

Independent Reporting Mechanism

Action Plan Review: Republic
of Moldova 2023-2025

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Section I: Overview of the 2023-2025 Action Plan

The Republic of Moldova's fifth OGP action plan covers priority areas for the country's accession to the European Union (EU). It features promising commitments on implementation of the new access to information law and improving public participation in decision-making. Active engagement of the lead agencies and consistent collaboration with civil society will be key to successful implementation.

The Republic of Moldova's fifth action plan (2023-2025) has six commitments. Most commitments follow or expand policy areas covered in previous action plans, such as access to information, public participation, anti-corruption, and public procurement. Capacity building and skills development are cross-cutting themes for all commitments.

The European Council granted EU candidate status to the Republic of Moldova on 23 June 2022. In December 2023, the Council opened accession negotiations with the Republic of Moldova, commending its progress in meeting the objectives under its candidate status.¹ Since receiving candidate status, the government has adopted many policy documents, strategies, and action plans to align with the EU *acquis*. The need to balance these tasks has stretched the capacities of the government agencies involved in OGP, and government and civil society stakeholders see the OGP process as complementary to these reforms. At the same time, Russia's full-scale military invasion of Ukraine has impacted the resources of the public administration, with the country experiencing economic and humanitarian crises.² These internal and external factors could distract political attention away from the OGP process during implementation.

The co-creation process started in May 2023 with the establishment of a new Coordination Committee (the country's multi-stakeholder forum). The new committee differs in composition from previous committees by the involvement of high-level government officials, the increase in membership, and the balanced civil society and government representation (five government and five civil society representatives). The co-creation processes reflected the IRM's past recommendations around setting a co-creation timeline, identifying potential priorities, and revisiting the committee's composition, mandate, and governing structure. The State Chancellery collected proposals via an open questionnaire and organized a public consultation in August 2023 to discuss the draft plan and collect additional ideas.³ The government and the Council of Europe also held events with local authorities on the possibilities of engaging in the national OGP action plan and in the OGP Local program.⁴

Stakeholders praised the State Chancellery's efforts in organizing the co-creation process, given the tight deadline, limited human resources, and the challenging political context. For future action plans, stakeholders recommended extending outreach further, for example through social networks and mass media and by organizing more public meetings.⁵ These activities could take place before and during the co-creation process, as part of the preparation.

AT A GLANCE

Participating since: 2012
Action plan under review: 2023–2025
Number of commitments: 6

Overview of commitments:
 Commitments with an open government lens: 5 (83%)
 Commitments with substantial potential for results: 2 (33%)
 Promising commitments: 2

Policy areas:

Carried over from previous action plans:

- Access to information
- Public participation
- Anti-corruption
- Fiscal openness
- Public procurement

Emerging in this action plan:

- Digitization of correctional services

Compliance with OGP minimum requirements for co-creation: Yes

Civil society generally assessed the action plan positively, as it covers major priorities for the country's EU accession.⁶ However, they thought the ambition might have benefited from comprehensive actions in anti-corruption, open data, and fiscal transparency. During the co-creation process, the Coordination Committee agreed that the action plan would not copy the activities from other strategies or policy documents, but rather would take an open government approach to implementing these strategies and documents.⁷ As the government has adopted a large number of strategies in 2023, only narrow sets of activities were included in most commitments, even though the areas addressed by these commitments often include larger challenges. For example, the government withdrew a commitment on e-democracy because of its duplication with the Strategy for Digital Transformation.⁸

The IRM has identified two commitments as promising. Under Commitment 1, the State Chancellery will monitor and support the implementation of the Law on Access to Information of Public Interest. For Commitment 2, the State Chancellery has set ambitious targets for improving transparency and participation in the decision-making process. The other commitments are less ambitious. Commitment 3 could improve the digitization of the correctional services, but it is unclear if it will improve their transparency or accountability. Commitment 4 focuses on improving the Republic of Moldova's reporting on its implementation of the United Nations Convention Against Corruption, one of several anti-corruption tools the country has at its disposal. Commitment 5 aims to engage civil society in budget monitoring and the EU accession process but does not include institutional support by the government. Finally, Commitment 6 supports new regulations and policies aimed at improving transparency in public procurement, complementing the steps planned in the National Program on Developing Public Procurement 2023-2026.

Successful implementation of the action plan will require consistent work of the government, and particularly the State Chancellery as the coordinating agency. It will be critical to mobilize both governmental and non-governmental stakeholders, including those outside the Coordination Committee, to achieve the targets and ensure the timeliness and quality of implementation.⁹

¹ Council of the European Union, EU Enlargement Policy, Moldova, <https://www.consilium.europa.eu/en/policies/enlargement/moldova/>

² Republic of Moldova parliament, DECISION No. 41 of 24.02.2022 on the declaration of the state of emergency, https://www.legis.md/cautare/getResults?doc_id=130079&lang=ro

³ See <https://cancelaria.gov.md/ro/content/comitetul-de-coordonare-pentru-guvernare-deschisa-s-intrunit-sedinta>

⁴ Government of the Republic of Moldova, Informative Note to the Government Disposition on the approval of priority areas and commitments for open government for 2023-2025, https://cancelaria.gov.md/sites/default/files/9_nota_informativa_la_pgd_2023-2025.pdf

⁵ Maria Covalciuc (Association for Efficient and Responsible Governance (AGER)), Diana Enachi (IDIS "Viitorul"), Nicolae Panfil (Promo-LEX), Veronica Cretu, interviews by the IRM, January 2024.

⁶ Nicolae Panfil (Promo-LEX), Iana Spinea (TI-Moldova), Veronica Cretu (Governance and Data4Development Expert, Envoy with the Open Government Partnership, Access Info Group at the Council of Europe, Moldova4EU Diaspora Task Force), interviews by the IRM, January 2024.

⁷ Natalia Postica (State Chancellery of the Republic of Moldova), interview by the IRM, 19 December 2023; Maria Covalciuc (Association for Efficient and Responsible Governance (AGER)), interview by the IRM, 25 January 2024, Diana Enachi (IDIS "Viitorul"), interview by the IRM, 29 January 2024.

⁸ Natalia Postica (State Chancellery of the Republic of Moldova), interview by the IRM, 19 December 2023.

⁹ Ana Calinici (State Chancellery of the Republic of Moldova), Anastasiya Kozlovtsseva (Open Government Partnership), Veronica Cretu (Governance and Data4Development Expert, Envoy with the Open Government Partnership, Access Info Group at the Council of Europe, Moldova4EU Diaspora Task Force), interviews by the IRM, January 2024.

Section II: Promising Commitments in the Republic of Moldova 2023-2025 Action Plan

The following review looks at the two commitments that the IRM identified as having the potential to realize the most promising results. Promising commitments address a policy area that is important to stakeholders or the national context. They must be verifiable, have a relevant open government lens, and have modest or substantial potential for results. This review also provides an analysis of challenges, opportunities, and recommendations to contribute to the learning and implementation process of this action plan.

Table 1. Promising commitments

Promising Commitments
1. Implementation of Access to Information Law: This commitment will ensure the implementation of Law No. 148/2023 on access to information.
2. Improving consultation mechanisms in decision-making: This commitment will improve the transparency of and public participation in decision-making processes at the national and local level, and the functioning of permanent consultative platforms.

Commitment 1: Implementation of Access to Information Law (State Chancellery, Ministry of Justice)

For a complete description of the commitment, see Commitment 1 in the [Republic of Moldova Action Plan 2023-2025](#).

Context and objectives:

In June 2023, the Republic of Moldova adopted the Law on Access to Information No 148/2023, which replaced Law 982/2000 and reflected the provisions of the Council of Europe Convention on Access to Official Documents (the Tromsø Convention).¹⁰ The law entered into force in January 2024. The State Chancellery proposed this commitment to ensure the law's effective implementation.¹¹ The law is an important step in the Republic of Moldova's EU accession process. It provides an extensive list of information that public institutions must publish on their official websites.¹² The procedure for submitting information requests was simplified, with clearer rules on the forms of access to information and rules on the imposition of fees. The law also obliges information providers to register requests in a separate register. The State Chancellery is responsible for collecting and publishing aggregate data on information requests and responses. Furthermore, the law envisages more streamlined sanctions for non-compliance, removing the internal administrative appeal process and limiting the timeline for judicial reviews to a maximum of three months.

The Republic of Moldova's 2022 Freedom of Information Index by Freedom House identified systemic shortcomings in access to information, including significant gaps in the legislation and challenges in the practical application of the previous law. It called on the government to promote greater availability of information on the websites of public institutions and enhance external compliance controls through inspections, monitoring of websites, and sanctions on authorities and officials who violate the right to information.¹³ The 2023 Freedom of Information Index noted significant progress in the country's legislative framework around access to information as a result of the new law but also limited understanding of transparency principles

among public bodies (especially local authorities and state-run enterprises), which indicates a need for more monitoring, supervision, and awareness raising.¹⁴ Transparency International (TI) Moldova's 2021 report on OGP implementation found that public authorities and state-run enterprises sometimes failed to respond to information requests on the grounds of personal data protection or secrecy, and rarely place information about their activities on their webpages, as was required by the previous law.¹⁵ The CSO Meter's 2023 report mentions that information providers often unjustifiably invoke protection of personal data, protection of commercial secrets, or other types of secrecy to deny access to information.¹⁶

Access to information has been a priority for Moldovan civil society for several years.¹⁷ In line with the IRM's recommendations,¹⁸ this commitment will ensure the exercise of the right of access to information of public interest and establish a national mechanism for monitoring and evaluating the right of access to information. This commitment is expected to improve government transparency by strengthening the enforcement of the Law on Access to Information. It will also provide public information on implementation of the legal provisions by public authorities based on the monitoring results. In addition, the commitment will promote civic participation by collecting feedback from stakeholders on the implementation of the law.

Potential for results: Substantial

Based on stakeholders' feedback, the monitoring mechanism envisioned by this commitment will be key to ensure the law's implementation and to address the issues described above.¹⁹ Although the law calls for the monitoring of responses to information requests, it does not cover monitoring of proactive disclosure of information. The commitment will fill this gap by allowing the State Chancellery to track the implementation of the legal provisions and provide information holders with guidance on the information they need to publish. Furthermore, stakeholders believe that by-law regulations for official webpages will help standardize information on the official websites of information holders and ensure its publication as required by the law. On 26 September 2023, the government adopted Government Decision No. 728/2023 to update the regulatory framework for official websites of public authorities and extend the scope of regulation to social media profiles, redefine the content published on official websites, establish rules to ensure the accessibility of public information, and improve the regulatory framework for cyber security.²⁰

In addition, a manual on implementation will provide step-by-step support to public authorities, local governments, and state enterprises in implementing the new legal provisions.²¹ The training for public servants and awareness raising for citizens could also improve capacities and understanding of rights and responsibilities related to access to information. Training local administration is particularly important as small communities often lack awareness and capacity to meet their obligations around access to information.

The commitment has the potential to improve access to information and help the Republic of Moldova comply with the EU accession requirements. It provides a strong framework to guarantee the right to information and improve the scope and quality of the information disclosed to the public. Thus, the IRM assesses the commitment as having substantial potential for results.

Opportunities, challenges, and recommendations during implementation

It will be important to ensure that the State Chancellery has sufficient human and financial resources to implement the activities under this commitment. The EU-funded project "Support for structured policy dialogue, coordination of the implementation of the Association Agreement

and enhancement of the legal approximation process²² and the and the Council of Europe project "Support for Media Pluralism and Freedom of Expression"²³ are expected to support implementation, particularly the manual, public events, and training. Monitoring and capacity building for authorities in all communities in the country (around 900) might be a challenge. Civil society can play a critical role in supporting the State Chancellery in monitoring and capacity-building activities, particularly at the local level.

The Republic of Moldova could consider the following recommendations:

- **Make the online training course mandatory** for current civil servants and as part of the onboarding of new civil servants. The State Chancellery and civil society could also promote use of the manual among civil servants, as part of the training.
- **Increase the human resources of the State Chancellery** to monitor the handling of information requests and the proactive disclosure of information and include monitoring of proactive disclosure in the regulatory acts.
- **Provide information in formats that are accessible to the wider public, including underrepresented groups, in line with Government Decision No. 728/2023.** Government Decision No. 728/2023 sets out the style, visual concept, and design of official websites of public institutions. At the same time, it provides specific requirements to ensure access to the information on official websites for the public and people with disabilities. During implementation, the State Chancellery could ensure that official websites of public institutions adhere to the principles with this Government Decision. For example, the websites could be adjusted to support the use of visually impaired persons and provide sign language translation for videos. Public institutions could also adopt user-friendly formats for easy search and comprehension of information.
- **Create a unified information system for registering information requests with automated analysis of data.** The commitment calls for assessing the appropriateness of creating an automated information system (AIS) register of requests for access to information, for all authorities subject to reporting. If funds are secured to create such a system, the State Chancellery could design the anticipated register to allow users to filter statistics by state agency, time, region, etc. The system could also serve as a universal platform for submitting information requests to public administration bodies or local governments. For example, the Single Portal for Access to Information Requests in Spain allows users to submit requests and see statistics for requests in real time and provides resources for understanding how access to information works.²⁴ Armenia's platform for information requests allows the authors of requests to track the status of their request and receive responses through the platform.²⁵
- **Proactively disclose data that is most frequently requested and used by citizens and stakeholders.** The State Chancellery could consult data users and civil society on which datasets should be prioritized and the requirements for the quality of information provided. The IRM also recommends applying open data standards, allowing easier use and reuse of the data, following Directive (EU) 2019/1024 on open data.²⁶ The transposition of this directive is planned for the third quarter of 2025, according to the National Action Plan for the Accession of the Republic of Moldova to the European Union 2024-2027, approved by Government Decision No. 829/2023.²⁷ More ideas on possible reforms to improve access to information can be found in the Open Gov Guide.²⁸

Commitment 2: Improving consultation mechanisms in decision-making (State Chancellery, A.O. "IDIS Viitorul", Congress of Local Authorities)

For a complete description of the commitment, see Commitment 2 in the [Republic of Moldova Action Plan 2023-2025](#).

Context and objectives:

The Republic of Moldova has several regulations for public participation in law-making, including the Law on Transparency of Decision-Making²⁹ and the Government Decision on the mechanism for public consultations with civil society in the decision-making process.³⁰ The central platform for publishing legal drafts, [particip.gov.md](#), has operated since 2012. Previous OGP commitments have sought to strengthen e-participation and collaboration with civil society. However, adherence to the legal provisions remains inconsistent. As a rule, all public authorities must publish drafts of normative acts for consultations before their final adoption. However, they do not always provide the full package of documents, subsequent versions of the drafts, or the public's feedback on proposals.³¹ TI-Moldova reports that some draft normative acts of public interest do not entail public consultations at all, while the results of public consultations (minutes of consultative meetings and summaries of recommendations) are not always available.³² The State Chancellery reports that in 2022 around 80 percent of the normative acts were consulted on, and only 60 percent of those public consultations saw their results published. Furthermore, civil society and public interest toward [particip.gov.md](#) is low, with draft normative acts receiving few comments.³³

These problems have also been noted by international organizations. The Organisation for Economic Co-operation and Development (OECD)'s SIGMA monitoring report recommended strengthening the quality control for public consultations, including establishing institutional responsibility.³⁴ The Group of States Against Corruption (GRECO) recommended the publishing of draft legislation and all amendments and supporting documents in a timely manner, as required by law, and to follow adequate timeframes for more meaningful consultations.³⁵ The European Commission highlighted civil society participation in decision-making at all levels as one of nine priorities for the Republic of Moldova's membership in the EU.³⁶

This commitment, proposed by the State Chancellery,³⁷ aims to assess the regulations and existing digital tools and mechanisms for participation, and based on the assessment, amend the regulatory framework around public consultations and improve [particip.gov.md](#). It will also improve the functioning of permanent consultative platforms in all central public authorities, as required by the amendment to Government Decision No. 967/2016 adopted in June 2023.³⁸ These platforms serve as a space for dialogue where draft decisions, regulatory acts, and policy documents are discussed with civil society, academia, social partners, and other interested parties. The commitment envisages mapping their activities, holding workshops with the public officials responsible for the platforms, developing guidelines and indicators for their operation, and creating an inter-agency group for monitoring among public authorities (composed of persons responsible for ensuring transparent decision-making by central public authorities). Finally, activities aimed at local governments include workshops and training on decision-making transparency and citizen involvement in decision-making. The commitment is linked to the Action Plan for EU accession,³⁹ and the Civil Society Development Strategy (CSDS) adopted in 2023.⁴⁰ It is relevant to civic participation, as it entails improving mechanisms for participation, including [particip.gov.md](#) and the permanent consultative platforms.

Potential for results: Substantial

If fully implemented, this commitment has substantial potential for results. It will promote public participation in practice with improvements to the online platform, consultative bodies, and regulatory and practical measures enacted based on an in-depth assessment conducted in a participatory manner. The State Chancellery has set ambitious targets in this commitment for improving the quality and quantity of public consultations. These include increasing the publication rate for notices of normative acts and draft normative acts to 90 percent and ensuring a 100 percent publication rate for the results of public consultations (including a summary of proposals and objections to the draft decision). The proportion of the drafts that receive comments and proposals received via particip.gov.md is set to increase from 0.7 percent to 20 percent, while the target for feedback to these comments is at least 90 percent.

The needs for improving particip.gov.md will be identified through an assessment of existing digital solutions in consultation with civil society. The amendments to the regulatory framework will be determined by consulting civil society, assessing existing digital tools, and conducting a study of the existing framework. Interviewed civil society stakeholders have high expectations from the assessments of the regulatory framework and particip.gov.md, which they believe will enable more targeted solutions to increase public interest in engaging in decision-making processes.⁴¹ In addition, civil society stakeholders consider the monitoring activities important in enforcing implementation of regulations on participatory decision-making.⁴²

The commitment could also help institutionalize the work of the permanent consultative platforms across all central public institutions and help public authorities comply with the amendments to Government Decision No. 967/2016. Prior to these amendments, consultative platforms were established at the discretion of the public authority. For example, the Ministry of Justice established four consultative groups aimed at the development and implementation of sector strategies.⁴³ The inter-agency group will provide oversight over the operations of the consultative platforms. This could standardize the work of the platforms and ultimately improve the dialogue between public authorities and civil society, particularly in the early stages of drafting regulations. Meanwhile, the operational indicators for the consultative platforms (to be published in an annual report) could help the State Chancellery and the inter-agency group to monitor their efficiency.

Finally, the commitment could improve participatory practices among local governments, including through promoting usage of particip.gov.md, and providing workshops and training on open government and public participation. Stakeholders believe the coverage of local authorities is important, as traditionally the discrepancy between the legal regulations on consultations and their practical implementation has been more visible at the local level (due to lack of skills as well as fewer CSOs operating in smaller communities).⁴⁴

Opportunities, challenges, and recommendations during implementation

The success of the commitment will largely depend on the ability of the State Chancellery to improve public participation, including through regulatory amendments, improvements to particip.gov.md, promotional events, and capacity building. As the commitment includes a broad scope of measures, its full implementation might be challenging. As with Commitment 1, sufficient human and financial resources will be needed for implementation, and cooperation with other state agencies and civil society will be critical for success.

The IRM recommends the following steps for ensuring effective implementation:

- **Carry out an in-depth, qualitative assessment of the consultation mechanisms.** When assessing the effectiveness of existing consultation mechanisms,

the State Chancellery could supplement its data collection with an in-depth, qualitative assessment to learn about the root causes for their limited use, particularly particip.gov.md. For example, the State Chancellery could consult small focus groups of CSOs and citizens who have visited the platform, allowing them to share their views on how to improve the user experience. The State Chancellery could also consult a diverse range of stakeholders when determining the changes in the regulatory framework.

- **Focus on users' needs when modernizing particip.gov.md.** The State Chancellery could add options for users to subscribe to specific policy areas and receive notices of consultations around topics of interest. The platform could allow easier searching and filtering by topics, include short descriptions of drafts in a language accessible for citizens, and provide comprehensive information on each draft law, with the revised version of the drafts and information on their status. The State Chancellery could also take inspiration from other countries for enhancing particip.gov.md. For example, Estonia's system allows citizens to receive notifications about the upcoming draft legal acts, the possibility to track the progress of policy development, and a user-friendly space for co-creation of policies.⁴⁵ On Croatia's e-consultation portal, comments are linked to specific parts of the proposed act.⁴⁶ After a consultation process is finished, the comments and the government responses can be downloaded in Excel format.
- **Develop mechanisms for consultation at the early stages of drafting regulations.** CSOs mention that laws are usually prepared in collaboration with a closed circle of experts rather than sectorial organizations. As a result, CSOs must sometimes provide substantial feedback on the drafts when there is a considerable gap between the draft and their expectations. Organizing consultations at an earlier stage could help public institutions to better consider the interests of affected groups and prepare higher quality draft regulations.⁴⁷
- **Ensure the permanent consultative platforms are effective in practice.** The State Chancellery and the inter-agency group could adopt clear regulatory mechanisms and institutionalize the monitoring of the activities of the permanent consultative platforms.
- **Have an open and competitive selection of members to the permanent consultative platforms.** There is a risk that the platforms will become pro-forma structures whose members are selected based on the preferences of the state bodies (e.g. excluding critical voices), which could restrict their effectiveness. To reduce this risk, it will be important to have an open and competitive selection of members and regular rotation of membership. Moreover, the IRM recommends collaborating with civil society to develop the guidelines for the platforms.
- **Improve public consultations mechanisms with the Parliament.** Although beyond the scope of this commitment, civil society emphasized the importance of improving legal regulations and practices of public participation in the Parliament.⁴⁸ Similar to the government, the Parliament has adopted measures to improve public participation and engagement with civil society based on the EU accession recommendations.⁴⁹ The rules of procedures of the Parliament require consultations on legislative drafts with the public and publication of the consultation results. CSOs and the EU mention a need to integrate public consultation mechanisms in the Parliament's rule of procedure and ensure implementation of public consultation requirements in practice.⁵⁰ In future OGP action plans, the Republic of Moldova could invite the Parliament to add commitments as part of a separate Open Parliament action plan.⁵¹

Other commitments

Other commitments that the IRM did not identify as promising commitments are discussed below. This review provides recommendations to contribute to the learning and implementation of these commitments.

Under Commitment 3, the Ministry of Justice will create a unified system to standardize data collection on detained, arrested, and convicted persons. There is currently limited interoperability between the data collection and management practices of the penitentiary and probation institutions (i.e., prisons, police, the courts, and the Prosecutor's Office), while some institutions still maintain data in paper format, which hinders the work of these institutions.⁵² The long-term aim is to increase the accountability and transparency of the penitentiary and probation systems. However, access to the data in question is restricted to the Ministry of Justice and other relevant institutions and the commitment does not include a public-facing element, such as publishing statistical data. The Ministry of Justice plans to produce indicators for monitoring the performance of the penitentiary and probation systems which, together with the establishment of digital systems and automated reporting, could improve access to statistical data.⁵³

Commitment 4 was inspired by the United Nations Convention Against Corruption (UNCAC) Coalition's call to sign the Transparency Pledge, presented at the OGP 2023 Global Summit.⁵⁴ It aims to increase transparency and civil society participation in the implementation and self-reporting of the Republic of Moldova's UNCAC review. While this commitment could help the Republic of Moldova's UNCAC reporting, it represents a modest improvement to the country's anti-corruption practices. For greater impact, the IRM recommends applying a similar approach of transparency and participation to other national anti-corruption policies, such as the National Integrity and Anti-Corruption Program 2024-2028 and the recommendations of GRECO.

Commitment 5 entails mobilizing three CSO platforms (comprising 75 CSOs) to support budget monitoring at the central and local levels, in the context of the Republic of Moldova's accession to the EU. The commitment does not explicitly involve any government institutions, which could undermine its sustainability. The IRM recommends working toward more sustainable transparency and participation in budgetary processes and in the implementation of the EU association agenda. This could involve taking steps to engage government institutions, for example through regulations on implementing participatory budgeting processes, or by creating new institutional mechanisms for participation of CSOs in budgetary processes.

Commitment 6 involves publishing data on low-value procurement, and training civil servants, particularly procurement specialists, on opening and reporting procurement data. Although access to public procurement data on MTender has improved in recent years, not all data is published, open data standards are not always followed, and information on post-tender stages is not available.⁵⁵ The OECD's Baseline Report of the Fifth Round of Monitoring of Anti-Corruption Reforms in Moldova (published in March 2024) found that most procurement data is still not published centrally or in machine-readable formats (benchmarks 5.4.3 and 5.4.4).⁵⁶ The National Program on Developing Public Procurement 2023-2026 will address these deficiencies.⁵⁷ As the Coordination Committee preferred to not copy activities from other policy documents, the Committee proposed this commitment to address issues not directly covered by this program. Civil society stakeholders expect this commitment to increase the transparency of low-value procurement data, as the Public Procurement Agency (PPA) will include this data in its quarterly and annual reports.⁵⁸ Moreover, there is a shortage of procurement skills among the

staff in many public authorities, especially in smaller ones.⁵⁹ The training could improve understanding of transparency and open data principles among civil servants and build their capacities in preparing and submitting documentation on contracting and post-contract stages. However, the IRM assesses the potential for results as modest, as the commitment involves a narrow set of activities for public procurement transparency. The commitment mentions that the PPA will include low-value procurement data in official procurement statistics but does not specify how often or where the PPA will publish this data. For long-term sustainability, the PPA could update its reporting regulations to mandate the publication of low-value procurement data in its procurement reports. In addition, the PPA could work with CSOs to incorporate topics of transparency, access to information, and open contracting into the training programs for procurement officers.

¹⁰ European Commission, Commission Staff Working Document, Republic of Moldova 2023 Report, SWD(2023) 698 final, Brussels, 8 November 2023, https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_698%20Moldova%20report.pdf; Action Plan for the implementation of the measures proposed by the European Commission in its Opinion on the application for the accession of the Republic of Moldova to the European Union, approved by the National Commission for European Integration, 4 August 2022, https://presedinte.md/app/webroot/uploaded/plan_cnie_04.08.2022.pdf

¹¹ Minutes No 2 of the meeting of the Open Government Coordination Committee, 10 July 2023, https://cancelaria.gov.md/sites/default/files/proces_verbal_nr.2_ccgd_10.07.2023.pdf

¹² Republic of Moldova, Law No. 148 of 09-06-2023 on access to information of public interest, https://www.legis.md/cautare/getResults?doc_id=137908&lang=ro

¹³ Freedom of Information Index: Measuring Transparency of Public Institutions in Moldova, Edition 2022, https://freedomhouse.org/sites/default/files/2022-12/fh-Moldova_Access-to-Info-Report-2022_Eng-v5_0.pdf

¹⁴ Freedom of Information Index: Measuring Transparency of Public Institutions in Moldova, Edition 2023, https://freedomhouse.org/sites/default/files/2023-12/fh-Moldova_Access-to-Info-Report-12-2023_Eng.pdf

¹⁵ Transparency International Moldova, Open governance in the Republic of Moldova: what issues remain on the agenda? Executive Summary, https://www.transparency.md/wp-content/uploads/2021/05/TI_Moldova_Monitoring_Open_Governance_Action_Plan_2019-2020_Executive_Symmary.pdf

¹⁶ CSO Meter: A compass to conducive environment and CSO empowerment: Moldova 2023 Country Report, Chisinau, 2023, https://csometer.info/sites/default/files/2023-12/CSO%20Meter%20Moldova%20Country%20Report%202023%20EN_1.pdf

¹⁷ Open Government Partnership, Republic of Moldova Transitional Results Report 2019-2020, <https://www.opengovpartnership.org/documents/republic-of-moldova-transitional-results-report-2019-2020/>

¹⁸ Open Government Partnership, Republic of Moldova Design Report 2019-2020, <https://www.opengovpartnership.org/documents/moldova-design-report-2019-2020/>

¹⁹ Nicolae Panfil (Promo-LEX), Adrian Ermurachi (Institute for European Policies and Reforms (IPRE)), Maria Covalciuc (Association for Efficient and Responsible Governance (AGER)), Andrei Lutenco (Center for Policies and Reforms (CPR)), Nadejda Burciu (Ministry of Justice), interviews by the IRM, January 2024.

²⁰ Republic of Moldova, Government Decision No. 728 of 09-26-2023 regarding the official websites of public authorities and institutions and the minimum requirements regarding their social media profiles, https://www.legis.md/cautare/getResults?doc_id=139673&lang=ro.

²¹ Ianina Spinea (TI-Moldova), Maria Covalciuc (Association for Efficient and Responsible Governance (AGER)), Viorel Rusu (Congress of Local Authorities of Moldova), interviews by the IRM, January 2024.

²² The European Union for the Republic of Moldova, <https://eu4moldova.eu/projects/eu-project-page/?id=1608>

²³ Council of Europe, Support for Media Pluralism and Freedom of Expression in the Republic of Moldova, <https://www.coe.int/en/web/chisinau/media-pluralism-and-freedom-of-expression>

²⁴ See: SAIP, Statistics by institution, <https://saip.gob.do>

²⁵ See: Armenia's Unified portal for online requests, <https://e-request.am/en>

²⁶ EUR-Lex, Open data and the reuse of public-sector information, <https://eur-lex.europa.eu/EN/legal-content/summary/open-data-and-the-reuse-of-public-sector-information.html>

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⁵⁶ OECD, Baseline Report of the Fifth Round of Monitoring of Anti-Corruption Reforms in Moldova, 14 March 2024, pgs. 84-85, <https://www.oecd-ilibrary.org/docserver/25fc47ac-en.pdf?expires=1710957278&id=id&accname=guest&checksum=CD31999DCBC3DB11D5CB7A4B86255FD9>

⁵⁷ Republic of Moldova, Government Decision, No. 625 of 30.08.2023 on the approval of the National Program for the Development of the Public Procurement System for the years 2023-2026, https://www.legis.md/cautare/getResults?doc_id=139302&lang=ro

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⁵⁹ World Bank, Moldova - Assessment of the Public Procurement System: Main Report (English), <http://documents.worldbank.org/curated/en/881221617692348590/Main-Report>

Section III. Methodology and IRM Indicators

The purpose of this review is not an evaluation. It is intended as a quick, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, a high priority for country stakeholders, a priority in the national open government context, or a combination of these factors.

The three IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges IRM identifies to inform a stronger implementation process.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In the Action Plan Review, the IRM follows a filtering and clustering process to identify promising reforms or commitments:

Step 1: Determine what is reviewable based on the verifiability of the commitment as written in the action plan.

Step 2: Determine if the commitment has an open government lens. Is it relevant to OGP values?

Step 3: Review commitments that are verifiable and have an open government lens to identify if certain commitments need to be clustered. Commitments that have a common policy objective or contribute to the same reform or policy issue should be clustered. The potential for results of clustered commitments should be reviewed as a whole. IRM staff follow these steps to cluster commitments:

- a. Determine overarching themes. If the action plan is not already grouped by themes, IRM staff may use OGP's thematic tagging as reference.
- b. Review commitment objectives to identify commitments that address the same policy issue or contribute to the same broader policy or government reform.
- c. Organize commitments into clusters as needed. Commitments may already be organized in the action plan under specific policy or government reforms.

Step 4: Assess the potential for results of the clustered or standalone commitment.

Filtering is an internal process. Data for individual commitments is available in Annex 1. In addition, during the internal review process of this product, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM's International Experts Panel (IEP).

As described earlier, IRM relies on **three key indicators** for this review:

I. Verifiability

- **Yes, specific enough to review:** As written in the action plan, the stated objectives and proposed actions are sufficiently clear and include objectively verifiable activities to assess implementation.
- **No, not specific enough to review:** As written in the action plan, the stated objectives and proposed actions lack clarity and do not include explicitly verifiable activities to assess implementation.
- Commitments that are not verifiable will be considered not reviewable, and further assessment will not be carried out.

II. Open government lens

This indicator determines if the commitment relates to the open government values of transparency, civic participation, or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance by responding to the following guiding questions. Based on a close reading of the commitment text, the IRM first determines whether the commitment has an open government lens:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The IRM uses the OGP values as defined in the Articles of Governance. In addition, the following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform or influence decisions? Will the government create, enable, or improve participatory mechanisms for minorities or underrepresented groups? Will the government enable a legal environment to guarantee freedoms of assembly, association, and peaceful protest?
- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

III. Potential for results

The IRM adjusted this indicator—formerly known as the “potential impact” indicator—to take into account the feedback from the IRM Refresh consultation process with the OGP community. With the new results-oriented strategic focus of IRM products, the IRM modified this indicator to lay out the expected results and potential that would be verified in the IRM Results Report after implementation. Given the purpose of this Action Plan Review, the assessment of potential for results is only an early indication of the possibility the commitment has to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area.

The scale of the indicator is defined as:

- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training, or pilot projects.
- **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review was prepared by the IRM in collaboration with Tatevik Margaryan and was externally expert reviewed by Andy McDevitt. The IRM methodology, quality of IRM products, and review process are overseen by IRM's IEP. For more information, see the IRM Overview section of the OGP website.¹

¹ IRM Overview: <https://www.opengovpartnership.org/irm-guidance-overview/>

Annex 1. Commitment by Commitment Data¹

<p>Commitment 1: Implementation of Access to Information Law</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Substantial
<p>Commitment 2: Improving Consultation Mechanisms in Decision-Making</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Substantial
<p>Commitment 3: Digitization of Correctional Services</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? No • Potential for results: Unclear
<p>Commitment 4: Transparency of UNCAC implementation</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 5: Budget Monitoring by CSOs</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 6: Open Data across the Public Procurement Cycle</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest

¹ **Editorial notes:**

1. For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, rather than the individual commitments.
2. Commitment short titles may have been edited for brevity. For the complete text of commitments, please see Republic of Moldova Action Plan 2023-2025 at <https://www.opengovpartnership.org/documents/moldova-action-plan-2023-2025/>.

Annex 2: Action Plan Co-Creation

OGP member countries are encouraged to aim for the full ambition of the OGP Participation and Co-Creation Standards that came into force on 1 January 2022.⁶² The IRM assesses all countries that submitted action plans from 2022 onward under the updated standards. Table 2 outlines the extent to which the countries' participation and co-creation practices meet the minimum requirements that apply during development of the action plan.

OGP instituted a 24-month grace period to ensure a fair and transparent transition to the updated standards. Action plans co-created and submitted by 31 December 2023 fall within the grace period. The IRM will assess countries' alignment with the standards and their minimum requirements.⁶³ However, countries will only be found to be acting contrary to process if they do not meet the minimum requirements for action plans co-created in 2024 and onwards.

Please note that, according to the OGP National Handbook, countries implementing four-year action plans must undertake a refresh process at the two-year mark. Countries are expected to meet minimum requirements 3.1 and 4.1 during the refresh process.⁶⁴ IRM assessment of the refresh process will be included in the Results Report.

Table 2. Compliance with minimum requirements

Minimum requirement	Met during co-creation?	Met during implementation?
1.1 Space for dialogue: The State Chancellery renewed the MSF (the Coordination Committee) in May 2023. The Committee includes five civil society and five government members, as well as nine alternate members serving as replacements as needed. ⁶⁵ The Congress of Local Authorities is included, formally, in the list of civil society members. The Committee's information and regulations are available on the government's OGP webpage. ⁶⁶ The regulations state that the meetings shall take place at least quarterly. The Committee held three meetings during the co-creation period. ⁶⁷	Yes	<i>To be assessed in the Results Report</i>
2.1 OGP website: The State Chancellery maintains a page on its website dedicated to OGP (no login or registration is required). ⁶⁸ The webpage includes documents related to the fifth action plan and previous action plans.	Yes	<i>To be assessed in the Results Report</i>
2.2 Repository: The OGP webpage serves as a repository. ⁶⁹ It includes documentation on co-creation processes, semi-annual and annual implementation reports for the previous action plans along with links to relevant websites for some activities. There is no information yet on the implementation of the fifth action plan. While the repository is comprehensive, not all information is available in a user-friendly format during the co-creation process, as some documents are scanned PDFs. In February 2024, the State Chancellery reviewed all information available on repository for compliance with accessibility standards and replaced non-compliant documents in order to meet the requirements for publishing information content on official websites.	Yes	<i>To be assessed in the Results Report</i>
3.1 Advanced notice: The State Chancellery published on the OGP website the calendar for the elaboration of the fifth action plan along	Yes	Not applicable

<p>with the minutes of the Coordination Committee’s meeting on 18 May 2023 where the co-creation process was discussed.⁷⁰ The collection of proposals started a week later, on 25 May 2023, and lasted over six weeks, until 10 July 2023. The IRM considers the seven weeks between the publication of the calendar (18 May 2023) and the end of the call for proposals (10 July 2023) to be sufficient advanced notice for the start of the co-creation process. The call for proposals was published in the News section of the website.⁷¹</p>		
<p>3.2 Outreach: The State Chancellery organized a public event on 4 May 2023 to announce the relaunch of the Coordination Committee and the initiation of a new co-creation cycle.⁷² The State Chancellery launched the call for proposals on 25 May 2023 with a link to a questionnaire.⁷³ In addition, the Council of Europe, under the project "Strengthening Dialogue and Open and Ethical Local Governance in the Republic of Moldova", held a series of events on open government with representatives of local public authorities, discussing their participation in the co-creation process of the action plan.⁷⁴ CSO members of the Coordination Committee also disseminated information on the co-creation process among their networks.⁷⁵</p>	<p>Yes</p>	<p>Not applicable</p>
<p>3.3 Feedback mechanism: The State Chancellery’s call for proposals included a questionnaire (Google Form)⁷⁶ published on the government OGP website⁷⁷ and on particip.gov.md,⁷⁸ and sent to central and local public authorities, autonomous authorities, CSO platforms, and directly to CSOs.⁷⁹ The collection of proposals lasted from 25 May 2023 to 10 July 2023, with 70 responses collected.⁸⁰ A consultation was held in the Government House on 23 August 2023 to discuss suggestions on the draft action plan. Participation in this consultation was invitation-based.⁸¹</p> <p>The State Chancellery sent the draft action plan to governmental bodies and CSOs in September 2023 with a request for feedback within 10 working days.⁸² In parallel, the draft was published on particip.gov.md for public comment from 12-27 September 2023. The action plan was finalized at the Coordination Committee meeting on 6 October 2023.⁸³</p>	<p>Yes</p>	<p>Not applicable</p>
<p>4.1 Reasoned response: The State Chancellery published the responses to the questionnaire on the OGP website in a table format.⁸⁴ In a separate document, the State Chancellery published a table of proposals with feedback based on the outcomes of the Coordination Committee meeting in July 2023.⁸⁵ It also published 10 proposals presented during the public consultation in August 2023 in a table, outlining the decisions and justifications for accepting or rejecting each proposal.⁸⁶ The State Chancellery published 60 comments received from the state administration bodies and CSOs after the draft’s dissemination on the OGP webpage on 10 October 2023, along with feedback (after the Coordination Committee reviewed them).⁸⁷</p>	<p>Yes</p>	<p>Not applicable</p>
<p>5.1 Open implementation: The IRM will assess whether meetings were held with civil society stakeholders to present implementation results and enable civil society to provide comments in the Results Report.</p>	<p>Not applicable</p>	<p><i>To be assessed in the Results Report</i></p>

The renewed Coordination Committee includes high-level officials as members (state secretaries of government agencies), which demonstrates the Republic of Moldova’s political commitment

to the OGP process. The composition of the Committee was discussed at a meeting in April 2023 with participation of state authorities and civil society representatives, including the members of the previous Committee.⁸⁸ One CSO member was selected from the previous Committee, three were selected by the Eastern Partnership Civil Society Forum, and one was invited from the Congress of Local Authorities of Moldova. This selection procedure helped to secure better representation of civil society and engagement of local governments in the OGP process.

The opportunities for participation in the co-creation were sufficient, although stakeholders mentioned that outreach could have been extended through social networks, during public meetings, and mass media.⁸⁹ Stakeholders also recommended starting the next co-creation process earlier, to avoid a concentration of meetings during the summer months, and to provide more advanced notice for consultation events.⁹⁰

Based on the co-creation process, the IRM recommends taking the following steps in the future:

- Carry out large-scale awareness raising on OGP, not only during the co-creation of the next action plan but also during the implementation of the current plan. This could be achieved through user-friendly infographics, videos, talk shows, and interviews reflecting on OGP values, priority areas, and the country's achievements and current plans in the framework of its participation in OGP;
- Consider broadening the range of stakeholders involved to cover the private sector and the media. These groups could serve as resourceful partners in awareness raising and in improving the ambition of future commitments around OGP activities where they have expertise, such as digital platform creation and monitoring access to information;
- The OGP website could allow for easy search and filtering of information, include options for providing feedback on documents, and cover up-to-date information on the Coordination Committee. The State Chancellery and the Coordination Committee could also set up a dedicated OGP Facebook page for greater communication.
- Start the co-creation process earlier to engage a broader range of stakeholders and allow more time for consultations on the draft documents. Consider organizing open (rather than invitation-only) consultation events to allow any interested party to participate.

⁶² 2021 OGP Participation and Co-Creation Standards: <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>

⁶³ IRM Guidelines for the Assessment of Minimum Requirements:

<https://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements/>

⁶⁴ OGP National Handbook 2022, Section 2.3: <https://www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2022/>

⁶⁵ Annex No. 1 to Decision No. 1 of 18 May 2023, Nominal composition of the Open Government Steering Committee and alternate members, <https://cancelaria.gov.md/sites/default/files/componenta.pdf>

⁶⁶ Government of the Republic of Moldova, State Chancellery, Open Government, <https://cancelaria.gov.md/ro/apc/guvernare-deschisa>

⁶⁷ Annex No. 2 to Decision No. 1 of 18 May 2023, Regulation of the organization and functioning of the Coordination Committee for Open Government,

https://cancelaria.gov.md/sites/default/files/regulamentul_comitetului_de_coordonare_pentru_guvernare_deschisa.pdf

⁶⁸ Government of the Republic of Moldova, State Chancellery, Open Government, <https://cancelaria.gov.md/ro/apc/guvernare-deschisa>

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⁷⁰ Government of the Republic of Moldova, State Chancellery, The process of co-creation of the Action Plan, <https://cancelaria.gov.md/node/4374>, OGP Action Plan development calendar,

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⁷¹ Government of the Republic of Moldova, State Chancellery, The Coordination Committee for Open Government announces the initiation of the process of developing the Action Plan for an open government for the years 2023-2025,

<https://cancelaria.gov.md/ro/content/comitetul-de-coordonare-pentru-guvernare-deschisa-anunta-initierea-procesului-de-elaborare>

⁷² Government of the Republic of Moldova, State Chancellery, The activity of the Coordination Committee for Open Government was relaunched, with a new composition, 05 May 2023, <https://cancelaria.gov.md/ro/content/fost-relansata-activitatea-comitetului-de-coordonare-pentru-guvernare-deschisa-intr-o-noua>

⁷³ Government of the Republic of Moldova, State Chancellery, The Coordination Committee for Open Government announces the initiation of the process of developing the Action Plan for an open government for the years 2023-2025, 25 May 2023, <https://cancelaria.gov.md/ro/content/comitetul-de-coordonare-pentru-guvernare-deschisa-anunta-initierea-procesului-de-elaborare>

⁷⁴ Government of the Republic of Moldova, Informative Note to the Government Disposition on the approval of priority areas and commitments for open government for 2023-2025,

https://cancelaria.gov.md/sites/default/files/9_nota_informativa_la_pgd_2023-2025.pdf

⁷⁵ Natalia Postica (State Chancellery of the Republic of Moldova), interview by the IRM, 19 December 2023; Diana Enachi (IDIS “Viitorul”), interview by the IRM, 29 January 2024; Maria Covalciuc (Association for Efficient and Responsible Governance (AGER)), interview by the IRM, 25 January 2024.

⁷⁶ Government of the Republic of Moldova, State Chancellery, The Coordination Committee for Open Government announces the initiation of the process of developing the Action Plan for an open government for the years 2023-2025, 25 May 2023, <https://cancelaria.gov.md/ro/content/comitetul-de-coordonare-pentru-guvernare-deschisa-anunta-initierea-procesului-de-elaborare>

⁷⁷ Government of the Republic of Moldova, State Chancellery, The Coordination Committee for Open Government announces the initiation of the process of developing the Action Plan for an open government for the years 2023-2025, <https://cancelaria.gov.md/ro/content/comitetul-de-coordonare-pentru-guvernare-deschisa-anunta-initierea-procesului-de-elaborare>

⁷⁸ Particip.gov.md, Announcement of the initiation of the process of drawing up the Open Government Action Plan for the years 2023-2025, 25 May 2023-10 July 2023, <https://particip.gov.md/ro/document/stages/anunt-de-initiere-a-procesului-de-elaborare-a-planului-de-actiuni-pentru-o-guvernare-deschisa-pentru-anii-2023-2025/10553>

⁷⁹ Natalia Postica (State Chancellery of the Republic of Moldova), interview by the IRM, 19 December 2023.

⁸⁰ Government of the Republic of Moldova, Informative Note to the Government Disposition on the approval of priority areas and commitments for open government for 2023-2025,

https://cancelaria.gov.md/sites/default/files/9_nota_informativa_la_pgd_2023-2025.pdf

⁸¹ Minutes of the public consultation meeting on the elaboration of the Action Plan for Open Government 2023-2025, 23 August 2023, https://cancelaria.gov.md/sites/default/files/3_proces_verbal_23.08.2023_0.pdf ; Natalia Postica (State Chancellery of the Republic of Moldova), correspondence with the IRM, 23 January 2023.

⁸² Republic of Moldova, Letter of State Secretary of State Chancellery No. 24-78-9688, 12 September 2023, https://cancelaria.gov.md/sites/default/files/solicitare_de_avizare_12.09.2023.pdf

⁸³ Minutes No. 3 of the meeting of the Coordination Committee for Open Government, https://cancelaria.gov.md/sites/default/files/2_proces_verbal_nr.3_din_06.10.2023.pdf

⁸⁴ Problems and proposals identified in questionnaire responses, https://cancelaria.gov.md/sites/default/files/7_propuneri_parvenite_conform_chestionarului.pdf

⁸⁵ Problems and proposals identified in questionnaire responses with respective decisions, https://cancelaria.gov.md/sites/default/files/sinteza_propunerilor_chestionar_iulie_2023.pdf

⁸⁶ Issues and proposals summarized during the public consultation meeting on 23 August 2023, https://cancelaria.gov.md/sites/default/files/3_proces_verbal_23.08.2023_0.pdf

⁸⁷ Summary of objections and proposals (recommendations) to the project Government Provision on the Approval of the Action Plan for Open Government 2023-2025, https://cancelaria.gov.md/sites/default/files/8_sinteza_propunerilor_dupa_avizare_30.09.2023.pdf

⁸⁸ Natalia Postica, correspondence with the IRM, 06 February 2024; Diana Enachi (IDIS “Viitorul”), interview by the IRM, 29 January 2024.

⁸⁹ Maria Covalciuc, Diana Enachi, Nicolae Panfil, and Veronica Cretu, interviews by the IRM, January 2024.

⁹⁰ Anastasiya Kozlovtsseva, Nicolae Panfil, and Andrei Lutenco, interviews by the IRM, January 2024.