



Executive Summary

Moldova's path to membership of the European Union is complicated by the unresolved Transnistrian conflict and Russia's illegal military presence on its territory. While the EU has not formally required the conflict to be resolved before accession, the situation in the Transnistrian region poses significant challenges to Moldova's ability to meet EU standards of governance, or on the rule of law and security. A central issue in this context is whether the Republic of Moldova can join the EU before final resolution of the Transnistrian conflict.

Accession to the EU without the Transnistrian region, which is home to over 360,000 Moldovan citizens, would raise concerns about internal and regional stability. However, making EU accession conditional on territorial reintegration risks granting Moscow a de facto veto, due to its role in perpetuating the conflict.

Given the current regional context of Russia's full-scale invasion of Ukraine, accession with a settled status of the Transnistrian region is the most likely and feasible scenario. In this context, Moldova must pursue EU integration while advancing conflict settlement efforts, and the support of Brussels must play a crucial role in accelerating both processes.

The EU could enhance its role in the Transnistrian settlement by shifting from an observer to a mediator, leveraging its political and economic potential to balance all parties, in particular to counter Russia's dominance. Developing a targeted Conflict Engagement Framework for the Transnistrian conflict, which would comprise diplomatic, security and economic measures, and providing specific reintegration funds could provide a model for similar conflicts in the Eastern Partnership countries and the Western Balkans.

Introduction

Territorial conflicts are one of the most persistent barriers to European integration for countries in the EU's Eastern Partnership and beyond. Like Georgia and Ukraine, Moldova struggles with an unresolved conflict, exacerbated by Russia's long-standing political, economic and military interference.

Moldova has made notable progress on its EU integration path. It was granted candidate status in June 2022 and official accession negotiations were opened two years later. However, the most challenging phase lies ahead. A central issue is whether Moldova can realistically pursue EU membership while the Transnistrian conflict remains unresolved.

Historical precedents in EU enlargement such as Cyprus, the United Kingdom and West Germany, which joined the EU despite facing territorial divisions, offer limited guidance, as Moldova faces a distinct challenge shaped by active Russian interference and stricter post-1993 Copenhagen accession criteria.

The unresolved Transnistrian conflict and the stalled settlement process have gained new importance in the context of the rapidly evolving regional security environment generated by Russia's full-scale invasion of Ukraine. Both are mediators in the Transnistrian settlement process. The invasion has significantly undermined Moscow's credibility as a mediator and underscores the urgent need for a renewed, transparent approach that reflects current geopolitical realities.

Implementation of EU law throughout the entire territory of the Republic of Moldova is impeded by the ongoing Transnistrian conflict. The heavily militarized "Security Zone" along the uncontrolled Transnistrian region, established after the 1992 ceasefire, further complicates the situation. There are frequent incidents of detention and kidnapping by criminal Transnistrian entities. While the presence of Russian troops is often emphasized, the region is also militarized by local forces. The lack of control over the region makes it difficult to assess the full strength of these capabilities, including the enormous amount of weaponry which remains a major concern for both internal and external stability.

The application of EU law even to the territory controlled by **Chişinău** faces obstacles. Several localities and state institutions located in the Transnistrian region are administered by the Moldovan Government, but access to them is obstructed by illegal, militarized crossing points controlled by Tiraspol.

A defined status for the Transnistrian region would significantly advance Moldova's EU integration by strengthening its commitment to EU standards of stability and security, thereby mitigating the risk of escalation that threatens Moldova's EU accession process at any stage. In this context, Moldova's progress towards EU membership hinges not only on sustainable internal reforms, but also on its ability to navigate a complex geopolitical landscape and advance a viable, sustainable resolution of the Transnistrian issue.

The Long Shadow of the Protracted Transnistrian Conflict and its Settlement

The Transnistrian entity – a narrow strip of land of approximately 4,200 square kilometres located along the Moldovan-Ukrainian border – remains outside the control of **Chişinău**'s authorities and has long served as a geopolitical interface for Russian interests in the region. The conflict, which dates back to the early 1990s, has been driven by Moscow's desire to maintain influence in Moldova, clearly reflecting that its causes lie <u>beyond Moldova's internal dynamics</u>.

The armed clashes between Transnistrian separatist forces and Moldovan police, which began in November 1990, had escalated into a violent confrontation by 1992, resulting in roughly 1000 deaths. Russian Cossacks joined the Transnistrian forces and the Russian 14th Army provided full support to the Tiraspol regime. A ceasefire, known as the Agreement on Principles of the Peaceful Settlement of the Armed Conflict in the Transnistrian Region of the Republic of Moldova, was agreed on 21 July 1992. **Chişinău** was forced to accept Tiraspol's Russia-backed representatives as negotiators in the conflict.

In the following three decades, various formats have been created to resolve the conflict. The most prominent, the 5+2 format, involves **Chişinău** and Tiraspol as parties, Ukraine, the Russian Federation and the OSCE as mediators, and the EU and the US as observers. In addition, the 1+1 format involves working meetings between **Chişinău**'s and Tiraspol's leaders or chief negotiators, expert working groups on confidence building involve sectoral experts from various fields in **Chişinău** and Tiraspol and the <u>Joint Control Commission</u> a permanent body of representatives from **Chişinău**, Moscow, and the OSCE, established to monitor the implementation of the provisions of the Moldova-Russia ceasefire agreement from 1992.

The 5+2 negotiation framework is structured around three thematic baskets: socio-economic issues, human rights and political/security issues. However, talks on the crucial political/security basket have not commenced, as Tiraspol and Moscow condition these on resolution of the first two complex sets of issues, which are unlikely to be definitively resolved.

It is worth noting that the 5+2 format was formalized in the <u>Bratislava Protocol on 20 February 2002</u> but the most recent round took place, also in Bratislava, in October 2019. Given the war in Ukraine, Moscow's reluctance to support extension of the mandate of the OSCE Missions in Moldova and the years of inactivity, the format is widely considered obsolete.

After more than three decades, it has become evident that Russia's dominance in the existing negotiation formats for the Transnistrian settlement process, exerting influence through its own vote and via Tiraspol, has hindered meaningful progress. Given Moldova's European Integration path and the shifting geopolitical context, there is a growing imperative to reconfigure the existing dialogue formats and upgrade the role of the EU from observer to mediator, to ensure a balanced and effective negotiation process.

Moldova's European Integration and Transnistrian Reintegration Dynamics

After declaring independence in 1991, Moldova's first priority was to establish a political and legal system aligned with western principles, starting with a Partnership and Cooperation Agreement with the EU in 1994. For the past three decades, the EU has played a key role in the Transnistrian conflict settlement process, particularly after it gained observer status in the 5+2 format in 2005. The EU's involvement expanded through initiatives such as the EU Border Assistance Mission (EUBAM) and the EU Partnership Mission in Moldova (EUPM Moldova) under the Common Security and Defence Policy, both of which aimed to support Moldova's alignment with European standards.

Moldova's pursuit of EU integration has faced many obstacles, particularly as the Transnistrian leadership has pushed for separation through actions such calling a <u>so-called referendum</u>, <u>backed by Moscow</u>, in 2006. Despite these tensions, Moldova has continued on its European path, joining the Eastern Partnership in 2009 and negotiating an <u>Association Agreement with the EU</u>, which was signed in 2014.

The provisions of a Deep and Comprehensive Free Trade Area entered into force in the Transnistrian region on 1 January 2016. This demonstrates that the Transnistrian conflict is distinct from other conflicts in the post-Soviet space and highlights <u>Tiraspol's interest in maintaining close ties with the EU</u>. Despite Tiraspol's strong economic interest in the EU market and EU investment, however, Moscow and Tiraspol are increasingly using the Transnistrian conflict to hinder Moldova's European integration. This highlights the urgent need for a comprehensive and lasting solution to the Transnistrian conflict.

An effective Transnistrian settlement must ensure a viable, functional Moldovan state grounded in democracy, the rule of law and respect for human rights, as well as a sustained commitment to European integration. Since 1994, Moldova's Constitution has provided a legal basis for granting autonomy to regions on the left bank of the Nistru River under Article 110 (2) and the Organic Law on the basic provisions of the special legal status of the localities on the left bank of the Nistru River (Transnistria) No. 173/2005.

A key challenge in the potential reintegration of the Transnistrian region is the financial burden it would impose on Moldova, which would currently be unable to absorb the costs of integrating the region's population. One possible solution would be the introduction of a reintegration tax, modelled after Germany's 1991 Solidarity tax, which funded the integration of East Germany.

Over the years, various avenues have been explored for resolving the Transnistrian conflict, both formally and informally. For instance, the 2003 Kozak Memorandum suggested the federalization of Moldova. Accepting this controversial plan, however, would undoubtedly have undermined Moldova's EU accession process and posed a threat to the country's independence. In 2005, Ukraine's Yushchenko Plan, which focused on the democratization and demilitarization of the Transnistrian region, gained western support but faced strong resistance from Moscow, particularly due to Russia's desire to maintain its military presence in Moldova.

Moldova continues to work to find a viable solution to the Transnistrian conflict. Under favourable internal and international conditions, it might be able to present a comprehensive plan for conflict settlement.

The Transnistrian Status Challenge: Looking for Solutions in EU Enlargement History

Several prospective EU member states faced unresolved conflicts and territorial disputes. Notable examples are Cyprus in 2004, West Germany in 1957 and the United Kingdom in 1973. While certain regions in Spain, Italy and Belgium have secessionist aspirations, these have not led to territorial divisions and are not analysed in this report.

Cyprus is often cited as a relevant comparison with Moldova, given its context. Cyprus joined the EU in 2004 even though it was still divided by the 1974 Turkish invasion. While the EU recognizes Cyprus as a whole, EU law is not applied in the northern part, over which the government has no control. Despite hopes that EU membership would resolve the conflict, the division remains two decades later, highlighting the challenges of integrating a divided territory. Some EU representatives have since acknowledged the risks of admitting a member state with an unresolved conflict, and are unlikely to repeat this with other candidates, including Moldova.

Importantly, in the case of Cyprus, the main opposing force was Turkey, a country anchored in the western world. Turkey has been a NATO member since 1952 and a candidate for EU membership since 1999. Destabilizing the situation in Cyprus could lead to Greece opposing Turkey's EU accession.

Nonetheless, several European officials continue to draw parallels between Moldova and Cyprus. For example, in February 2025, the European Commissioner for Enlargement, Marta Kos, stated that "Moldova's European integration and territorial reintegration are separate processes, and Moldova's future should not be held hostage by the frozen Transnistrian conflict".

The UK joined the EU in 1973 in the midst the Northern Ireland conflict, known as "the Troubles". Following widespread violence and division, the EU played a key role in facilitating peace through the Good Friday Agreement of 1998. After the UK left the EU in 2020, however, the Northern Ireland border issue became a significant concern, leading to the creation of the Northern Ireland Protocol to maintain peace and keep Northern Ireland aligned with the EU's single market. The case of the UK has its own particularities, much like other states in the context of European integration. An important aspect in this regard is that the Republic of Ireland joined the EU before the UK, had a strong interest in Northern Ireland becoming part of the EU and strongly supported this position.

West Germany was a founding member of the European Coal and Steel Community in 1952 and the European Economic Community, the precursor to the European Union, in 1957. At that time, Germany was divided into East and West as a result of the post-World War II settlement, but also as one of the most prominent symbols of the Cold War.

The EU played a vital role in Germany's unification, facilitating diplomatic negotiations and ensuring security and stability. Economic support from the EU, which involved financial aid and integration into the European single market, was crucial to managing the economic burden of unification. Unlike Moldova, Germany had a strong enough economy to shoulder much of the costs on its own. Nonetheless, it still benefited from EU mechanisms that eased the process. Germany's experience demonstrates how EU membership can serve as both a framework and a catalyst for overcoming divides, transforming past disputes into opportunities for interaction and effective reintegration.

Moldova faces unique challenges in confronting the unresolved Transnistrian conflict and the ongoing Russian military presence. Despite its commitment to European integration, Moldova's political and territorial complexities require a tailored approach. While historical examples such as Germany, Cyprus and the UK offer valuable lessons, Moldova's situation underscores that unresolved conflicts and political instability significantly complicate the EU accession process. The EU's stringent criteria for political stability, the rule of law and security further challenge Moldova on its path to full membership.

Scenarios for Moldova's EU Accession With or Without a Defined Status for the Transnistrian Region

Scenario 1: Moldova joins the EU even though the Transnistrian conflict remains unresolved

In this scenario, the EU would potentially move forward with Moldova's accession without a final resolution of the Transnistrian conflict, by supporting peace-building efforts, dialogue and gradual reintegration or establishing a conflict management framework. However, challenges would include political resistance in both **Chişinău** and Tiraspol, concerns over national sovereignty and the risk of abandoning over 360,000 Moldovan citizens. The heavily militarized region, involving Russian troops and local forces, would further complicate the situation. Illegal crossing points and a Russian weapons depot would restrict Moldova's control.

Russia's political and military influence would be a significant obstacle, and Moscow would seek to undermine Moldova's EU aspirations. It is natural to assume that, in a scenario where Russia perceives a loss of influence over Moldova, it will seek to escalate the situation as much as possible. Last but not least, the EU's post-2004 official rhetoric regarding Cyprus clearly suggests that there is no appetite among European political elites to 'upload' yet another unresolved conflict to the EU level, particularly where hostile geopolitics and the military presence of an increasingly antagonistic Russia further complicate the case.

Scenario 2: Moldova accedes to the EU with an International Transitional Administration in the Transnistrian region

Another potential scenario would involve the introduction of an International Transitional Administration in the Transnistrian region, while accelerating Moldova's EU integration process. In this case, both **Chişinău** and Tiraspol would need to ensure a gradual transition from the current uncertain situation to full international administration of the region. This might constitute an international mission under the auspices of the UN, the EU, the OSCE or other relevant actors. A pertinent historical example in this context is the United Nations Transitional Administration for Eastern Slavonia, which operated from 1995 to 1998, before the region was reintegrated into Croatia. Once the international administration has established an appropriate level of security in the Transnistrian region, Moldova could consider EU accession, even before the final reintegration of the region, which would be likely to take time. As an EU member state, Moldova would be able to leverage the full potential of the EU to achieve a final, comprehensive and sustainable settlement.

Scenario 3, the most likely scenario: Moldova joins the EU after resolution of the Transnistrian conflict

In this scenario, the EU could stress the importance of resolving the Transnistrian conflict by granting the region a clearly defined legal status within Moldova's territorial integrity. This approach would be especially critical given the wider regional consequences of Russia's invasion of Ukraine. **Chişinău** must recognize that its actions should not exacerbate the challenges facing the EU but instead help strengthen its stability and security. Maintaining the status quo would increase the security risks for both Moldova and Ukraine, and have broader implications for EU stability. The shared EU aspirations of Moldova and Ukraine, combined with Russia's waning influence in the region, have created an opportunity for conflict resolution. Tiraspol's growing economic connections with the EU and Moldova's integration efforts further support this momentum. By leveraging its authority and resources, the EU can accelerate the conflict resolution process using diplomatic, economic and security incentives that encourage constructive negotiation of a comprehensive and peaceful settlement.

Conclusions and Policy Recommendations

First, the current status quo of the Transnistrian conflict significantly limits Moldova's EU accession prospects by fostering ongoing instability and preventing the country from fully aligning with European standards, particularly in the areas of governance, the rule of law and security policy.

While Brussels has never conditioned Moldova's EU accession on resolving the Transnistrian conflict, the situation in the uncontrolled region continues to pose significant obstacles to integration. In this context, resolving the conflict naturally becomes a precondition for progress. The ongoing territorial dispute, Russia's illegal military presence and various Transnistrian armed structures, which contribute to severe human rights violations on the left bank of the Nistru River, make Moldova's EU integration difficult. **Chişinău** must prioritize strengthening the stability and security of the EU, acknowledging that its lack of control over the Transnistrian region, combined with Russia's military depot and the ongoing war in neighbouring Ukraine, pose a significant threat with broad regional implications.

Second, although there are several historical precedents for countries with territorial divisions seeking EU membership, applying such scenarios to Moldova would present significant challenges.

Most historical cases of unresolved conflict were internal and when external forces were involved, these were not Russian, which is a fundamental difference. Russia is vehemently opposed to the EU, its enlargement agenda and its influence projection in the region. Applying EU law solely on the territory controlled by **Chişinău** would face significant challenges. Several localities and state institutions in the Transnistrian region are administered by **Chişinău** but access to them is obstructed by illegal and militarized crossing points controlled by Tiraspol, which has been preventing the free movement of people, goods and services for decades. Moreover, most of the countries analysed above joined the EU under different historical and accession conditions. Moldova must meet the 1993 Copenhagen criteria, which establish a more complex framework than was required in the past.

Finally, given the current regional context, the most likely scenario for Moldova's EU accession involves a settled status for the Transnistrian region, as well as increased EU engagement in the process.

A defined status for the Transnistrian region would significantly advance Moldova's EU integration by reinforcing its commitment to territorial integrity and alignment with EU standards on stability and security. **Chişinău** has demonstrated its openness and maintained a flexible internal legal framework that allows for the granting of a defined status to the Transnistrian region. The Transnistrian conflict, although complex, demonstrates potential for resolution due to the strong historical ties between the people on both sides of the Nistru River, Tiraspol's economic connections with the EU and shifting geopolitical dynamics that could present a timely opportunity to promote a structured plan. **Chişinău** must address both the Transnistrian conflict and EU integration, without following a fixed sequence, and seize every opportunity to advance in each area. Strengthening the connection between the Transnistrian region and the EU accession process, with the support of international partners, will be crucial, as it is key to advancing the conflict settlement process and to Moldova's EU integration.

Policy Recommendations for the European Union

- The EU could enhance its presence in the Transnistrian settlement process by transitioning from an observer to a mediator, leveraging its political and economic influence to balance all parties, in particular to counter Russia's dominant position.
- The EU could develop a targeted Conflict Engagement Framework for the Transnistrian issue, focused on tailored diplomatic, economic and security measures to support a peaceful resolution, which would include dedicated reintegration funds.
- The EU could strengthen its focus on the Copenhagen Criteria, adapted to Moldova's specific situation by recognizing the country's unique internal and external challenges, and adjusting the timelines for implementing reforms in the Transnistrian region.



Eugen Cara

Fellow at EU4Youth, Natolin Fellowship Programme, College of Europe in Natolin.

Legal disclaimer: The produced contents are the sole responsibility of the EUGEN CARA and do not necessarily reflect the views of the European Union, the Ministry of Foreign Affairs of the Republic of Lithuania, and the College of Europe in Natolin.

About SCEEUS

The Stockholm Centre for Eastern European Studies (SCEEUS) at the Swedish Institute of International Affairs (UI) is an independent Centre, funded by the Swedish Government, established in 2021. The Centre conducts policy relevant analysis on Russia and Eastern Europe and serves as a platform and meeting place for national and international discussions and exchanges on Russia and Eastern Europe. Any views expressed in this publication are those of the author.

©2025 Stockholm Centre for Eastern European Studies

Cover Photo: Vadim Ghirda AP

Previous SCEEUS Publications

<u>Pledges and Priorities: Mapping Europe's Uneven Support for Ukraine by Nicole Jeffler and Sara Lannebo</u>

SCEEUS Commentary No. 11, 2025

The European Offer for Democratic Belarus: A Strategic Agenda for the EU by Victoria Leukavets

SCEEUS Report No. 7, 2025



