges be appointed to the Supreme Court of Justice from among evaluated candidates. The April 2025 baseline indicated 70 vacancies out of a total of 97 positions at the courts of appeal and only five evaluated and appointed judges at the Supreme Court of Justice, out of the statutory complement of 20.

With regard to filling judicial vacancies at the courts of appeal, one of the factors contributing to the delay appears to be the statutory procedure for appointment to these positions. Under the existing legal framework, once the CSM announces a competition, candidates are evaluated by the Board for the Selection and Evaluation of Judges, after which the CSM conducts the competition and selects the successful candidates. Only after this stage are the selected candidates subject to the external integrity evaluation. The external evaluation commission (Vetting Commission) submits its report to the CSM, which decides whether to accept or reject it and, where the candidate passes the evaluation, submits a proposal for appointment to the President of the Republic of Moldova.

The consecutive nature of these stages results in cumulative timeframes and prevents the procedures from progressing in parallel. If the successful candidate does not pass the external evaluation, the completed competition does not produce the intended result — namely, filling the position — and the position remains vacant. Consequently, the slow pace of appointments cannot be explained solely by low participation in competitions, and even less by an assumed lack of attractiveness of the positions. It is substantially influenced by the regulatory architecture of the procedure and by the capacity of the institutions involved to complete each successive stage.

The implementation deadline has not yet expired, and progress in completing the composition of the Supreme Court of Justice demonstrates that the measure is under implementation. Nevertheless, the stagnation in the number of permanently filled positions at the courts of appeal, the increase in the number of vacancies, low participation in competitions, and the time required for selection, vetting and appointment indicate a significant risk that the first component will not be achieved by June 2027. Since the two results are cumulative, progress recorded at the Supreme Court of Justice cannot compensate for failure to achieve the target concerning the courts of appeal.

Rating: **Ongoing (at risk of non-completion)**

The absence of a clear strategy for filling vacancies, together with the failure to identify and address the factors that make these positions unattractive, including to judges serving in lower-level courts, jeopardises fulfilment of this payment condition even though, at first sight, the remaining implementation period may appear sufficient.

Recommendations

- Review the regulatory framework governing the promotion of judges to the courts of appeal with a view to reducing the excessively sequential nature of the procedure, including by examining the possibility of conducting certain stages in parallel or establishing a pool of candidates who have already passed the professional evaluation and external evaluation, from which the CSM could select persons to be proposed for appointment.
- Strengthen the administrative, analytical and technical capacities of the Board for the Selection and Evaluation of Judges so that candidates can be evaluated on a continuous basis, within predictable timeframes aligned with the schedule of competitions organised by the CSM.
- Monitor separately the duration of each stage, the intervals between procedures, and the number of candidates progressing from one stage to the next, in order to identify bottlenecks precisely and realistically assess the possibility of achieving the target by June 2027.

Measure 7.2.4. Adoption and Implementation of the National Institute of Justice Strategic Plan

Element	Content
Deadline	December 2026
Responsible institutions	National Institute of Justice; Ministry of Justice
Payment condition and intended result	Adoption of a new NIJ Strategic Plan aligned with the recommendations of the 2022 TAIEX peer review, in consultation with the European Commission, and implementation of a significant part of the Plan by the deadline
Baseline	In April 2025, the National Institute of Justice did not have a new Strategic Plan
Source of verification provided for in the Reform Agenda	Reports published on the NIJ official website, the 2022 TAIEX Peer Review Report, secondary legislation of the Ministry of Justice and, where applicable, acts published in the Official Gazette of the Republic of Moldova.

The Reform Agenda requires not only the adoption of a strategic document, but also evidence that a significant part of it has been implemented by the end of 2026. The Plan must reflect the recommendations of the 2022 TAIEX peer review and be developed in consultation with the European Commission.

The NIJ continued its regular initial and continuous training activities, approved programmes and curricula, and further developed cooperation with external partners. These activities are relevant to the functioning of the institution, but do not substitute for the specific deliverable required by the Reform Agenda.

CAPC assessment and rating

The **INJ Activity Report for 2025** confirms the development of the Strategic Development Plan for 2026–2031, with the support of the European Union and the Council of Europe, as well as the initiation of activities corresponding to the strategic directions established therein.

Approval of the Plan was included on the **agenda of the INJ Council meeting of 24 July 2026**, and the Plan was approved following prior consultation with the European Commission. It is to be published on the official website of the National Institute of Justice.

The adoption of the Plan is an important step towards fulfilment of the payment condition. However, by the end of 2026, the National Institute of Justice must also ensure the implementation of a significant part of the Plan. The remaining period may be considered sufficient to achieve the indicator.

Rating: **Ongoing (on schedule)**

Recommendations

- Establish a mechanism for the periodic monitoring and reporting of the implementation of the 2026–2031 Strategic Plan, including the publication of information on the status of each action, results achieved, indicators attained, deadlines, responsible institutions, and any delays or corrective measures.

Measure 7.2.5. Expansion of e-Case File and interoperability of the Integrated Case Management Programme

Element	Content
Deadline	December 2027
Responsible institutions	Ministry of Justice; Agency for Digitalisation in Justice and Court Administration
Payment condition and intended result	Operationalisation of the e-Case File IT solution in all first-instance courts and submission and processing through it of at least 15% of all cases. Operationalisation of the Integrated Case Management Programme (PIGD) for 100% of cases, ensuring electronic accessibility of data and connecting the system to seven national information systems.
Baseline	e-Case File was being piloted in the courts and covered approximately 0.4% of all cases. PIGD was used in the courts, but the interoperability and functionalities required by the measure had not been fully implemented.
Source of verification provided for in the Reform Agenda	Reports of the Agency for Digitalisation in Justice and Court Administration, statistical reports generated by PIGD and the e-Case File solution, system extracts and, where applicable, on-site verification.

The payment condition seeks to move from the limited use and piloting of digital tools to their operation as part of the routine infrastructure of the judicial system. By December 2027, the e-Case File IT solution must be operational in all first-instance courts, with at least 15% of all cases submitted and processed through it. In parallel, PIGD must provide electronic coverage of 100% of cases, all relevant data must be available electronically, and connections to seven government information systems must be operational.

The condition therefore comprises several cumulative components. The availability of the application in a court does not automatically demonstrate its operationalisation, just as the existence of a user account does not demonstrate that a case is managed entirely electronically. Fulfilment of the measure requires both geographical and technical expansion and effective use, measured by the number of cases submitted and processed through e-Case File as a proportion of the total number of cases.

The e-Case File IT solution is integrated with PIGD and enables the electronic submission of applications and court documents, as well as online access to case files. The platform became operational in 2019. From 2022 onwards, piloting was gradually extended to other courts through successive CSM decisions. The [ADJAJ Report for 2025](#) refers to the use of the platform in civil and administrative litigation cases and to the planned expansion to other categories of participants and types of cases.

By [CSM Decision No. 575/42 of 4 November 2025](#), the CSM extended the piloting of e-Case File until 31 December 2026 to all courts in the country. As of the report's cut-off date, the platform was therefore available nationwide, but formally remained in an extended pilot phase.

Extending the pilot to all courts constitutes an important step, but cannot be equated with the full operationalisation required by December 2027. Piloting involves testing, identifying deficiencies and

adjusting functionalities, whereas the payment condition requires stable and measurable use of the application in the courts' routine operations.

The [ADJAJ report assessing the use of e-Case File](#), prepared in 2025, was based on a sample of 170 lawyers, of whom 96 responded. Among the respondents, 22 used the platform daily and 28 frequently. A further 32 used it rarely or occasionally, while 14 reported that they had not used it. Thus, 50 of the 96 respondents used the platform daily or frequently, while almost half used it only occasionally or not at all. These findings confirm the existence of an active user community, but cannot be converted into a rate of cases processed through the application. The frequency of use reported by lawyers does not indicate how many applications were submitted, how many were accepted by the courts, how many cases were managed entirely electronically, or what proportion these represent of all cases registered in the judicial system.

The report also identified difficulties that may affect the expansion of use. Of the 96 respondents, 39, representing 41%, encountered technical problems. Difficulties were reported with the use of mobile devices, an interface perceived as not user-friendly, problems with scanning, uploading and signing documents, the inability to automatically view all cases handled by the user, and the 20 MB file upload limit. At the same time, 47 respondents, or 49%, reported procedural problems. The most frequently reported issues concerned delays in examining requests for access to case files or statements of claim, incomplete uploading of materials into PIGD, and requirements to submit documents both electronically and in paper form.

These shortcomings do not demonstrate that the platform is non-functional, but they show that technical expansion alone is insufficient. To reach the 15% threshold, the use of e-Case File should reduce administrative burdens rather than create a parallel procedure in which electronic documents are systematically duplicated on paper.

On [6 April 2026](#), ADJAJ removed the requirement for lawyers to conclude a prior cooperation agreement with the Agency in order to access e-Case File. Through interoperability with the Register of Legal Professions, professional status, user role and access rights are now verified automatically and in real time. This change addresses one of the administrative barriers previously identified and constitutes a concrete technical result.

In June 2026, the Council for Coordination of Justice Sector Digitalisation reviewed progress on the measures included in the Reform Agenda. The [ADJAJ report](#) referred to increased use of e-Case File and the expansion of PIGD interconnections with state registers through MConnect. This information confirms that development is continuing, but does not indicate the number of cases processed, the usage rate, or the status of each of the seven connections required by the payment condition.

In parallel, the Ministry of Justice developed a [draft law on the digitalisation of certain judicial procedures](#). The draft was submitted to the Government on 15 July 2026 and approved by the Government on 22 July 2026. The amendments seek to expand electronic service and communication of documents, the use of videoconferencing, the categories of participants able to submit applications electronically, and courts' access to data managed by other authorities. Government approval of the draft constitutes relevant regulatory progress but, as of the cut-off date, did not yet demonstrate the practical application of the new rules. Their impact on the usage rate can be measured only after their entry into force, adaptation of the systems, training of participants and accumulation of a sufficient volume of cases.

The Reform Agenda requires PIGD to be connected to seven national information systems and interoperability to be used at all stages of case examination. This requirement cannot be considered fulfilled merely because the MConnect platform exists or because certain connections have been technically initiated. For each system, it is necessary to demonstrate: the available data service; the legal basis for the exchange; completion of testing; deployment into production; the institutions and users with access; the volume and regularity of exchanges; and the procedural stage at which the data are used.

The connection between e-Case File and the Register of Legal Professions is publicly demonstrated. With regard to the other connections, the June 2026 ADJAJ report referred to above mentions the expansion of PIGD interoperability, but does not provide a matrix allowing verification of the seven systems required by the Reform Agenda.

As of 31 July 2026, no consolidated statistics were identified in the public sources examined indicating:

- the total number of cases registered;
- the number of cases submitted through e-Case File;
- the number of cases processed entirely through e-Case File;
- the resulting percentage in relation to the total number of cases;
- the distribution by court and case category;
- the distinction between a document submitted electronically and a case managed entirely electronically;
- the status of each of the seven interconnections.

In the absence of a numerator, denominator and definition of a case “submitted and processed” through e-Case File, the exact distance from the 15% threshold cannot be calculated. Data on the frequency of use by lawyers and the general statement that use has increased cannot substitute for the indicator required by the Reform Agenda.

CAPC assessment and rating

The implementation deadline has not yet expired. The e-Case File pilot has been extended to all courts, lawyers’ access has been simplified, and the regulatory framework required for the expansion of electronic procedures has advanced. These results demonstrate that the measure is under implementation.

However, the system continued to operate formally in pilot mode. Publicly available data do not allow calculation of the proportion of cases submitted and processed through e-Case File against the 15% threshold and do not show the status of each of the seven PIGD interconnections. The technical and procedural problems reported by users also indicate that fully electronic case management is not yet uniform.

Given the cumulative nature of the condition, the absence of interim quantitative benchmarks and the remaining technical stages indicate a significant risk that all components will not be operationalised and demonstrated by December 2027.

Rating: **Ongoing (at risk of non-completion)**

Recommendations

The Ministry of Justice and ADJAJ should:

- establish and publish an operational definition of a case “submitted and processed” through e-Case File;
- publish quarterly the total number of cases, the number managed through e-Case File and the resulting rate, disaggregated by court and case category;
- establish the criteria for exiting the pilot phase and the date of full deployment into production in each court;
- publish a matrix of the seven interconnections, indicating the status of testing and use;
- monitor separately the electronic submission of a document and the fully electronic management of a case;
- address the technical and procedural deficiencies identified by users and periodically assess the impact of the measures adopted;
- ensure cybersecurity, data protection, user training and continuous technical support.

Measure 7.2.6. Increasing the efficiency of and access to justice by reducing case duration and increasing resolution rates

Element	Content
Deadline	December 2027
Responsible institutions	Superior Council of Magistracy
Payment condition and intended result	A 30% reduction in the time required to resolve administrative cases at first instance compared with 2023. An increase in the resolution rate to 110% for civil and commercial cases and to 100% for administrative cases, both at first instance and on appeal.
Baseline	According to 2023 data: duration of resolution of administrative cases at first instance – 544 days; resolution rate for civil and commercial cases – 98% at first instance and 96% on appeal; resolution rate for administrative cases – 76% at first instance and 96% on appeal.
Source of verification provided for in the Reform Agenda	Justice Dashboard

This condition measures reform through statistical results concerning court performance. By December 2027, the duration of resolution of administrative cases at first instance must be reduced by 30% compared with the 2023 value. At the same time, the resolution rate must reach 110% for civil and commercial cases and 100% for administrative cases, both at first instance and on appeal.

The baseline comprises five distinct values:

- duration of administrative cases at first instance – 544 days;
- resolution rate for civil and commercial cases at first instance – 98%;
- resolution rate for such cases on appeal – 96%;
- resolution rate for administrative cases at first instance – 76%;
- resolution rate for such cases on appeal – 96%.

A 30% reduction from 544 days requires a value of approximately **381 days** to be achieved. The other four targets are expressed directly as percentages.

The condition cannot be assessed on the basis of the overall volume of cases examined or general data on court activity. Each of the five indicators must be monitored separately and on a comparable basis, using the same methodology and covering the same case categories and levels of jurisdiction.

The indicative time required to clear the pending caseload expresses the time needed to resolve pending cases, assuming that the current pace of case resolution remains unchanged. The Reform Agenda calculates it by comparing the existing pending caseload with the number of cases resolved and converting the resulting value into days.

The resolution rate compares the inflow of cases with the number of cases resolved during a given period. A value of 100% indicates a balance between incoming and resolved cases. A rate above 100% indicates that courts are resolving more cases than they receive, thereby reducing the accumulated pending caseload.

For the indicators to be independently verifiable, reports should present not only the final percentage, but also:

- the pending caseload at the beginning of the period;
- the number of new cases;
- the number of cases resolved;
- the pending caseload at the end of the period;
- the formula applied;
- the categories of cases included;
- the courts and level of jurisdiction.

The **JUSTAT SIA** was launched on 26 May 2023 as a public tool for consulting and analysing judicial statistics. The platform was inspired by CEPEJ-STAT and developed in cooperation with CEPEJ and the judicial administration of the Republic of Moldova. The data are drawn largely from PIGD.

The [JUSTAT presentation page](#) indicates that the initial structure of the platform included data for the period 2020–2023 and indicators such as the resolution rate, indicative time required to clear the pending caseload, the duration of cases pending before the courts, and the duration of resolved cases. The platform allows data to be filtered by court, case category and period.

In December 2025, the **Government approved the Concept of the JUSTAT Information System**, with the aim of strengthening the regulatory, functional and technological framework for the collection, analysis and publication of judicial statistics. Approval of the Concept represents progress in developing the statistical infrastructure. However, it does not in itself demonstrate the availability of the updated data series required to verify the payment condition.

In February 2026, ADJAJ published a [statistical report on the examination of cases under the Administrative Code for the 12 months of 2025](#). The report contains detailed data on the initial pending caseload, incoming cases, completed cases, the final pending caseload and the age of cases, disaggregated by category. These data constitute a relevant source, but the report does not present, in consolidated form, all five values required by the Reform Agenda. In particular, it does not simultaneously provide:

- the duration of administrative cases at first instance;
- the resolution rate for administrative cases at first instance;
- the resolution rate for administrative cases on appeal;

- the resolution rates for civil and commercial cases at first instance and on appeal;
- a direct and methodologically consistent comparison with the 2023 values.

The raw data could allow certain indicators to be calculated for particular categories, but it is unclear whether the universe of cases, classification and validation rules fully correspond to those used for the baseline in the 2024 CEPEJ report. Calculating percentages by the evaluator on the basis of different reports cannot substitute for an official, validated and comparable data series.

No consolidated series was identified in the public sources examined up to 31 July 2026 presenting all five values for 2024 and 2025 calculated according to the methodology used for the baseline. Nor were interim values identified for the first half of 2026 that would make it possible to assess the direction in which the indicators are evolving. This does not mean that PIGD does not contain the necessary data. JUSTAT relies primarily on data from PIGD, and ADJAJ publishes numerous statistical reports. The issue is that the information has not been consolidated into a public and comparable series directly linked to the payment condition. Without values for 2024–2026, it is not possible to establish whether the duration of administrative cases has decreased towards the target of approximately 381 days or whether the resolution rates are approaching the 100% and 110% thresholds.

The comparability of the indicators may be affected by:

- changes in the classification of cases;
- court reorganisation or changes in jurisdiction;
- transfers of cases between courts;
- changes in the rules for recording cases in PIGD;
- retrospective corrections to the data;
- the inclusion or exclusion of certain applications and materials;
- the quality and completeness of records entered by the courts.

The [JUSTAT webpage](#) states that the data are drawn largely from PIGD and that responsibility for their quality lies with the courts' information system. The publication of the final indicator should therefore be accompanied by the methodology used for data extraction and validation.

A clear distinction is also required between the actual duration of completed cases and the indicative time required to clear the pending caseload. The two indicators describe different phenomena and should not be used interchangeably. The Reform Agenda refers to the indicator calculated by comparing resolved cases with the unresolved caseload and expressing the resulting value in days.

CAPC assessment and rating

The implementation deadline has not yet expired. The judicial system has the necessary infrastructure for collecting and publishing data, including PIGD, ADJAJ statistical reports and the JUSTAT platform.

However, the public sources examined do not present, in a complete and comparable form, updated values for the five indicators established by the payment condition: the duration of administrative cases at first instance and the resolution rates for civil, commercial and administrative cases at first instance and on appeal.

In the absence of a series calculated according to the same methodology as the baseline, it is not possible to establish whether the indicators are moving towards the December 2027 targets or whether their trajectory indicates a risk of non-completion.

Rating: **Insufficient data for assessment**

Recommendations

The CSM and ADJAJ should:

- publish quarterly the five indicators established by the payment condition;
- present, for each indicator, the 2023 baseline value, subsequent annual and quarterly values, the target and the remaining distance to the target;
- publish the formula, numerator, denominator and validation rules;
- indicate the initial pending caseload, new cases, resolved cases and final pending caseload;
- present first-instance and appeal data separately, as well as separate data for civil, commercial and administrative cases;
- publish a methodological note on any changes in classification, jurisdiction or court organisation;
- enable data export and independent recalculation of the indicators;
- establish interim benchmarks for the end of 2026 and 2027;
- conduct periodic audits of the quality of data entered into PIGD.

SUMMARY ASSESSMENT MATRIX FOR SUB-AREA 7.2

#	Key findings	CAPC Rating	Priority recommendation
7.2.1	The Board for the Selection and Evaluation of Judges is complete, but the Disciplinary Board had only five of its seven members after the deadline had expired.	Partially completed	Complete the two outstanding appointments and publish an individualised overview of the appointment and evaluation status of each member.
7.2.2	All serving judges included in the baseline underwent the evaluation required by the payment condition.	Completed	Publish a final consolidated register of the procedures and correlate the results with the filling of vacancies.
7.2.3	Progress at the Supreme Court of Justice is significant, but the number of filled positions at the courts of appeal has increased by only two compared with the baseline, while participation in competitions remains low.	Ongoing (at risk of non-completion)	Adopt an operational catch-up plan with quarterly targets for each court of appeal and for the Supreme Court of Justice.
7.2.4	The NIJ Strategic Plan for 2026–2031 has been approved, and fulfilment of the condition now	Ongoing (on schedule)	Publish an implementation matrix setting out actions, deadlines, responsible

	depends on implementation of a significant part of the Plan by December 2026.		institutions, indicators and results achieved.
7.2.5	The e-Case File pilot has been extended to all courts, but the rate of electronically processed cases and the status of the seven interconnections have not been demonstrated.	Ongoing (at risk of non-completion)	Publish quarterly the usage rate, the criteria for exiting the pilot phase, and the status of the seven interconnections.
7.2.6.	The statistical infrastructure is in place, but the updated and comparable data series required to assess the five indicators are not available.	Insufficient data for assessment	Publish the five indicators in JUSTAT, together with the methodology, numerator and denominator for each value.

Conclusions on the implementation of Sub-area 7.2

Implementation of the six measures under Sub-area 7.2 shows uneven results. The extraordinary evaluation of judges of the courts of appeal has been completed and is the only condition rated as completed. The constitution of the specialised boards of the CSM is partially completed: one of the boards has reached its full composition, while the Disciplinary Board continued to operate with two vacancies after the deadline had expired.

Filling vacancies remains one of the main vulnerabilities. Appointments to the Supreme Court of Justice have produced visible progress, but the number of permanently filled positions at the courts of appeal has increased only marginally compared with the baseline. Low participation in competitions and the remaining evaluation and appointment stages create a significant risk to achievement of the target by June 2027.

The NIJ Strategic Plan for 2026–2031 has been approved and, as of the cut-off date, the measure is progressing in a manner consistent with the deadline. The next decisive stage is to demonstrate the implementation of a significant part of the Plan by the end of 2026.

In the area of digitalisation, the expansion of the e-Case File pilot and the removal of certain access barriers represent verifiable progress. However, the absence of data on the rate of electronically processed cases, the fact that the solution formally remains in the pilot phase, and the lack of a complete overview of the seven interconnections indicate a risk of non-completion of the condition as a whole.

The measure concerning case duration and resolution rates cannot be assessed on a sufficiently substantiated basis. The data collection tools are in place, but the updated and comparable data series required to establish the trend of the five indicators have not been published.

Overall, the reform has advanced more clearly where results can be demonstrated through a completed procedure or an identifiable act. The most significant vulnerabilities remain staff shortages, the transition of digital systems from piloting to measurable use, and the availability of the statistical data required to assess court efficiency.

4. GENERAL FINDINGS

4.1 Overall level of implementation of the commitments

The interim assessment covers **11 measures and payment conditions**, of which five relate to Sub-area 7.1 *Fight against corruption* and six to Sub-area 7.2 *Reform of the justice and prosecution systems*.

As of the **cut-off date (31 July 2026)**, the overall implementation status is as follows:

Rating	Number of measures	Measures
Completed	1	7.2.2
Ongoing (on schedule)	3	7.1.3, 7.1.4, 7.2.4
Ongoing (at risk of non-completion)	5	7.1.1, 7.1.2, 7.1.5, 7.2.3 și 7.2.5
Partially completed	1	7.2.1
Not completed	0	–
Insufficient data for assessment	1	7.2.6

The distribution of ratings should not be converted into an overall implementation percentage. The measures have different deadlines, levels of complexity and types of intended results. A condition whose deadline has already expired cannot be assessed on the same basis as a measure due for completion in 2027, while the absence of data required for assessment cannot automatically be treated as an absence of progress.

Of the **two measures whose deadlines had expired**, **one** had been fully completed and the other partially completed. The extraordinary evaluation of judges of the courts of appeal covered the entire group specified by the payment condition. By contrast, the constitution of the specialised boards of the CSM remained incomplete: one of the boards had reached its full composition, while the Disciplinary Board continued to operate with two vacancies after the deadline had expired.

For the remaining **nine measures**, the deadlines had not yet expired as of the cut-off date:

- **three measures** show interim results consistent with fulfilment of the conditions within the respective deadlines;
- **five measures** are exposed to significant risks of non-completion or failure to demonstrate results;
- for **one measure**, the available information does not allow a sufficiently substantiated assessment of the likelihood that the payment condition will be fulfilled.

The fact that five measures are rated **“Ongoing (at risk of non-completion)”** constitutes the main warning signal emerging from the interim assessment. This rating does not constitute an advance finding of failure. Rather, it identifies situations in which the current pace of implementation, the remaining stages, or institutional and methodological difficulties do not provide sufficient assurance that all components of the condition will be completed and demonstrated by the deadline.

The overall picture shows that the reforms are under way, but most final results have either not yet been achieved or cannot yet be demonstrated in the form required by the verification indicators.

4.2. Progress and verifiable results

Implementation of the Reform Agenda has produced verifiable progress, although this progress is unevenly distributed across measures and institutions. The clearest results are visible in areas where fulfilment of the condition can be demonstrated through the completion of a procedure, the adoption of an act, or the establishment of an institutional structure.

The main progress identified includes:

- **completion of the extraordinary evaluation of judges of the courts of appeal**, covering the entire group specified by the payment condition;
- **full constitution of the Board for the Selection and Evaluation of Judges**, one of the two components of the measure concerning the specialised boards of the CSM;
- **approval of the INJ Strategic Development Plan for 2026–2031**, following consultation with the European Commission;
- **progress at the Supreme Court of Justice**, where the number of evaluated and appointed judges has increased compared with the baseline;
- **addressing all anti-corruption proofing recommendations** monitored for 2025 and the period January–June 2026, including through written justifications for recommendations that were not accepted;
- **exceeding the 95% threshold** for the integration of recommendations into integrity plans and the 85% threshold for their implementation, with the disaggregated data provided by the CNA indicating an aggregate recommendation implementation rate of approximately 91.4%;
- **reported improvement in the duration and resolution rate of corruption cases**, although exact comparability with the baseline remains to be demonstrated;
- **extension of the e-Case File pilot to all courts**, simplification of access for lawyers, and continued development of interconnections;
- **progress in the preparatory stages for the new version of the “e-Integrity” SIA**, including the development of technical requirements and the conduct of procurement procedures.

In the area of corruption prevention, favourable interim results can be observed both in addressing anti-corruption proofing recommendations and in implementing recommendations formulated within institutional integrity assessments. The separate data provided by the CNA indicate that all monitored anti-corruption proofing recommendations were addressed and that the established thresholds for the integration and implementation of recommendations in integrity plans were exceeded. The disaggregated information subsequently provided to CAPC makes it possible to distinguish between recommendations and the actions included in the plans and clarifies the calculation basis for the 85% indicator.

The overall acceptance rate of 76.34% presented in the CNA Annual Activity Report does not fully reflect the indicator under Measure 7.1.3. Data from the separate monitoring mechanism indicate that all 962 recommendations formulated during the periods examined were addressed, of which 814 were accepted and incorporated, while 148 were not accepted but were accompanied by written justifications.

In the area of justice reform, completion of the extraordinary evaluation represents the clearest result. It creates the conditions for filling vacancies with evaluated judges, but does not automatically resolve staff shortages. Appointments to the Supreme Court of Justice have produced visible progress, while the number of filled positions at the courts of appeal has increased only marginally compared with the baseline.

Progress in digitalisation is, for the time being, primarily technical, regulatory and preparatory in nature. Extending the pilot, developing technical requirements, simplifying access and initiating interconnections are necessary steps, but the payment conditions require more: systems deployed into production, effective use, and rates that can be measured against the established targets.

Overall, the reforms have advanced, but progress is more difficult to establish for cumulative conditions, statistical trends and results that depend on cooperation among several institutions. The conclusions for the two sub-areas reflect the same distinction between identifiable institutional results and statistical or functional results that have not yet been sufficiently demonstrated.

4.3. Cross-cutting shortcomings and risks

The analysis of the 11 measures highlights a number of vulnerabilities that extend beyond the situation of any single institution or payment condition. They concern the way in which the reform is planned, implemented, measured and demonstrated.

- **The gap between activity and result**

In several cases, the authorities can demonstrate that documents have been developed, procedures initiated, competitions organised, procurement procedures launched, or technical activities carried out. It is more difficult, however, to establish whether these activities have produced the concrete result required by the payment condition. This gap is particularly visible in the case of:

- the new version of the “e-Integrity” AIS, where development and contracting do not substitute for deployment into production and automated operation;
- e-Case File, where expansion of the pilot does not demonstrate achievement of the 15% usage rate for all cases;
- anti-corruption proofing recommendations, where the number of draft normative acts examined does not demonstrate that all recommendations have been addressed;
- integrity plans, where completion of individual actions does not necessarily amount to implementation of the recommendation and mitigation of the identified risk;
- competitions for filling vacancies, where initiating or repeating the procedure does not substitute for an actual appointment.

- **Quality, comparability and accessibility of data**

A second major vulnerability concerns statistical data and calculation methodologies. With regard to the results of investigating and sanctioning corruption, there is no single comparable data series tracking investigations, indictments and final judgments on the basis of harmonised definitions and distinguishing high-level corruption cases.

In the case of case duration and resolution rates, public sources sometimes use different reference periods, universes of cases and calculation formulas. For Measure 7.2.6, the updated and comparable data series required to assess the five indicators are unavailable, resulting in the rating **“Insufficient data for assessment”**.

Without the methodology, numerator, denominator and precise definition of the categories included, a figure may suggest a trend, but cannot independently demonstrate it.

- **Risk of non-completion and risk of failure to demonstrate results**

The analysis identifies two risks that should be distinguished.

The first is the **risk of non-completion**, where the remaining stages, available time, resource shortages or low participation in procedures indicate that the intended result may not be achieved by the deadline.

The second is the **risk of failure to demonstrate results**, where activities or results may exist but are not supported by sufficiently comprehensive public data to enable verification of the payment condition.

The two risks overlap in some measures. For example, in the case of the “e-Integrity” AIS, neither technical completion nor the effective operation of its components has been demonstrated. For Measures 7.1.3 and 7.1.4, the additional data provided by the CNA reduced the risk of failure to demonstrate results identified during the initial stage of the assessment. Maintaining this result requires continued monitoring and periodic publication of the calculation basis and consolidated data so that the evolution of the indicators can be verified up to the applicable deadlines. For Measure 7.2.6, the lack of data does not even allow the direction in which the indicators are evolving to be established.

Public reporting is therefore not a secondary stage of the reform. Where a condition is expressed in percentages, durations, usage rates or statistical trends, the capacity to publish complete, comparable and verifiable data becomes part of the result itself.

- **Operationalisation of information systems**

For the measures concerning the “e-Integrity” AIS, e-Case File and PIGD interoperability, activities relating to design, procurement, development and piloting have been identified. The decisive stage, however, remains the transition from project development to routine operation. This stage cumulatively requires: completion and acceptance of the development; functional and security testing; data migration and validation; user training and support; deployment into production; effective and measurable use; and operation of the required interconnections.

The risk is compounded by the fact that each stage depends on completion of the preceding one, while technical or contractual delays may affect the entire timetable for fulfilment of the measures.

- **Human Resources Shortages**

Justice reform highlights a tension between strengthening integrity and maintaining operational capacity. The extraordinary evaluation of judges of the courts of appeal has been completed, but resignations, withdrawals and the duration of the procedures have contributed to the persistence of a high number of vacancies.

At the courts of appeal, the number of filled positions has increased only marginally compared with the baseline. At the Supreme Court of Justice, progress is more advanced, but the target of 18 judges has not yet been reached. Low participation in competitions also affects the operationalisation of the specialised mechanism for examining corruption cases.

Vetting can create the conditions for a judiciary with greater integrity, but it cannot substitute for filling vacancies and ensuring that courts have the capacity to resolve cases within a reasonable time.

- **Fragmentation of responsibilities**

Several conditions are formally assigned to one institution, while their fulfilment depends in practice on cooperation among a larger number of authorities.

The CNA formulates anti-corruption proofing recommendations, but addressing them and providing justification for non-acceptance are the responsibility of the authors of the draft normative acts. The digitalisation of justice involves the Ministry of Justice, ADJAJ, the CSM, the courts and the institutions managing the interconnected registers. The results of investigating and sanctioning corruption depend on the successive work of investigative bodies, the prosecution service and the courts.

In the absence of a common timetable, consolidated records and clear coordination, each institution may be able to demonstrate its own activities without the result of the condition as a whole being reconstructed with the same degree of clarity.

- **Deadline pressure**

Measures with a December 2026 deadline are entering a critical stage. The remaining period needs to be used to achieve the intended result, rather than merely to continue preparatory activities. This applies in particular to:

- operationalisation of the new version of the “e-Integrity” AIS;
- continued monitoring of how anti-corruption proofing recommendations are addressed and publication of consolidated results;
- updating data on the integration and implementation of recommendations formulated within institutional integrity assessments;
- clarification and maintenance of the indicators concerning corruption cases;
- demonstrating the implementation of a significant part of the NIJ Strategic Plan.

For measures with deadlines in 2027, the availability of a longer implementation period does not eliminate the risks. Without interim benchmarks and periodic reporting, delays may become visible only when the scope for corrective action is already limited.

5. RECOMMENDATIONS

The recommendations presented in this report derive directly from the findings and ratings assigned to the 11 measures assessed. Their primary purpose is to support fulfilment of the payment conditions within the deadlines established by the Reform Agenda and, secondly, to strengthen the mechanisms through which progress can be monitored and demonstrated.

The recommendations are not based exclusively on the volume of activities that remain to be completed. Priorities were established taking into account:

- the proximity or expiry of the implementation deadline;
- the rating assigned to the measure;
- the number and complexity of the stages that remain to be completed;
- the cumulative nature of the payment condition;
- the existence of institutional, technical or methodological bottlenecks;
- the extent to which failure of one action could prevent fulfilment of the condition as a whole;
- the scope for recovering delays within the remaining period;
- the need to produce verifiable evidence for the assessment of results.

P1 priority recommendations require immediate action. This category includes measures whose deadlines have expired, measures with a December 2026 deadline for which a significant risk has been identified, and cross-cutting actions without which results cannot be measured or demonstrated.

P2 priority recommendations seek to consolidate progress and reduce risks for measures with deadlines in 2027. They are not of secondary importance, but allow for a longer implementation timeframe, provided that interim benchmarks and periodic reporting are established.

The rating assigned to a measure and the priority of a recommendation do not automatically coincide. A measure rated **“Ongoing (on schedule)”** may require a P1 recommendation if its deadline is approaching and a significant result must be demonstrated by the end of 2026. Similarly, a measure with a deadline in 2027 may require immediate action if the gap to the target is substantial and the procedures required are lengthy.

The consolidated recommendations are not intended to create a parallel reporting mechanism. Rather, they propose bringing together and presenting coherently the information already produced by the institutions, so that the link between activity, indicator and payment condition can be verified.

Priority	Recommendation	Responsible institutions	Implementation deadline	Measures concerned
P1	Establish a single public monitoring dashboard for the 11 measures, including the deadline, baseline, target, current value, calculation basis and methodology, status of cumulative components, supporting evidence and date of the latest update.	State Chancellery and responsible institutions	Within 60 days of publication of the report; quarterly updates thereafter	All measures
P1	Develop acceleration plans for measures with a December 2026 deadline that are at risk of non-completion, setting out monthly milestones, responsible institutions,	ANI, Ministry of Justice, CSM and other institutions involved	By 30 September 2026	7.1.2 7.1.5

Priority	Recommendation	Responsible institutions	Implementation deadline	Measures concerned
	resources, interim results and the documents through which fulfilment of the condition will be demonstrated.			
P1	Publish harmonised statistical series and calculation methodologies , including definitions, reference period, numerator, denominator, categories included and explanations of any breaks in the statistical series.	Ministry of Justice, Prosecutor General's Office, CNA, Anti-Corruption Prosecutor's Office, CSM and ADJAJ	By 30 September 2026; quarterly thereafter	7.1.1 7.1.5 7.2.6
P1	Publish the critical timetable for the development and operationalisation of the new version of the "e-Integrity" SIA , including the status of contracting, accepted deliverables, testing, security, migration, training, interoperability and deployment into production.	ANI, Electronic Governance Agency and Information Technology and Cyber Security Service	Within 30 days; monthly reporting until operationalisation	7.1.2
P1	Continue the separate monitoring mechanisms for Measures 7.1.3 and 7.1.4 and periodically publish, in a consolidated and verifiable form, data on the addressing, integration and implementation of CNA recommendations , including the calculation basis and explanations of differences between recommendations and actions included in integrity plans.	CNA, State Chancellery, authorities drafting normative acts and assessed entities	By the next official reporting exercise relating to the payment conditions; periodic updates thereafter until the applicable deadlines expire	7.1.3 7.1.4
P1	Publish the INJ Strategic Plan and its implementation matrix , indicating the TAIEX recommendations reflected therein, actions, indicators, budget, responsible institutions and results that will demonstrate implementation of a significant part of the Plan by the end of 2026.	INJ and Ministry of Justice	Within 30 days; progress report by the end of 2026	7.2.4
P1	Complete the constitution of the Disciplinary Board and publish, for each position, the status of the competition, the evaluation result and the appointment decision.	Ministry of Justice and CSM	Without further delay	7.2.1
P2	Adopt an operational catch-up plan for filling vacancies at the courts of appeal and the Supreme Court of Justice, with quarterly targets for each court, deadlines for selection, evaluation and appointment, and a monitoring record that excludes temporary transfers from the indicator of filled positions.	CSM, in cooperation with the Evaluation Commission and the authorities involved in appointments	By 30 September 2026; quarterly updates until June 2027	7.2.3
P2	Adopt a roadmap for transitioning e-Case File from the pilot phase to operational use	Ministry of Justice and ADJAJ	By 31 December 2026; quarterly	7.2.5

Priority	Recommendation	Responsible institutions	Implementation deadline	Measures concerned
	and for PIGD interoperability, including a definition of a case submitted and processed electronically, interim usage rates, criteria for exiting the pilot phase, and the status of the seven interconnections.		updates thereafter	

A coordinating institution should be designated for each recommendation. The designation of several responsible institutions should not result in diluted accountability. The coordinating institution should consolidate the information, request contributions from the other actors involved, and publish the consolidated result.

Reporting on the implementation of the recommendations should be evidence-based. A narrative description of activities may explain the context, but does not substitute for the documents and data through which the result can be verified. Depending on the recommendation, such evidence may include:

- the adopted act or approval decision;
- the methodology and calculation formula;
- the dataset and recalculated result;
- the contract, deliverables and acceptance record;
- the testing report and evidence of deployment into production;
- the implementation matrix;
- appointment decisions;
- the updated usage or implementation rate.

For P1 recommendations, the responsible institutions should publish an initial progress update within no more than 30–60 days and, where appropriate, ensure monthly or quarterly reporting until the intended result is achieved. For P2 recommendations, quarterly reporting is necessary to identify any deviations from the timetable at an early stage.

Acceleration plans should not reproduce existing lists of activities. They should start from the result that remains to be achieved and work backwards to identify the stages without which the condition cannot be fulfilled. For each stage, the following should be specified:

- the interim result;
- the responsible institution and person or organisational unit;
- the deadline;
- the resources required;
- dependencies on other institutions;
- the main risk;
- the document that will demonstrate completion.

Monitoring should avoid replacing the final indicator with a process indicator that is easier to report. The number of meetings, competitions, documents developed, training sessions or interconnections initiated may demonstrate institutional effort, but does not substitute for the appointment, usage rate, implementation percentage, duration or functional result required by the Reform Agenda.

In this respect, transparency is not a stage that follows implementation. In the context of a Reform Agenda based on results and payment conditions, the publication of data and evidence is one of the prerequisites for verifiable and credible implementation.

Annex No. 1. Consolidated Monitoring Matrix on the Implementation of Commitments

The matrix complements the analysis in the main body of the report by setting out the verification trail: the evidence identified, its limitations, and the documents that are still required for final verification of each payment condition. References S01–S57 correspond to the list in Annex No. 2.

Measure	Result / indicator to be verified	Evidence identified in the report	Verification gaps as of 31 July 2026	Evidence required for final verification	CAPC Rating
7.1.1	Overall positive trend in investigations, indictments and final judgments, including in high-level corruption cases; harmonised statistical definitions.	CNA reports for 2024–2025 and the review of the first half of 2026; Anti-Corruption Prosecutor's Office reports for 2024–2025; the EU e-platform and the regulatory framework governing competences and the classification of offences (S03–S11).	There is no single comparable data series for 2021–2026; high-level corruption cannot be tracked separately; CNA figures for 2024 are presented differently across sources; data on final judgments are not harmonised.	A single statistical methodology; a recalculated 2021–2026 series covering all three stages; separate disaggregation for high-level corruption; a reconciliation note for CNA data for 2024.	Ongoing (at risk of non-completion)
7.1.2	New version of the “e-Integrity” SIA deployed into production: full electronic submission, automated risk analysis, flagging and random allocation, and interoperability with the required registers.	Operation of the existing system; two procurement procedures; information on MConnect; the ANI 2025 Report and the parliamentary hearing (S12–S18).	Acceptance and deployment into production have not been demonstrated; nor have the automated application of risk criteria, random allocation, the status of each interconnection, or the content and acceptance of contractual deliverables.	Contract and deliverables; acceptance records; functional and security testing reports; evidence of migration and deployment into production; interconnection matrix, etc.	Ongoing (at risk of non-completion)
7.1.3	Addressing 100% of anti-corruption proofing recommendations: full or partial acceptance, or non-acceptance accompanied by a written and reasoned justification.	CNA Activity Reports for 2024 and 2025; the framework established by Law No. 100/2017; CNA Board Decision No. 3 of 17 July 2026 and its annexes. The separate monitoring mechanism indicates that all 699 recommendations formulated in 2025 and all 263 recommendations formulated during January–June 2026 were addressed. Of the 962 recommendations, 814 were accepted and incorporated, while 148 were not accepted but were accompanied by written justifications (S03, S04, S19, S58).	The annexes to Decision No. 3 present consolidated data by Government meeting, without publicly identifying each individual recommendation and the corresponding justification. This mode of publication limits independent verification of the quality of the justifications and their correspondence with the final wording of the normative acts, but does not call into question the interim results of the monitoring mechanism.	Consolidated CNA reporting for the entire relevant period, indicating the drafts monitored, the number of recommendations addressed, accepted and not accepted with written justification, as well as the period and calculation basis.	Ongoing (on schedule)
7.1.4	Inclusion in integrity plans of at least 95% of the recommendations formulated by the CNA and full implementation of at least 85% of the recommendations.	Law No. 325/2013; CNA Report to Parliament; monitoring reports on integrity plans; CNA Board Decision No. 4 of 17 July 2026; disaggregated data subsequently provided to CAPC. Recommendations were integrated into integrity plans at a rate of 99–100%. For the 16 entities included in the calculation basis, 1,341 of 1,467 recommendations were fully implemented, representing approximately 91.4% (S20–S23, S59, S60).	Decision No. 4 presents implementation rates but does not provide the full numerator, denominator or explanations of differences between recommendations and actions. These elements were clarified through the disaggregated information subsequently provided to CAPC, which is not, however, published together with the Decision.	Updated data through the applicable deadline and publication of a consolidated overview indicating the entities included, recommendations formulated, integrated and fully implemented, the calculation formula, and explanations regarding the consolidation or division of recommendations into actions.	Ongoing (on schedule)
7.1.5	A 40% reduction in the duration and a 10% increase in the resolution rate of corruption and corruption-	ADJAJ reports for 2025 and the first quarter of 2026; CSM information concerning the Chişinău Court Report; Law No. 192/2025 and	Comparability with the baseline and the resolution-rate formula have not been clarified; the meaning of an increase “by 10%” is ambiguous; the specialised	A uniform 2024–2026 series for Chişinău Court; formulas and case categories; official clarification of the indicator; appointment and	Ongoing (at risk of non-completion)

	related cases, in correlation with the specialised examination mechanism.	CSM decisions concerning competitions for the specialised structures (S24–S28).	structures are not operational; the attribution link between the mechanism and the results has not been demonstrated.	organisational acts and evidence of the transfer of cases to the specialised structures.	
7.2.1	Appointment of all 16 evaluated members: 9 to the Board for the Selection and Evaluation of Judges and 7 to the Disciplinary Board.	CSM webpages concerning the composition of the boards; the Disciplinary Board decision; information on candidate withdrawal and evaluation and on the extension of the competition (S29–S34).	The Disciplinary Board has 5 of its 7 members; one evaluation had not been completed, while the competition for the other position was extended after the deadline had expired.	Final outcome of the evaluation of each candidate; appointment decisions for the two vacant positions; consolidated individualised overview of all 16 positions.	Partially completed
7.2.2	Evaluation of 100% of the serving judges of the three courts of appeal included in the baseline group.	Statistics and communications of the Evaluation Commission; 2025 Annual Report; information on completion of the evaluation at the Central, Northern and Southern Courts of Appeal; the framework established by Law No. 252/2023 and the EU Dashboard (S35–S39).	The information is dispersed across statistics, reports and communications; the report does not contain a final consolidated list showing, for each person, the relevant acts and the final status of the procedure.	Final consolidated register of the baseline group, including the evaluation result and relevant acts; separate report on the effects on the operational capacity of the courts of appeal.	Completed
7.2.3	Filling, with evaluated judges, at least 35 of the 70 vacancies included in the baseline and appointment of 18 judges to the Supreme Court of Justice.	CSM decisions concerning staffing levels at the courts of appeal and the Supreme Court of Justice; Evaluation Commission data; information on competitions for the specialised panels (S28, S35, S40, S41).	At the courts of appeal, the net number of filled positions has increased by only two, while temporary transfers do not constitute filled positions; at the Supreme Court of Justice, 12 of the target 18 positions are filled; there is no single consolidated overview of positions and evaluation status.	Operational plan with monthly milestones and quarterly reporting; appointment decisions; separate overview of approved, filled and vacant positions; evidence of the evaluation of appointed persons; exclusion of temporary transfers.	Ongoing (at risk of non-completion)
7.2.4	Adoption of the INJ Strategic Plan 2026–2031, alignment with the TAIEX recommendations and implementation of a significant part of the Plan by December 2026.	INJ 2025 Activity Report and the agenda of the INJ Council meeting of 24 July 2026; the 2022 TAIEX report is referred to as a benchmark (S42, S43).	The Plan and its implementation matrix were not published in the sources indicated; alignment with the TAIEX recommendations has not been demonstrated; the concept of a “significant part” and the implementation status have not been quantified.	Published Plan; matrix correlating the Plan with the TAIEX recommendations; indicators, budget, responsible institutions and deadlines; progress report identifying the part implemented by the end of 2026.	Ongoing (on schedule)
7.2.5	e-Case File operational in all first-instance courts and used for at least 15% of cases; PIGD operational for 100% of cases and seven functional interconnections.	ADJAJ report on e-Case File; CSM decision extending the pilot; removal of the prior agreement requirement for lawyers; June 2026 information on interconnections; draft legislation on digitalisation (S44–S48).	The system formally remains in the pilot phase; the numerator and denominator for the 15% usage rate have not been published; there is no definition of a case “submitted and processed” electronically; the status of the seven interconnections has not been presented.	Quarterly statistics by court and case category; operational definition and formula; criteria and dates for exiting the pilot phase; matrix of the seven interconnections; security testing and evidence of effective use.	Ongoing (at risk of non-completion)
7.2.6	A 30% reduction in the duration of administrative cases at first instance and achievement of the four resolution-rate targets for civil, commercial and administrative cases at first instance and on appeal.	Launch and webpage of JUSTAT; JUSTAT Information System Concept; ADJAJ report on administrative cases for 2025; the CEPEJ 2024 Report is referred to as the methodological basis (S49–S52).	There is no complete and comparable public series for the five indicators for 2024–2026; formulas, numerators, denominators and validation rules are unavailable, as is clarification of changes in classification or jurisdiction.	Official series for the five indicators using the same methodology as the baseline; exportable datasets; formulas and validation rules; methodological note on breaks in the statistical series and data-quality auditing.	Insufficient data for assessment

Annex No. 2. List of documents and public sources analysed

This list was compiled exclusively on the basis of documents, institutional webpages and platforms that can be individually identified in the text of the report. It reflects the sources available up to the cut-off date of 31 July 2026.

ID	Document / source	Issuing institution	Date / period	Measure	Link
S01	Reform Agenda associated with the Growth Plan for the Republic of Moldova for 2025–2027, approved by Government Decision No. 260/2025	Government of the Republic of Moldova	2025	All measures	Acces
S02	Council of the European Union document on the Reform and Growth Facility for the Republic of Moldova (ST-16525-2024-INIT)	Council of the European Union	2024	Context	Acces
S03	2024 Activity Report of the National Anti-Corruption Centre	CNA	2024	7.1.1; 7.1.3	Acces
S04	2025 Activity Report of the National Anti-Corruption Centre	CNA	2025	7.1.1; 7.1.3	Acces
S05	CNA review meeting: 447 offences detected and more than 200 cases – data for the first half of 2026	CNA	2026	7.1.1	Acces
S06	2024 Report of the Anti-Corruption Prosecutor’s Office	Anti-Corruption Prosecutor’s Office	2024	7.1.1	Acces
S07	2024 Report of the Anti-Corruption Prosecutor’s Office	Anti-Corruption Prosecutor’s Office	2025	7.1.1	Acces
S08	Classification/criteria used by the European Commission for collecting corruption data in accession countries	European Commission	n/d	7.1.1	Acces
S09	European Commission e-platform for the track record on organised crime, corruption, money laundering and other serious offences	European Commission	n/d	7.1.1	Acces
S10	Law No. 136/2024, used in the report to explain changes in penalties and the classification of certain offences	Parliament of the Republic of Moldova	2024	7.1.1	Acces
S11	Law No. 111 of 11 June 2026 concerning the reconfiguration of the competences of the criminal prosecution bodies referred to in the report	Parliament of the Republic of Moldova	2026	7.1.1	Acces
S12	ANI notice for declaration subjects concerning the functionalities of the declaration submission system	ANI	April 2025	7.1.2	Acces
S13	ANI communication concerning the 31 March deadline for submitting declarations of assets and personal interests	ANI	March 2026	7.1.2	Acces

ID	Document / source	Issuing institution	Date / period	Measure	Link
S14	Procurement procedure launched on 1 August 2025 for the “e-Integrity” SIA, which did not result in a contract award	achizitii.md / ANI	2025	7.1.2	Acces
S15	Repeated procurement procedure for services to adjust the “e-Integrity” SIA	e-licitatie.md / ANI	2025	7.1.2	Acces
S16	Presentation webpage of the MConnect Government Interoperability Platform	Electronic Governance Agency	n/d	7.1.2	Acces
S17	2025 Activity Report of the National Integrity Authority	ANI	2025	7.1.2	Acces
S18	Parliamentary hearing on the NIA 2025 Activity Report and the recommendations formulated	Parliament of the Republic of Moldova	April 2026	7.1.2	Acces
S19	Law No. 100/2017 on normative acts	Parliament of the Republic of Moldova	Version cited in the report	7.1.3	Acces
S20	Law No. 325/2013 on institutional integrity assessment	Parliament of the Republic of Moldova	Version cited in the report	7.1.4	Acces
S21	CNA Report to Parliament on the implementation of Law No. 325/2013	CNA	March 2026	7.1.4	Acces
S22	CNA webpage containing reports on monitoring the implementation of integrity plans, including final reports published in March–May 2026	CNA	2026	7.1.4	Acces
S23	Report on monitoring the implementation of the Civil Aviation Authority Integrity Plan – first monitoring semester	CNA	2026	7.1.4	Acces
S24	Report on first-instance court activity in the examination of criminal cases – first quarter of 2026	ADJAJ	2026	7.1.5	Acces
S25	First-instance court report on the examination of criminal cases concerning natural persons – 12 months of 2025	ADJAJ	2025	7.1.5	Acces
S26	Chişinău Court reports progress in the examination of corruption cases – information concerning the 2025 Annual Report	CSM	2026	7.1.5	Acces
S27	CSM Decision No. 334/21 of 21 July 2026 concerning competitions for positions in the specialised anti-corruption board	CSM	21.07.2026	7.1.5	Acces
S28	CSM Decision No. 335/21 of 21 July 2026 concerning positions in the specialised panels of the Central Court of Appeal	CSM	21.07.2026	7.1.5; 7.2.3	Acces

ID	Document / source	Issuing institution	Date / period	Measure	Link
S29	Composition of the Board for the selection and evaluation of judges	CSM	Updated through July 2026	7.2.1	Acces
S30	Composition of the Disciplinary Board	CSM	24 July 2026, according to the report	7.2.1	Acces
S31	Decision of the Disciplinary Board of 31 March 2025 on the formation of panels for examining appeals	CSM Disciplinary Board	31.03.2025	7.2.1	Acces
S32	Communication concerning the withdrawal of a candidate from the competition for the Disciplinary Board of Judges	Evaluation Commission	2026	7.2.1	Acces
S33	Communication concerning the entry of a new candidate for the Disciplinary Board into the evaluation procedure	Evaluation Commission	22.06.2026	7.2.1	Acces
S34	Announcement concerning the extension of the competition for the selection of a candidate for membership of the Disciplinary Board	Ministry of Justice	2026	7.2.1	Acces
S35	Statistics of the Judicial Evaluation Commission	Evaluation Commission	Updated through 31 July 2026	7.2.2; 7.2.3	Acces
S36	External evaluation of the Central Court of Appeal completed – final report submitted to the CSM	Evaluation Commission	16.06.2025	7.2.2	Acces
S37	Status of the external evaluation of judges at the end of 2025	Evaluation Commission	31.12.2025	7.2.2	Acces
S38	2025 Annual Report of the Judicial Evaluation Commission	Evaluation Commission	2025	7.2.2	Acces
S39	Completion of the vetting procedure at the Northern and Southern Courts of Appeal	Evaluation Commission	21.10.2025	7.2.2	Acces
S40	CSM Decision No. 333/21 of 21 July 2026 concerning staffing levels at the courts of appeal and temporary transfers	CSM	21.07.2026	7.2.3	Acces
S41	CSM Decision No. 332/21 of 21 July 2026 concerning the staffing level of the Supreme Court of Justice	CSM	21.07.2026	7.2.3	Acces
S42	2025 Activity Report of the National Institute of Justice	INJ	2025	7.2.4	Acces
S43	Agenda of the INJ Council meeting of 24 July 2026	INJ	24.07.2026	7.2.4	Acces

ID	Document / source	Issuing institution	Date / period	Measure	Link
S44	Report on the Assessment of the Use of the e-Case File Information System	ADJAJ	2025	7.2.5	Acces
S45	CSM Decision No. 575/42 of 4 November 2025 concerning the extension of the e-Case File pilot	CSM	04.11.2025	7.2.5	Acces
S46	Automated access to the e-Case File Information System – removal of the prior agreement requirement for lawyers	ADJAJ	06.04.2026	7.2.5	Acces
S47	Meeting of the Council for the Coordination of Justice Sector Digitalisation of 19 June 2026	ADJAJ	19.06.2026	7.2.5	Acces
S48	Draft law on the digitalisation of certain judicial procedures, submitted to the Government on 15 July 2026	Ministry of Justice	July 2026	7.2.5	Acces
S49	Launch of the JUSTAT SIA – the national tool for publishing judicial statistics	Council of Europe / national authorities	26.05.2023	7.2.6	Acces
S50	JUSTAT public platform	ADJAJ / judiciary	n/d	7.2.6	Acces
S51	JUSTAT Information System Concept, approved by the Government	Government of the Republic of Moldova	Decembre 2025	7.2.6	Acces
S52	Statistical report on the examination of cases under the Administrative Code – 12 months of 2025	ADJAJ	February 2026	7.2.6	Acces

Note: "n/d" indicates that the exact date is not specified in the text of the report. The descriptive wording used in the list does not extend the content of the source, but reflects exclusively the manner in which the source is used in the report.