

Moldova: State of Affairs Report

1. Country Snapshot

1.1 Internet Freedom State of Affairs

Moldova has a relatively open environment in terms of Internet freedom, with no recent developments indicating mass surveillance, censorship or prosecution of freedom of speech online.¹ The online media space remains unregulated and provides vibrant fora for civic activism. However, the situation may change as government has actively sought to introduce multiple changes towards greater regulation and control of Internet under seemingly legitimate grounds, and this elicits high concern and resistance of most stakeholders in terms of potentially negative implications.

The infrastructure of connectivity is well-developed, with a high penetration rate and near universal mobile broadband access and population coverage. The telecommunications market for Internet services is competitive, even though the national operator plays a significant role in some segments, while the national regulator is seen as independent and accountable.

1.2 Brief Country Data

Moldova is a parliamentary republic in Eastern Europe, with an area of over 33.8 thousand square kilometers. The country has a hilly terrain, presenting prevalent steppe and forest-steppe landscapes, mostly transformed into farmland. As of January 2017, its resident population is 3.5 million.² Only 42.7% of the population lives in urban areas, and according to the last census in 2004, the majority (75.8%) are ethnic Moldovans.

The economy of Moldova has been traditionally reliant on agriculture and food processing, and bolstered by a significant flow of remittances from labor migrants in Russia. Moldova is energy-dependent, from Russian and Ukrainian imports of energy supplies. The composition of GDP is 65% services, 21% industry and 14% agriculture.³ GDP of Moldova was \$6.7 billion in 2016, representing a decline from the highs of almost \$8 billion in 2015 and 2014, following a major \$1 billion banking fraud amidst political instability.⁴ The country's income level is lowest in Europe, and classified as lower middle income, according to World Bank's classification, with GNI per capita at \$2120 in 2016.⁵

2. Access to Internet & Internet Services

¹ In terms of overall assessment of the country environment, this review refers to the situation in the Republic of Moldova in its borders de-facto controlled by the government, and excludes the situation in the unrecognized Republic of Transnistria, due to lack of reliable and comprehensive information. Where relevant in sub-sections of the review, some reports on developments in Transnistria are referenced.

² National Bureau of Statistics of the Republic of Moldova, Statistical Databank query, "Resident Population, as of January 1 by Years and Areas"

http://statbank.statistica.md/pxweb/pxweb/en/20%20Populatia%20si%20procese%20demografice/20%20Populatia%20si%20procese%20demografice_POP010/POP010100.px/table/tableViewLayout1/?rxid=b2ff27d7-0b96-43c9-934b-42e1a2a9a774

³ CIA World Factbook, "Moldova", <https://www.cia.gov/library/publications/the-world-factbook/geos/md.html>

⁴ Country data for Moldova, World Bank, available at: <http://data.worldbank.org/country/moldova> accessed on May 30, 2017.

⁵ Ibid.

2.1 Penetration

Moldova has relatively high Internet penetration indicators in the post-Soviet space. By end of 2016, International Telecommunications Union (ITU) lists the percentage of individuals aged 6+, using Internet in Moldova to be 71%, up from 63% in 2015.⁶ According to the country's National Agency for Regulation of Electronic Communications and Information Technology, by end of 2016, there were 5557 thousand subscribers with fixed access to Internet, increasing 4.3% compared to 2015 and translating to 15.7% penetration rate in this category.⁷ However, the fixed broadband penetration of households is 46.5%. The number of mobile Internet users grew rapidly, reaching 1.92 million (showing an increase of 9%), of which almost all had mobile broadband connections (an increase of 37%), and 54% penetration rate in this category. In the 2016 State of Broadband report by ITU (which uses 2015 figures), Moldova ranked 65th among 187 nations in the fixed broadband category, and 76st in the mobile broadband category.⁸

2.2 Demographics of the Internet audience and its uses of Internet

The most recent GemiusAudience study from December 2016, estimates the country has just over 2 million users (72% penetration rate), including 1.8 million daily users.⁹ Geographical distribution reflects the patterns of socio-economic distribution - 58% of Internet users in Moldova are concentrated in the central region of the country, which has 80% penetration and where the capital city Chişinău is located.¹⁰ The less developed southern region has only 17% of users and 63% penetration. Chişinău has 25% of the Internet users and Bălţi, the second largest city, another 7%.

According to the same study, young urban audience prevails among the Moldovan Internet audience. Age groups 15-29 constitute 38% of the total audience, while penetration among the age group 20-25 is almost 100%. As different from the trend in most other post-Soviet countries, the Moldovan audience is 53% women and gender variance is most apparent in younger age groups, such as in the 15-19 group, responsible for 9% of the total female audience, and only 4% of the male audience.

White collar professions – specialists with higher education constitute 24% of the audience, followed by students (19%). Accordingly, 38% of users have completed higher education, and another 32% technical/vocational degree (lyceum or college).

Uses of Internet are diverse, with news, education/personal development, job search, health and food among the most frequently searched categories, in order of frequency.¹¹

2.3 Barriers to access

With continued improvements of the past few years in terms of expanding penetration rate and geographic coverage, falling costs of data plans and devices, Moldova does not have major barriers to access. This is especially true for the mobile Internet segment, where 3G and 4G broadband coverage is almost universal in terms of both the coverage of the population and territory, depending on choice of a

⁶ International Telecommunications Union, "Percentage of individuals using Internet", <https://www.itu.int/en/ITU-D/Statistics/Pages/stat/default.aspx> accessed on May 30, 2017.

⁷ National Agency for Regulation of Electronic Communications and Information Technology, "Evolution of Electronic Communications Market in 2016", [http://en.anrceti.md/files/filefield/Evolutia_Pietei_2016\(eng\).pdf](http://en.anrceti.md/files/filefield/Evolutia_Pietei_2016(eng).pdf)

⁸ ITU, "The State of Broadband 2016: Broadband Catalyzing Sustainable Development", <http://www.itu.int/pub/S-POL-BROADBAND.17-2016>

⁹ Gemius, "GemiusAudience Study" in partnership with the Bureau for Audit of Print Runs and Internet, <http://www.bati.md/news/0002>

¹⁰ Ibid.

¹¹ Ibid.

mobile operator. However, financial constraints are a likely barrier for most Moldovans without access. According to a 2013 study by the Center for Electronic Governance,¹² 18% of respondents without Internet access said the cost of service is too expensive. Similarly, more than half of the respondents who have no computers to enable access, said the cost is not affordable for them. 15% of such respondents also said they lack skills to use computers. Lack of fixed infrastructure may be of concern for some rural locations, as the fixed telephony infrastructure historically has a limited coverage and investments into the fiber optic networks have been concentrated in urban locations. Still, only 4% of respondents in the survey by the Center for Electronic Governance said there is no available infrastructure to connect their household.

3. ICT Actors & Infrastructure

3.1 Fixed Communication

The fixed-line Internet market generates a smaller share of Internet penetration in Moldova, delivered predominantly by wireless connections. The fixed-line market dominated by Moldtelecom, the national operator with absolute dominance of the fixed telephony network (96.4% of the market). It leads with 64.6% market share by end of 2016, followed by Starnet Solution (20.2%) and Sun Communications (5.3%).¹³ Other smaller providers jointly account for 9.9% of the market.

Fixed Internet connections in Moldova offer high speeds – half of connections allow speeds from 30 to 100 Mbps, while another 35% allow 10-30 Mbps. FTTx technology is overall prevalent, deployed in 56.5% of connections by December 2016, with especially high rate in Chişinău and other bigger cities, while xDSL technology features in 36.1% of connections, and most common in smaller towns and rural locations. Fixed broadband penetration of households is 80% in Chişinău but below 30% in several administrative-territorial units of Moldova.¹⁴

3.2 Mobile Connection

Three companies constitute the mobile market of Moldova, where penetration is about 125%, with a total number of subscriptions is at 4.4 million. According to the National Agency for Regulation of Electronic Communications and Information Technology, Orange Moldova held 65.5% market share by turnover, declining from 70% in 2013. The next largest share by turnover belongs to Moldcell with 30.2%, which grew from 26.2% in 2013, and Moldtelecom with 4.2%, which also grew from 3.76% since 2013.

The market for mobile Internet access (by revenue) has a slightly different composition. Orange Moldova had a 58.9% share, while Moldcell had a 27.4% share. Interestingly, Moldtelecom has a 13.7% share, punching well above its weight relative to its mobile market share and signifying an ISP-focused strategy of development. The total number of mobile broadband users stood at 1.92 million, including 1.59 million mobile broadband subscriptions and over 300 thousand subscriptions for dedicated mobile Internet access (e.g. USB-modems).

¹² Roman Bahnaru, deputy chief of National Agency for Regulation of Electronic Communications and Information Technology, presentation at the ITU Regional Forum, Moldova, 31 March – 1 April 2015, available at https://www.itu.int/en/ITU-D/Regional-Presence/CIS/Documents/Events/2015/03_Chisinau/Session_6_Bahnaru.pdf

¹³ Ibid., p.20

¹⁴ Ibid., p. 33

The speeds and coverage of mobile connections offered in Moldova have significantly improved over the past few years. Orange Moldova and MoldTelecom report their 3G broadband coverage for both the territory and population to exceed 98%.¹⁵ Orange Moldova also reports 97% and 94% coverage with 4G service for territory and population, respectively. Moldcell and Moldtelecom have only 30% population coverage by 4G, and even smaller (9.6%, Moldcell and 5%, Moldtelecom) coverage in terms of territory.

3.3 International Communication

The infrastructure for international connectivity was monopolistic in Moldova until 2010, when the other operators gained access to Moldtelecom's network and were also licensed to develop their own gateways. Moldovan operators are linked with the networks of their Romanian and Ukrainian counterparts, providing access to backbone infrastructure onwards in Europe and Russia. By end of 2016, total external Internet capacity was 341 Gpbs, growing from 326 Gpbs in 2015.¹⁶

4. Regulatory ICT Policy

4.1 Regulatory/governing bodies and standards (National & International)

The Ministry of Information Technology and Communications is responsible for policy development and policy application in the fields of information technology, information society and communications. The Ministry sets the national table for allocation of the radio spectrum, administers and manages the civilian spectrum and administers technical control and certification needs of the telecommunications sector.

The Ministry also oversees the work of the several related state enterprises. **The State Enterprise National RadioSpectrum Center**, undertakes technical management of spectrum and certification of radio emitting devices. **The State Enterprise Radiocomucatii**, is the national operator for radio and television broadcasting, which also provides Internet access services, including over the WiMax network. **The State Enterprise MoldData** specializes in software development and IT services, including web-hosting and domain registration.

The National Agency for Regulation of Electronic Communications and Information Technology is the regulator, or the central public authority that regulates activity in electronic communications, information technology and postal communication.

5. Information Security, Data Protection and Privacy

5.1 Internet Infrastructure (susceptibility to cybercrime, terrorism, and attacks)

The Internet infrastructure in Moldova is relatively resilient and sustainable in phase of cybercrime attacks and physical disruptions. The frozen conflict in its Transnistria region that is claimed, but not controlled by Moldova, is not of much concern for connectivity of the rest of Moldova, except for potential cyber threats originating from the territory. At the same time, the infrastructure appears to be

¹⁵ National Agency for Regulation of Electronic Communications and Information Technology, "Evolution of Electronic Communications Market in 2016", pp. 14-15.

¹⁶ Ibid., p.4

more vulnerable inside Transnistria. The de-facto independent region has its own operators, licensed by the unrecognized government of the Pridnestrovian Moldavian Republic. Yet, Transnistria periodically experiences blockade by Ukraine, prohibiting transit of goods destined to Transnistria through Ukrainian territory, while Moldova also uses economic leverage against the break-away region.

Since 2010, Moldova has its cyber security center – CERT-GOV-MD, integrated in the State Enterprise Special Telecommunications Center, which is part of the Intelligence and Security Service of Moldova. Also in 2010, the General Prosecutor’s Office established a dedicated Division for Cybercrime Investigation, and the Intelligence and Security Service established a Department for Combatting Cybercrime. In 2012, the Ministry of Interior also set up its own Center for Combatting Cyber Criminality. Moldova ranked globally 73rd (out of 165 countries) in the 2017 Global Cybersecurity Index, which measures the level of commitment to cybersecurity, ahead of six other countries in the region.¹⁷

5.2 Types of attacks, actors, and those targeted

Moldova experiences a range of cyber threats, involving government and private sector targets, as well as the general public.

In the recent period, government systems have seen coordinated mass attacks during major political events. In connection with the two rounds of presidential elections in October and November 2016, Moldova experienced unprecedented large-scale cyberattacks on government entities, Central Election Commission websites, the observation missions and media outlets.¹⁸ During the second round, the attacks intensified, as more than 680 thousand attacks were registered by the CEC.

In other times, government agencies are exposed to typical threats, such as viruses. In February 2016, a wave of virus infections affected the information systems of five government agencies.¹⁹ Earlier, the Intelligence and Security Service of Moldova reported that it prevented 27 attempts to breach government information systems, with one of the attacks targeting 12 government agencies through a Trojan virus.²⁰

Among the non-government targets, common citizens remain highly vulnerable. Throughout 2016, Moldovan users frequently filed complaints regarding ransomware in Moldovan language, purporting to be an official police message, imposing a fine, payable online.²¹ In 2015, dozens of Moldovans fell victim of phishing attacks over the instant messenger networks, including Viber.²²

As in most other countries, the banking sector is particularly exposed. In June 2015, the National Bank of Moldova experienced Ddos attacks on its website, temporarily shutting it down.²³ In 2015, Moldovan law enforcers registered over 13000 cases of theft from bank accounts.²⁴ In some cases, Moldovan residents were themselves the source of threats. In late 2016, several Moldovan citizens were arrested

¹⁷ ITU, Global CyberSecurity Index 2017, https://www.itu.int/dms_pub/itu-d/opb/str/D-STR-GCI.01-2017-PDF-E.pdf accessed July 4, 2017

¹⁸ <https://digital.report/bolee-40-tyisyach-kiberatak-byilo-soversheno-na-servery-tsik-moldovy-v-den-vyiborov/>

¹⁹ <https://digital.report/virus-sovershavshiy-ataki-na-sayty-gosuchrezhdeniy-rm-zablokirovan/>

²⁰ <https://ru.sputnik.md/incidents/20160209/4576383.html>

²¹ <http://locals.md/2017/v-moldove-internet-moshenniki-pod-vidom-mvd-vyimogayut-dengi/>

²² <https://ru.sputnik.md/news/20150728/1048488.html>

²³ <https://ru.sputnik.md/incidents/20150605/407400.html>

²⁴ <https://digital.report/zakon-big-brother-v-moldove-ot-kiber-obyiskov-do-proverki-elektronnoy-pochty/>

in connection with an investigation of an international criminal ring, operating in Moldova and 30 other countries, and responsible for theft of funds from bank accounts.²⁵

5.3 Government surveillance

Moldova is not known for mass surveillance of its citizens, but experts have doubted the strength of existing safeguards against unwarranted and disproportionate breaches of privacy. Only the special units of the Ministry of Interior, the Intelligence and Security Service and the National Center for Combatting Corruption are allowed to use technical equipment allowing interception of communication, in a process that requires a court warrant (with a post-factum warrant issuable in case of a need to avert an imminent criminal activity). However, in recent years, the number of such warrants has been steadily increasing, reaching 4500 warrants in the first six months of 2015.²⁶ The expert community questions the integrity of the process, noting that courts may not extensively review the requests and it is possible to add any person to a request under an unrelated criminal investigation.²⁷ The operators are required to install surveillance systems and equipment (SORM, the System for Operational Investigative Activities), and store the relevant metadata for six months.

In recent years, there were cases when major political figures had their conversations wiretapped and leaked online. In one case, a former official of the Intelligence and Security Service was sentenced to three years for abusing power for surveillance.

6: Legal Overview

6.1 Current Laws

The national strategic framework most relevant to Internet freedom in Moldova is the Strategy for Development of an Information Society, or “Digital Moldova 2020”. Adopted in 2013, the document sets the priorities of expanding access and connectivity, promoting competitiveness of the broadband market, support to digital content and service development, and information security. The Strategy includes the objectives of connecting all localities to at least a 30 Mbps fiber optic network, 85% mobile broadband coverage of localities and 60% household penetration rate. The Strategy provided continuity from the earlier frameworks related to the State Program Electronic Moldova (2005) and the State Program for Broadband Development for the period 2010-2013 (2010), which is expected to be updated for the 2015-2020 period.

Among other relevant documents supporting the development of Internet infrastructure, access and skills development are the Strategic Program for Technological Modernization of Governance (Electronic Transformation), adopted in 2011 for the period until 2020; and the Strategy for Increasing the Competitiveness of the IT Industry, covering the period 2015-2021 and adopted in 2015. Also of note is the Strategic Program for Cybersecurity adopted in 2015, and the process is underway for finalization in summer 2017 of a Concept for Information Security.

In terms of the legislative frameworks, Moldova has harmonized its national legislation with the EU regulatory frameworks. The 2008 Law on Electronic Communications provides the general legal basis for provision of telecommunications services in Moldova, and transposes the provisions of several EU

²⁵ <https://ru.sputnik.md/incidents/20161206/10209653/kiberprestupnosti-rassledovanie-moldova.html>

²⁶ <https://digital.report/pod-kolpakom-spetssluzhb-est-li-v-moldove-massovaya-slezhka/>

²⁷ Ibid.

directives governing the telecommunications industry, such as on competition and market regulation. The 2016 Law on Access to Properties and Joint Use of Associated Infrastructure Electronic Communication Networks of Public Use regulates the infrastructure access and promotes competition, also in line with the EU frameworks. The Law on Press does not regulate online media, bloggers or websites of traditional media and nor does Moldova have a dedicated law on information as in most other post-Soviet states.

6.2 Litigation

Considering the generally favorable environment for Internet freedom in Moldova, there have been no recent cases of public interest litigation specifically seeking to uphold Internet freedom. Some recent law suits by media entities on access to information are tangentially relevant, since those entities have online presence. For instance, in 2014, the media portal jurnaltv.md sued the then President of Moldova Nikolai Timofti for violating the norms of the law on petitions, and failing to provide a timely response to information request from the outlet.²⁸ The suit was declined by the district court, and filed for review by the Appellate Court of Moldova, as well as the European Court of Human Rights.

6.3 Recent legislative initiatives

Recent initiatives with potential to impact Internet freedom have been connected to general security and information security justifications. In early 2016, Moldovan government approved a draft law (No 161) with a package of legislative amendments, enabling wider digital surveillance mandate for law enforcement and security agencies, as well as powers to block websites with content inciting hatred, discrimination and violence.²⁹ Under the changes the operators would also have broader responsibilities to collect and store metadata and digital surveillance. Amidst critical reviews from civil society, media and business representatives, nicknaming the package as the “Big Brother” legislation, and a Venice Commission review in December 2016 with recommendations for compliance with EU frameworks, the draft law is still under review in parliament.

In late 2016, Moldovan government approved a draft Law on Prevention of and Combating Terrorism, which includes a prohibition on use of electronic communications for terrorist activity and blocking of media outlets for undesirable coverage of terrorist activity. The draft law has many references to online threats and new powers for security services and the bodies regulating the information space. As of June 2017, the law was passed in the first reading in parliament.³⁰

In September 2016, the Moldovan government circulated for discussion the draft National Strategy for Public Order and Security (2016-2020).³¹ The document references freedom of speech and unfettered access to Internet as determinants behind the rise of anti-state propaganda and manipulation of public opinion. The risks of radicalization are also highlighted, along with the need to improve capacity against cybercrimes. In October 2016 the government approved a draft Concept for Information Security,³² under which all actors in the information space are to receive a legal status and common information threats and crimes will be further defined. Along with improved intelligence on information threats, a special division will be created within the Intelligence and Security Service, which will monitor Internet more closely. Meanwhile in the unrecognized republic of Transnistria, the republic’s parliament passed a

²⁸ <https://ava.md/2014/04/23/timofti-pred-yavlen-isk/>

²⁹ <https://advox.globalvoices.org/2017/01/27/in-moldova-civil-society-stands-up-to-big-brother-law/>

³⁰ <https://point.md/ru/novosti/obschestvo/detali-novogo-zakona-v-moldove-vserez-zadumalis-o-borbe-s-terrorizmom>

³¹ <http://www.gov.md/en/content/moldovan-cabinet-approves-national-strategy-public-order-security-2017-2020>

³² <http://www.moldova.md/en/content/cabinet-adopts-draft-law-concept-information-security-moldova>

law in the first reading prohibiting placement of state websites on servers registered outside Transnistria, citing security justifications. Earlier, in 2015 the Transnistrian President Shevchuk issued a decree on countering extremism, providing the basis for blocking of online content.³³

In March 2017, following extensive media coverage of newly revealed suicide groups in Russian-language social media, targeting adolescents, a government decree approved an Action Plan for online safety of children and adolescents for the years 2017-2020.³⁴ The Plan includes measures for training of students, development of content warning and filtering systems and partnerships with civil society. As part of the related government response, the Interior Ministry circulated a draft law on amendments to the Criminal Code, increasing the penalty for abetment to suicide from 6 to 20 years.

Moldova also continues to improve the environment for IT industry and harmonize its national legislation with the EU frameworks. In November 2016, the parliament passed amendments to the law on e-commerce, harmonizing it with EU directives, such as on personal data protection. The parliament is also reviewing a draft law facilitating development of IT parks, with changes affecting tax, social payments and medical insurance.

6.4 Limitations and opportunities for advancing Internet freedom through legal means

Moldova presents a conducive environment for promoting Internet freedom through legal means. The political landscape is diverse and principles of media freedom are not questioned by most actors, even though the media scene is fragmented and subject to strong political influence. Civil society is resilient, and actively uses strategic litigation to advance access to information and other human rights objectives (for instance, the Center for Investigative Journalism in Moldova³⁵ works on access to information cases). It can be reasonably expected that litigation will be also deployed against infringements of Internet freedom, should there be a drastic change, resulting in deteriorated legal frameworks and practice. It should still be a consideration that the judicial system is not trusted and is seen as corrupt and under the influence of other branches of power.

7. Information Campaigns and Internet Activism

7.1 Advocacy work on IF

- Topics of activism, activist networks and campaign
- Mediums: social media, journalism, blogs, etc

Advocacy efforts focused on protecting Internet freedom in Moldova have become more apparent from 2014, when the anti-extremist legislation allowing censorship was first proposed and a group of media organizations, associations and watchdogs issued a joint declaration with their concerns.³⁶ Such advocacy intensified from 2016 onwards, in connection to the “Big Brother” package of amendments. Independent media outlets were especially active, as well as a number of leading civil society

³³ US State Department Human Rights Report 2016, Moldova, p.22 <https://md.usembassy.gov/wp-content/uploads/sites/210/2017/04/MOLDOVA-HRR-2016-RUS.pdf>

³⁴ <https://digital.report/v-moldove-pristupili-k-povyisheniyu-bezopasnosti-interneta/>

³⁵ <http://media-azi.md/en/about-us>

³⁶ <http://www.media-azi.md/en/stiri/media-ngos-asking-parliament-not-allow-restriction-internet-freedom-0>

organizations, such as the Legal Resource Center of Moldova,³⁷ Promo-LEX Association³⁸ all of which issued joint statements and held public discussions critical of the amendments. From among the private sector groups, the National Association of ICT Companies,³⁹ and Starnet, one of the ISPs have taken an active stance against the changes. As a result, the government modified some of the most problematic areas of the proposed changes, introducing for instance the list of grounds on which the blocking of online resources can be effected.

Other pressing issues have also provided the focus for concerted campaigns, such as the awareness campaign against misinformation and manipulation of content, including in the social media space. Since late 2015, the Association of Independent Press,⁴⁰ the Independent Journalism Center and the Association of Independent TV Journalists ran a two-year campaign called “Media campaign against false and biased information - STOP FALS!:.⁴¹

A variety of mediums are used to support advocacy activities, from media platforms and online petitions to direct engagement of policy makers. The annual ICT Summit held since 2000 is a major industry event, where advocates on issues of Internet governance, Internet freedom and cybersecurity are able to engage the relevant government agencies.

Some of the campaigns deployed public protests as a means of delivering the advocacy message. The most well-known story is related to the anti-corruption protests in 2014-2016, initiated by the Dignity and Truth grassroots movement, emerging in response to the \$1 billion banking fraud scandal. In early 2017, the media and civil society activists protested in front of the Ministry of Justice, seeking to overturn the ban introduced in early 2017 under personal data protection regulations, on disclosing the names of participants of court cases.

7.2 Government Response

The government overall remains open to dialogue with outside advocates for legal changes. Moldovan non-government advocates are proactive in shaping the policies and legislation, initiating and achieving changes related to greater transparency of media ownership, improving the e-commerce regulations, and safety of Internet for children and adolescents. Nevertheless, in recent period, such efforts are seeing resistance from government. A case in point is the ongoing development related to the legislative amendments regulating civil society, where the Ministry of Justice suddenly responded in early July 2017 to the draft law on NGOs proposed by civil society groups with an initiative to add measures limiting foreign funding of NGOs, mimicking similar laws passed in countries with highly restrictive NGO environments.⁴² 43 civil society organizations have signed a statement urging the government to pass the law without such restrictions.

7.3 Opportunities for additional/alternative advocacy

Based on the situation unfolding in Moldova regarding Internet freedom, it is clear that more sustained advocacy efforts are needed to help achieve the balance between security concerns and human rights. Targeted awareness and information campaigns engaging the parliamentarians and government

³⁷ <http://crjm.org/en/>

³⁸ <https://promolex.md/misiune/?lang=en>

³⁹ <http://ict.md>

⁴⁰ <http://www.api.md/page/en-misiunescopobiective-12>

⁴¹ <http://www.fhi360.md/index.php/en/our-work/stop-fals.html>

⁴² <https://promolex.md/9842-tentativa-de-a-limita-finantarea-din-exterior-a-ong-urilor-pune-in-pericol-functionarea-democratiei-in-republica-moldova-si-nu-poate-fi-acceptata-sub-nicio-forma/?lang=en>

agencies may be especially helpful. More informed advocacy work, based on thorough legal analyses is needed in the area of cyber security and government response to the threats of radicalism and terrorism, and propaganda. Here, the main concepts were already outlined but their actual impact will be determined by the detailed action plans. For instance, the plans and supporting documents for implementation of the Concept for Information Security require work on development and introduction of internationally recognized standards and technical requirements.