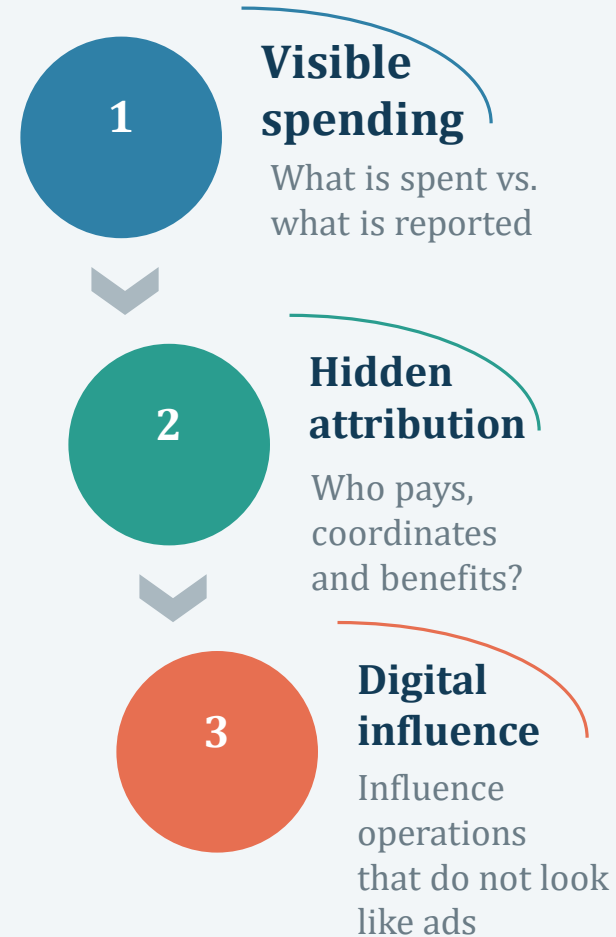


Closing the transparency gap

Moldova's experience in civic oversight of emerging risks in political finance

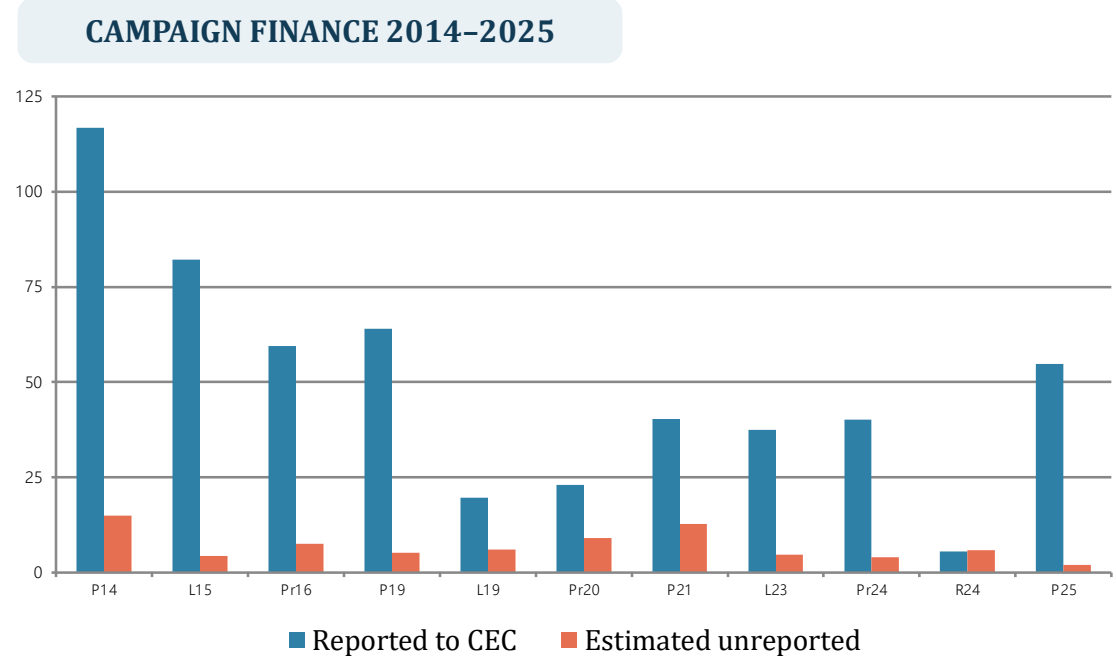
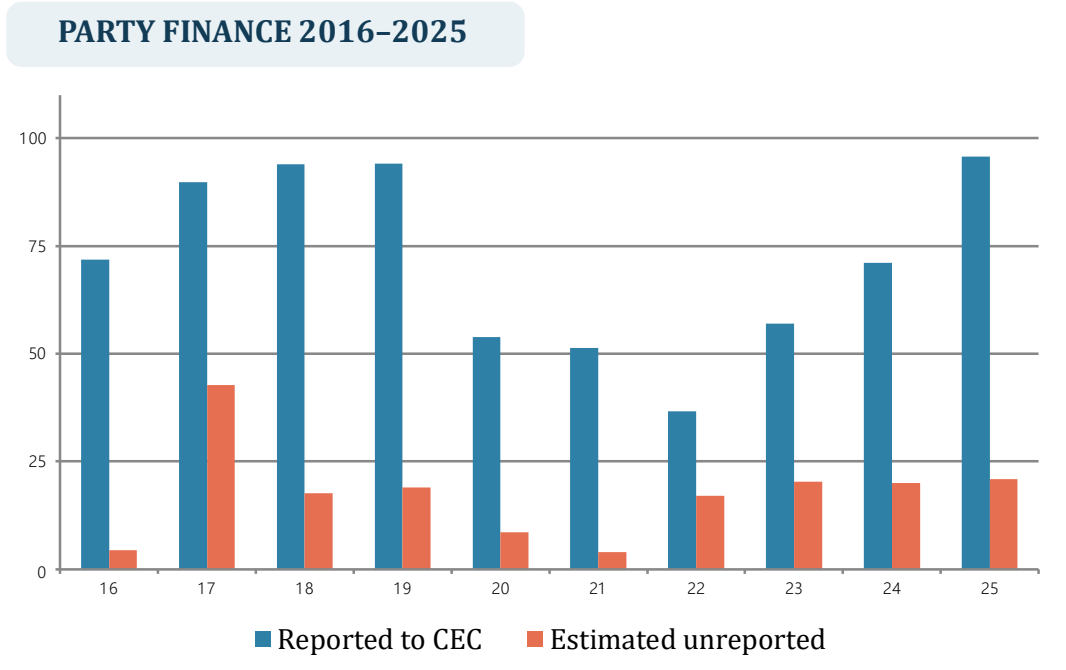
Core argument

Political finance transparency has improved - but the gap is moving from visible spending to hidden influence.



Ten years of civic oversight

The classical gap became visible, measurable and harder to ignore.



≈21m

estimated unreported party spending in 2025

22%

of reported party spending in 2025

2.04m

estimated unreported spending in the 2025 parliamentary campaign

100%+

2024 referendum: estimated unreported exceeded reported spending

The classic gap is better documented - but not fully closed

Sources: Promo-LEX party finance reports 2016–2025; Promo-LEX EOM final reports 2014–2025. Amounts in million MDL.

Inside the visible gap

Reporting exists - but the quality, completeness and verifiability of data remain uneven.

The next transparency challenge is not only “how much is reported”, but whether the reporting is meaningful and verifiable.

-44k

Party members

Declared members fell from 173,948 (2024) to 129,634 (2025). Stronger rules revealed fragile or inflated party infrastructure.

43.47m

Volunteers

19 competitors reported volunteer activity worth 43.47m lei; one bloc accounted for 47% of the total. Legitimate — but hard to verify uniformly.

?

Polls & consultancy

Modern campaign costs — polls, strategy, expert advice, digital production — remain insufficiently visible in reports.

CEC+

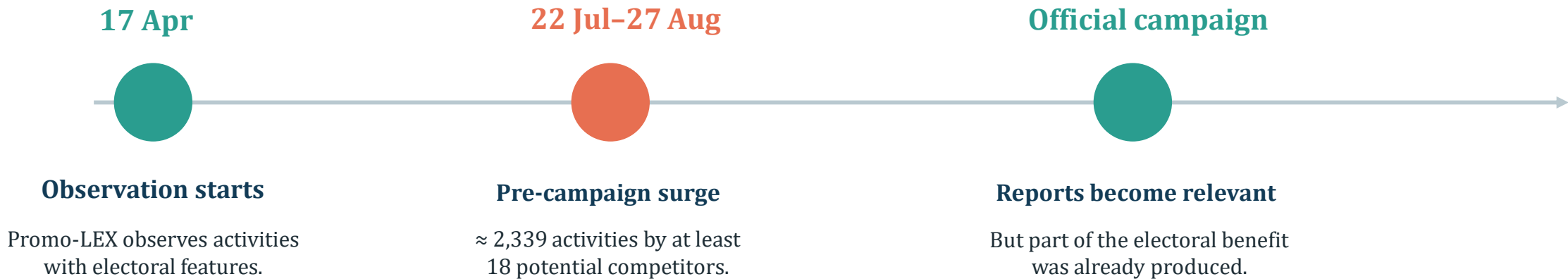
Enforcement

More active controls, online ad-library checks and sanctions are positive — but data architecture and categories lag behind the risks.

Core lesson Classical oversight must move from document collection to data quality, comparability and verification.

Timing gap: the campaign starts before the campaign

The spending can be visible, but transparency comes too late.



Pre-campaign activities observed in 2025

Not necessarily illegality, but delayed transparency!

71%
information materials

19%
street & online ads

6%
meetings with voters

**The political/electoral benefit is immediate; reporting arrives later.
Equal playing field affected!**

Attribution gap: third parties and hidden beneficiaries

The hardest question: who pays, who coordinates and who benefits?

Third parties are actors outside the formal campaign who spend resources or act systematically to promote or discredit parties, candidates or electoral issues.

17.1m+

estimated third-party/proxy spending identified by Promo-LEX in 2016–2021 policy analysis

25+

third-party entities identified in the 2025 parliamentary campaign

755k+

lei in sponsored posts with electoral impact based on Meta data only

What to regulate?

paid and systematic political influence - not opinions, journalism or civic criticism

Who reports?

actors above reasonable spending/ coordination thresholds; platforms for ad data; beneficiaries where coordination is proven

How to sanction?

proportionate, predictable, enforceable - avoiding vague rules that chill political competition

Window of opportunity!

Constitutional Court and Venice Commission both point to the need for clearer, proportionate tools for online influence, third parties and electoral integrity.

Digital influence gap

Political money increasingly buys infrastructure of influence, not only campaign materials.

This is not only disinformation. It may also function as untransparent financing of political influence.

55.1%

used social media often/very often for campaign information

84.6%

agree false information frequently circulates on social media

78.1%

agree social networks manipulate voter opinions

2025 examples

- cloned CEC page
- narratives about “falsified” or “cancelled” elections
- Telegram/local channels amplifying political content
- journalistic investigations exposed paid online networks linked to Ilan Șor / Evrazia / Russian support channels

AI-assisted TikTok network documented by Promo-LEX

550+

fake accounts

2,700

videos

1.4m

views

#alegmoldova

hashtag

Oversight must look at accounts, coordinators, sponsors, narratives, platforms and beneficiaries - not only invoices.

What next: close the next transparency gap

Oversight must follow political influence across the whole electoral cycle.

01

Link party, pre-campaign and campaign finance into one oversight logic

02

Introduce proportionate rules for third-party spending and online political advertising

03

Require near-real-time transparency for paid online political content

04

Clarify reporting of volunteers, polls, consultancy, digital production

05

Modernize SSI “Control Financiar” and publish data in open, analyzable formats

06

Strengthen cooperation: CEC, law enforcement, anti-corruption bodies, media regulators, strategic communication institutions and platforms

Public funding dilemma

Public funding reduces dependence on oligarchic or foreign money — but it should support pluralism and real party development, not only status quo or dependence on state resources.

2025: 58.9m lei transferred from the state budget; 76% went to three parliamentary parties.

The next generation of political finance oversight must follow influence, not only money.