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Civic Space Report
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Civic Space Report Moldova

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Moldova

Country Score: **Mixed – Enabling Leaning**

Country Trend: ↗

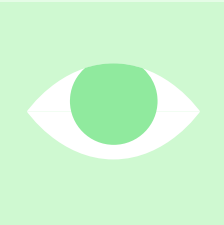
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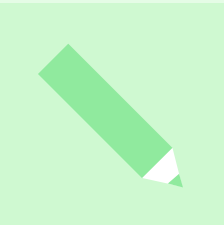
Cluster A: 3.00
A1 Equal treatment: 3
A2 Political recognition as partners: 3
A3 Refrained authorities from smearing: 3
A4 No weaponization of state powers: 3
A5 Transparent and open public institutions: 3



Cluster B: 3.00
B1 Free establishment and operation: 4
B2 CSOs enjoy a safe space: 3
B3 Liberty of resourcing: 3
B4 Enabling fiscal environment: 2
B5 Free expression of criticism: 3



Cluster C: 2.60
C1 Citizens trust: 3
C2 Present in media: 2
C3 Free engagement: 3
C4 CSOs embedded in communities: 2
C5 Freedom of assembly: 3



Cluster D: 2.40
D1 Decision-making participation: 3
D2 Timely consultations: 2
D3 Policies for cooperation: 3
D4 Free advocacy: 2
D5 Government listens: 2

Civic Space Report – Moldova

Introduction

This report assesses civic space in the Republic of Moldova between 1 January 2025 and 30 June 2026. The period was shaped by three developments: the country's accelerating EU-accession process, the September 2025 parliamentary elections held amid intensive Russian hybrid interference, and the abrupt withdrawal of US development funding, on which much of the sector depended. Overall, Moldova scores 2.8 out of 4, between "Restrictive Leaning" and "Mostly Enabling". The accession agenda has produced legislative reform and an expanding cooperation architecture between the state and civil society, and the legal framework for CSOs remains largely open; these are reflected in the two strongest clusters, the institutional and political environment and the legal and financial framework (both 3.0). Practice, however, remains uneven: fiscal and foreign-funding pressures weigh on CSO sustainability, a record number of attacks on journalists coexists with persistent local capacity gaps among CSOs (2.6), and the more politically significant a legislative dossier, the less CSO input appears to shape its final outcome (2.4).



Cluster A – Institutional and Political Environment and Narratives of CSOs

How do political institutions interact with and portray CSOs?

A1 – Equal treatment

Standard. *The state treats all CSOs equally with regard to their establishment, registration and activities, and does not restrict organizations because they express views critical of officials or policy without privileging loyal or government-organized/funded entities (GONGOs).*

The 2020 Law on Non-Commercial Organisations sets uniform rules for the establishment, registration and activities of CSOs and contains no category that privileges government-aligned entities. In March 2025, opposition deputies from the Bloc of Communists and Socialists tabled a "foreign agents" bill modelled on Russian and Georgian legislation, which would have imposed separate, stigmatizing obligations on foreign-funded CSOs. The parliamentary majority did not support it, and a weakened version remained pending without adoption throughout the period (CSO Meter, 2025c).

Registration and operational practice remained even-handed, with one exception. During the 2025 energy crisis triggered by the suspension of gas deliveries to Transnistria, the Commission for Emergency Situations granted energy-cost compensation only to commercial enterprises, excluding CSOs, including CSO-run social enterprises (Promo-LEX, 2025).

The decision created a direct financial burden for the affected organizations during an acute crisis, but it was an isolated administrative measure rather than a pattern of targeting critical organizations.

Trend. The situation deteriorated slightly because of the crisis-related exclusion, although the failure of the "foreign agents" bill prevented a more serious setback.

Score 3: Equal treatment is preserved in law and in most practice, but the exclusion of CSOs from crisis support and a pending hostile bill keep the score below the top band.

A2 – Political recognition as partners

> ***Standard.*** *Public institutions and officeholders recognize CSOs as legitimate, independent democratic actors and engage them as partners rather than adversaries.*

There is no general statutory duty to treat CSOs as partners, but the EU-accession process has created several cooperation channels, including the drafting of a new Public Participation Law led by the State Chancellery and the sectoral Roadmaps required by the accession framework. In February 2026, the State Chancellery launched the sixth Open Government Action Plan, following an 87% implementation rate for the 2023–2025 cycle (Moldpres, 2026), and new dialogue formats, such as a Parliament–CSO conference, were introduced (Moldova 1, 2026).

The influence of CSOs on decisions is more limited. In May 2025, the Government adopted the Roadmaps on the rule of law and on the functioning of democratic institutions largely in their initial wording, without the main amendments proposed by CSOs (CSO Meter, 2025a). Of the 56 contributions civil society experts submitted on 35 draft normative acts in 2025, about a quarter were fully or partially accepted

(Moldova 1, 2026). Civil society representatives also report that consultations are often formal and that criticism of government policy is poorly received.

Trend. Recognition is improving, but unevenly, as the formal cooperation architecture is expanding faster than the influence of CSO input on final decisions.

Score 3: Recognition of CSOs as partners in the EU-accession process is growing, but the low uptake of substantive CSO proposals in key documents such as the Roadmaps limits the score.

A3 – Refrained authorities from smearing

> ***Standard.*** *Officials and state bodies refrain from stigmatizing, vilifying, or delegitimizing rhetoric and smear campaigns against CSOs (e.g., "foreign agents," "enemies"), including in state-supported media.*

No law authorizes state bodies to label CSOs as "foreign agents", and the governing majority did not use such rhetoric during the period. "Foreign agent" and hidden-interest narratives were nevertheless widespread. Opposition deputies, mainly from the Bloc of Communists and Socialists, were the most visible source, but during the September 2025 electoral campaign candidates from several parties attacked CSOs, particularly those working against disinformation, and networks linked to Russian-backed influence operations amplified the same messages (Eastern Partnership Civil Society Forum, 2025; Logos-Press, 2026a). Statements by governing-party figures were rare but not entirely absent (Promo-LEX, 2026).

CSOs report a chilling effect from these sustained narratives, even though their source is mainly the opposition, electoral competitors and external actors rather than the executive (Logos-Press, 2026a). This distinguishes

Moldova from countries where the government itself drives stigmatizing discourse, although the authorities do not consistently counter such narratives.

Trend. Government rhetoric remained stable, but civil society describes the online and regional environment as increasingly hostile, especially around elections.

Score 3: Governing authorities have largely refrained from stigmatizing rhetoric, but hostile "foreign agent" narratives remain active in the opposition and electoral space and are not consistently countered.

A4 – No weaponization of state powers and good governance principles

Standard. *The state does not deploy institutional powers — audits, inspections, tax, security or law-enforcement bodies, or emergency measures and principles such as transparency, fiscal due diligence or privacy protection and the like — selectively or disproportionately to pressure CSOs because of their activities or views.*

Legislative amendments adopted during the period in response to Russian hybrid threats expanded the definition of "extremist activity", introduced the possibility of suspending CSOs, restricted access to information under the law on states of emergency and crisis, and created new obligations for CSOs to provide information under the National Security Law (Promo-LEX, 2025). These measures were not designed to target CSOs, but they broaden the legal basis for state scrutiny of the sector.

In practice, public institutions focused on disinformation and interference operations around the September 2025 parliamentary elections, including cases in which front non-profit organizations were used to channel illegal foreign funding (CSO Meter, n.d.-a). There is no evidence that

the new powers were used against genuine CSOs during the period. The ambiguous definition of extremism and the emergency-powers framework nevertheless create a latent risk of selective use in the future.

Trend. The trend is mixed, as the legal framework became more restrictive while enforcement remained focused on actors involved in hybrid threats rather than on civil society at large.

Score 3: There was no documented misuse of state powers against legitimate CSOs, but the broadened legal basis for security-related scrutiny of the sector is a structural risk.

A5 – Transparent and open public institutions

Standard. *Public institutions operate transparently and proactively provide access to information, enabling CSOs and citizens to scrutinize decisions and/or access to decision-making and hold authorities accountable.*

The Law on Access to Information of Public Interest, adopted in 2023 and in force since January 2024, introduced proactive transparency obligations, simplified request procedures and clearer sanctions, and Moldova ratified the Council of Europe's Tromsø Convention (Access Info Europe, 2024). Most amendments proposed by CSOs during the drafting process were, however, rejected by the Ministry of Justice.

Implementation lags behind the law. Freedom House (2023) found limited understanding of transparency obligations among public bodies, particularly local authorities and state-owned enterprises, with procurement information often published late or withheld on generic grounds. In 2025, the State Chancellery and Parliament launched new participation and information portals, which improved access to baseline information, but inconsistent compliance at local level and in procurement continues to hamper the watchdog work of CSOs.

Trend. The situation is improving from a low base, with implementation outside central government now the main remaining gap.

Score 3: A modern transparency law and new digital tools support access to information, but uneven implementation, especially locally and in procurement, keeps the score below the top band.



Cluster B – Legal and Financial Framework for CSOs

What formal conditions shape CSO operations and sustainability?

B1 – Free establishment and operation

> ***Standard.*** *Everyone can freely establish, join or participate in a CSO; CSOs are free to determine their own objectives and activities; and where registration as a legal entity is required, the procedure is clear, simple, quick and inexpensive. The state does not interfere in the internal governance and operations of CSOs; any monitoring, inspection or reporting is defined by law, proportionate to the CSO's size and activities, and not onerous.*

The 2020 Law on Non-Commercial Organisations provides a clear and simplified registration procedure and protects the internal governance autonomy of CSOs. The law was drafted with substantial input from civil society and removed earlier restrictions on participation in associations (CSO Meter, n.d.-a). Freedom of association remains one of the strongest aspects of the legal environment for CSOs in Moldova.

Registration practice remained stable, with no reports of systemic obstruction. Reporting obligations are largely self-declared and proportionate: the National Bureau of Statistics launched its first survey on CSO finances only in May 2026, on a voluntary pilot basis ahead of full rollout in 2027 (Biroul Național de Statistică, 2026). The main administrative burden reported by the sector concerns banking and anti-money-laundering compliance (see B4) rather than establishment or interference in internal governance.

Trend. The situation is stable, with no material legislative or practical change during the period.

Score 4: Establishment and operational autonomy are the strongest area of the legal framework, with no adverse developments during the period.

B2 – CSOs enjoy a safe space and protection from arbitrariness

Standard. *CSOs are protected against arbitrary or politically motivated suspension, dissolution or sanction; such measures rest on clear legal grounds, proportionality and independent judicial review.*

Dissolution and suspension of CSOs require judicial proceedings under the 2020 Law on Non-Commercial Organisations, but two legal risks are relevant. First, the security-related amendments adopted during the period (see A4) introduced for the first time the possibility of suspending CSOs, linked to the broader definition of extremist activity (Promo-LEX, 2025). Second, Article 28 of the 2020 law requires CSOs registered before 2020 to bring their statutes into conformity and re-register with the Public Services Agency or face forced liquidation (Agenția Servicii Publice, 2022), and practitioners report that the procedure has not always been clearly communicated.

No genuine CSO was suspended or dissolved under the new power during the period; its use has so far concerned front organizations linked to

disinformation around the 2025 elections. The re-registration requirement is procedural rather than politically targeted, but it remains a compliance risk that falls mainly on older, smaller and less-resourced organizations rather than on visible advocacy groups.

Trend. The situation deteriorated slightly in law and remained stable in practice, as the new suspension tool adds a risk that did not exist at the start of the period.

Score 3: Judicial safeguards remain in place and no genuine CSO was sanctioned, but the new suspension power and the unclear re-registration procedure are structural risks.

B3 – Liberality of resourcing

> ***Standard.*** *CSOs are free to seek, receive and use financial and material resources from domestic, foreign and international sources, public or private, with no distinction in treatment between foreign/international and domestic resources, and without stigmatization.*

Moldovan law imposes no restrictions on foreign funding and no "foreign agent" registration requirement; the 2025 opposition bill that would have changed this was not adopted (CSO Meter, 2025c). The main pressure on resourcing came from outside: the US foreign-aid freeze of January 2025 and the subsequent USAID cuts. USAID disbursements to Moldova amounted to around USD 150 million in 2024 (European Leadership Network, 2026), and Promo-LEX reported that USAID funds had covered 75–80% of its budget (Balkan Insight, 2025).

European donors, including the European Endowment for Democracy and the EU Delegation, which opened a EUR 12.5 million call for CSO proposals in 2026, partly compensated for the gap (European Endowment for Democracy, 2025; European Leadership Network, 2026). Organizations nevertheless reported layoffs and suspended activities. The episode shows

that the legal freedom to seek foreign funding does not ensure sustainable access to resources when a dominant donor withdraws, particularly as domestic philanthropy remains underdeveloped (see B4).

Trend. The situation deteriorated in practice despite a stable legal framework, as European support prevented a collapse but did not restore previous funding levels.

Score 3: There is no legal barrier to foreign or domestic funding, but the sector's heavy exposure to a single donor's policy shift shows a real gap between legal freedom and sustainable access to resources.

B4 – Enabling fiscal environment

> ***Standard.*** *CSOs and their donors enjoy a favorable and stable tax environment that supports CSO resourcing and encourages philanthropy. Anti-money laundering and counter-terrorism measures, and sanction regimes are applied to CSOs proportionately and on a risk basis.*

The 2% income-tax designation mechanism and the 2022 law clarifying philanthropy and sponsorship form the domestic fiscal base for CSOs. This base has repeatedly faced weakening proposals: 2023 amendments risked diluting the mechanism by extending it to public schools (CSO Meter, 2023), and in mid-2026 new Tax Code amendments under discussion raised concerns about beneficiary privacy and a further weakening of the mechanism (CSO Meter, n.d.-a).

CSOs also report excessive bureaucracy linked to ultimate beneficial ownership disclosure under anti-money-laundering rules, which are applied without the risk-based approach for non-profits recommended by the Financial Action Task Force (European Center for Not-for-Profit Law, 2026). Tax incentives for philanthropic donations and sponsorship

remain limited. Together, these factors keep domestic fundraising underdeveloped and reinforce the sector's dependence on foreign funding (see B3).

Trend. The situation is stagnant to slightly deteriorating, as no structural fiscal reform was completed and the main developments were new threats to the 2% mechanism.

Score 2: The fiscal environment offers basic tools but is under sustained pressure from weakening proposals, a disproportionate anti-money-laundering burden and limited tax incentives for giving.

B5 – Free expressions of criticism

Standard. *CSOs, activists and journalists can express opinions and criticism freely, online and offline, and are protected from SLAPPs, legal intimidation and disproportionate sanctions.*

CSOs, activists and journalists were able to criticize public authorities openly during the period, and no case was identified of a CSO being sanctioned by the state for its views. The main gap concerned protection against abusive litigation: Moldova had no dedicated anti-SLAPP legislation, despite documented cases of abusive lawsuits against CSOs and journalists. Monitoring of attacks on CSOs and human rights defenders by the Legal Resources Centre from Moldova was cited in the European Commission's 2024 enlargement report, after which the Ministry of Justice started work on anti-SLAPP safeguards under the Roadmap on the functioning of democratic institutions (CSO Meter, n.d.-a).

A draft anti-SLAPP law was opened for public consultation in 2026, although CSOs considered that it fell short of commitments on the protection of human rights defenders (CSO Meter, 2026). The Government approved the anti-SLAPP package on 24 July 2026, after the assessment

period, and Parliament has yet to adopt it. Within the period, protection rested on general civil-procedure safeguards, leaving CSOs and journalists exposed to the costs and chilling effect of abusive lawsuits.

Trend. The situation is improving, as the anti-SLAPP process advanced during the period, although the Government approved the package only after it closed.

Score 3: Critical expression by CSOs and journalists remained possible throughout the period, but the absence of dedicated protection against abusive litigation keeps the score below the top band.



Cluster C – Public Engagement and Perceptions towards the Work of CSOs

How are CSOs perceived, and how do citizens engage with them?

C1 – Citizens' trust

Standard. *Citizens broadly trust CSOs and regard them as legitimate, valuable contributors to public life.*

Public trust in CSOs is measured by the Public Opinion Barometer, conducted twice a year by the Institute for Public Policy since 1998. The autumn 2025 wave recorded an increase in trust in CSOs from 19% in 2024 to 28% in 2025 (IPN, 2025). The increase took place in a polarized

and sceptical society: the same survey found 32% trust in Parliament and only 43% of respondents believing the country was heading in the right direction (IPN, 2025).

Rising trust strengthens the legitimacy of CSOs, including in their relations with public institutions. At under a third of the population, however, confidence in CSOs remains a minority position.

Trend. Trust is improving substantially, having risen by nine percentage points in a single year.

Score 3: The strong upward trend is a positive signal, but at 28% public trust in CSOs remains well short of majority confidence.

C2 – Pluralistic presentation in media

> ***Standard.*** *CSOs are represented in the media fairly and pluralistically, with access to diverse, independent outlets that report on their work without systemic bias.*

Legislative reforms adopted during the period strengthened the independence guarantees of the Audiovisual Council and the public broadcaster and regulated state advertising (Media Azi, 2026). Practice improved less. The Press Situation Index of the Independent Journalism Center rose only marginally in 2025, keeping the press in the "serious problems" category for the tenth consecutive year (Centrul pentru Jurnalism Independent, 2026), and Moldova fell four places, to 35th of 180 countries, in the Reporters Without Borders ranking (UNIMEDIA, 2025).

Moldova recorded 97 attacks on journalists in 2025, 47% more than in the previous year and the highest number since monitoring began in 2017 (Media Azi, 2026). This level of pressure on journalists narrows the space in which CSOs can expect fair, safe and pluralistic coverage of their work.

Trend. The situation is stagnant to worsening in practice, as legal improvements were offset by a record number of attacks on journalists and a lower international press-freedom ranking.

Score 2: Legal reforms are a step forward, but a record year of attacks on journalists and a falling international ranking show that the practical environment deteriorated.

C3 – Free engagement

> ***Standard.*** *Citizens can engage freely and safely in civic activities, volunteering, activism, donating, protest, and such participation is socially accepted and not penalized.*

A new Volunteering Law, harmonized with EU legislation, was adopted in second reading on 29 December 2025 and replaced the 2010 framework (Parlamentul Republicii Moldova, 2025). It lowers the minimum volunteering age to 14, regulates formal, informal, corporate and international volunteering, and replaces paper volunteer booklets with skills-based certificates (Moldova 1, 2025).

Civic engagement continued throughout the period, and no criminal or administrative penalties against citizens for peaceful civic participation, donations or volunteering were documented. No official national statistics measure volunteering rates or hours, which makes it difficult to assess participation trends. Once implementing regulations are in place, the new framework should make it easier for CSOs to recruit and retain volunteers.

Trend. The situation is improving, following a substantive, EU-aligned reform of the volunteering framework.

Score 3: A modernized legal basis for volunteering is in place, but the absence of national data on participation keeps the score below the top band.

C4 – CSOs embedded in communities

> ***Standard.*** *CSOs are embedded in their communities and able to mobilize grassroots support, public solidarity and cross-sector backing in defense of civic space.*

The Civil Society Development Programme 2024–2027 names local embeddedness and grassroots capacity as strategic priorities (CSO Meter, n.d.-b). Grassroots activity was documented during the period: a People in Need programme engaged more than 50 initiatives in ten districts on local budgeting, monitoring and advocacy (People in Need, n.d.), Norway committed NOK 45 million to civil society work for 2025–2028 (FundsforNGOs, 2025), and nine in ten of the roughly 135,000 Ukrainian refugees hosted in 2025 lived in host communities rather than in camps (Ukraine Crisis Analysis Team, 2026).

A May 2026 social-cohesion assessment found that, despite national-level polarization, relations between communities remain largely cooperative and that trust grows where grassroots initiatives deliver locally relevant results (Ukraine Crisis Analysis Team, 2026). Local CSOs nevertheless face persistent capacity constraints: insufficiently trained staff, limited access to funding and equipment, and less organizational experience than national CSOs based in Chișinău. Their ability to sustain community engagement without continued donor support therefore remains fragile, and mobilization capacity is uneven between project-supported districts and the rest of the country.

Trend. The trend is mixed, as donor-funded programmes deliver results where they operate but have not visibly narrowed the gap in organic local capacity.

Score 2: Grassroots mobilization and solidarity are real where donor-funded programmes operate, but persistent local capacity gaps mean that community embeddedness is not yet self-sustaining.

C5 – Freedom of assembly

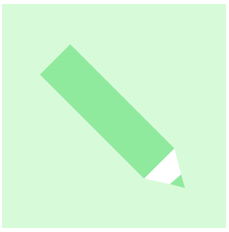
> ***Standard.*** *Everyone can freely enjoy the right to freedom of peaceful assembly, organizing and participating in assemblies (including online), without unwarranted interference.*

Freedom of assembly is constitutionally guaranteed and has generally been respected in Moldova. On 15 May 2025, however, the Chișinău Municipal Council voted to ban public assemblies, demonstrations and "propaganda" related to gender identity and sexual orientation, mirroring a 2022 measure in Gagauzia (Radio Moldova, 2025).

Despite the ban, the 13th Moldova Pride march took place on 15 June 2025, as central law-enforcement authorities did not apply the municipal decision (Cotidianul, 2025). Police detained some counter-protesters who tried to break through the police cordon; claims of police brutality against marchers were identified as part of a pro-Kremlin disinformation narrative (EUvsDisinfo, 2025). The gap between a formally valid local ban and its non-enforcement by central authorities left organizers without legal certainty.

Trend. The situation deteriorated because of the explicit municipal ban on LGBTI-related assemblies.

Score 3: Assembly rights remain broadly respected, but the explicit municipal ban on LGBTI-related assemblies is a documented deterioration.



Cluster D – CSOs as Policy Makers

To what extent do CSOs influence and shape public policy?

D1 – Right to participate in decision-making including in the policy cycle

> ***Standard.*** *Everyone has the right to participate in decision-making, and authorities use various mechanisms to ensure meaningful public and CSO participation.*

Public participation is currently regulated by the Law on Transparency in Decision-Making (No. 239) and Government Decision No. 967/2016. On 19 February 2025, the State Chancellery set up a working group of 35 civil society representatives and 21 public officials to draft a new Law on Public Participation in Decision-Making (CSO Meter, 2025b). The Government approved the draft on 22 July 2026, after the end of the assessment period (Logos-Press, 2026b).

Within the period, participation practice improved after Parliament and the Government launched new participation and information portals. CSOs obtained a structured and balanced role in drafting the main law governing their participation, although the binding guarantees it would introduce were not yet in force.

Trend. The situation is improving procedurally, with the substantive legal upgrade concentrated at, and just after, the end of the period.

Score 3: An inclusive drafting process ran throughout the period, but binding participation guarantees fall outside the assessment window.

D2 – Timely consultations and equal participation

> ***Standard.*** *Consultations are launched early, allow adequate time, and supply the information needed for substantive input.*

Current legislation does not set strong minimum consultation periods; the 2026 draft Public Participation Law would introduce clearer minimums. Practice varied considerably between dossiers. The anti-SLAPP draft law, for example, was consulted through a defined process linked to the Roadmap on democratic institutions (CSO Meter, 2026).

By contrast, Law No. 100/2025 was adopted in bulk on 30 April 2025, one day after being tabled, without any public consultation, in breach of Moldova's legislation on transparency in decision-making (CSO Meter, 2025d). Promo-LEX has repeatedly pointed to a broader pattern of normative acts approved through non-transparent procedures without genuine consultation (Promo-LEX, 2026). CSOs, particularly smaller and grassroots organizations, were thus excluded from providing input on a significant legislative package.

Trend. The situation is inconsistent, with consultation practice ranging from structured processes to its complete absence on major legislation.

Score 2: The unconsulted adoption of a major legislative package, part of a broader pattern, clearly breaches the core expectation of the standard.

D3 – Policies encourage cooperation with CSOs

> ***Standard.*** *State policies actively facilitate cooperation with CSOs: there is a strategy/policy on cooperation, and transparent consultative bodies that genuinely feed into decision-making.*

The Civil Society Development Programme 2024–2027 is a dedicated government strategy for cooperation with CSOs (CSO Meter, n.d.-b),

and the sixth Open Government Action Plan, launched in February 2026, provides a second cooperation track (Moldpres, 2026). The working group on participation legislation (see D1) is an active consultative body, and in 2026 the State Chancellery launched its first grant competition for CSO capacity building, awarding two projects a total of MDL 400,000, roughly EUR 20,000 (Telegraph.md, 2026).

An independent mid-term evaluation of the Programme, carried out by the Centre for Training and Organisational Consultancy (CICO) for the CONTACT Center and presented in January 2026, concluded that it had produced procedural rather than substantive change in how the state supports and cooperates with civil society (Comunicate.md, 2026). Beyond dialogue formats and modest pilot funding, concrete support measures remain limited, and CSOs continue to report non-transparent decision-making and poor access to data as obstacles to cooperation.

Trend. The trend is mixed, as the cooperation architecture is expanding but has not yet produced systemic change, with 2026–2027 identified by the evaluation as the decisive years.

Score 3: A cooperation strategy and several active consultative structures exist, including a first direct grant line for CSOs, but the independent evaluation found mostly procedural rather than substantive change.

D4 – Free advocacy and watchdogging

> ***Standard.*** *CSOs can freely conduct advocacy, watchdog and campaigning activities to influence policy and opinion.*

No law classifies CSO advocacy as prohibited political activity. However, Article 472 of the Contravention Code ("Corruption for organised assemblies"), adopted on 30 April 2025 without consultation, penalizes providing financial means for participation in certain public assemblies (CSO Meter, 2025d).

In its March 2026 opinion, the Venice Commission compared the provision with a similar Armenian rule it had criticized for penalizing material incentives to participate in assemblies (Venice Commission, 2026). No prosecution of an advocacy CSO under the article was documented during the period, but organizations that cover participants' transport or other costs now face legal uncertainty, and the resulting chilling effect is so far anticipatory.

Trend. The situation deteriorated because of a vaguely drafted new contravention introduced without consultation.

Score 2: A vaguely drafted, unconsulted new provision creates a legal risk for CSO mobilization and advocacy financing.

D5 – Government listens

> ***Standard.*** *Public authorities give CSO and public input genuine consideration and provide reasoned, traceable feedback.*

No binding mechanism requires authorities to explain how CSO input affected a final decision; the 2026 draft Public Participation Law would introduce a first step toward such feedback. In 2025, CSOs submitted 56 contributions on 35 draft normative acts, of which about a quarter were accepted (Moldova 1, 2026).

On the most significant files, responsiveness was lower. The May 2025 Roadmaps were adopted largely unchanged (CSO Meter, 2025a), and Law No. 100/2025 was adopted without any consultation (CSO Meter, 2025d). CSOs can therefore point to a partial record of influence alongside repeated instances of being bypassed on high-salience decisions.

Trend. The trend is mixed, with a concerning pattern in which the more politically significant the file, the less CSO input shapes the outcome.

Score 2: On the most consequential files of the period, responsiveness to CSO input was limited or absent.

Conclusion

Moldova's civic space in 2025–2026 is best described as legally open but practically fragile. With a composite score of 2.8 out of 4, the country sits between "Restrictive Leaning" and "Mostly Enabling". Its strongest features are structural: CSOs can be established and operate freely, there is no "foreign agent" regime or legal restriction on foreign funding, and the governing majority has largely refrained from stigmatizing rhetoric against civil society. In regional comparison, this places Moldova among the more open environments. Yet across most standards, it is the distance between the formal framework and everyday practice that determines the score.

The EU-accession process has been the main driver of positive change, producing a modern access-to-information law, a new volunteering law, an active cooperation architecture and a participatory drafting process for a new Public Participation Law. At the same time, the response to Russian hybrid interference around the 2025 elections produced security-driven measures, including a broader definition of extremism, a new CSO suspension power and a sanction on financing participation in assemblies, often adopted quickly and without consultation. None of these tools was used against genuine CSOs during the period, but together they create latent risks. The weakest cluster is CSOs as policy makers (2.4): CSOs are consulted more often than before, yet their input rarely shapes the most politically significant decisions. The abrupt loss of US funding further exposed the sector's dependence on foreign donors and the underdevelopment of domestic philanthropy.

Future monitoring should focus on whether the Public Participation Law and the anti-SLAPP package, both approved by the Government in July 2026, are adopted by Parliament without being weakened; how the new security-related powers are applied in practice; the fate of the 2% designation mechanism in ongoing Tax Code revisions; the sector's ability to diversify its funding; and whether the Civil Society Development Programme delivers substantive rather than procedural change in its decisive final years, 2026–2027.

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