

UNITED NATIONS HUMAN RIGHTS COUNCIL
40th Session of the Working Group on the Universal Periodic Review

**JOINT SUBMISSION
TO THE UNIVERSAL PERIODIC REVIEW OF THE REPUBLIC OF MOLDOVA**

Submitted on 15 July 2021

on behalf of the Legal Resources Centre from Moldova, CONTACT Centre, the Independent Analytical Centre Expert-GRUP and the Association for Participatory Democracy "ADEPT"

Contents

Introduction.....	1
Civil Society Development Strategy.....	2
Attacks and defamation towards Moldovan CSOs.....	3
Transparency in decision-making.....	4
Financial sustainability of CSOs.....	6
Anti-Money Laundering / Combating Financing of Terrorism processes.....	8
Human Rights Defenders.....	8

Introduction

1. The purpose of this submission is to present the environment in which civil society and human rights defenders (HRDs) work in Moldova.
2. The previous UPR recommendations regarding civil society environment and HRDs:

121.132 Continue to support the work of civil society, especially the work of the human rights and journalists' organizations (Peru);

121.133 Continue the dialogue and substantive cooperation with human rights non-governmental organizations, in particular those involved in protecting human rights defenders (Romania);

121.135 Support the work of human rights defenders and other representatives of civil society, acknowledge their contribution to the advancement of human rights in the country, thoroughly and promptly investigate threats, attacks, harassment and intimidation against human rights defenders or independent journalists, and bring their perpetrators to justice in fair trials and ensure effective remedies to the victims (Poland);

121.136 Recognize explicitly the legitimacy of the job done by human rights defenders and ensure that their work is carried out in a safe and enabling environment, without fear of reprisals, intimidations or acts of violence, which should be sanctioned, and those responsible be taken before justice (Uruguay);

121.137 Create a safe, favourable environment for human rights defenders: a framework where human rights can be defended without fearing reprisals or intimidation in line with the international obligations

of the Republic of Moldova, in particular as a State party to the International Covenant on Civil and Political Rights (Belgium).

3. The authors of the submission welcome the adoption the draft law on non-commercial organizations was adopted in final reading in June 2020 and entered into force on 27 August 2020, after more than four years of work on the draft law. This law increases the protection of CSOs against abuses committed by the state and lays the foundation for a sustainable development of the NGO sector. We also welcome the adoption and implementation of the "2% Law", a mechanism through which 2% of the individuals income tax can be redirected to CSOs and religious entities.

Civil Society Development Strategy

4. The Civil Society Development Strategy (the Strategy or CSDS) is the main state policy document regarding CSOs in Moldova. The CSDS for 2018-2020 was adopted quite late, only at the end of March 2018 and came into force on 18 May 2018, undermining the implementation of activities for the first year. The Strategy was developed by the Parliament in a participatory manner through several rounds of consultations with the participation of Moldovan CSOs. Compared to the previous Strategies, 2018-2020 CSDS had a detailed and concrete Action Plan with a timeframe, responsible bodies for implementation, sources of funding, and progress indicators.
5. Despite all initial efforts to draft a good CSDS and obtain a deep cooperation between the civil society and governmental bodies in the implementation process, the subsequent results fell short of the stated goals. First of all, there was planned an intricate system of three monitoring and evaluation instruments of the Strategy that would ensure participation of civil society on equal foot with governmental bodies. The first instrument was supposed to be a Monitoring committee with representatives of the Parliament, Government and civil society. The second instrument was planned as periodic round-tables and public discussions, while the third one as annual conference to be organized by the Parliament. All these instruments were not implemented and the entire monitoring and evaluation process was concentrated in a specialized unit of the State Chancellery, without true involvement of the civil society. The very this approach to the monitoring and cooperation instruments showed the real "interest" of the state in the implementation of the CSDS.¹
6. The main responsible for the implementation of the Strategy was the Executive, represented by the State Chancellery. The Executive lacked ownership of the Strategy, which was developed by the Parliament during 2017. The political instability that followed the next years negatively influenced the supervision of the implementation of the Strategy by the State Chancellery.
7. Overall, the process of 2018-2020 CSDS implementation was rather slow and many actions were implemented not by governmental bodies, but by different CSOs. As a result of such distancing of the Government from ownership of the 2018-2020 CSDS, the overall implementation of the Action Plan was low, by the end of 2020 not being initiated 30% of envisaged actions.²
8. Another failure of the 2018-2020 CSDS is that the absolute majority of CSOs either do not know or have superficial knowledge about this important document for them. As a result, some reported improvements like the perceived rise of participation in the decision-making process or development of 2% financing mechanism can be classified rather as collateral product of the 2018-2020 CSDS,

¹ Dumitru Pinteau, Iurie Morcotilo, Civil Society Development Strategy 2018-2020: An intermediary assessment. Policy review, November 2020, page 3, <https://www.dezvolt.md/media/civil-society-development-strategy-2018-2020-an-intermediary-assessment>.

² Idem, page 3.

implemented due to the CSOs activities rather than the 2018-2020 CSDS implementation.³

9. The previous CSDS for 2012-2015 had a very low rate of implementation. Only 27% of actions were implemented, while the document lacked a clear mechanism of implementation.⁴

Recommendation:

- Develop the next Civil Society Development Strategy in a participatory manner, including at the local level, ensuring a clear ownership of the Executive over the Strategy and a full budget support for the actions planned in the Action Plan of the Strategy.

Attacks and defamation towards Moldovan CSOs

10. During the last 5 years, Moldovan CSOs were a target for attacks and defamation campaigns from politicians, affiliated mass media and online trolls. Several Moldovan CSOs reported annually the attacks against CSOs from 2016-2019, where they describe orchestrated attacks and smearing campaigns against CSOs that are involved in human rights protection.⁵ The attacks are usually replicated by numerous online publications and politically affiliated televisions and mass media. The attacks against Moldovan CSOs took place mainly through the following:
11. Legislative initiatives limiting the civic space. The civic space was under attacks via legislative initiatives aimed at limiting the foreign funding for CSOs. The draft law on non-commercial organizations that was adopted in final reading in June 2020 was amended in 2017 by the Ministry of Justice, introducing provisions prohibiting foreign funding for CSOs involved in “political activities”, proposing burdensome financial and activity reporting obligations to any CSO that received foreign funding or state funds and additional sanctions for the latter.⁶ The provisions were withdrawn by the Ministry of Justice as a result of the public pressure. The adoption of this law in a good version was not the expression of the genuine will of the Moldovan Parliament, but rather a result of the conditionalities imposed by the development partners and of the public campaign of the Moldovan civil society.
12. Attacks during the electoral campaigns. In the run-up to the parliamentary elections of 24 February 2019, several politicians and public authorities showed discontent with the alternative election monitoring reports developed by Promo-LEX Association. Among other things, the Promo-LEX Monitoring mission reports highlighted the practice of some political parties to use administrative resources, absence of financial reports for all expenditures incurred during the electoral campaign or offering of gifts during the electoral period.⁷ During the electoral campaign of the presidential elections that took place in November 2020, a Socialist MP launched an unprecedented attacks against civil society and independent mass media, portraying them as grant-eaters, foreign agents and enemies of

³ Idem, page 4.

⁴ Caraseni Gh., Implementation of the Civil Society Development Strategy 2012-2015, Chişinău, June 2016, https://pdf.usaid.gov/pdf_docs/PA00MDJW.pdf.

⁵ See details on the attacks for 2017-2019 here: Radiography of attacks against nongovernmental organizations from the Republic of Moldova, September 2016 – December 2017, <https://crjm.org/wp-content/uploads/2018/03/2016-2017-radiography-NGO-attacks-EN.pdf>; Radiography of attacks against nongovernmental organizations from the Republic of Moldova in 2018, https://crjm.org/wp-content/uploads/2019/03/2019-03-20-timeline-atacks-OSC_2018_final-ENG.pdf; Radiography of attacks against nongovernmental organizations from the Republic of Moldova in 2019, <https://crjm.org/wp-content/uploads/2020/07/2020-05-04-Timeline-attacks-CSOs-EN.pdf>.

⁶ Sorina Macrinici, Shrinking space for Civil Society in Moldova, April 2018, <https://crjm.org/wp-content/uploads/2018/08/2018-Civil-Society-Macrinici.pdf>.

⁷ See more details in the Radiography of attacks against nongovernmental organizations from the Republic of Moldova in 2018, pages 5 and 6, https://crjm.org/wp-content/uploads/2019/03/2019-03-20-timeline-atacks-OSC_2018_final-ENG.pdf

people.⁸ The attack employed faking and defamatory accusations to discredit civil society on the whole and targeting the organizations working in the field of human rights protection, justice reform, anticorruption, freedom of the press, pro-European reforms, and social and healthcare reforms though releasing a so-called book in a press conference in the full swing of the election campaign, just days before the presidential election. During the electoral campaign of the snap parliamentary elections in July 2021, the president of the Communist party declared that all the registered CSOs, namely around 12,000, are foreign agents.

13. Attacks as a result of the CSOs opposition to some legislative initiatives. Moldovan CSOs were heavily attacked by the politicians for opposing to some legislative initiatives undermining the democracy in Moldova, such as the amendment of the electoral system in 2017.⁹ The Legal Resources Centre from Moldova (LRCM) was attacked in the context of the judiciary reform announced by the Ministry of Justice in 2019. A judge of the Supreme Court of Justice declared that the LRCM must be liquidated.¹⁰
14. Surveillance. Moldovan authorities abusively used secret surveillance against civil society activist and journalists. According to a journalistic investigation,¹¹ at least 51 journalists, representatives of CSOs and opposition politicians were subjected to wire-tapping within the framework of three criminal cases in 2016-2017.

Recommendation:

- All the attacks and defamation of civil society and civil society organizations should stop, and replaced with fully enabling space for civic participation in decision-making.

Transparency in decision-making

15. According to the Commissioner for Human Rights of the Council of Europe, authorities in the Republic of Moldova have become more reluctant to involve CSOs in drafting legislation, which undermines the trust of civil society in central and local authorities.¹²
16. Moldovan CSOs face many difficulties in the process of the decision-making in the Parliament. One of them is the insufficient legislative framework. The legislative framework on the transparency in the decision-making process in the Parliament of the Republic of Moldova is split in several regulatory acts and creates confusion in practice. Also, the Rules of Procedure of the Parliament contain regulations on public consultations that are too general to be applicable. There are also other regulatory acts containing rules on public consultation and transparency in decision-making, which are also not clear enough. As a result, the provisions are not enforced or are applied inconsistently and inefficiently. The draft Code of the Parliamentary Rules and Procedures, adopted in first lecture in November 2018, contains regulations on public consultations that are even vaguer than those currently in force

⁸ National Platform of the Eastern Partnership Civil Society Forum, PUBLIC ALERT: Stop attacks on civil society in the Republic of Moldova!, 23 October 2020, <https://www.eap-csf.md/en/public-alert-stop-attacks-on-civil-society-in-the-republic-of-moldova/>.

⁹ See more details: Sorina Macrinici, Shrinking space for Civil Society in Moldova, April 2018, page 5, <https://crim.org/wp-content/uploads/2018/08/2018-Civil-Society-Macrinici.pdf>

¹⁰ Radiography of attacks against nongovernmental organizations from the Republic of Moldova in 2019, page 15, <https://crim.org/wp-content/uploads/2020/07/2020-05-04-Timeline-attacks-CSOs-EN.pdf>.

¹¹ RISE Moldova, Investigation: The Ministry of Interceptions, 14 June 2019, <https://www.rise.md/english/the-ministry-of-interceptions/>.

¹² Commissioner for Human Rights of the Council of Europe, Human Rights Defenders in the Council of Europe Area: Current Challenges and Possible Solutions, CommDH(2019)10, 29 March 2019, para. 34, <https://rm.coe.int/hr-defenders-in-the-coe-area-current-challenges-and-possible-solutions/168093aabf>.

mentioned above.¹³

17. In practice, public consultations are formal and are reduced to the publication on the website of draft regulatory acts and the summary of recommendations before the final reading. GRECO was concerned about repeated failure to systematically ensure adequate timeframes for meaningful public consultation and parliamentary debate.¹⁴
18. Access to information on the legislative activity of the Parliament is quite limited. The legislative plans of the Parliament are not published and hamper a better organization of the CSOs in the public consultation process. The current legal framework does not provide for the publication of amendments proposed by the MPs and preliminary versions of the drafts before final reading. Therefore, the civil society is devoid of the opportunity to know what is happening with the drafts and, if necessary, to come up with comments on the submitted proposals. Such limited information does not allow genuine involvement of the stakeholders in the decision-making process. Publishing of the summary of recommendations and objections in scanned PDF format does not allow searching by keywords and substantially reduces the access to information for the stakeholders.¹⁵
19. Although the meetings of the parliamentary committees and the Plenary of the Parliament are public, the publication of the agenda of the meetings shortly before they are held (one to two days) makes it impossible to get access to the meetings. Also, the minutes of the meetings of the parliamentary committees and of the Plenary of the Parliament are not published.¹⁶
20. Another issue represents the emergency procedure. The Rules of Procedure of the Parliament do not provide criteria and the procedure for the adoption of draft regulatory acts in the emergency procedure. This procedure is left to the full discretion of the Standing Bureau of the Parliament, which does not publish a written and reasoned decision. The responsible parliamentary committee should organize public consultations and present the report within 10 days. This procedure raises serious concerns about the lack of transparency in decision-making and authentic public consultations.¹⁷ In its report, GRECO indicated that the emergency procedure has increasingly been used for the adoption of laws. GRECO also noted that a considerable number of laws have been adopted through the accelerated legislative procedure (adoption in the first and second readings the same day), without sufficient consultations.¹⁸
21. A unified E-legislation portal for draft laws was expected to be operational in 2019. It has to include all versions of the legislative drafts and additional materials at different stages of elaboration. At this moment, after 2.5 years, the portal is not available. The authorities are working for several years already on an E-Parliament Information System, including a new web portal, electronic document circulation and E-voting.

Recommendations:

¹³ Legal Resources Centre from Moldova, How can we make the decision-making process in the Parliament of the Republic of Moldova more transparent?, October 2018, page 21, <https://crjm.org/wp-content/uploads/2019/03/2018-CRJM-PPD-JudTransp.pdf>.

¹⁴ Council of Europe, Group of States Against Corruption (GRECO), Second Compliance Report. Republic of Moldova, GrecoRC4(2020)9, September 2020, para. 15, <https://rm.coe.int/fourth-evaluation-round-corruption-prevention-in-respect-of-members-of/16809fec2b>.

¹⁵ Legal Resources Centre from Moldova, How can we make the decision-making process in the Parliament of the Republic of Moldova more transparent?, October 2018, page 21, <https://crjm.org/wp-content/uploads/2019/03/2018-CRJM-PPD-JudTransp.pdf>.

¹⁶ Idem.

¹⁷ Idem.

¹⁸ Council of Europe, Group of States Against Corruption (GRECO), Second Compliance Report. Republic of Moldova, GrecoRC4(2020)9, September 2020, para. 15, <https://rm.coe.int/fourth-evaluation-round-corruption-prevention-in-respect-of-members-of/16809fec2b>.

- Law on transparency in decision-making and the Rules of Procedure of the Parliament should be amended in order to provide adequate participation of the civil society in developing and monitoring the implementation of public policies at the Parliament level and to define the mechanism of the emergency procedure used by the Parliament;
- Ensure that draft legislation, all amendments and all supporting documents as required by law are published in a timely manner on the webpage of the Parliament;
- Ensure that adequate timeframes are followed to allow for meaningful public consultation and parliamentary debate, including by ensuring that the emergency procedure is applied only in exceptional and duly justified circumstances;
- E-legislation platform should be launched as soon as possible;
- E-Parliament Information System, including a new web portal, electronic document circulation and E-voting should be launched as soon as possible.

Financial sustainability of CSOs

22. In 2016, the authorities adopted the regulatory framework in order to implement the "2% Law", a mechanism through which 2% of the individuals income tax can be redirected to CSOs and religious entities. Through this mechanism, during 4 years, from 2017 to 2020, Moldovan CSOs received about USD 1,220,000. 2% mechanism can allow CSOs to have more diverse fundraising resources. Although the 2% amount received by organizations is substantial, the 2% mechanism is not sufficient in itself to ensure the financial sustainability of the non-profit sector. The development of the mechanism requires constant measures to inform about and promote the 2% mechanism, both on the part of the beneficiary organizations and on the part of the authorities.
23. At the same time, there are several issues related to the 2% mechanism that impede a better implementation. One of them is that a substantial fraction of the 2% amounts distributed to the beneficiary organizations are directed to organizations that have connections with state institutions - are established by former or current employees of state institutions - and/or those that have connections with public and political figures. Overall, between 2017 and 2020, the share of the 2% amounts received by organizations that have connections with state institutions and/or public persons was 39%. This is quite a large share of the 2% amounts and raises questions on the use of the 2% amounts. These organizations did not disclose how they used the 2% amounts and the results they obtained. The number of such beneficiary organizations is increasing every year.¹⁹
24. Some taxpayers referred to cases when the State Tax Service employees were reluctant to provide guidance on the designation procedure or even mislead them about the beneficiaries of the mechanism. Additional assurances are needed that the 2% designation is based on the free consent and is not imposed by their employers. In addition, the tax inspectors of the State Tax Service need to be trained and ensure impartiality towards this mechanism, without favoring any organizations.²⁰
25. Further measures are needed to inform and promote the mechanism by both the beneficiary organizations and the authorities. More accessible information needs to be published on the websites of the authorities involved in the implementation of the 2% mechanism, and tax inspectors should be trained on the percentage designation mechanism. At the same time, the capacity of non-commercial organizations to run information campaigns needs to be improved.

¹⁹ Legal Resources Centre, Snapshot: Three Years of Implementation of the 2% Mechanism in the Republic of Moldova, September 2020, https://crjm.org/wp-content/uploads/2021/07/EN_Trei-ani-de-implementare-a-mecanismului-2_print.pdf.

²⁰ Idem.

Recommendations:

- The beneficiary organizations that have connections with the state institutions and/or public figures should be subjected to a thorough eligibility assessment in order to benefit from the 2% mechanism and the assessment of the proper use of 2% amounts both at the stage of registration in the List of 2% beneficiaries – by the Public Services Agency and after registration – by the Public Services Agency and the Financial Inspection. These organizations should be more accountable and transparent and publish the results of the 2% amounts. It is important that the authorities' efforts are directed towards promoting the 2% mechanism rather than promoting organizations with which they have connections.
- Organize campaigns for awareness raising and promotion of the 2% mechanism at the national and, especially, at the local level by beneficiary organizations and by authorities;
- Build the capacities of non-commercial organizations to carry out campaigns for awareness raising and promotion of the 2% mechanism, with a particular focus on regions outside the capital;
- Strengthen the authorities' role in informing about the possibility to participate in the percentage designation mechanism, and placing more detailed information about the 2% mechanism on the websites of the State Tax Service and that of the Public Services Agency;
- The State Tax Service should instruct employees to inform individual taxpayers about the possibility of directing 2% to an organization from the List of 2% beneficiaries and ensure the free consent of the taxpayer that wants to designate 2%, as well as the confidentiality of the 2% designation.

26. An important financial resource for CSOs are donations and sponsorships from individuals and legal entities. Promoting philanthropy plays a special role in this regard. In the Republic of Moldova, the activity of philanthropy and sponsorship is regulated by Law no. 1420 of 31 October 2002 on philanthropy and sponsorship. The legal regulatory framework is extremely ambiguous, non-adapted to current needs, with erroneous wording and does not clearly regulate the manner of sponsorship and philanthropy (details in analysis).

27. The main issues related to the regulation of the philanthropy in Moldova are:

- the difference between philanthropy and sponsorship is not very clearly established in the Law no. 1420/2002;
- the Law no. 1420/2002 does not provide norms on the sponsorship / philanthropy contract;
- the aims of the philanthropy / sponsorship activity are not adapted to the current needs;
- the mechanism for granting sponsorships and providing philanthropic support, the reporting mechanism, etc. is not clearly regulated;
- the way of granting tax deductions for donor and sponsoring legal entities is inefficient and bureaucratic;
- individuals are deprived of the right for tax deductions if they make a philanthropic donation, etc.²¹

28. All these issues lead to the fact that individuals and legal persons do not use philanthropy and sponsorship or use it very rarely. The Ministry of Justice initiated the revision of the Law no. 1420/2002 and CSOs sent their comments.

Recommendations:

- Improve the legal framework on philanthropy by amending the Law no. 1420 of 31 October 2002 on philanthropy and sponsorship and develop an encouraging policy for donations made by donors / sponsors including foreigners (including for diaspora representatives);
- Granting the right of individuals to benefit from tax deductions if they make a philanthropic donation;
- Regulation of a simplified (including electronic) procedure for confirmation of donations;

²¹ CONTACT Centre, Law On Philanthropy And Sponsorship: Summary Analysis (in Romanian), October 2018, https://contact.md/wp-content/uploads/2021/06/Analiza_LEGEA-cu-privire-la-filantropie-si-sponsorizare_2018.pdf.

- Establish a transparent, accessible online mechanism for monitoring philanthropic support and sponsorship (including an effective reporting system).

Anti-Money Laundering / Combating Financing of Terrorism processes

29. According to the Recommendation 8 of FATF (Financial Action Task Force - an inter-governmental body that is committed to preventing and responding to money laundering and terrorist financing), “countries should review the adequacy of laws and regulations that relate to non-profit organizations which the country has identified as being vulnerable to terrorist financing abuse. Countries should apply focused and proportionate measures, in line with the risk based approach, to such non-profit organizations to protect them from terrorist financing abuse...”.
30. Globally there have been a number of cases when overregulation related to anti-money laundering and counter-terrorism financing (AML/CTF) has negatively affected nonprofit organizations (NPOs). Governments often justify those measures as necessary in order to comply with the standards of the FATF.²²
31. The regional body of FATF that assesses Moldova is MONEYVAL. According to the 2019 Moneyval report, Moldova completed its NPO sector risk assessment on 1st November 2018.²³ The authorities did not organize public consultations and did not publish the assessment.
32. In December 2020, the Parliament adopted the national AML/CFT Strategy and Action Plan. The Action Plan provided for the assessment of the NPO sector for the purpose and identification of the types of vulnerable NPOs to be used for the purpose of financing of terrorism, to be done during the second half of 2020. It also provided for the elaboration and approval of the Action Plan to minimize the risks identified in the evaluation of the NPO sector during the first half of 2021.
33. The authorities have not published neither the assessment of the NPO sector, nor the Action Plan to minimize the risks identified in the evaluation of the NPO sector, contrary to the FATF requirements.

Recommendation:

- Publication of the summary of the findings, conclusions and recommendations of the assessment of the NPO sector for the purpose and identification of the types of vulnerable NPOs to be used for the purpose of financing of terrorism and publication of the Action Plan to minimize the risks identified in the evaluation of the NPO sector.

Human Rights Defenders

34. Human rights defenders (HRD) in the Republic of Moldova face several challenges, including the shrinking of space for the activity of the civil society. After a visit in Moldova in June 2018,²⁴ the UN

²² European Center for Not-for-Profit Law, Impact of anti-money laundering and countering terrorism financing measures on non-profit organizations in the Eastern Partnership region, 2021, <https://ecnl.org/sites/default/files/2021-07/EaP%20AML%20CT%2002072021.pdf>.

²³ Council of Europe, MONEYVAL, Anti-money laundering and counter-terrorist financing measures Republic of Moldova Fifth Round Mutual Evaluation Report, MONEYVAL(2019)6, July 2019, page 188, <http://www.fatf-gafi.org/media/fatf/documents/reports/mer-fsrb/Moneyval-Mutual-Evaluation-Report-Moldova-2019.pdf>.

²⁴ Human Rights Council, Visit to the Republic of Moldova. Report of the Special Rapporteur on the situation of human rights defenders, A/HRC/40/60/Add.3, 15 January 2019, <https://undocs.org/en/A/HRC/40/60/Add.3>.

Special Rapporteur on the situation of HR defenders noted that public authorities had stigmatized and discredited human rights defenders and their work, including through politically affiliated mass media. The attacks took different forms – accusations of the CSOs that promote political rights of being biased and of following a foreign agenda that is contrary to national interests, orchestrated attacks and smearing campaigns against CSOs that expressed their dissenting position regarding several actions of the Government,²⁵ abusive wire-tapping against journalists, representatives of CSOs and opposition politicians.²⁶ In the Transnistrian region, the legislation on non-governmental organizations was already introduced to restrict CSOs activities defined as “political”. Receiving foreign funding by human right CSOs expose them to the risk of being closed down. The judiciary lacks independence and transparency.²⁷ It is often used against those perceived as opponents to the regime, including journalists, lawyers, independent judges and human rights defenders.

35. The UN Special Rapporteur indicated that some groups of HRDs are particularly vulnerable owing to the very nature of the rights they are defending, their own identity or the specificities of their work. In the Republic of Moldova, groups particularly at risk include:
- lawyers who were defending opposition figures or dissenting voices, or raising awareness about corruption cases or human rights violations. Some lawyers have also been intimidated and received threats to force them not to provide legal assistance to certain clients. In some instances, the threats and unfounded charges have also been addressed to their relatives;
 - independent journalists investigating corruption cases or other politically relevant issues are particularly targeted;
 - defenders of lesbian, gay, bisexual, transgender and intersex rights confront with homophobic attitudes, including hate speech, in society, even from relevant public figures;
 - women human rights defenders in the Republic of Moldova reported facing harassment, intimidation and threats because of their role in defending the rights of women;
 - Roma women people continued to be victims of widespread discrimination. The network of mediators is not yet fully operational. Other concerns raised included their lack of participation in decisions that affected them and the lack of a training curriculum for them and emphasized that no State institution had taken the lead in this particular issue.
 - human rights defenders in the Transnistrian region.
36. Another group in risk in the recent years represent the CSOs working on the protection of children victims of violence and with victims of domestic violence. They often receive threats and are intimidated by the perpetrators of violence for the work they are doing. The State does not take appropriate measures to stop this phenomenon.

Recommendation:

- Protect human rights defenders, including from attacks from third parties, in particular those working for the protection of children victims of violence and for the protection of the rights of the victims and domestic violence

²⁵ Radiography of attacks against non-governmental organizations from Republic of Moldova, September 2016-December 2017, <https://crjm.org/wp-content/uploads/2018/03/2016-2017-radiography-NGO-attacks-EN.pdf>; January-December 2018, https://crjm.org/wp-content/uploads/2019/03/2019-03-20-timeline-atacks-OSC_2018_final-ENG.pdf.

²⁶ Legal Resources Centre from Moldova, Newsletter no. 22, April-June 2019, page 9, https://crjm.org/wp-content/uploads/2019/09/Newsletter-LRCM_April_June_2019_Good_Governance_Anti-corruption_Notorious_cases_Justice_human_rights_civil_society_moldova.pdf.

²⁷ International Commission of Jurists, “Only an empty shell” - The undelivered promise of an independent judiciary in Moldova, March 2019, <https://www.icj.org/wp-content/uploads/2019/03/Moldova-Only-an-empty-shell-Publications-Reports-Mission-reports-2019-ENG.pdf>.