

Comments on the *Participation of NGOs in the decision-making process in the Republic of Moldova* report

The report *Participation of NGOs in the decision-making process in the Republic of Moldova*, written as a result of November 9 - 11 2015 visit undertaken by the Conference of INGOs of the Council of Europe to Chisinau, is in general, reflective of the current situation, in our view.

However, we have noticed a slight inconsistency on page 4 of the report, in the first paragraph: 'In 2010, there were 7000 registered CSOs, but only about 25% of them had implemented projects in the three years prior to the relevant study (IDIS, 2014)'. IDIS study makes reference to 2014, but in the sentence is mentioned the situation as of 2010. Phrasing is confusing, perhaps a rephrasing would shed some clarity.

Furthermore, there are some aspects worth mentioning additionally. Regarding the *Funding* part, apart from the "2% law" which has not been yet implemented, but has been registered as a draft bill in the Parliament, it is worth to reflect on other efforts made in support of financial sustainability of CSOs. There are several legal initiatives, which could contribute to the sector's sustainability, i.e.: social contracting of CSOs, as the outcome of the Law on Social Services (adopted in 2010, with secondary regulation recently finalized); development of social entrepreneurship by establishing a working group under the Ministry of Economy (which is currently reviewing social enterprises amendments). In addition, there are successful examples of direct public funding to CSOs, small grants are allocated by ministries: Ministry of Youth and Sport, Ministry of Culture and Ministry of Environment. It is important to say that CSOs' fundraising and resource mobilization is encouraged through available indirect tax benefits. All these factors are important for financial sustainability of CSOs.

The part on *Participation of NGOs in consultative bodies set up by the public authorities*, there are also some aspects worth elaborating upon. The Republic of Moldova is viewed as a pioneer in the region in supporting public input to policy-making. It was done through introduction of a comprehensive legal framework on participation, with a Law on Transparency in Decision-Making (2008 with further positive amendments of 2012 and 2015), implementing regulation (2010) and innovative mechanisms for general public and CSO input to policy-making.

For instance, the National Participation Council, established in 2010, as a pioneering initiative made significant impact on possibilities for CSOs to provide their input to public authorities. With the caveat, of course, that after the first mandate expired, the government and CSOs failed to carry on this commitment, but it is still a significant attempt undertaken by Moldova.

The fact that there are several online platforms on participation could be viewed as a positive, rather than a negative factor in our opinion. Moreover, the revised and updated webpage of the Parliament of the Republic of Moldova has a specific section on civil society. The Parliament, as the main legislative body and in its capacity as national partner to monitor the implementation of the Civil Society Development Strategy for 2012-2015 has organized annual conferences and working meetings with CSOs, with the involvement of national and international partners.