

# Independent Reporting Mechanism

Results Report: Republic  
of Moldova 2023–2025

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## Executive Summary

The Republic of Moldova's 2023–2025 OGP action plan saw high levels of implementation and strong government-civil society collaboration. Early results are visible in participatory lawmaking reforms and improved access-to-information tools, supporting the country's alignment with European Union accession requirements. Changes in its multi-stakeholder forum, such as involving additional civil society organizations beyond its core membership, expanded awareness of and participation in the OGP process.

### Implementation

The Republic of Moldova's fifth action plan for 2023–2025 initially comprised six commitments. It was amended in December 2024 to add a commitment concerning data publication and reuse. Most commitments expanded on policy areas covered in previous action plans, such as access to information, public participation, anti-corruption, and public procurement, and involved capacity building and skills development for public officials. Several commitments entailed the adoption of new legislation and regulations, or the implementation of legislation adopted shortly before the action plan cycle, such as the Law on Access to Information.

The commitments had a high level of completion, with five out of seven substantially or fully completed.<sup>1</sup> Policy areas assessed as promising in the IRM Action Plan Review—on access to information (Commitment 1) and public participation in decision-making (Commitment 2)—generated the most notable early results.<sup>2</sup> These commitments helped operationalize open government principles that civil society has advocated for many years. They also constitute milestones in the Republic of Moldova's European Union (EU) accession process under Cluster 1: Fundamentals of the accession process.<sup>3</sup>

As a result of Commitment 1, the State Chancellery and civil society organizations (CSOs) implemented a wide range of activities to support the effective implementation of Law No. 148 of 2023 on Access to Information. Consequently, public authorities now have a

### At a Glance

#### LEVEL OF COMPLETION

5/7

Complete or substantially complete commitments

#### EARLY RESULTS

5/7

Commitments with early results

2/7

Commitments with significant results

#### KEY OBSERVATIONS

- Strong political commitment, incentivized by EU integration, led to strong early results in access to information and public participation.
- Government-civil society collaboration led to strong implementation of commitments and greater uptake of open government practices in the public sector.
- International support, particularly EU financing, ensured a high level of implementation for transparency-focused commitments.

Met the minimum requirements during implementation: Yes

more consistent way to provide public information, while citizens have better access to data on access to information requests.

Under Commitment 2, the State Chancellery engaged civil society to design a new law on public participation in decision-making. While the law is expected to come into force in January 2027, some of its reforms have already been introduced to public officials through training and guidance. The State Chancellery has also submitted Commitments 1 and 2 as Open Government Challenges. Commitment 7, added as an amendment, resulted in the adoption of a regulatory framework on open data and the reuse of public sector information, transposing the EU Directive 2019/1024 on Open Data and the Reuse of Public Sector Information.

Commitments 1, 2, 5, 6 and 7 set a strong foundation for expanding transparency, participation, and accountability. Moving forward, more efforts will be needed to translate these policy changes into practical impact. The commitments also contributed to strategic documents that the Moldovan Government has published on EU accession, civil society development and collaboration, anti-corruption, and digital transformation. CSOs were involved in implementing or supporting certain milestones, including through training sessions, with Commitment 5 being fully implemented by several CSOs.

The high level of government dedication and collaboration with civil society were key to the strong completion level of the action plan. In addition, the EU accession process and related funding enabled actors to sustain focus on OGP implementation.

### **Participation and Co-Creation**

The State Chancellery remained the OGP secretariat and point of contact in the Republic of Moldova. The country's multi-stakeholder forum is the Coordination Committee, composed of ten members—five each from civil society and government. The co-creation process for the action plan followed past IRM recommendations by establishing a timeline, revisiting the multi-stakeholder committee, gathering priorities through an open questionnaire and public consultations, and offering reasoned responses. Despite tight deadlines, limited resources, and a difficult political context, stakeholders praised the State Chancellery's efforts to organize the process and engage both national and local actors.<sup>4</sup>

The committee met quarterly during the implementation period. The participation of state secretaries—equivalent to deputy ministers—in committee meetings ensured high-level political buy-in for the action plan.<sup>5</sup> Because of the selection procedure, civil society members represent broader coalitions of CSOs. In addition, the involvement of the Congress of Local Authorities<sup>6</sup> in the committee created opportunities for broader dissemination and coordination for commitments requiring action from local governments.

Early in the implementation process, the committee opened its meetings to a larger group of stakeholders to ensure broader participation from CSOs and other interested parties. This innovation increased awareness of and participation in the OGP process, generated additional comments, inputs and ideas, and strengthened oversight of the plan's implementation.<sup>7</sup> Civil society stakeholders noted the high level of engagement from the State Chancellery and its focus on maintaining the pace of implementation despite political and institutional constraints.<sup>8</sup>

### **Implementation in Context**

The European Council granted EU candidate status to the Republic of Moldova in June 2022 and opened accession negotiations with the country in December 2023. EU candidate status contributed to the revival of the country's OGP process after a three-year gap following the

previous plan’s conclusion in 2020 and shaped the priorities of the 2023–2025 action plan. Another relevant important development before the action plan was the adoption of the Law No 148 of 2023 on Access to Information of Public Interest in June 2023. The State Chancellery included Commitment 1 to ensure the law’s effective implementation.

During implementation, the Republic of Moldova operated in a challenging political and security environment. Russia’s ongoing war against Ukraine has deep political and economic repercussions.<sup>9</sup> At the same time, the Republic of Moldova held presidential elections and an EU integration referendum in 2024, followed by parliamentary elections in 2025, further straining administrative capacity and demanding the attention of decision-makers. Destabilization attempts by Russian actors and proxies—including disinformation, vote buying, illicit financing, and other hybrid attacks—placed sustained pressure on state institutions and weakened societal trust.<sup>10</sup>

Economic conditions also remained fragile. Ukraine’s decision in January 2025 not to renew the contract for transiting Russian natural gas transit to Europe and the broader effects of the war led to energy price shocks, higher fiscal costs, and continued vulnerability, despite the Republic of Moldova securing energy supplies through EU imports.<sup>11</sup> The war also led to the presence of a high number of Ukrainian refugees in the Republic of Moldova, straining the country’s resources.

Amid pressures linked to Russia’s military invasion of Ukraine, the government maintained a strong focus on EU integration, with many OGP commitments aligned with accession-related reforms and associated funding frameworks.<sup>12</sup> However, reductions in United States Agency for International Development (USAID) and other US government funding in early 2025 directly affected many development and governance programs and organizations.<sup>13</sup> Certain commitments included in the action plan—such as Commitment 3 to digitalize correctional services—were temporarily affected, although the government found a different source of funding to cover the gaps. Although the action plan was implemented amid heightened geopolitical, economic, and electoral pressures, the Coordination Committee specifically and the OGP process generally provided an expression of vibrant civic space.<sup>14</sup>

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<sup>1</sup> “Self-evaluation report,” State Chancellery, 10 February 2026, <https://gov.md/sites/default/files/users-media/media-15/Raport%20de%20autoevaluare%20a%20implementarii%20PAGD%202023-2025.pdf>.

<sup>2</sup> “IRM Action Plan Review: Republic of Moldova 2023–2025,” Open Government Partnership, May 2024, [https://www.opengovpartnership.org/wp-content/uploads/2024/05/Moldova\\_Action-Plan-Review\\_2023-2025\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/05/Moldova_Action-Plan-Review_2023-2025_EN.pdf).

<sup>3</sup> “Republic of Moldova 2025 Report,” European Commission, 4 November 2025, [https://enlargement.ec.europa.eu/document/download/23fa6af0-89b3-4532-a3d9-d1638727d14c\\_en?filename=moldova-report-2025.pdf](https://enlargement.ec.europa.eu/document/download/23fa6af0-89b3-4532-a3d9-d1638727d14c_en?filename=moldova-report-2025.pdf); “Shadow Report No 2: Assessment of the progress of the Republic of Moldova in implementing the European Commission’s recommendations on the Fundamentals Cluster in the context of EU accession,” Expert-Grup, 29 July 2025, <https://www.euromonitor.md/en/raportul-de-monitorizare-independenta-nr-2-evaluarea-progresului-republicii-moldova-in-implementarea-recomandarilor-comisiei-europene-privind-clusterul-elementele-fundamentale-in-contextul-aderarii-l>.

<sup>4</sup> “IRM Action Plan Review: Republic of Moldova 2023–2025,” Open Government Partnership.

<sup>5</sup> “Composition of the 2023–2025 Coordination Committee is available at: [https://gov.md/sites/default/files/Filepdf/Componenta%20actuala\\_27.05.2025.pdf](https://gov.md/sites/default/files/Filepdf/Componenta%20actuala_27.05.2025.pdf).

<sup>6</sup> See: <https://www.calm.md>.

<sup>7</sup> Natalia Postica (OGP Point of Contact at the State Chancellery), interview by IRM researcher, 26 January 2026.

<sup>8</sup> Viorel Rusu (Congress of Local Authorities), Diana Enache (IDIS Viitorul), Nicolae Panfil (PromoLex), interviews by IRM researcher, 30 January–6 February 2026.

<sup>9</sup> “Socio-economic impact on the Moldovan economy since the war in Ukraine,” Norwegian Refugee Council, 24 November 2023, <https://www.nrc.no/resources/reports/socio-economic-impact-on-the-moldovan-economy-since-the-war-in-ukraine>.

<sup>10</sup> Laura Thornton, “Analysis: Pre-Election Mission to the Republic of Moldova,” McCain Institute, 18 September 2025, <https://www.mccaininstitute.org/resources/reports/analysis-pre-election-mission-to-moldova>; Ancuta Hanssen, “How

Russia tried to manipulate Moldova’s election—and what it reveals,” The Lowy Institute, 27 November 2025, <https://www.lowyinstitute.org/the-interpreter/how-russia-tried-manipulate-moldova-s-election-what-it-reveals>.

<sup>11</sup> “The EU offers emergency support to tackle the energy crisis in Moldova,” European Commission, 27 January 2025, [https://enlargement.ec.europa.eu/news/eu-offers-emergency-support-tackle-energy-crisis-moldova-2025-01-27\\_en](https://enlargement.ec.europa.eu/news/eu-offers-emergency-support-tackle-energy-crisis-moldova-2025-01-27_en).

<sup>12</sup> See: [https://enlargement.ec.europa.eu/moldova-report-2025\\_en](https://enlargement.ec.europa.eu/moldova-report-2025_en).

<sup>13</sup> Simion Ciocina, “Moldova: Development Set to Suffer after USAID Cutbacks,” Deutsche Welle, 1 April 2025, <https://www.dw.com/en/moldova-development-set-to-suffer-after-usaid-cutbacks/video-72110440>.

<sup>14</sup> Panfil, interview.

## Section I. Key Observations

The key observations below offer reflections from the Republic of Moldova’s fifth action plan cycle. These lessons aim to support the Republic of Moldova’s future action plans and broader open government journey.

### **Observation 1: Strong political commitment, incentivized by EU integration, led to strong early results in access to information and public participation.**

The Republic of Moldova’s EU accession process was a powerful incentive for sustained political focus on open government reforms during the action plan. The momentum fostered cross-sector collaboration in the OGP Coordination Committee, channeling resources toward tangible results, especially in areas aligned with EU transparency and governance standards. Despite this focus on EU integration, stakeholders raised the question of sustainability and proper enforcement of the commitments. Moving from changing legislation and developing new platforms to shifting institutional practices and cultures will require long-term commitment from government and non-government actors. International monitoring will continue to be important for keeping the pace of reforms, including those in the OGP action plan. Local oversight mechanisms, either institutional or through civil society monitoring, could also preserve longer-term impact.

EU accession requires rapid and massive legal and policy approximation and a cross-cutting focus on transparency and accountability. Civil society also warns that the speed at which the reform process must take place to meet the EU accession calendar should not come to the detriment of openness and participation.<sup>15</sup> Experiences from countries that have joined the EU in recent decades show that the pace of reform tends to falter, especially after accession. Moldovan stakeholders in government and civil society are building on the momentum towards institutionalizing open government practices. The OGP platform provides an additional driver for certain reforms. Leveraging the OGP process to include more ambitious anti-corruption commitments—a key area for EU accession—could provide additional impetus where collaboration between civil society and relevant institutions is less productive.

### **Observation 2: Government-civil society collaboration led to strong implementation of commitments and greater uptake of open government practices in the public sector.**

Government-civil society collaboration fostered shared ownership of the action plan, leading to strong implementation. Civil society members of commitment working groups provided expertise, monitoring, and advocacy to support implementation. For example, a working group composed of 27 members—16 of whom were from civil society—provided expertise, monitoring and advocacy for Commitment 1 on access to information.

Collaboration expanded awareness of open government values among civil servants and civil society stakeholders alike. For example, CSOs participated in studies on the existing legal framework and tools for public participation in decision making that informed the actions under Commitment 2. Civil society further supported the State Chancellery by developing guides and delivering trainings for public servants on access to information (Commitment 1), public participation (Commitment 2), and the publication of and reporting on low value procurement data (Commitment 6). For Commitment 5, Chişinău-based CSOs trained local CSOs on strengthening their organizational capacity and advocacy skills on budget transparency and monitoring, including citizen budgets. Where CSOs delivered trainings, State Chancellery representatives were invited to present.

The new structure and functioning of the OGP Coordination Committee explains this high level of cooperation in part. Opening the committee’s sessions to all interested parties drove higher engagement in the OGP process and fueled meaningful conversations on the action plan’s implementation. *Ex officio* participation of the Congress of Local Authorities increased penetration of open government reforms to local government and provided a feedback loop and insights from frontline implementers, while also strengthening collaboration with CSOs in local level activities. In addition, stakeholders almost unanimously praised the State Chancellery’s leadership in maintaining momentum for the implementation of the action plan.

Going forward, it will be important to properly resource the State Chancellery to continue overseeing the implementation of open government reforms. In addition, the State Chancellery can continue to play a coordinating role, while the OGP platform can offer a platform for CSOs to contribute to joint initiatives and deconflict activities where needed.

**Observation 3: International support, particularly EU financing, ensured a high level of implementation for transparency-focused commitments.**

International support, particularly financial assistance from the EU, was critical for implementing commitments. EU and other external funding mechanisms enabled most of the civil society-led initiatives during implementation and allowed CSOs to stay engaged in the OGP process. For example, Council of Europe funding was instrumental in developing a new online course on access to public information (Commitment 1), while the Council of Europe and the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) funded a study on the effectiveness of the online public consultation portal [particip.gov.md](https://particip.gov.md) (Commitment 2). EU funding supported Commitment 5 on budget monitoring by CSOs, as well as actions under Commitment 2. The World Bank supported implementation of Commitment 6 on open data in procurement and the Open Contracting Partnership (OCP), through OGP Support Unit connections, provided training to the Ministry of Finance and other government agencies on the use of the Open Contracting Data Standard. Other activities also benefited from US government funding in 2024.

External funding will continue to be key to developing the technical infrastructure and capacity so that transparency reforms—such as around public procurement and open data—transition from policy goals into functional realities. Government stakeholders perceive this as a potential vulnerability and recommend allocating domestic resources to sustaining these efforts long-term.<sup>16</sup> Increasing domestic resources for open government priorities could further solidify political commitment to these issues and send a positive message to civil society counterparts.

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<sup>15</sup> “Shadow Report No 2: Assessment of the progress of the Republic of Moldova in implementing the European Commission’s recommendations on the Fundamentals Cluster in the context of EU accession,” Expert-Grup, 29 July 2025, <https://www.euromonitor.md/en/raportul-de-monitorizare-independenta-nr-2-evaluarea-progresului-republicii-moldova-in-implementarea-recomandarilor-comisiei-europene-privind-clusterul-elementele-fundamentale-in-contextul-aderarii-l>.

<sup>16</sup> “Self-evaluation report,” State Chancellery, 10 February 2026, <https://gov.md/sites/default/files/users-media/media-15/Raport%20de%20autoevaluare%20a%20implementarii%20PAGD%202023-2025.pdf>.

## Section II. Early Results

This section analyzes commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

### Table 1. Commitments with Early Results

<b>Commitment 1:</b> Increased access to information by strengthening the implementation of Law No. 148 of 2023 on Access to Information of Public Interest.
<b>Commitment 2:</b> Improved public participation in decision-making by adopting new legislation, strengthening the functionality of existing platforms and training public officials.

### Commitment 1: Implementation of Access to Information Law

**Implementer:** State Chancellery

#### Context and Objectives

Access to information has long been a priority for Moldovan civil society and has been included in previous action plans. While the Republic of Moldova is assessed positively in international transparency rankings,<sup>17</sup> civil society has demanded reforms to ensure citizens have meaningful access to public information. Under Commitment 1, the State Chancellery aimed to ensure the effective implementation of Law No. 148 of 2023 on Access to Information. As the law introduced stronger transparency and proactive publication standards, the commitment prioritized ensuring broad understanding of the law's provisions among public servants. In line with previous IRM recommendations, it aimed to safeguard the right of access to information and establish a national monitoring and evaluation mechanism.

The State Chancellery submitted this commitment as an Open Government Challenge. During implementation, the commitment was expanded to include the development of Moldova's new e-Democracy platform, [e-democratie.gov.md](https://e-democratie.gov.md), launched by the e-Government Agency, as a single window for access to information requests and responses.

#### Early Results: Significant

This commitment set a strong foundation for increasing transparency and access to information and supporting future efforts on open data. It included 13 milestones ranging from creating guidance on public institutions' website functionalities to ensure better publication of information, training and guides, new online platforms, and efforts to improve reporting by public institutions and authorities on how they are answering requests for information from the public. Implementation also surveyed public servants to gather their questions about practical issues. All milestones have been completed, except for one that remains in progress: the development of an online course by the Institute for Administration and Public Management.

In September 2023, the State Chancellery adopted regulations related to the webpages of public institutions and authorities, including what content needs to be included and how it should be presented to enhance transparency and proactive publication. The regulations provide basic graphic design requirements to ensure websites are user-friendly and accessible for people with disabilities. They include rules for the visual identity of public institutions' websites and social media channels, as well as other requirements related to metadata, data administrators, updates,

and related issues.<sup>18</sup> As a result, public authorities have a more consistent way to provide public information, although implementation has so far been slow, as few local authorities have requested the new templates.<sup>19</sup>

The State Chancellery also created a central registry of all entities that must provide access to public information, with the aim of integrating it with the e-Democrație platform. It also passed a new regulation in December 2023 to standardize the way authorities file requests in the new registry.<sup>20</sup> In addition, thousands of public officials have benefited from training and have access to a manual on how to implement the 2023 Law on Access to Information. The Congress of Local Authorities (CALM) has also delivered training to local government officials among its members.

The State Chancellery is collecting statistics about the number and types of access to information requests to guide proactive publication efforts. In 2025, the State Chancellery published its first report on the implementation of the Law on Access to Information in 2024.<sup>21</sup> The report shows good results in authorities' responsiveness to public information requests, with over 70 percent of requests being resolved. However, since the information is self-reported and not derived from a central platform, it is difficult to verify. The report also offers insights into the difficulties that responsible institutions are facing, with almost 78 percent of respondents from institutions and authorities responsible for providing access to information saying they find the implementation of the law challenging. This information can help structure further guidance and training.

In the 2024 amendments to the action plan, the E-Governance Agency proposed upgrading e-Democrație to include an e-petition module and improve data collection on how citizens use its features.<sup>22</sup> The revamped platform was launched in June 2025 to make requesting information easier. It also includes an option to register a new petition or join an existing one.<sup>23</sup> Public authorities and institutions are receiving training on how to use the platform, though only 70 have joined it out of over 1400 information providers.<sup>24</sup> All central-level institutions are on the platform, but local authorities are lagging due to capacity gaps. Should all information providers join the platform, it would allow for accurate and comprehensive data collection regarding the types of information citizens are requesting. This could support proactive publication efforts and potentially address recurring issues in responding to such requests.

The working group for the implementation of Commitment 1 (access to information) was composed of 27 members, 16 of whom were civil society representatives. CSOs actively supported implementation, in cooperation with the State Chancellery. In February 2026, they published a new guide on proactive transparency to support public authorities.<sup>25</sup> In addition, CSOs participated in and delivered training sessions to public officials and provided feedback and inputs on the e-Democracy platform. Stakeholders recognize that there are major capacity needs in implementing both the access to information and the public participation provisions, especially at the local level.<sup>26</sup> Many local authorities still use channels other than the official websites and platforms to communicate with citizens (social media or messaging applications), which can be exclusionary or do not allow for traceability.<sup>27</sup> e-Democrație and other functionalities on the websites of central and local public administration as per the new regulation and templates could help address these issues, provided implementers design these changes with citizens in mind and place greater emphasis on interconnecting various platforms.<sup>28</sup>

Although the Law on Access to Information came into force two years ago, stakeholders note that results are beginning to show. Some municipalities are already implementing the new website templates, and the number is likely to grow as more receive technical support from the Information Technology and Cybersecurity Service (which was involved in developing the website templates). In addition, the State Chancellery monitored the implementation of the

website templates for several central and local authorities and provided feedback, although the reports are not public. However, the results are rather modest so far on ensuring proactive transparency. On official webpages (both central, and local governments) much of the information, data and documents required to be proactively published are missing or only partially available. These challenges are reflected in reports from the State Chancellery<sup>29</sup> as well as civil society.<sup>30</sup>

The commitment relied significantly on iterative processes and consultation with partners and responsible authorities, which offers a good model for continuing work on implementation of the Law on Access to Information. The component of the law that civil society stakeholders think will have the greatest impact is the proactive publication of information, although future efforts will be needed to implement it particularly at the local level.

### Looking Ahead

As the OGP process proved useful in increasing awareness of the importance of transparency and access to information, some stakeholders believe this commitment could be carried over into the next action plan.<sup>31</sup> Scaling these efforts to cover hundreds of local public administration bodies, while administrative reform, including the amalgamation of small and financially unsustainable localities to improve public services is also underway, will require focus and resources. The State Chancellery has been instrumental in ensuring the uptake of the Law on Access to Information by local public authorities and needs to be adequately resourced to continue this important work, provide guidance and potentially monitor and oversee the implementation of the law going forward. Some civil society stakeholders noted that local public authorities need easy templates to follow in publishing information and calling for citizen input, such as meeting minutes, letters, calls for public input, and so on.<sup>32</sup>

The Law on Public Data and Public Sector Information Reuse, adopted as part of Commitment 7, will reinforce proactive publication.<sup>33</sup> Public institutions will have to publish information in open data formats and automatically share it through an interoperable platform—the government’s open data portal—making disclosure the default without requiring extra steps from responsible public servants. The new law came into force in May 2026, and the Ministry of Economic Development and Digitalization and the E-Government Agency will oversee its implementation. This law not only reinforces transparency but also creates a more structured path for proactive publication. Future OGP commitments could focus on implementing the proactive transparency components of the Law on Public Data and Public Sector Information Reuse and the Law on Access to Information.

Maintaining cooperation with CSOs and ensuring complementary efforts between government and civil society will be key. The plans to make access to information and public participation modules compulsory in training elected officials and public servants could reduce the impact of turnover and loss of expertise transparency reforms. In addition, with the enactment of the Law on Public Data and Public Sector Information Reuse, targeted training, including on the technical requirements for data interoperability, will be necessary. Civil society monitoring and support could spot challenges and address capacity needs.

A question remains about strengthening capacity for implementation and ensuring enforcement going forward.<sup>34</sup> Some stakeholders noted the need for an independent oversight body responsible for implementation of the access to information law.<sup>35</sup> More public institutions joining the e-Democracy platform could ensure easier monitoring of access to information requests.

## Commitment 2: Improving consultation mechanisms in decision-making

**Implementers:** State Chancellery, local authorities, IDIS Viitorul

### Context and Objectives

Proposed by the State Chancellery, this commitment responded to the inconsistent use of public participation mechanisms, the low uptake of the participation platform [particip.gov.md](https://particip.gov.md) by citizens, the limited traceability of acts subject to consultation, and the lack of reasoned responses to public input.<sup>36</sup> The EU and Moldovan civil society have previously flagged the lack of meaningful consultation and participation processes.<sup>37</sup> This commitment aimed to assess existing regulations and digital tools and, based on the findings, strengthen the public consultation framework and improve [particip.gov.md](https://particip.gov.md). The commitment also sought to enhance the permanent consultative platforms across central public authorities, in line with the June 2023 amendment to Government Decision No. 967/2016. The commitment aligns with the EU accession Action Plan<sup>38</sup> and the 2023 Civil Society Development Programme<sup>39</sup> and directly advances civic participation. The State Chancellery submitted this commitment as an Open Government Challenge.

### Early Results: Significant

This commitment set a strong foundation for strengthening public participation in using open data to reform decision-making. It included 14 milestones ranging from assessing the existing legal framework and online tools, to creating guidance and providing training to public institutions on public participation, improving the online participatory platform, mapping existing participatory formats within public institutions and creating a formal network of public participation specialists from the public sector. Notably, during the implementation period, a new Law on Public Participation was drafted through extensive consultation with civil society. All milestones have been completed, except for one that remains in progress: the development of online courses on the government's e-learning ([Mlearn.gov.md](https://mlearn.gov.md)) and CALM platforms.

With support from the Council of Europe and GIZ, the State Chancellery conducted two studies to assess the existing legal framework and its implementation,<sup>40</sup> as well as the usability and effectiveness of [particip.gov.md](https://particip.gov.md).<sup>41</sup> The studies were discussed during a consultation with CSOs and public officials in November 2024, after which the State Chancellery drafted the requirements for technical improvements to the portal. In addition, the Secretary General of the Government issued an order in January 2025 to set up a working group to draft amendments to the regulatory framework on transparency in decision-making. The working group comprised 35 civil society and 21 government representatives. The draft went through extensive consultations and has been submitted for broader public consultation<sup>42</sup> before entering the parliamentary approval process in 2026.<sup>43</sup> The State Chancellery noted that it accepted 80 percent of the 77 proposals received at the early stage.

The draft Law on Public Participation specifies that participation will be mainstreamed throughout the entire decision-making process, particularly early in the policy cycle before a legal act has been drafted. In addition, [particip.gov.md](https://particip.gov.md) will become the only point of access for all public consultations, mandating that all public authorities proactively use the platform. Public authorities will also have to publish all documentation related to a public decision as well as a report on public participation. Where more than 30% of the draft legislation has been modified through public consultations, the new law introduces a process for repeated consultations. The draft includes clear guidelines for the exceptional circumstances under which a decision-making process can take place without public consultations. The draft law also introduces the concept of civic initiative at the national and local levels, through which citizens can collect signatures to

place a certain topic on the policy and public consultation agenda. The draft law gives the State Chancellery an oversight role to solicit information from public authorities for annual reporting and assess the implementation of the law every three years.

The drafting of the law was the most notable achievement under this commitment. Civil society thought that the drafting process marked a significant departure from previously limited participation opportunities—largely seen as an afterthought or merely as pro forma consultation.<sup>44</sup> Civil society successfully advocated for moving beyond consultation toward meaningful participation and insisted on the adoption of a new law to institutionalize this approach.<sup>45</sup> Consultations began before a draft was prepared, with the establishment of a working group, reflecting lessons learned from the access to information law process, which was published for consultation once a draft existed. CSOs were actively involved in consultations with local public authorities and the process included iterative rounds of recommendations, contributing to a more robust bill. This experience also highlights the need for clearer standards distinguishing consultation from genuine participation, which the new bill is moving toward.

The State Chancellery included a module on public participation in the trainings on access to information (implemented under the first commitment). In addition, CALM, the CSO Centre for Policies and Reform (CPR), and the Institute for Development and Social Initiatives (IDIS) ‘Viitorul’, together with the State Chancellery, organized training sessions with public officials from various regions. CPR has also organized inclusive consultations with environmental organizations to increase the inclusion of a diversity of voices.<sup>46</sup> The State Chancellery also drafted a public participation guide.

The online course on open government, including the module on public participation, is still under development. This course is meant to ensure continuity during turnover in public administration. Similarly, the State Chancellery and civil society are still developing and refining new functionalities for [particip.gov.md](https://particip.gov.md). Some improvements have already been made with the Council of Europe’s support.<sup>47</sup> The draft law mandates that all public institutions and authorities will use [particip.gov](https://particip.gov.md) for consultation processes to allow the traceability of public engagement and document how individuals contributed to specific policy issues. This is meant to eliminate the barriers to access of other commonly used tools—such as online forms, social media, or messaging groups—that lack such transparency and accountability features. The transparency of decision-making processes for central public authorities is high, with more modest figures when it comes to publishing the outcomes of consultations, and the State Chancellery monitoring developments through annual reporting.<sup>48</sup>

Several milestones regarding the functioning of the permanent consultative bodies were also implemented. The State Chancellery mapped the existing platforms, organized workshops and operationalized the ‘Te Consult’ network, a program that trains and connects persons responsible with public consultations within public institutions with the aim of professionalizing and mainstreaming this practice.<sup>49</sup> Civil society sees the network as a potentially useful repository of expertise on public participation. However, the institutionalization of permanent consultative committees is also seen as a potential vulnerability.<sup>50</sup> It will be important for these permanent bodies not to replace broader participation processes that engage citizens and groups beyond these platforms.

### Looking Ahead

This commitment sets a strong foundation for deepening the understanding and the practice of public consultation in decision-making. Both the State Chancellery and civil society stakeholders

are committed to ensuring the continuation of these efforts and it will be important to build on this momentum. While the new law is planned to be adopted in parliament in October 2026, refining the web platform and continuing to provide guidance and trainings will help build the skills of public authorities and ensure a smoother implementation of the new law. A pending question is how to aggregate information on public consultation processes at local level to get a better understanding where gaps and needs remain. Integrating the platform with the website of all public authorities could provide a solution. Also, more remains to be done to further promote these platforms among civil servants and citizens alike.<sup>51</sup>

As with Commitment 1, stakeholders should aim to involve the parliament in improving its public participation practices<sup>52</sup> and participating in OGP more actively.<sup>53</sup> Regarding the bill drafted under this commitment, it will be important for parliament to ensure an open and participatory process in adopting the law.

Partnerships with civil society were an asset in implementation and could be replicated going forward. Additional training and awareness raising could ensure that the new law will be effectively implemented. As some stakeholders suggested, the government may consider additional incentives for local public officials in conducting participation processes.<sup>54</sup> It will be important to ensure penetration in smaller municipalities and those that haven't benefited from trainings already.<sup>55</sup> Here, coordination with civil society will be important to avoid duplication and scale these efforts. Expanding the geographical scope of these trainings, as well as mainstreaming it through the training programs of the Institute for Administration and Public Management, could also strengthen consultation processes.<sup>56</sup> Some of these implementation priorities could be taken forward in the next action plan.

<sup>17</sup> See: <https://corruptionrisk.org/country/?country=MDA#forecast>.

<sup>18</sup> “Government Decision 728/2023 regarding official websites and social media profiles for public authorities and institutions,” State Chancellery, 26 September 2023 (amended in 2025 and 2026), [https://www.legis.md/cautare/getResults?doc\\_id=139673&lang=ro](https://www.legis.md/cautare/getResults?doc_id=139673&lang=ro).

<sup>19</sup> Self-assessment by the State Chancellery as of November 2025 shared with the IRM researcher.

<sup>20</sup> “Government Decision 10/27/2023 regarding the registration of access to information requests,” State Chancellery, 21 December 2023, [https://www.legis.md/cautare/getResults?doc\\_id=140756&lang=ro](https://www.legis.md/cautare/getResults?doc_id=140756&lang=ro).

<sup>21</sup> “Raport privind soluționarea cererilor de comunicare a informațiilor de interes public în anul 2024,” [Report on the resolution of requests for communication of information of public interest in 2024], State Chancellery, March 2025, <https://gov.md/sites/default/files/users-media/media-15/Raport%20privind%20solu%C8%9Bionarea%20cererilor%20de%20comunicare%20a%20informa%C8%9Bilor%20de%20interes%20public%20C3%AEEn%20anul%202024.pdf>.

<sup>22</sup> “OGP Coordination Committee meeting minutes,” State Chancellery, 20 November 2024, [https://gov.md/sites/default/files/users-media/media-16/proces\\_verbal\\_nr.6\\_20.11.2024.pdf](https://gov.md/sites/default/files/users-media/media-16/proces_verbal_nr.6_20.11.2024.pdf).

<sup>23</sup> See: <https://edemocratie.gov.md>.

<sup>24</sup> Presentation by the State Chancellery during OGP public event, 13 February 2026.

<sup>25</sup> See: <https://cpr.md/publicatii/ghid-de-transparenta-proactiva-pentru-autoritatile-publice>.

<sup>26</sup> Viorel Rusu (Congress of Local Authorities), interview by IRM researcher, 30 January 2026.

<sup>27</sup> Vlada Ciobanu (Center for Policies and Reforms), interview by IRM researcher, 12 February 2026.

<sup>28</sup> Nicolae Panfil (PromoLex), interview by IRM researcher, 6 February 2026.

<sup>29</sup> “Raport privind soluționarea cererilor de comunicare a informațiilor de interes public în anul 2025” [Report on the resolution of requests for communication of information of public interest in 2025], State Chancellery, 2026, <https://gov.md/sites/default/files/users-media/media-15/Raport%20privind%20soluționarea%20cererilor%20de%20comunicare%20a%20informațiilor%20de%20interes%20public%20in%20anul%202025.pdf>

<sup>30</sup> “Noua lege de acces la informații și năravul lupului” [The new access to information law and the wolf's nature], Centrul de Politici și Reforme, Mariana Rață, 3 April 2026, <https://cpr.md/publicatii/noua-lege-de-acces-la-informatii-si-naravul-lupului>. “A new report analyses how transparent is the decision-making process in the Republic of Moldova”, Council of Europe, 22 August 2025,

<https://www.coe.int/en/web/chisinau/-/a-new-report-analyses-how-transparent-is-the-decision-making-process-in-the-republic-of-moldova>

<sup>31</sup> Diana Enachi (IDIS Viitorul), interview by IRM researcher, 3 February 2026; Panfil, interview; Ciobanu, interview.

<sup>32</sup> Iana Spinei (Transparency International Moldova), interview by IRM researcher, 25 February 2026.

<sup>33</sup> Stefan Vornic (Ministry of Economic Development and Digitalization), correspondence with IRM researcher, 16 March 2026.

<sup>34</sup> “EU Moldova Report 2025,” European Commission, 4 November 2025, [https://enlargement.ec.europa.eu/document/download/23fa6af0-89b3-4532-a3d9-d1638727d14c\\_en?filename=moldova-report-2025.pdf](https://enlargement.ec.europa.eu/document/download/23fa6af0-89b3-4532-a3d9-d1638727d14c_en?filename=moldova-report-2025.pdf).

<sup>35</sup> Ciobanu, interview.

<sup>36</sup> “EU Moldova Report 2025,” European Commission; Vlada Ciobanu, “Nu putem sta vesnic in consultari. De la promisiuni la dialog autentic,” [We cannot stay in consultations forever: From promises to authentic dialogue], Center for Policies and Reforms, 17 October 2025, <https://cpr.md/publicatii/nu-putem-sta-vesnic-in-consultari-de-la-promisiuni-la-dialog-autentic>.

<sup>37</sup> “Shadow Report No 2: Assessment of the progress of the Republic of Moldova in implementing the European Commission’s recommendations on the Fundamentals Cluster in the context of EU accession,” Expert-Grup, 29 July 2025, <https://www.euromonitor.md/en/raportul-de-monitorizare-independenta-nr-2-evaluarea-progresului-republicii-moldova-in-implementarea-recomandarilor-comisiei-europene-privind-clusterul-elementele-fundamentale-in-contextul-aderarii-l>.

<sup>38</sup> “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,” National Commission for European Integration, 4 August 2022, [https://presedinte.md/app/webroot/uploaded/plan\\_cnie\\_04.08.2022.pdf](https://presedinte.md/app/webroot/uploaded/plan_cnie_04.08.2022.pdf).

<sup>39</sup> “Government decision 845 / 01.11.2023 on approving the Civil Society Organizations’ Development Programme 2024–2027,” State Chancellery, 1 November 2023, [https://gov.md/sites/default/files/document/attachments/acte\\_normative\\_adoptate\\_in\\_sedinta\\_guvernului\\_din\\_01.11.2023.pdf](https://gov.md/sites/default/files/document/attachments/acte_normative_adoptate_in_sedinta_guvernului_din_01.11.2023.pdf).

<sup>40</sup> Adrian Ermurachi, Aleksandra Martinovic, Carolina Ungureanu, Diana Enachi, and Mihai Turcanu, “Report on the Practical Aspects of Ensuring Transparency in Decision Making Processes of Central and Local Public Authorities,” IDIS Viitorul, 2024, [http://www.viitorul.org/files/Raport\\_ENG\\_V3.pdf](http://www.viitorul.org/files/Raport_ENG_V3.pdf).

<sup>41</sup> The latter study was not made public but was made available by the State Chancellery to the IRM researcher.

<sup>42</sup> See: <https://particip.gov.md/ro/document/stages/anunt-privind-consultarea-publica-a-proiectului-legii-privind-participarea-publica-in-procesul-decizional/13845>.

<sup>43</sup> Natalia Postica (OGP Point of Contact at the State Chancellery), interview by IRM researcher, 26 January 2026; “Moldova: Government launches review of legislation on transparent decision-making through new working group,” CSO Meter, 3 March 2025, <https://csometer.info/updates/moldova-government-launches-review-legislation-transparent-decision-making-through-new>.

<sup>44</sup> Ciobanu, interview.

<sup>45</sup> Ciobanu, interview.

<sup>46</sup> Ciobanu, interview.

<sup>47</sup> “Self-evaluation report,” State Chancellery, 10 February 2026, <https://gov.md/sites/default/files/users-media/media-15/Raport%20de%20autoevaluare%20a%20implementarii%20PAGD%202023-2025.pdf>.

<sup>48</sup> “Raport privind asigurarea în anul 2024 a transparenței în procesul decizional de către autoritățile administrației publice centrale,” [Report on ensuring transparency in the decision-making process by central public administration authorities in 2024], State Chancellery, 2025, [https://gov.md/sites/default/files/users-media/media-15/Raport%20TPD\\_APC\\_2024.pdf](https://gov.md/sites/default/files/users-media/media-15/Raport%20TPD_APC_2024.pdf).

<sup>49</sup> See: <https://gov.md/ro/reteaua-profesionistilor-consultari-publice>.

<sup>50</sup> Ciobanu, interview.

<sup>51</sup> Adrian Ermurachi (Institute for European Policies and Reforms), interview by IRM researcher, 25 February 2026.

<sup>52</sup> A monitoring report from Promo Lex NGO showed that only 16 percent of all bills discussed by parliament in 2023–2024 were opened for public consultation, see: [https://promolex.md/wp-content/uploads/2024/12/ro\\_monitorizarea-activitatii-parlamentului-de-legislatura-a-xi-a-august-2023-%E2%80%93iulie-2024.pdf](https://promolex.md/wp-content/uploads/2024/12/ro_monitorizarea-activitatii-parlamentului-de-legislatura-a-xi-a-august-2023-%E2%80%93iulie-2024.pdf).

<sup>53</sup> Panfil, interview.

<sup>54</sup> Rusu, interview.

<sup>55</sup> Ciobanu, interview.

<sup>56</sup> For instance, the Institute’s 2026 training and professional development plan for public servants includes a module on transparency and communication with citizens, see: [https://gov.md/sites/default/files/media/documents/sedinte-de-guvern/2026-01/NU-888-CS-2025\\_2.pdf](https://gov.md/sites/default/files/media/documents/sedinte-de-guvern/2026-01/NU-888-CS-2025_2.pdf).

## Section III. Participation and Co-Creation

The Republic of Moldova’s OGP process saw strong co-creation and participation, supported by high-level coordination within the State Chancellery and balanced government-civil society representation in the Coordination Committee. The process involved open consultations, transparent feedback, and sustained dialogue throughout implementation, including opportunities to amend commitments collaboratively. Opening the Coordination Committee meetings to all interested CSO representatives strengthened the culture of dialogue and participation beyond the remit of the multi-stakeholder forum.

### OGP in the Republic of Moldova

The State Chancellery coordinated the OGP process in Moldova, with the Department of Human Rights and Cooperation with Civil Society serving as point of contact. This ensures high-level political commitment and coordination of key policy areas and provides strong oversight of the action plans by different government departments. Despite financial constraints, the government maintained its focus on the implementation of the action plan and the State Chancellery was able to perform its role adequately. The State Chancellery also maintains the secretariat of the country’s multi-stakeholder forum, the Coordination Committee.

During the 2023–2025 action plan, the basic rules on the composition of the Coordinating Committee and main requirements of its members were set by the Order No 53 of the Secretary-General of the Government dated 27 April 2023.<sup>57</sup> The Coordination Committee included 10 members—five each from government and civil society—with nine alternate members. The five CSO representatives comprised three members of the country’s national platform of the Eastern Partnership Civil Society Forum (on the basis of the request and criteria provided by the State Chancellery), one member among CSO members of the previous Coordination Committee to keep the institutional memory, and the last one based on nomination by the Congress of Local Authorities of Moldova (CALM). This selection process differed from the previous action plan, which was based on an open call for applications that did not elicit enough interest or provide the level of diverse representation sought by the Chancellery. In February 2026, the State Chancellery issued a public call for interested parties to submit nominations for potential members of the Coordinating Committee. The eligibility criteria for candidates remained unchanged from the previous procedure. Subsequently, the nominations that met the criteria were voted on utilizing the e-democracy platform.<sup>58</sup>

### Action Plan Co-Creation

The Coordination Committee met regularly during action plan co-creation and implementation. Members jointly agreed on the co-creation timeline and the policy priorities to be addressed in the action plan. The State Chancellery announced a collection of proposals for the action plan through a variety of channels and CSO networks and organized an in-person public consultation to discuss the proposals and draft commitments.

The Chancellery solicited commitment proposals through an online questionnaire on the governmental consultation portal [particip.gov.md](https://particip.gov.md).<sup>59</sup> The platform also served as the main tool for public consultation during the elaboration of the plan. The questionnaire was also sent to central and local public authorities, autonomous authorities, representative platforms of CSOs, as well as directly. The government responded to contributions in written summaries of proposals, as well

as during a public consultation event where additional proposals were presented. Despite time constraints, stakeholders participating in this public consultation noted that there was open and active discussion and quality dialogue between government and civil society.<sup>60</sup>

The selection of civil society members by a CSO platform contributed to the engagement and interest of larger scope of civil society in the OGP processes. Equal membership of civil society and government representatives provided balanced representation and equal dialogue. The inclusion of CALM ensured engagement of local government and promoted the interest of local governments in the OGP processes.

### Participation during Implementation

During implementation, meetings of the Coordination Committee were opened to any interested parties and many other CSOs took part and had the opportunity to suggest additional activities. Stakeholders praised the collaborative atmosphere within the committee on implementing activities, particularly in supporting the delivery of trainings and contributing to manuals and guides. Between 7 and 25 November 2024, the State Chancellery collected inputs on amendments to the action plan. Interested parties submitted their proposals online on [particip.gov.md](https://particip.gov.md). Stakeholders also had the opportunity to discuss their proposals with the Chancellery, particularly the Center for Policies and Reforms (CPR) who submitted the most proposals, and join a Coordination Committee meeting to discuss amendments to the plan. The State Chancellery received 38 recommendations from both government institutions and CSOs, out of which it accepted 18 and an additional two only partially.<sup>61</sup> The State Chancellery responded about its decisions to accept suggestions or not and agreed to add a commitment in 2024 on passing new legislation on open data as well as data re-use and standardization. Stakeholders appreciated the open dialogue during these sessions and the good cooperation between civil society and government.<sup>62</sup>

### Table 2. Compliance with Minimum Requirements

The IRM uses the OGP Participation and Co-Creations Standards to assess countries' participatory practices throughout the action plan cycle.<sup>63</sup> Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each standard.<sup>64</sup> The OGP Criteria and Standards Subcommittee determines if a country has acted according to OGP process.<sup>65</sup>

Minimum requirement	Co-creation	Implementation
<b>1.1 Space for dialogue:</b> The Coordination Committee met quarterly during the implementation period. Meetings were open to the public and many CSOs participated and were able to track progress or provide input. The State Chancellery published the meeting agendas, minutes and decisions on the dedicated website section. The rules of engagement and selection process for the committee members were available on the State Chancellery's webpage. <sup>66</sup>	Yes	Yes
<b>2.1 OGP website:</b> The State Chancellery maintains a page on its website dedicated to OGP. <sup>67</sup> The OGP webpage contains relevant documents such as meeting minutes of the Coordinating Committee, the 2023–2025 action plan and all previous action plans, documentation on co-creation processes, and self-assessment reports and IRM reports. In addition, a dedicated	Yes	Yes

Google website hosts relevant documents, event recordings and other resources. <sup>68</sup>		
<b>2.2 Repository:</b> The State Chancellery updates the OGP webpage several times a year. The webpage includes two interim self-assessments of the 2023–2025 action plan, one from November 2024 <sup>69</sup> and the second from November 2025. <sup>70</sup> During the implementation period, the Coordination Committee’s meeting minutes included updates on the implementation of the commitments.	Yes	Yes
<b>3.1 Advanced notice:</b> See the Action Plan Review. <sup>71</sup>	Yes	Not applicable
<b>3.2 Outreach:</b> See the Action Plan Review. <sup>72</sup>	Yes	Not applicable
<b>3.3 Feedback mechanism:</b> See the Action Plan Review. <sup>73</sup>	Yes	Not applicable
<b>4.1 Reasoned response:</b> See the Action Plan Review. <sup>74</sup>	Yes	Not applicable
<b>5.1 Open implementation:</b> The Coordination Committee met quarterly during the implementation period. The State Chancellery also managed a WhatsApp group for coordination and scheduling. <sup>75</sup> As a novelty from previous cycles, the meetings were open to interested parties and several CSOs participated and provided comments. Half-way through the implementation period, a new consultation process was opened to gather suggestions to amend the action plan.	Not applicable	Yes

<sup>57</sup> “Order No 53 of 27 April 2023 on the creation of the Open Government Steering Committee,” State Chancellery, 27 April 2023, [https://cancelaria.gov.md/sites/default/files/ordin\\_privind\\_instituirea\\_comitetului\\_cgd.pdf](https://cancelaria.gov.md/sites/default/files/ordin_privind_instituirea_comitetului_cgd.pdf).

<sup>58</sup> Natalia Postica (OGO Point of Contact at the State Chancellery), correspondence with IRM researcher, 20–25 February 2026.

<sup>59</sup> “Announcement of the initiation of the process of drawing up the Open Government Action Plan for the years 2023–2025, 25 May–10 July 2023,” State Chancellery, 25 May 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>.

<sup>60</sup> For additional details on the co-creation process, see: “IRM Action Plan Review: Republic of Moldova 2023–2025,” Open Government Partnership, 1 May 2024, <https://www.opengovpartnership.org/documents/republic-of-moldova-action-plan-review-2023-2025>.

<sup>61</sup> “Coordination Committee meeting minutes, 4 December 2024,” State Chancellery, 4 December 2024, [https://gov.md/sites/default/files/users-media/media-16/proces\\_verbal\\_nr.7\\_04.12.2024.pdf](https://gov.md/sites/default/files/users-media/media-16/proces_verbal_nr.7_04.12.2024.pdf).

<sup>62</sup> Diana Enachi (DIS Viitorul), interview by IRM researcher, 3 February 2026; Nicolae Panfil (PromoLex), interview by IRM researcher, 6 February 2026.

<sup>63</sup> “OGP Participation and Co-Creation Standards,” Open Government Partnership, 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards>.

<sup>64</sup> “IRM Guidelines for the Assessment of Minimum Requirements,” Open Government Partnership, 2022, [https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements\\_20220531\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf).

<sup>65</sup> See: <https://www.opengovpartnership.org/wp-content/uploads/2025/08/Resolution-of-CS-on-the-Temporary-Suspension-of-the-Enforcement-of-Time-Bound-Minimum-Requirements-2.pdf>; for information on the OGP Procedural Review Policy, see: <https://www.opengovpartnership.org/procedural-review/#IC>.

<sup>66</sup> “Comitetul de Coordonare pentru Guvernare Deschisă,” [Coordination Committee for Government Open], State Chancellery, <https://gov.md/ro/comitetul-de-coordonare-pentru-guvernare-dechisa>.

<sup>67</sup> “Cordination Committee for Government Open,” State Chancellery.

<sup>68</sup> “Moldova OGP Multi-Stakeholder Forum,” State Chancellery, <https://sites.google.com/view/moldovaopengovernmentforum/newsnoutati?authuser=0>.

<sup>69</sup> “Self-evaluation report,” State Chancellery, 10 February 2026, <https://gov.md/sites/default/files/users-media/media-15/Raport%20de%20autoevaluare%20a%20implementarii%20PAGD%202023-2025.pdf>.

<sup>70</sup> “Ședința Comitetului de coordonare pentru guvernare deschisă,” [Meeting of the Open Government Coordination Committee], State Chancellery, 17 November 2025, <https://gov.md/sites/default/files/users-media/media-15/Prezentare%20Raport%20PAGD%202023-2025%20%26%20Rezultate%20Summit.pdf>.

<sup>71</sup> “IRM Action Plan Review: Republic of Moldova 2023–2025,” Open Government Partnership.

<sup>72</sup> “IRM Action Plan Review: Republic of Moldova 2023–2025,” Open Government Partnership.

<sup>73</sup> “IRM Action Plan Review: Republic of Moldova 2023–2025,” Open Government Partnership.

<sup>74</sup> “IRM Action Plan Review: Republic of Moldova 2023–2025,” Open Government Partnership.

<sup>75</sup> Postica, interview.

## Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.<sup>76</sup>

The 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 the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **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 Results Reports, the IRM assesses commitments using two indicators:

### Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.<sup>77</sup> The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

### Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
  - improving practices, policies or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.
- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive

results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:

- improving practices, policies or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.
- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
    - improving practices, policies or institutions governing a policy area or within the public sector, or
    - enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Corina Rebegea and reviewed by Jeff Lovitt, IRM external expert. The IRM methodology, quality of IRM products and review process is overseen by the IRM’s International Experts Panel (IEP).<sup>78</sup> For more information, refer to IRM webpage<sup>79</sup> or the glossary of IRM and OGP terms.<sup>80</sup>

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<sup>76</sup> For definitions of OGP terms, such as co-creation and promising commitments, see “OGP Glossary,” Open Government Partnership, <https://www.opengovpartnership.org/glossary>.

<sup>77</sup> The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses “Potential for Results” and “Early Results” at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.

<sup>78</sup> “International Experts Panel,” Open Government Partnership, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel>.

<sup>79</sup> “IRM Overview,” Open Government Partnership, <https://www.opengovpartnership.org/irm-guidance-overview>.

<sup>80</sup> “OGP Glossary,” Open Government Partnership.

## Annex I. Commitment Data<sup>81</sup>

<b>Commitment 1: Implementation of Access to Information Law</b>	
<ul style="list-style-type: none"> <li>● <b>Verifiable:</b> Yes</li> <li>● <b>Does it have an open government lens?</b> Yes</li> <li>● <b>Potential for results:</b> Substantial</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Completion:</b> Substantial</li> <li>● <b>Early results:</b> Significant</li> </ul>
This commitment is assessed in Section II.	
<b>Commitment 2: Improving consultation mechanisms in decision-making</b>	
<ul style="list-style-type: none"> <li>● <b>Verifiable:</b> Yes</li> <li>● <b>Does it have an open government lens?</b> Yes</li> <li>● <b>Potential for results:</b> Substantial</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Completion:</b> Substantial</li> <li>● <b>Early results:</b> Significant</li> </ul>
This commitment is assessed in Section II.	
<b>Commitment 3: Digitalization of Correctional Services</b>	
<ul style="list-style-type: none"> <li>● <b>Verifiable:</b> Yes</li> <li>● <b>Does it have an open government lens?</b> No</li> <li>● <b>Potential for results:</b> Unclear</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Completion:</b> Substantial</li> <li>● <b>Early results:</b> No Notable Results</li> </ul>
<p>Under this commitment, the Ministry of Justice aimed to standardize data collection on detained, arrested, and convicted persons to improve the interoperability of data collection and management practices of the penitentiary and probation institutions, i.e. prisons, police, the courts, and the Prosecutor’s Office), as some institutions still maintained data in paper format. The commitment covered an important area for human rights advocates and the digitalization efforts in the country.</p> <p>The Ministry of Justice completed five of six milestones, including mapping available data registers and of processes that can be digitalized, identifying the information that can be interconnected with other databases (such as police and prosecutor offices), the generation of automatic reports to the Ombuds, prosecutors and National Administration of Penitentiaries about cases of violence, suicide, or death.</p> <p>US funding cuts affected some components of the system: defining performance indicators for the probation system. Momentum for implementation was lost due to turnover within the Ministry of Justice.<sup>82</sup> The implementation was also in part affected by the cut of United States Agency for International Development (USAID) funding in January 2025, particularly defining the performance indicators for the probation system. This temporarily impacted the government, as the Ministry of Justice was implementing the electronic management system in cooperation with UNDP and funded by the US, with the CSO Promo-LEX Association also involved in implementation.<sup>83</sup></p>	

<b>Commitment 4: Transparency of UNCAC implementation</b>	
<ul style="list-style-type: none"> <li>● <b>Verifiable:</b> Yes</li> <li>● <b>Does it have an open government lens?</b> Yes</li> <li>● <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Completion:</b> Limited</li> <li>● <b>Early results:</b> No Notable Results</li> </ul>
<p>This commitment aimed to increase transparency and civil society participation in the implementation and self-reporting of the Republic of Moldova’s United Nations Convention Against Corruption (UNCAC) review. The Republic of Moldova signed the Joint Statement on Transparency and the Inclusion of Civil Society in the Implementation Review Mechanism during the UNCAC Conference of State Parties in December 2023. Other follow up activities, included in both the statement and the OGP commitment, are delayed. Only the report of the first cycle of review has been published.<sup>84</sup> Moldovan civil society has criticized the National Anti-Corruption Center for insufficiently engaging CSOs in the monitoring of the national integrity plan.<sup>85</sup> Stakeholders believed that the commitment had limited scope and lacked support from relevant agencies, such as the National Anticorruption Center.<sup>86</sup></p> <p>Anti-corruption continues to be a priority for the country. Civil society would like to see stronger commitments on key policies, such as asset and conflict of interest disclosures, and transparency around institutional performance in combating corruption in future action plans.<sup>87</sup></p>	
<b>Commitment 5: Budget Monitoring by CSOs</b>	
<ul style="list-style-type: none"> <li>● <b>Verifiable:</b> Yes</li> <li>● <b>Does it have an open government lens?</b> Yes</li> <li>● <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Completion:</b> Complete</li> <li>● <b>Early results:</b> Moderate</li> </ul>
<p>Under this commitment, three CSO platforms—comprising 75 CSOs in total—aimed to support budget monitoring at the central and local levels, in the context of the Republic of Moldova’s EU accession.</p> <p>All activities were completed. National-level CSOs provided training and learning for local CSOs on strengthening their organizational capacity and advocacy skills on budget transparency and monitoring, including citizen budgets.<sup>88</sup> A total of 29 expenditure reports for central and local authorities were published because of this commitment.<sup>89</sup> Reports were presented and discussed in roundtables involving representatives of local authorities. Stakeholders thought this commitment was important in addressing gaps in local community involvement in local issues and a need to be more engaged in local projects and their monitoring.<sup>90</sup> However, civil society requires resources and capacity building to sustain its engagements with local authorities, and this capacity was a priority for the State Chancellery.<sup>91</sup></p> <p>This commitment sets a good foundation for expanding civil society’s role at local level, as well as knowledge transfers and peer communication between CSOs at national and local levels. However, it remains unclear how these efforts will be sustained. Civil society at the local level remains under-resourced and reliant on bigger, better financed and higher-expertise organizations. Stakeholders have noted that successful commitments were those where a central authority took ownership, while for this commitment CSOs were in charge.</p>	

Some stakeholders mentioned that the municipality of Leova that participated in OGP Local achieved positive outcomes in co-creation and public participation processes and transferred some of these lessons learned in the current voluntary amalgamation process.<sup>92</sup> Examples from OGP Local, including from outside the Republic of Moldova, could offer inspiration to the central government authorities about how to incentivize and scale open government processes at the local level.

### Commitment 6: Open Data across the Public Procurement Cycle

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| <ul style="list-style-type: none"> <li>● <b>Verifiable:</b> Yes</li> <li>● <b>Does it have an open government lens?</b> Yes</li> <li>● <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>● <b>Completion:</b> Limited</li> <li>● <b>Early results:</b> Moderate</li> </ul> |
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This commitment involved publishing data on low-value procurement, and training civil servants, particularly procurement specialists, on opening and reporting procurement data. The Moldovan Court of Accounts—the supreme audit institution—estimated that low-value procurements amounted to 50 percent of the entire value of public contracting in 2020.<sup>93</sup> Low-value procurements typically cover more day to day and essential services, particularly at the local level. Low-value procurements involve non-competitive processes, with higher thresholds introduced in 2023,<sup>94</sup> and lower transparency obligations, creating a gap in access to public information.<sup>95</sup> The commitment was meant to cover this gap in data availability and reuse: while individual procurement contract information is available on the online platform, it is difficult to generate aggregate reports and run analysis.<sup>96</sup>

As a result of Government Decision 87/2022, which came into force in July 2023, authorities must submit quarterly reports which are published on the Ministry of Finance’s website.<sup>97</sup> Some stakeholders noted that the existing [M-tender.gov.md](https://m-tender.gov.md) platform is not user-friendly for procurement officials who have to input the data.<sup>98</sup> This can make using the platform burdensome for local authorities and impede speedy resolution of community issues that require quick acquisition of goods or services.<sup>99</sup> The Public Procurement Agency (PPA) and civil society partners, such as IDIS Viitorul, trained around 4000 public servants and local public officials to ensure better publication of and reporting on low value procurement data, including on how to use M-Tender.<sup>100</sup>

Overall, this commitment had moderate early results in the transparency. Despite improvements compared to 2023, civil society found progress in transparency of low-value procurement unsatisfactory. Even though reporting increased over 2024 and 2025, only one third of city halls are publishing this data and some of it remains incomplete.<sup>101</sup> Moreover, it is difficult for researchers to independently analyze the data through M-Tender. Civil society suggests strengthening the capacity of the PPA to monitor low-value procurement, including by creating guidance and tools to assist with monitoring and reporting of data collected.<sup>102</sup>

During the 2024 amendments to the action plan, the Ministry of Finance proposed an additional milestone to re-engineer the public procurement online platform. This component, which aims to build a new electronic procurement system surpassing the current functionalities of M-Tender, will be implemented with support from the World Bank.<sup>103</sup> The process for collecting proposals for the new online system was completed in February 2026, after the end

of the action plan.<sup>104</sup> The new system would digitalize the entire procurement cycle, which would significantly improve transparency in procurement processes.

Civil society noted that the specifications for the new procurement platform could deliver better integration with accounting systems public institutions use, lessening the reporting burden and generating better data.<sup>105</sup> If continued in the next action plan, the government could focus on strengthening the capacity of procurement officers and developing mechanisms to ensure data reporting is complete and accurate. The government could also expand open data and tracking program implementation (the execution phase) in the next action plan.

### Commitment 7: New regulatory framework on open data and the reuse

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|---|--|
| <ul style="list-style-type: none"> <li>● <b>Verifiable:</b> Yes</li> <li>● <b>Does it have an open government lens?</b> Yes</li> <li>● <b>Potential for results:</b> Substantial</li> </ul> | <ul style="list-style-type: none"> <li>● <b>Completion:</b> Substantial</li> <li>● <b>Early results:</b> Moderate</li> </ul> |
|---|--|

This commitment was introduced in the action plan one year into the implementation period. Government and civil society stakeholders thought it dovetailed with the other commitments. It involved the development and approval of the regulatory framework on open data and the reuse of public sector information, effectively transposing the EU Directive 2019/1024 on Open Data and the Re-use of Public Sector Information.<sup>106</sup> Open data would support proactive publication of public information, evidence-based policy making, civil society oversight, as well as transparency in procurement. The State Chancellery also thought this commitment would ensure better oversight of its implementation.<sup>107</sup>

The first milestone was achieved with the approval of the law on open data and the reuse in March 2025. The law, which enters into force in May 2026, specifies that public authorities must make information available in open, interoperable and reusable formats seeking to transpose the principle of “open by design and by default.” It expands the scope of access and reuse rules to include information held by public sector bodies, certain public enterprises (such as those in energy, transport, and postal services), and publicly funded research data. It also introduces clear definitions of open data and dynamic data, establishes high-value datasets that must be made available free of charge and in bulk, and sets a general principle of free reuse, allowing fees only in exceptional cases to cover justified additional costs. Access and reuse are governed through standardized government-approved licenses aligned with international standards and designed to avoid unnecessary restrictions. The government also adopted secondary legislation setting detailed rules and steps for the implementation of the law and the utilization of the open data portal ([data.gov.md](https://data.gov.md)).<sup>108</sup> A second milestone envisaged the adoption of a new law on data governance to align with the EU’s Data Governance Act and the Digital Omnibus. The latter is still under consultation as the EU is currently amending its own rules on the matter and has recommended that the Republic of Moldova pause the transposition process.<sup>109</sup>

Stakeholders see this commitment as an important step in advancing open government principles, particularly access to public information.<sup>110</sup> Awareness-raising, training regarding open data, and effective oversight will be key in institutionalizing open data practices at scale.<sup>111</sup> The impact of this commitment will depend on further consultative processes and follow up measures, which were not included at this stage.

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<sup>81</sup> Editorial notes:

1. Commitments' short titles may have been edited for brevity. For the complete text of commitments, please see: "Moldova Action Plan 2023–2025," State Chancellery, <https://www.opengovpartnership.org/documents/moldova-action-plan-2023-2025>.
2. For more information on the assessment of the commitments' design, see: "IRM Action Plan Review: Republic of Moldova 2023–2025," Open Government Partnership, 1 May 2024, <https://www.opengovpartnership.org/documents/republic-of-moldova-action-plan-review-2023-2025>.

<sup>82</sup> Diana Enachi (IDIS Viitorul), interview by IRM researcher, 3 February 2026.

<sup>83</sup> "Self-evaluation report," State Chancellery, 10 February 2026, <https://gov.md/sites/default/files/users-media/media-15/Raport%20de%20autoevaluare%20a%20implementarii%20PAGD%202023-2025.pdf>.

<sup>84</sup> See: <https://cna.md/ro/onu>.

<sup>85</sup> See: <https://www.transparency.md/apelul-societatii-civile-privind-lansarea-concursului-de-selectare-a-reprezentantilor-societatii-civile-in-grupul-de-monitorizare-al-programului-national-de-integritate-si-anticoruptie>.

<sup>86</sup> Iana Spinei (Transparency International Moldova), interview by IRM researcher, 25 February 2026.

<sup>87</sup> Spinei, interview.

<sup>88</sup> The national government publishes an annual citizens budget, see:

<https://www.mf.gov.md/sites/default/files/Bugetul%20pentru%20cetateni%20pe%202026%20a.pdf>.

<sup>89</sup> See: <https://www.euromonitor.md/categorie/publicatii/rapoarte>.

<sup>90</sup> Viorel Rusu (Congress of Local Authorities), interview by IRM researcher, 30 January 2026.

<sup>91</sup> Natalia Postica (OGP Point of Contact at the State Chancellery), interview by IRM researcher, 26 January 2026.

<sup>92</sup> Adrian Ermurachi (Institute for European Policies and Reforms), interview by IRM researcher, 25 February 2026.

<sup>93</sup> "Sinteza analitică a rezultatelor de audit aferente domeniului achiziții publice în perioada 2019–2020," [Analytical summary of audit results related to the field of public procurement in the period 2019–2020], Court of Accounts, 11 November 2021, [https://www.ccrm.md/ro/sinteza-analitica-a-rezultatelor-de-audit-aferente-domeniului-achizitii-3539\\_92092.html](https://www.ccrm.md/ro/sinteza-analitica-a-rezultatelor-de-audit-aferente-domeniului-achizitii-3539_92092.html).

<sup>94</sup> See: <https://monitorul.fisc.md/achizitiile-publice-de-mica-valoare-majorarea-pragurilor-cu-50>.

<sup>95</sup> Diana Enachi, "Achizițiile de valoare mică: între transparența și eficiența," Puls Achiziții, 24 August 2021, <https://pulsachizitii.md/achizitiile-publice-de-valoare-mica-intre-transparenta-si-eficienta>.

<sup>96</sup> Enachi, interview.

<sup>97</sup> Republic of Moldova, Government Decision No. 870 of 14-12-2022 on approval of the Regulation on low-value public procurement, [https://www.legis.md/cautare/getResults?doc\\_id=134614&lang=ro](https://www.legis.md/cautare/getResults?doc_id=134614&lang=ro)

<sup>98</sup> Enachi, interview.

<sup>99</sup> Rusu, interview; Maria Covalciuc (Association for Efficient and Responsible Governance), interview by IRM researcher, 24 February 2026.

<sup>100</sup> "Self-evaluation report," State Chancellery.

<sup>101</sup> Valeriu Ciorba, "2,5 ani de Raportare Achiziții de Valoare Mică, dar transparența lipsește: miliarde de lei rămân neraportate și în zona gri," [2.5 years of Low Value Procurement Reporting, but transparency is lacking: Billions remain unreported and in the gray area], Revizia, 23 January 2026, <https://revizia.md/ro/25-ani-de-raportare-achizitii-de-valoare-mica-dar-transparenta-lipseste-miliarde-de-lei-raman-neraportate-si-in-zona-gri>.

<sup>102</sup> Shadow report, 2025.

<sup>103</sup> See: <https://www.mf.gov.md/ro/content/banca-mondial%C4%83-desf%C4%83%C8%99oar%C4%83-o-misiune-de-sprijin-pentru-eficien%C8%9Ba-achizi%C8%9Bii-ilor-publice>.

<sup>104</sup> See: <https://mf.gov.md/ro/content/lansarea-procedurii-de-achizi%C8%9Bie-pentru-dezvoltarea-si-%E2%80%9Eersap%E2%80%9D-e-achizi%C8%9Bii>.

<sup>105</sup> Covalciuc, interview.

<sup>106</sup> See Law No. 109 of 2025: [https://www.legis.md/cautare/getResults?doc\\_id=148946&lang=ro](https://www.legis.md/cautare/getResults?doc_id=148946&lang=ro).

<sup>107</sup> Postica, interview.

<sup>108</sup> See Government Decision No. 563 of 2025: [https://www.legis.md/cautare/getResults?doc\\_id=150592&lang=ro](https://www.legis.md/cautare/getResults?doc_id=150592&lang=ro).

<sup>109</sup> Stefan Vornic (Ministry of Economic Development and Digitalization), correspondence with IRM researcher, 16 March 2026.

<sup>110</sup> Ermurachi, interview.

<sup>111</sup> Vlada Ciobanu (Center for Policies and Reforms), interview by IRM researcher, 12 February 2026; Nicolae Panfil (PromoLex), interview by IRM researcher, 6 February 2026; Enachi, interview.