

**ANALYTICAL  
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# REPUBLIC OF MOLDOVA AT THE EUROPEAN COURT OF HUMAN RIGHTS IN 2024

Daniel GOINIC

Carolina BAGRIN



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### Authors:

Daniel GOINIC

Carolina BAGRIN

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Kingdom of the Netherlands

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## EXECUTIVE SUMMARY

The Legal Resources Centre from Moldova (LRCM) has analyzed the work of the European Court of Human Rights (ECtHR) for the year 2024. The analysis was based on the [ECtHR's 2024 Annual Report](#) and the research of the ECtHR's case law on Moldovan cases.

We found the following:

- The ECtHR recorded its lowest number of applications in a decade – 28,800. The ECtHR attributes this primarily to a decline in the number of applications filed from Russia, Turkey, Serbia, and Greece.
- The ECtHR issued 1,102 judgments, which is almost similar to 2023. Approximately 50% of them were against three states: Russia, Ukraine, and Turkey.
- The ECtHR received 363 applications against the Republic of Moldova, which is the lowest in a decade. Among the 46 member states of the Council of Europe, Moldova is ranked 20th in the number of applications filed per capita. In 2024, Moldovans addressed the ECtHR three times more often than the European average.
- As of 31 December 2024, 1,144 Moldovan applications were still pending examination. Approximately 95% of them have a good chance of success. This number exceeds the total number of applications for which Moldova has been condemned over the 27 years it has been subject to the ECtHR's jurisdiction. In the number of applications pending examination, Moldova is ranked 9th out of the 46 member states of the Council of Europe.
- In 2024, the ECtHR issued 17 judgments, marking the lowest number in the past six years. This ranks Moldova 14th among the 46 member states of the Council of Europe.
- By 31 December 2024, the ECtHR had issued a total of 616 judgments in Moldovan cases, placing Moldova 11th in terms of the total number of judgments. At least one human rights violation by the Republic of Moldova was found in 531 of these cases (86%). This places Moldova ahead of the United Kingdom, Germany, Portugal, Spain, and the Netherlands, countries that joined the European Convention on Human Rights long before Moldova and have much larger populations.
- The most frequent types of violations found by the ECtHR in Moldovan cases remain non-enforcement of judgments, ill treatment, the inadequate investigation of ill treatment and deaths, detention in poor conditions, illegal detention, and illegal reversal of irrevocable judgments.
- As of the end of past year, the Republic of Moldova was ordered to pay a total of EUR 22,976,120 in all judgments and decisions, with EUR 162,200 of that amount being required in 2024.

The document also contains a summary of the ECtHR's judgments and decisions from 2024 concerning the Republic of Moldova.

Earlier, the LRCM produced similar analyses for the years [2010](#), [2011](#), [2012](#), [2013](#), [2014](#), [2015](#), [2016](#), [2017](#), [2018](#), [2019](#), [2020](#), [2021](#), [2022](#), and [2023](#), as well as [a summary of all violations](#) by the Republic of Moldova found by the ECtHR until 11 September 2023.



## THE ACTIVITY OF THE EUROPEAN COURT OF HUMAN RIGHTS ON MOLDOVAN CASES IN 2024

According to [the Activity Report](#) released on 31 January 2025 by the European Court of Human Rights (ECtHR), in 2024, the ECtHR received 363 applications against Moldova. This number is the lowest in a decade. Among the 46 member states of the Council of Europe, Moldova is ranked 20th in the number of applications filed per capita. In 2024, Moldovans approached the ECtHR three times more frequently than the European average, a decrease from 6.5 times in 2023.

From 1997 until 31 December 2024, the ECtHR logged approximately 17,700 applications against Moldova (details in the following table). As of 31 December 2024, 1,144 (6.5%) were still pending examination. In the total number of pending applications, Moldova is ranked 9th among all Council of Europe member states. This number is considerable, given the small population of our country.

Out of the 1,144 pending Moldovan applications, only 30 (approximately 3%) were assigned to a single judge for examination, suggesting, at first glance, a low chance of success. 827 applications (72% of pending applications) were assigned to panels of three or seven judges, and another 262 applications (23% of pending applications) had already been communicated to the government (details in Chart no. 1). The latter two categories of applications (95%, 1,089 applications) have a good chance of success. The number of applications with a strong likelihood of success exceeds the total number of applications for which Moldova has been condemned over the 27 years since the ECtHR began examining cases against Moldova.

By the end of 2024, the ECtHR had issued a total of 616 judgments in Moldovan cases. 17 of them were issued in 2024, marking the lowest number of judgments in the past six years. In 15 of the 17 judgments, the Republic of Moldova was found to have violated the ECHR. Most violations found in the 2024 judgments were committed at the national level between 2011 and 2016.

With 616 ECtHR's judgments adopted until 1 January 2025, Moldova surpasses countries like the United Kingdom, Germany, Portugal, Spain, and the Netherlands, although they ratified the European Convention much earlier and have considerably larger populations. In the Council of Europe, Moldova is in 11th place for the total number of judgments. In 531 of these judgements (86%), the ECtHR identified at least one human rights violation.

In the 616 Moldovan judgments, the ECtHR found 812 human rights violations. Most frequently identified violations include the persistent non-enforcement of national courts' judgments, inadequate investigation of ill treatment and deaths, detention in poor conditions, illegal detention, illegal reversal of irrevocable judgments, and ill treatment/use of excessive force by state agents.

In the 17 judgments issued in 2024, the ECtHR found 26 violations of the ECHR. Seven violations (27%) concerned the prohibition of inhuman and degrading treatment and torture (Article 3 of the ECHR), two of which involved inadequate investigations into ill treatment and another two were related to the lack of effective legal guarantees in involuntary commitment to psychiatric hospitals or in combating domestic violence. Other violations of Article 3 of the ECHR included poor detention conditions and the denial of proper medical care during detention. The right to a fair trial (Article 6 of the ECHR) was violated six times (23%), with issues related to the admission of late appeals, convictions based on evidence obtained by provocation, non-enforcement of national courts' judgments, or the limitation of access to justice. The prohibition of discrimination (Article 14 of the ECHR) was violated four times (15%) as a result of discrimination by gender or disability.

From a legal perspective and the perspective of impact, the most important judgments issued in 2024 were the following: [V.I. v. Moldova](#), where violations of Articles 2, 3, 13, and 14 of the ECHR were found

as a result of the applicant's involuntary commitment to a psychiatric hospital and the ill treatment he suffered, as well as the authorities' failure to conduct an effective investigation into his complaints. The ECtHR noted that, to ensure a proper enforcement of the judgment, the Republic of Moldova must adopt general comprehensive measures to reform the system of involuntary commitment and involuntary psychiatric treatment for people with mental disabilities, in particular for children.

In the case of [Vieru v. Moldova](#), the ECtHR determined that Articles 2, 3, and 14 of the ECHR had been violated due to the authorities' failure to effectively protect an individual from domestic violence inflicted by her ex-spouse, which led to her death, and to conduct a thorough investigation into the circumstances of this violence. In addition, the ECtHR highlighted the faulty way in which competent authorities had interpreted the legal provisions on the prevention and combating of domestic violence, thus denying numerous female victims of domestic violence adequate protection and investigation. In the case of [Oleg Balan v. Moldova](#), the ECtHR determined that Article 8 of the ECHR had been violated when the Supreme Court of Justice (SCJ) had incorrectly examined the case of defamation accusations. The SCJ was criticized for the way it had treated the accusations of defamation when it equated the statements of a politician with those of an investigative journalist, thus applying the presumption of good faith, specific to journalists, without a detailed analysis of the aspects related to the protection of the right to honor, dignity, and professional reputation of the applicant.

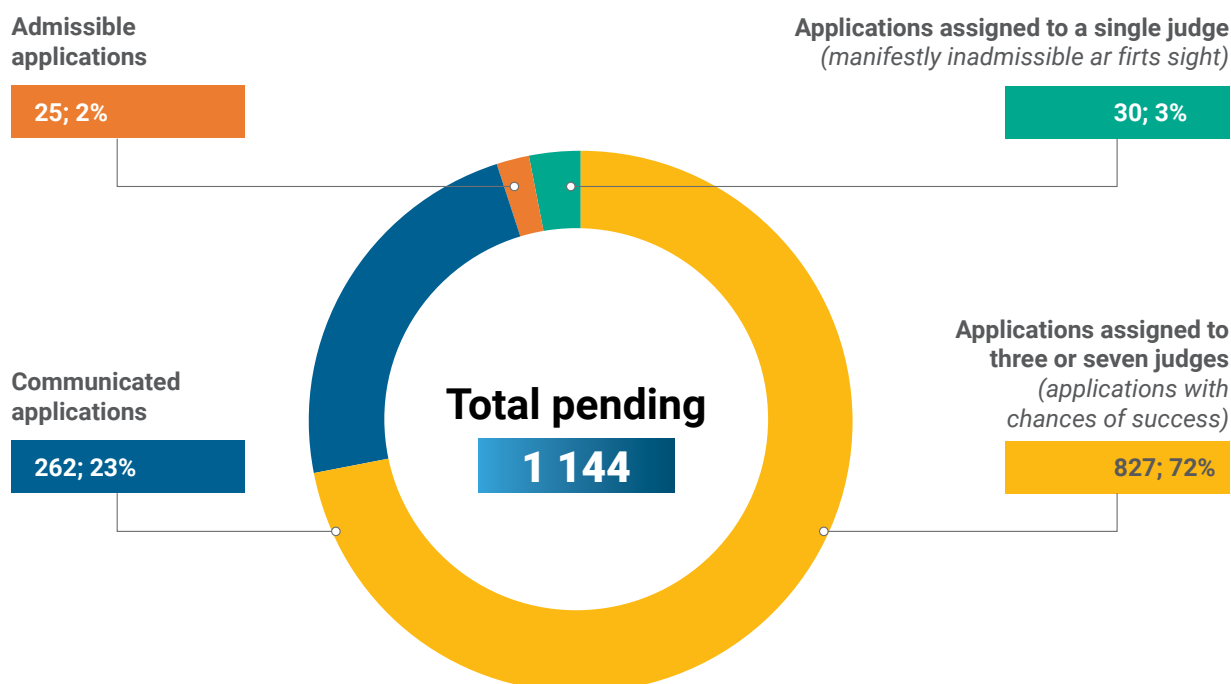
See the tables below for more details on the judgments and decisions of 2024.

Based on the judgments and decisions issued until 31 December 2024, the Government of the Republic of Moldova was ordered to pay EUR 22,976,120.50. Of this sum, EUR 20,435,781.50 (including EUR 144,950 in 2024) based on the judgments and EUR 2,540,339 (including EUR 17,250 in 2024) based on the amicable settlements and unilateral declarations.

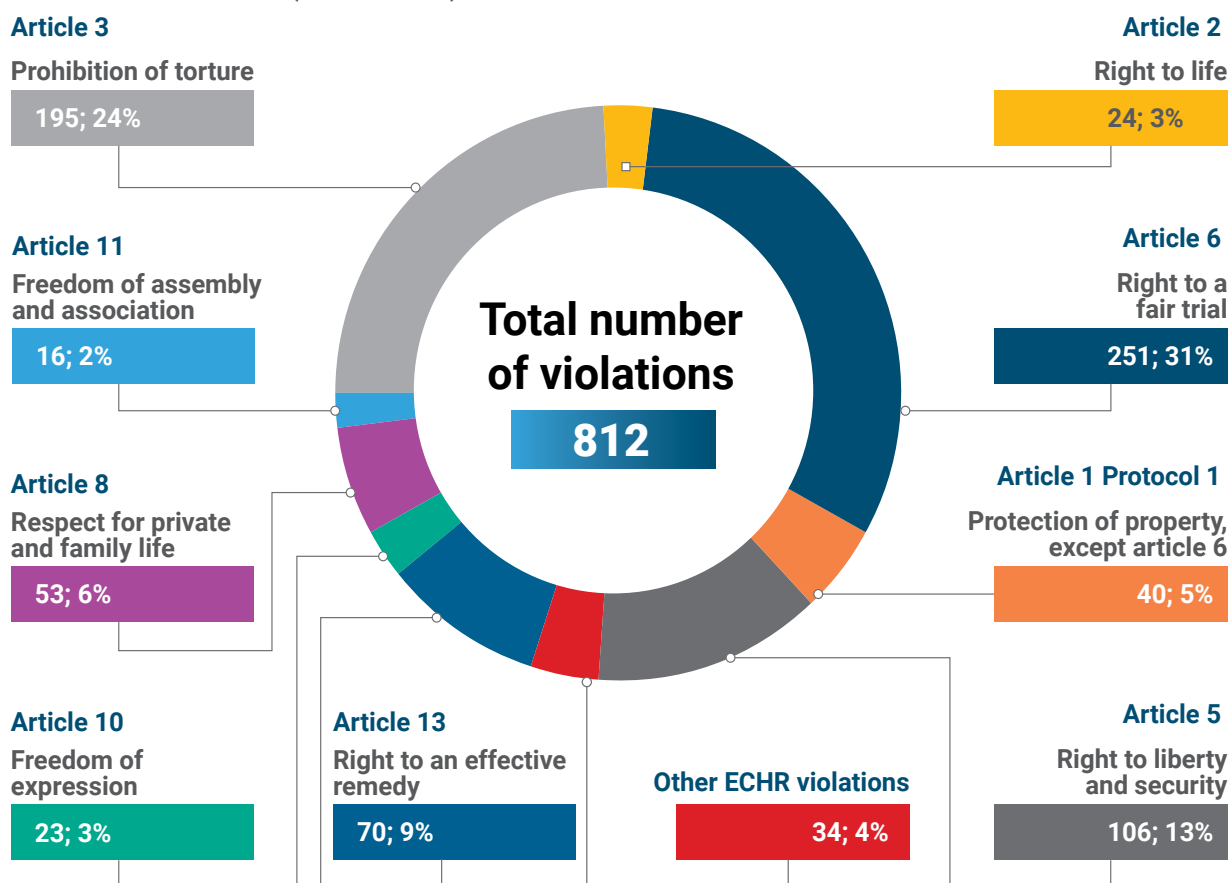
**Table no. 1:** Statistics on applications submitted to the European Court of Human Rights against the Republic of Moldova

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	+/- 2023	1.11.98-31.12.24
Registered applications	1 105	1 011	834	758	814	635	523	630	642	653	363	-44%	17 674
Applications declared inadmissible or struck out	1 341	926	750	633	858	697	451	553	601	496	343	-31%	16 231
Applications communicated to the government	73	121	41	67	54	119	42	76	150	53	50	-6%	
Delivered judgments	24	19	23	16	33	54	32	68	34	24	17	-30%	616
	31.12.2014	31.12.2015	31.12.2016	31.12.2017	31.12.2018	31.12.2019	31.12.2020	31.12.2021	31.12.2022	31.12.2023	31.12.2024		
Pending applications	1 159	1 223	1 283	1 348	1 204	1 056	1 054	1 038	1 020	1 149	1 144	-0,4%	

**Chart no. 1:** Moldovan applications pending before the European Court of Human Rights (31 December 2024)



**Chart no. 2:** Violations found by the ECtHR in the judgments concerning the Republic of Moldova (1997–2024)



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# THE ACTIVITY OF THE EUROPEAN COURT OF HUMAN RIGHTS (CONCERNING ALL STATES) IN 2024

According to the ECtHR's [Activity Report](#), in 2024 it logged 28,800 applications, 17% fewer than in 2023. In 2024, the number of filed applications was the lowest in a decade. The ECtHR attributes this primarily to a decline in the number of applications filed from Turkey, Hungary, Belgium, Slovenia, Serbia, and Greece.

Because of its aggression against Ukraine, Russia was expelled from the Council of Europe in March 2022. As a result, human rights violations committed by Russia [after 16 September 2022](#) can no longer be brought before the ECtHR. However, the ECtHR still can resolve applications against Russia for violations that occurred before that date. Thus, the ECtHR continued to accept applications against Russia, albeit fewer (2,129 or 7%). However, Russia is still among the top five countries with the highest number of applications filed against them. The remaining 15.5% of all applications filed in 2024 were against Turkey, followed by Ukraine (10%), Romania (9%), and Poland (7%). The Republic of Moldova is positioned at number 20 in this ranking, with 363 applications (1.3%) against it.

In addition to the 28,800 applications logged in 2024, the ECtHR received 8,650 applications that were prepared improperly. The applications were not logged, and the applicants were instructed to file their applications as required by the ECtHR. In 2024, the number of applications communicated to governments decreased by 41% to 9,832 from 16,623 in 2023. The decrease was largely due to fewer applications (1,540) communicated to Russia.

In 2024, the ECtHR examined 36,819 applications, 4% fewer than in 2023. The ECtHR declared inadmissible or struck out 25,990 applications, which is approximately 71% of all applications examined in the previous year. For more details, see Table no. 2.

As of 31 December 2024, 60,350 applications were pending examination at the ECtHR, 12% fewer than at the end of 2023. 62% of them were against three states: Turkey with 21,600 applications (36%), the Russian Federation with 8,150 applications (13.5%), and Ukraine with 7,700 applications (13%), which is in line with the trend from 2023. Moldova takes 9th place in this ranking for 2024 among the Council of Europe member states, with 1,144 pending applications, which is 1.9% of the total.

In 2024, the ECtHR issued 1,102 judgments, 9% more than in 2023. Almost half of those judgments were against three states: the Russian Federation with 302 judgments (27%), Ukraine with 158 judgments (14%), and Turkey with 73 judgments (7%). That almost half of the ECtHR's judgments were against these states is indicative of systematic and recurring issues at the national level. Moldova is in 14th place in this ranking, being condemned in 17 judgments, which is 1.5% of all judgments issued in 2024.

In 2024, the most frequently violated rights among the member states of the Council of Europe were, in descending order, the right to liberty and security under Article 5 of the ECHR with 465 violations, the prohibition of torture under Article 3 of the ECHR with 344 violations, and the right to a fair trial under Article 6 of the ECHR with 324 violations.

In 2024, the ECtHR did not issue judgments condemning such states as Sweden, Ireland, or Estonia. Countries with large populations, such as the United Kingdom, Germany, Spain, or Norway, each received between one and two condemnation judgments. The absence, or the minimal number, of condemnations in countries with large populations is indicative of a high level of compliance with ECHR standards at the national level.

**Table no. 2:** Statistics on the applications to the ECtHR, 2014-2024 (concerning all states)

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	+/- 2023
Registered applications	56 200	40 550	53 400	63 350	43 100	44 500	41 700	44 250	45 500	34 650	28 800	- 17%
Applications communicated to respondent governments	7 895	15 964	9 533	7 225	7 644	6 442	7 683	10 630	6 822	16 623	9 832	- 41%
Applications declared inadmissible or struck out	83 675	43 133	36 579	70 356	40 022	38 480	37 289	32 961	35 402	31 329	25 990	-17%
Issued judgments	891	823	993	1 068	1 014	884	871	1 105	1 163	1 014	1 102	9%
Pending applications as of 31 December	69 900	64 850	79 750	56 250	56 350	59 800	62 000	70 150	74 650	68 450	60 350	-12%
Incomplete applications (not considered valid)	25 100	32 400	20 950	22 650	19 550	20 400	14 150	16 400	14 400	10 600	8 650	-18%

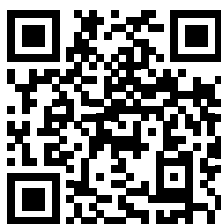
**Table no. 3:** Summary of the violations found by the European Court of Human Rights in Moldovan cases\* in 2024

ECHR article	Total number of violations	ECHR violation type	Number of violations	ECtHR's judgment
<b>Article 2 of the ECHR</b> (the right to life)	1	Faulty death investigation	1	Vieru;
<b>Article 3 of the ECHR</b> (the prohibition of torture and inhuman or degrading treatment)	7	Poor detention conditions	1	Clipea and Grosu;
		Faulty investigation of ill treatment	1	V.I.; Clipea and Grosu;
		Faulty investigation of domestic violence	2	Vieru;
		Violation of the state's positive obligation to establish and apply effective legal guarantees (regarding involuntary commitment to psychiatric hospitals or fight against domestic violence)	1	V.I.; Vieru;
		Denial of proper medical care during detention	2	Nițu;
<b>Article 5 of the ECHR</b> (the right to liberty and security)	1	§ 3 – Insufficient reasoning for an arrest	1	Malai;
<b>Article 6 of the ECHR</b> (the right to a fair trial)	6	§ 1 – Violation of the principle of legal security by rejecting the request for revision submitted by the applicant company, despite its acquittal in the criminal proceedings and conviction in the tax proceedings for the same acts	1	Tasoncom S.R.L.;
		§ 1 – Conviction based on evidence obtained through provocation	1	Rimschi and others;
		§ 1 – Failure to enforce a judgment within a reasonable time	1	Mereacre and others;
		§ 1 – Admission of late appeals	2	Szabo; Durlescu;
		§ 1 – Limitation of access to justice, as the power of attorney signed by the applicant, who had been declared incapacitated, was not considered an adequate authorization and the request to restore her legal capacity had to be made exclusively through the legal guardian or other officials	1	E.T.;

\* Violations committed by the Republic of Moldova



Article 8 of the ECHR (the right to respect for private and family life)	3	Eviction from an apartment after a period of more than 11 years and the lack of a fair balance between competing interests (the applicants' right to respect for their home and the building administrator's interest in recovering the property) when the courts ordered this measure	1	Nafornița;
		The Supreme Court of Justice's incorrect examination of the case or accusations of defamation	1	Oleg Balan;
		Permanent video surveillance during detention	1	Malai;
Article 10 of the ECHR (the freedom of expression)	1	Disproportionate ban on displaying posters and caricatures, which criticized discrimination against vulnerable groups, on the streets of Chișinău	1	National Youth Council of Moldova;
Article 13 of the ECHR (the right to an effective remedy)	1	Article 13 + Article 3 + Article 14 – lack of an effective remedy to defend the rights of people with mental disabilities	1	V.I.;
Article 14 of the ECHR (the prohibition of discrimination)	4	Article 14 + Article 2 + Article 3 – authorities' discriminatory attitude based on gender	1	Vieru;
		Article 14 + Article 3 – discrimination against a person with a real or presumed mental disability	2	V.I.; Clipea and Grosu;
		Article 14 + Article 8 – discrimination due to mental disability	1	E.T.;
Article 1 Protocol 1 of the ECHR (the protection of property)	2	The impossibility of defending ownership over real estate, despite a favorable judgment, and the lack of compensation for this fact	1	Furdui;
		Deprivation of considerable amounts through tax sanctions	1	Tasoncom S.R.L;
		See the violations from Article 6 of the ECHR – deprivation of property by admitting late appeals and failing to enforce a judgment		
Total number of violations:				26



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**LEGAL RESOURCES CENTRE FROM MOLDOVA**



33, A. Sciusev Street,  
MD-2001, Chisinau  
Republic of Moldova



+373 22 84 36 01  
+373 22 84 36 02



contact@crjm.org  
www.crjm.org



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