

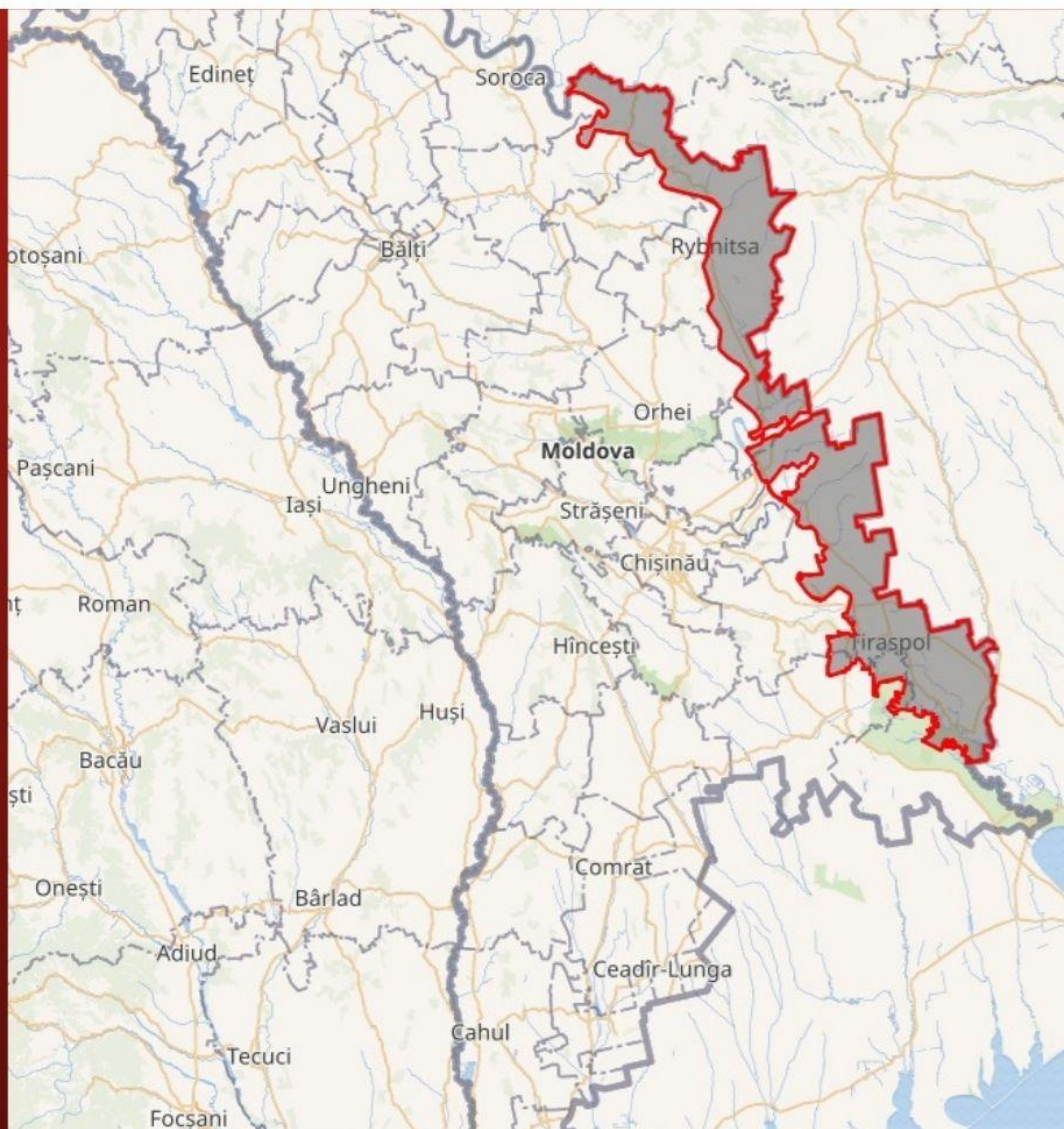


MINISTRY OF FOREIGN AFFAIRS  
OF DENMARK



# MOLDOVA PARLIAMENTARY ELECTIONS 2025: POLLING STATIONS FOR CITIZENS FROM THE TRANSNISTREAN REGION

ADEPT ASSOCIATION  
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The Association for Participatory Democracy ADEPT is an independent center for analysis and consultancy on decision-making, political, electoral, and socio-economic processes in the Republic of Moldova and the region. ADEPT’s mission is to promote democratic values and support the active participation of citizens in public life.

Since its establishment in 2000, ADEPT has been at the forefront of efforts to promote good governance, electoral integrity, and civic engagement through research, advocacy, and public information. Since 2018, ADEPT has served as the Secretariat of the Coalition for Free and Fair Elections (CALC), a platform that brings together civil society organizations to ensure transparency, inclusion, and integrity in the electoral processes of the Republic of Moldova.

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## Executive summary

The organization of polling stations for citizens of the Republic of Moldova residing on the left bank of the Dniester River constitutes an electoral practice initiated in 1994 and maintained to the present day, in the context of the lack of constitutional control over the region. The adaptation of the electoral legislation through the introduction of the “one country – one constituency” model has enabled the creation of special polling stations in localities under the control of the constitutional authorities, along the Dniester River. These measures have been accompanied by decisions and instructions issued by the Central Electoral Commission (CEC), aimed at ensuring access to voting for voters from the territory.

Over the course of three decades, both national and international observers have noted structural limitations that persist: limited access of voters to comprehensive electoral information and the inability of candidates to conduct campaigning within the region.

The number and location of polling stations have varied depending on the governing administration, ranging from 8–15 in the 1990s and early 2000s, to 47 during the 2016–2019 period. Statistical analyses have demonstrated that the absolute number of polling stations is not the determining factor, but rather their geographical placement: those located in the traditional corridor along the Dniester have consistently recorded higher voter turnout. Excessive expansions, such as the one in 2019, resulted in major discrepancies, with some polling stations remaining entirely unused while others were extremely overcrowded.

In 2025, the CEC decided to establish 12 polling stations for the parliamentary elections scheduled for 28 September, following interinstitutional consultations that included the Intelligence and Security Service, the Ministry of Internal Affairs, the General Police Inspectorate, the Bureau for Reintegration Policies, and the Supreme Security Council. The arguments presented focused primarily on the security and integrity of the process, voter turnout data from previous elections, and the risks of destabilization. Institutional positions varied, proposing between 8 and 19 stations, with the final decision being set at 12.

This decision has sparked criticism. The political opposition accused the authorities of restricting the voting rights of over 275,000 voters residing in the region, invoking the principle of equality, while Promo-LEX acknowledged the importance of security measures but considered the reduction from 30 to 12 polling stations to be disproportionate.

In the absence of clear international standards regarding voting in territories under unconstitutional administrations, the Republic of Moldova has developed its own practice, shaped by electoral legislation, national security considerations, and political constraints. The experience of the past three decades demonstrates that the organization of polling stations for Transnistrian voters must be calibrated based on criteria of security, effective location, and real participation, grounded in a transparent and consultative decision-making process.

## I. The first polling stations for citizens from the left bank of the Dniester – goodwill under hostile conditions

The Republic of Moldova organized its first multiparty parliamentary elections in 1994, under specific conditions – the lack of control over part of the territory located on the left bank of the Dniester River. To ensure the right to vote for Moldovan citizens residing on the left bank of the Dniester, the authorities amended Law No. 1609 of 14-10-1993 on the election of Parliament, replacing the limited proportional electoral system – multi-mandate electoral districts – with the absolute electoral system, following the Dutch model: one country – a single electoral district.

Under these circumstances, it was decided to open polling stations for citizens from the Transnistrean region in localities controlled by the constitutional authorities along the Dniester. To implement this idea in practice, the Central Electoral Commission (CEC) adopted a public declaration, a series of decisions, and instructions:<sup>1</sup>

- **The CEC Declaration of 26.12.1993** (p.34), through which it informed the public that the administrations of localities outside the control of the unconstitutional authorities were obstructing the organization of polling stations and the participation of citizens in the elections, persecuting individuals involved in the electoral campaign, and violating their fundamental human rights;
- **CEC Decision No. 255 of 18.02.1994** (p.56) on the procedure for participation in the voting for the election of the Parliament of the Republic of Moldova on 27 February 1994 by citizens from the districts located on the left bank of the Dniester and the city of Bender, through which it ordered the organization of 15 polling stations in localities along the Dniester that were under the control of the constitutional authorities;
- **Instruction to CEC Decision No. 255 of 1994** (p.59) on the procedure for participation in the voting for the election of the Parliament by citizens from the districts on the left bank of the Dniester and the city of Bender.

The authorities decided to organize polling stations for citizens from the Transnistrean region, even though they were fully aware that it was impossible to ensure the conduct of a fair electoral process on the territory of the left bank of the Dniester in accordance with the standards of the [Conference on Security and Cooperation in Europe \(CSCE – the predecessor of the OSCE\)](#). According to these standards, CSCE member states “*will ensure that no legal or administrative obstacle stands in the way of unimpeded access to the media, on a non-discriminatory basis, for all political groupings and individuals wishing to participate in the electoral process.*”

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<sup>1</sup> ELECTORALA'94 Documente și cifre, Ediție a Comisiei Electorale Centrale. Chișinău, TISH, 1994

## **II. National and International Election Observation Missions on Voting by Citizens from the Transnistrean Region**

Despite the difficulties mentioned above, the authorities of the Republic of Moldova have continued, for three decades, to organize polling stations for citizens residing in the Transnistrean region. However, these voters have been and remain systematically disadvantaged: their access to comprehensive and balanced information about the electoral process is limited, and electoral competitors are unable to conduct campaigns or meet directly with voters in the region. These issues have been consistently highlighted in the reports of national and international election observation missions.

The problems faced by voters from the Transnistrean region were documented for the first time by the [Promo-Lex Election Observation Mission](#), conducted under the auspices of the [Coalition for Free and Fair Elections \(CALC\)](#), during the 2009 parliamentary elections. The conclusions of this mission highlighted the structural obstacles to access to information and the impossibility of conducting a genuine electoral campaign in the region. Since then, the situation has not changed significantly.

The same findings were reiterated by the [ENEMO International Election Observation Mission](#), in its report on the 2021 parliamentary elections (p. 29). The observers noted: “many interlocutors expressed concerns regarding the equal access of voters from Transnistria to campaign messages, given that neither candidates nor their supporters had the possibility to campaign in this region and, consequently, the voters in that region had limited opportunities to make an informed choice.” The report also highlighted a concrete case in which representatives of a political party attempted three times to enter the Transnistrian region for campaign activities, but were stopped by local armed forces, thereby restricting a fundamental right of the electoral contestant.

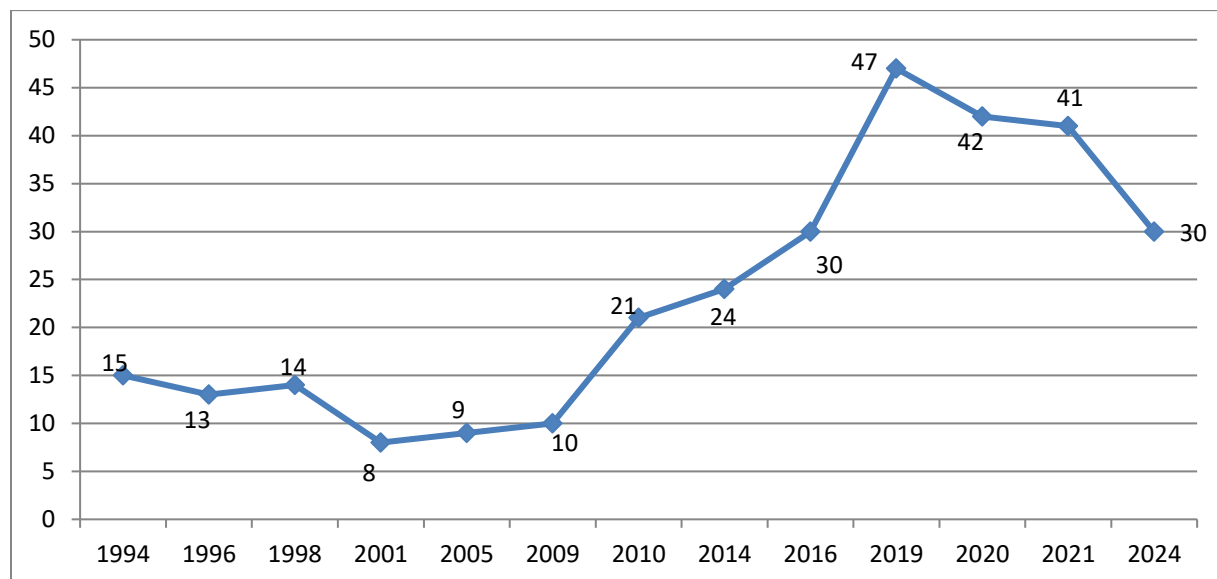
In this context, the efforts of the Moldovan authorities to organize polling stations for citizens residing in territories under an unconstitutional administration also attracted the attention of [electoral experts from Georgia and Ukraine](#). They appreciated the openness of the authorities in Chişinău and recognized the innovative nature of this practice, while at the same time stressing that international standards must be respected, in particular those established in the CSCE Copenhagen Document, which guarantees equal and non-discriminatory access to campaigning and information for all voters.

In the reports of [OSCE/ODIHR](#) missions, aspects related to the organization of polling stations for voters from the Transnistrean region and the voting process are traditionally mentioned; however, they do not explicitly address these citizens’ access to electoral information and do not document direct restrictions on candidates’ freedom to campaign in the region.

### **III. Statistics on polling stations for citizens residing in the Transnistrean region**

Since the first multiparty elections in 1994, for all national-level elections – parliamentary, direct presidential, and republican referendums – the Moldovan authorities have organized polling stations for voters residing in the Transnistrean region.

**Figure 1. Evolution of the number of polling stations for voters from the Transnistrean region**



The number of polling stations and their geographical distribution have varied significantly depending on the governing parties or coalitions in power, as follows:

Period / Year	Party / Alliance	Number of polling stations for citizens residing in the Transnistrean region
1994 – 1998	Democratic Agrarian Party of Moldova (PDAM)	13 – 15
2001	Alliance for Democracy and Reforms (ADR)	8
2001 – 2009	Party of Communists of the Republic of Moldova (PCRM)	9 – 10
2010 – 2015	Alliance for European Integration (AIE)	24 – 30
2016 – 2019	Democratic Party of Moldova (PDM)	47
2019 – 2021	Coalition of the Party of Socialists of the Republic of Moldova (PSRM) and the Shor Party (PȘ)	41 – 41
2021 – prezent	Party of Action and Solidarity (PAS)	30 (presidential elections 2024) and 12 (parliamentary elections 2025)

The data in the table highlight the often arbitrary nature of the process of organizing polling stations for citizens residing in the Transnistrean region.

During the governance of the Alliance for European Integration (2010–2015), the exclusive practice of organizing polling stations only along the Dniester, in the Security Zone, was abandoned. Instead, polling



stations were also opened in the municipalities of Chişinău, Bălţi, and Călăraşi, thus expanding accessibility.

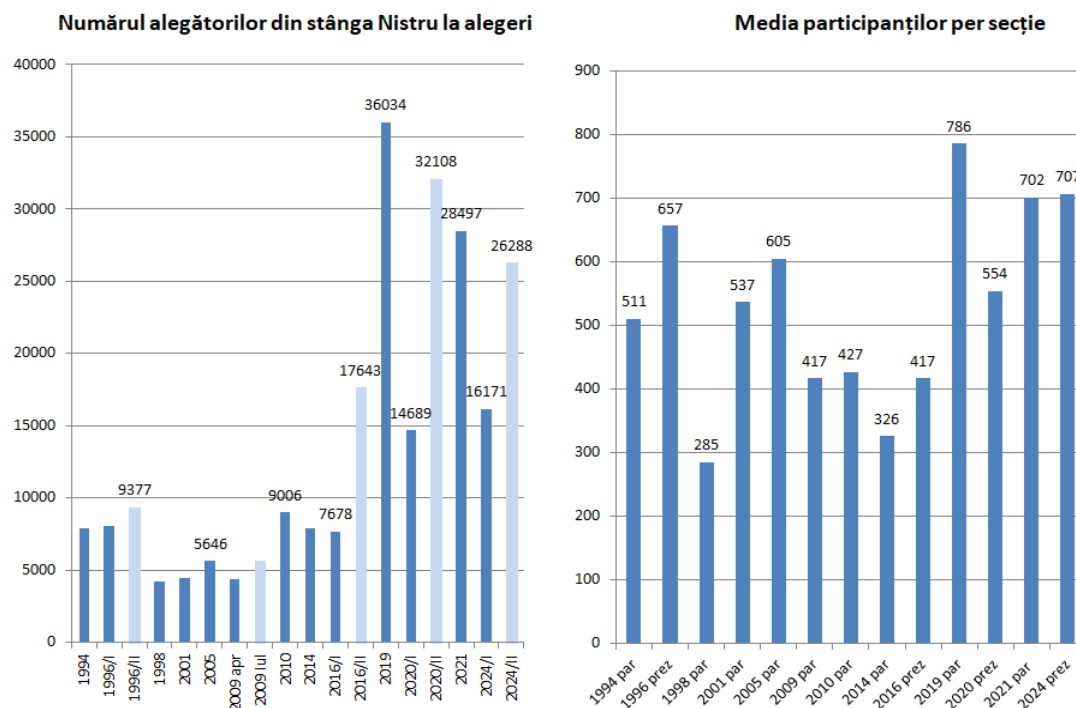
Another important stage came during the period 2016–2019, when the Democratic Party of Moldova increased the number of polling stations to 47. This expansion proved excessive, since in the 2019 parliamentary elections the participation results were highly uneven. In Chişinău, out of the 9 polling stations dedicated to citizens from the Transnistrean region, the busiest recorded 471 voters, while the least attended only 19, with an average of about 240 voters per station. By comparison, the average for an ordinary polling station in Chişinău generally exceeds 1,000 voters – roughly four times higher.

In Bălţi, the situation was even more illustrative. Out of the 4 polling stations opened for citizens from the Transnistrean region, in two no one turned out, in one a single person voted, and in the most attended only 5 voters participated. In Călăraşi and Soroca, in two polling stations each, no voters showed up. The same situation was repeated in polling stations organized in Cahul and Ungheni.

Overall, in the 2019 parliamentary elections, in 8 of the 47 polling stations no voters turned out, in two stations only one person voted, in two others 4 and 5 voters respectively, and in one other only 15. In 10 stations up to 500 voters participated, in 4 stations up to 1,000, in 16 stations more than 1,000, and in 4 stations the number exceeded 2,000.

The analysis shows that the decisive factor is not the total number of polling stations opened for citizens from the Transnistrean region, but rather their location. The most frequented polling stations were the traditional ones situated along the Dniester, where the average turnout consistently exceeded one thousand voters per station.

**Figure 2. Turnout of voters residing in the Transnistrean region and the average number of voters per polling station**



As early as 2017, the press anticipated that, with the amendment of the electoral legislation and the shift from the proportional to the mixed system, relations between Chişinău and Tiraspol would acquire a new dimension, influenced by the so-called [“oligarchic diplomacy”](#) promoted by the Plahotniuc–Guşan tandem, which extended even to the electoral process. However, reality has shown that the turnout of citizens from the Transnistrean region in the polling stations opened specifically for them is much lower than the national average and several times lower than the average recorded in polling stations abroad. This discrepancy has required a reconsideration of approaches to organizing the electoral process for this category of voters.

#### **IV. The evolution of the attitude of the unconstitutional administration towards the organization of polling stations**

The attitude of the unconstitutional administration in Tiraspol towards the organization of polling stations for citizens residing in the Transnistrean region has evolved in a fluctuating manner, oscillating between open hostility, calculated indifference, and paradoxical interest.

##### **A. The 1990s – Open hostility**

In the 1990s, the unconstitutional administration adopted an openly hostile stance towards the organization of polling stations by the authorities in Chişinău. The participation of Transnistrians in the elections of the Republic of Moldova was perceived as a [major risk](#), as it could legitimize claims for the reintegration of the region into the Moldovan unitary state. At that time, the tendency of residents from the left bank of the Dniester to regain Moldovan citizenship was explained not by loyalty to the Republic of Moldova, but by the need to obtain internationally recognized documents that guaranteed them freedom of movement.

##### **B. The 2000s – Calculated indifference**

Starting in the 2000s, the leaders of the unconstitutional administration nuanced their rhetoric: they no longer formally opposed the participation of Moldovan citizens from the region in elections, but instead [relied on their indifference toward the electoral process](#) in the Republic of Moldova. In reality, the behavior of the Transnistrian administration was one of discouraging electoral engagement.

This period coincided with the intensification of the Moldovan authorities’ efforts to convince the international community that the Tiraspol regime was under the control of the Russian Federation. Substantial arguments were put forward in support of this thesis:

- [The statement of Foreign Minister Andrei Stratan](#), from the [Vasile Tarlev Government](#), appointed by the Party of Communists of the Republic of Moldova (PCRM), at the OSCE (Sofia, 2004), according to which “Russia has occupied part of the national territory”;
- [The decision of the Tarlev Government \(GD 891/2006\)](#) which publicized the conclusions of the report [“Unfreezing a Frozen Conflict”](#) drafted by the Association of the Bar of the City of New York, according to which Transnistria is under the control of an “occupying power”;

The case law of the European Court of Human Rights (ECHR), which in nine judgments concerning [human rights violations](#) in Transnistria established that the Russian Federation exercises effective control over the region, including through its military presence, political influence, and economic support provided to the local administration.

This interpretation – Transnistria as a territory occupied by the Russian Federation – explains why, during the governance of the Party of Communists of the Republic of Moldova (PCRM) (2001–2009), only 10 polling stations were organized for voters residing in the Transnistrean region.

### **C. The year 2025 – Paradoxical interest**

On the eve of the parliamentary elections of 28 September 2025, for the first time, the unconstitutional administration [publicly expressed dissatisfaction](#) with the decision of the Moldovan authorities to organize only 12 polling stations. This reaction stands in stark contrast to its previous silence, as well as to recent reality: in the Russian presidential elections of 17 March 2024, [only 6 polling stations](#) were opened in the region, deemed sufficient, where 46,179 Russian citizens from the Transnistrean region exercised their right to vote, although the total number of those holding Russian citizenship is estimated at over 220,000.

## **V. Decision on the Establishment of Polling Stations for Citizens from the Transnistrean Region in the 2025 Parliamentary Elections**

On 24 August 2025, the Central Electoral Commission (CEC) adopted the Decision on the organization of polling stations for voters from localities located on the left bank of the Dniester, a territory not under the control of the constitutional authorities, for the parliamentary elections of 28 September 2025.

In accordance with Article 40 paragraphs (1)–(3) of the Electoral Code, the CEC based its decision on several criteria:

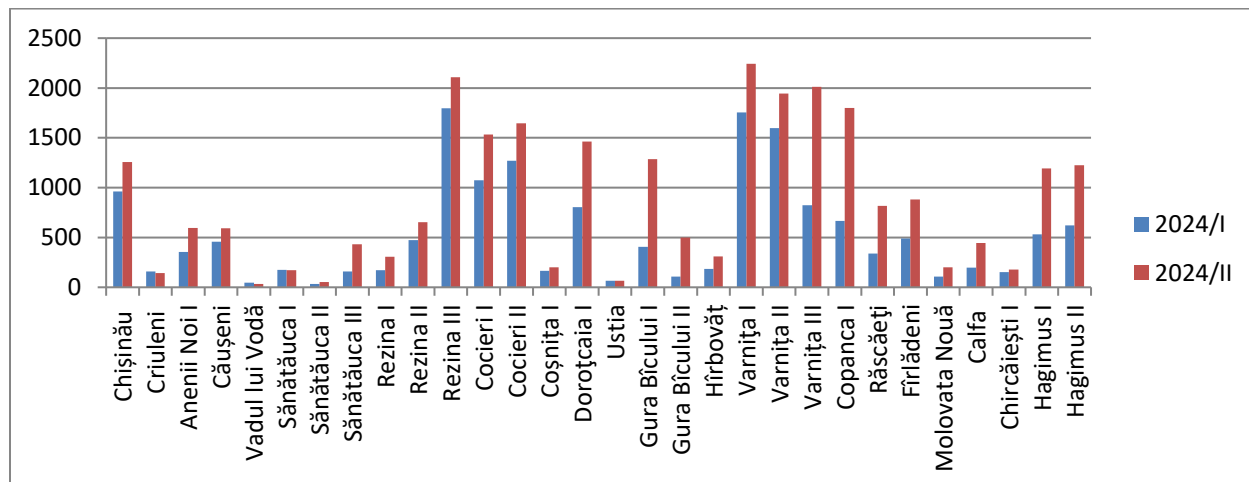
- data from the State Register of Voters, according to which 278,777 voters are registered in the localities on the left bank of the Dniester;
- the dynamics of voter participation in the last three elections (see Figure 2);
- the proposals and assessments of the institutions responsible for implementing reintegration and security policy.

Given that issues of electoral integrity and security were considered a priority, an inter-institutional working group was established, composed of: the CEC, the Intelligence and Security Service (SIS), the Bureau for Reintegration Policies of the State Chancellery, the General Inspectorate of Police (IGP), the Ministry of Internal Affairs (MAI), and the Supreme Security Council (CSS). The purpose of this group was to identify optimal solutions for guaranteeing the exercise of the right to vote by citizens of the Republic of Moldova residing in the Transnistrean region.

On 13 August 2025, the CEC submitted a request to the member institutions of the working group, arguing for the necessity of organizing 19 polling stations, based on turnout recorded in the last three elections.

Particularly relevant in this regard was the 2024 presidential election, which demonstrated that in one-third of the 30 polling stations opened, turnout was very low (see Figure 3).

**Figure 3. Number of voters from the Transnistrean region who participated in the 2024 presidential elections**



#### Positions of the institutions participating in the working group

- The General Inspectorate of Police (IGP) proposed that polling stations be established exclusively in localities within the perimeter of the Security Zone under state control, in order to effectively ensure public order measures.
- The Intelligence and Security Service (SIS), based on its responsibilities for preventing threats to state security, pointed out major risks and recommended the organization of only 8 polling stations.
- The Bureau for Reintegration Policies emphasized the deterioration of the security situation in the Security Zone and the Transnistrean region, as well as attempts by external actors to use the region to destabilize the Republic of Moldova. From this perspective, the institution recommended that the number of polling stations be determined based on the risk assessment conducted by the responsible institutions and their capacity to guarantee the security and integrity of the electoral process.

#### Final decision of the CEC

In light of these arguments and after consulting the institutions of the inter-institutional working group, the CEC decided to organize 12 polling stations for voters residing in the Transnistrean region for the parliamentary elections of 28 September 2025.

## **VI. Criticism of the CEC regarding the organization of 12 polling stations for voters residing in the Transnistrean region**

The CEC's decision to organize **12 polling stations** for voters residing in the Transnistrean region generated a wave of criticism and protests, coming both from opposition parties and from civil society observers.

### **A. Political opposition – “More polling stations for the Transnistrean region”**

Igor Dodon, the leader of the main opposition party – the Party of Socialists of the Republic of Moldova (PSRM) – [organized a protest at the CEC headquarters](#), accusing the government of “usurpation of state power.” The central argument of the opposition was that the CEC's decision violated the principle of equal rights for all voters:

*„Every citizen of the Republic of Moldova, wherever they may be – in Vulcănești, in Bălți or Briceni, in Drochia or Edineț, in Italy or in the Russian Federation, in Tiraspol or Leușeni – has equal rights guaranteed by the Constitution of the Republic of Moldova. (...) How can only 10 polling stations be opened for those on the left bank of the Dniester, where over 275,000 people with the right to vote live? At the same time, 80 polling stations are opened in Italy, where there are fewer people with the right to vote than in Transnistria.”*

This criticism, however, ignores several essential realities: in countries such as Italy or other destinations of the diaspora, [electoral participation has been steadily increasing](#), and the voter density per polling station has been at least twice as high as in the stations designated for voters from the Transnistrean region. Moreover, it disregards the fact that the territory on the left bank of the Dniester is not under constitutional control, and electoral competitors have no access to voters there, which contravenes the standards set out in the Copenhagen Document.

### **B. Promo-Lex Observation Mission – “The reduction is not fully justified”**

The Promo-Lex Election Observation Mission expressed, in [Report No. 2](#) (pp. 20–22), its disagreement with the reduction in the number of polling stations from 30 (in 2024) to 12 (in 2025). The observers acknowledged the need for security measures but considered that the argument of low turnout does not justify such a drastic decrease in the number of stations:

*„ With reference to the number of polling stations organized for the 2025 parliamentary elections, the Promo-LEX Observation Mission considers that, based solely on the turnout dynamics of the last three elections, the reduction by about three times in the number of stations does not appear to be justified. Based on the arguments invoked by the authorities, in addition to the application of legal criteria, the CEC's decision seems to be grounded primarily in considerations of security and the integrity of the voting process.”*

Thus, the observers' position falls within a moderate critique: they acknowledge the existence of security risks but consider that the decrease in the number of polling stations was disproportionate in relation to the statistical data on turnout.

## VIII. Conclusions

### A. The lack of a standardized international framework.

There are no established international norms or standards regarding the organization of polling stations for the citizens of a state residing in a territory controlled by an unconstitutional administration, unrecognized and supported by another state. The Republic of Moldova thus finds itself in an unprecedented situation, in which it is compelled to constantly adapt its solutions.

### B. A unique but challenging electoral experiment.

Through the CEC initiative of 1994, the Republic of Moldova created the first international precedent in organizing voting for citizens under the control of an unconstitutional administration. In the more than 30 years that have passed since then, this “electoral experiment” has followed a challenging trajectory, influenced by internal factors (political changes, governance strategies) and external ones (regional pressures, the influence of the Russian Federation, security risks).

### C. Differentiation of the criteria for organizing polling stations.

The criteria for organizing polling stations differ depending on the category of voters for whom these stations are opened:

- **Citizens residing in the territory controlled by the constitutional authorities** – the criteria are clear, precise, and unequivocally established by the electoral legislation;
- **Citizens residing abroad** – the criteria are established by national legislation but depend on participation in previous elections and on the consent of the host states (for example, the Czech Republic does not allow the opening of polling stations outside diplomatic missions, while Canada permits polling stations only for the national constituency and not for single-member constituencies);
- **Citizens residing in a territory controlled by an unconstitutional administration** – the legal criteria are accompanied by additional conditionalities related to the proper informing of citizens living under such an administration, the possibility for electoral competitors to communicate with voters in the respective territory, and, above all, considerations of national security.

### D. Institutional consultation as a basis for decision-making.

The CEC’s decision to organize 12 polling stations for voters from the Transnistrean region in the 28 September 2025 elections was the result of a broad consultation process, which involved both civil society organizations and key institutions within the inter-institutional group responsible for security and reintegration.

### E. The inevitable criticism of decisions.

In a politically and socially divided society, any CEC decision regarding the number of polling stations for voters from the Transnistrean region is inevitably subject to criticism. Some will invoke the insufficiency of polling stations, while other actors will denounce the risks and costs of an overly broad organization. In both cases, the fact is ignored that electoral competitors have no access to voters in the region and cannot conduct electoral campaigning under fair conditions.

### F. The primacy of the legal framework.

The CEC based its final decision on the provisions of the Electoral Code. In particular:

- **Article 28**, which requires the CEC to cooperate with 16 other entities (MIA, MFA, SIS, Bureau for Reintegration Policies, etc.) in the process of organizing elections;
- **Article 25 letter o)** of the Electoral Code No. 325/2022, which obliges the CEC to carry out post-electoral analyses, to examine electoral fraud, including alleged fraud, and to take measures to prevent and/or eliminate it.

#### **G. General conclusion.**

The case of the Transnistrean region demonstrates that the organization of voting in territories under unconstitutional administrations cannot be treated solely as an electoral issue. It lies at the intersection of citizens' rights, national security, and foreign policy. For this reason, CEC decisions must be analyzed not only through the lens of statistical participation criteria but also in terms of the strategic risks to the state.