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Declassified¹

Bureau of the Assembly

Proposal for testing the feasibility of observing out-of-country voting in the context of the parliamentary elections in the Republic of Moldova (28 September 2025)

Memorandum prepared by the Secretary General of the Parliamentary Assembly

1. Introduction

1. The majority of Council of Europe member states offer some form of out-of-country voting (OCV), employing methods such as in-person voting at diplomatic missions, postal voting, proxy voting or electronic voting systems. In some countries, diaspora votes are increasingly influencing domestic outcomes, representing a significant proportion of the vote.

2. Although there is no international law that mandates out-of-country voting, the European Convention on Human Rights (ECHR) (Protocol 1, Article 3) and the Venice Commission electoral standards require states to ensure electoral integrity for *all* voters, including those in the diaspora.

3. OCV presents vulnerabilities and risks of manipulation, some of which may be different from those encountered in the context of in-country electoral processes. And yet, observation of OCV remains the exception rather than the norm. To date, no international organisation observes OCV, unlike NGOs and civil society organisations. The possibility for the Assembly to observe OCV existed already in the 2019 edition of the PACE Guidelines for the observation of elections but was never used because of the lack of a defined methodology. According to the current formulation of the PACE Guidelines, the decision whether to observe OCV in each particular case is left to the Bureau of the Assembly.²

4. At its launching meeting on 29 January 2025, the Parliamentary Alliance for Free and Fair Elections proposed that the Assembly develop a methodology to observe OCV and mandated its Chairperson to bring this proposal to the attention of the Bureau (see letter of 30 January 2025). The Presidential Committee discussed the matter on 22 May 2025 and 26 June 2025. It suggested that the Bureau:

- consider testing a methodology for OCV observation in the context of the parliamentary elections in the Republic of Moldova (28 September 2025);
- and, on the basis of the results of this test, consider whether the methodology can be applied to future OCV observations.

5. There are several reasons why the parliamentary elections in the Republic of Moldova on 28 September 2025 would offer a good opportunity to test the feasibility of observing OCV, namely:

- The Moldovan diaspora represents a sizeable proportion of the electorate³ and, as shown by the 2024 presidential election, can have a significant impact on the electoral outcome;
- OCV is carried out in Moldovan diplomatic and other premises abroad (228 polling stations in 2024, 297 in 2025) and through postal voting in a limited number of countries;

¹ This Memorandum was approved and declassified by the Bureau on 5 September 2025

² In line with para. 37 of the [Guidelines for the observation of elections by the Parliamentary Assembly](#) as revised in 2025.

³ In the first and second round of the presidential elections of 18 October and 3 November 2024, out-of-country voters represented respectively 15,39% and 19,40% of the total number of votes cast. It is estimated that about a third of the Moldovan population lives abroad.

- Moldovan legislation permits the observation of out-of-country voting, a process already carried out by representatives of Moldovan political parties in many countries as well as by a renowned domestic NGO (Promolex) which has developed methodologies for civic observation of OCV with the support of the Council of Europe in 2020, 2021 and 2025.

2. Proposed methodology

General framework

6. Observation of OCV should be carried out in strict compliance with the PACE [Guidelines for the observation of elections by the Parliamentary Assembly](#), the Code of conduct for International Election Observation Missions and the 2005 Declaration of Principles for International Election Observation, including the rules governing the **disclosure of potential conflicts of interest**. Some adaptations, however, will be necessary, given the specificities of OCV as well as time constraints due to the proximity of the election date.

Submission of candidatures

7. Political groups should be invited to submit, by 10 September 2025, candidates from member states where OCV is provided for the parliamentary elections in the Republic of Moldova (28 September 2025), namely: Austria, Belgium, Bulgaria, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Iceland, Italy, Latvia, Lithuania, Luxembourg, Netherlands, Norway, Poland, Portugal, Romania, Spain, Sweden, Switzerland, Türkiye, Ukraine and the United Kingdom.

8. For information, countries with the highest number of Moldovan citizens voting abroad include France (26 polling stations), Germany (36), Ireland (12), Italy (75), Romania (23), Spain (15) and the United Kingdom (24).

9. Candidates should have experience in election observation, having observed at least one, preferably two elections as part of PACE election observation missions.

Composition of the ad hoc committee

10. The list of OCV observers will be approved by the Bureau by written procedure in time to request the accreditations.

11. When approving the composition, the Bureau will form teams of (at least) two of election observers preferably from different political groups, who will carry out the observation together. There may be more than one team per country. It shall not be possible for a member of the Assembly to carry out the election observation alone.

12. The total size of the delegation of OCV observers shall not exceed the size of the delegation observing the in-country vote (in the present case 20 members). For this test, considering the time constraints and to facilitate the process, there would be no requirement to respect the D'Hondt.

13. The ad hoc committee would be chaired by the Head of the election observation delegation (Mr Chris Said, Malta, EPP/CD), to whom the teams would report back their remarks and observations on the evening of the vote.

Secretariat and other support

14. Prior to election day, the Secretariat shall organise online briefings/training to provide information about the legal framework, address the distinct challenges of the OCV, and recall the regulatory framework applying to election observers, in particular as regards impartiality and non-interference.

15. The Secretariat will provide an election observation form to OCV observers, to facilitate and structure the collection of information.

16. The Secretariat will not accompany the teams. Interpretation shall not be provided. The Assembly shall not cover any costs stemming from the OCV observation. Any ad hoc committee members' expenses (transport, accommodation, etc.) should be covered by their respective national parliaments.

3. Follow-up

17. Given that the aim of this exercise is testing the feasibility of the Assembly observing OCV, the Head of the delegation, Chris Said (Malta, EPP/CD), will present to the Bureau the findings of the OCV observation but these will not be included in the PACE report on the observation of the parliamentary elections in the Republic of Moldova.

18. On the basis of the implementation of this test, the Bureau will approve the relevant methodology, taking into account possible adjustments. This methodology will be applied in future OCV observation missions by the Assembly, subject to adaptations as appropriate, should the Bureau decide to have them in each specific case, in line with the current Guidelines. In the future, and if so decided by the Bureau, the OCV findings could be included in the PACE EOM report.

4. Draft decision

The Bureau is invited to:

- decide to observe out-of-country voting in the context of the parliamentary elections in the Republic of Moldova on 28 September 2025, as a test, and approve the relevant methodology for this exercise;
- on the basis of this test, come back to the issue of the feasibility of the observation of out-of-country voting by the Assembly and approve the relevant methodology.