FROM A COUNTRY OF EMIGRANTS TO A COUNTRY THAT IMPORTS LABOUR

The labour market paradox of the Republic of Moldova

Extended version

Author: Ina Vîrtosu

October 2026

Executive summary

The Republic of Moldova is facing two simultaneous phenomena: the shrinking and emigration of its own workforce, on the one hand, and the growing recruitment of foreign nationals, on the other. The official replies obtained from the General Inspectorate for Migration (IGM), the National Employment Agency (ANOFM), the Public Services Agency (ASP) and the National Bureau of Statistics (BNS) make it possible to describe certain aspects of the phenomenon more accurately, but they do not yet provide all the data needed to demonstrate the causes of external recruitment.

IGM reports an increase in the number of documentations for employment purposes: from 1,305 grants in 2020 to 4,063 in 2025. For the first half of 2026, 3,918 grants are reported. The indicator reflects administrative documentations; it should not automatically be interpreted as the number of distinct persons who entered the country or as the number of persons actually employed in each year. In parallel, the number of legal entities that hired foreign nationals rose from 615 in 2020 to 1,050 in 2025.

The research also highlights the need to monitor the cumulative length of stay of foreign workers: the available data on grants and extensions do not make it possible to establish the number of persons benefiting from successive extensions, nor to assess the long-term dependence of certain sectors on external recruitment.

ANOFM data show that staff shortages are not uniform. Drivers, seamstresses, operators, salespersons, cooks and other occupations repeatedly appear among vacancies. For drivers, ANOFM recorded 1,996 vacancies in 2025 and 660 persons registered as unemployed in that occupation. These figures do not prove that those unemployed persons meet all the job requirements, but neither do they support the conclusion that there is no domestic labour reserve.

BNS shows that in 2025 approximately 57,954 persons outside the labour force stated that they would like to work, of whom 40,556 were available for work. At the same time, among employed persons who wished to change their job, the most frequent reason was to obtain higher hourly pay. BNS warns that the 2025 Labour Force Survey (AFM) data are not fully comparable with previous years as a result of methodological changes.

In the case of drivers, ASP confirms that there is no separate language test and no obligation to hold a language proficiency certificate. However, the practical exam is conducted in Romanian, Russian or English, without an interpreter, and the candidate must directly understand the examiner's instructions. ASP holds no data on drivers' certificates of professional competence; the authority responsible for these is the road transport authority.

The central conclusion is one of public policy, not an accusation against foreign workers: external recruitment may be justified in the case of real shortages, but the state must demonstrate that it first assessed the possibility of mobilising, training, adequately paying and retaining the domestic workforce. The data received support the need for such an assessment, but do not yet allow us to quantify exactly how many foreign workers are employed in each occupation, what wages they receive or how many subsequently leave for the EU.

At the same time, the research shows that the wages in foreign workers' contracts tend to coincide with the statutory minimum threshold – 50% of the average wage in the economy, i.e. 8,700 lei in 2026. From the perspective of protecting the domestic labour market, external recruitment must not be

cheaper than hiring a citizen of the Republic of Moldova, and labour migration must remain temporary by law. We therefore propose a mandatory labour market test, a wage threshold tied to the sector of activity, a cumulative limit on the stay of unskilled workers and mandatory verification of those who drive for commercial purposes on foreign licences.

The legal framework does not verify the priority of the domestic workforce. Law No. 200/2010, applicable until 31 May 2027, requires only the employer's declaration on its own responsibility that it has advertised the vacancy. Law No. 66/2026 on the admission, stay and supervision of foreigners, which replaces it from 1 June 2027, requires a confirmation from ANOFM, but only of the registration of the vacancy and only at the first grant; extensions and changes of employer take place without any check of the domestic market, and after 5 years the immigrant worker may obtain permanent residence. Until the new law enters into force, there is a window for correction that Parliament should use.

Introduction

For decades, the Republic of Moldova has been facing a structural phenomenon: the emigration of a significant part of its active population in search of higher incomes, better working conditions and professional prospects that the national economy is not always able to offer. The consequences go beyond the demographic dimension. The departure of the workforce affects the availability of skills, the ability of enterprises to meet their staffing needs, the taxpayer base and, in the long term, the country's economic development potential.

In this context, one phenomenon is becoming increasingly relevant: while the Republic of Moldova continues to lose workforce through emigration, local employers are increasingly resorting to the recruitment of foreign nationals. This development raises a fundamental question: how does a country facing a decline in human resources come to need workers from abroad? Is it a real shortage of staff, a mismatch between available qualifications and employers' requirements, or the inability of the domestic market to offer wages and working conditions attractive enough to retain and make use of the domestic workforce?

These explanations are not mutually exclusive. In certain sectors, international recruitment may be a legitimate response to a shortage of qualified staff or to the impossibility of filling vacancies in a timely manner. It can help sustain economic activity, carry out investments and ensure the continuity of certain essential services. However, the existence of vacancies and the growing number of foreign workers do not in themselves demonstrate that the labour shortage cannot be covered by domestic resources. To establish this, it is necessary to examine the availability of jobseekers, their skills, the opportunities for retraining, the level of pay and the conditions offered by employers.

The aim of this study is not to challenge the right of foreign nationals to work in the Republic of Moldova, but to assess how the state and employers manage the available human resources. Before the import of labour is treated as a structural solution, it must be analysed whether the opportunities for employing Moldovan citizens, for vocational training, for improving working conditions and for the return of those who have gone abroad have been exploited. Otherwise, there is a risk that external recruitment will temporarily mitigate the effects of internal imbalances without helping to remove their causes.

The study seeks to examine this contradiction by correlating data on labour immigration with indicators of the domestic labour market. The analysis is based on official data provided by the General Inspectorate for Migration (IGM), the National Employment Agency (ANOFM, which include data for the period 2020 – first half of 2026; the Public Services Agency (ASP), as well as information provided by the National Bureau of Statistics (BNS) on the inactive population, labour underutilisation and the reasons why employed persons wish to change their professional situation. This information is analysed against the general indicators of employment, unemployment and labour demand used in the initial version of the research.

Particular attention is paid to the transport sector, where data on vacancies for drivers can be compared with records on the licences held by foreign nationals. This case study allows a closer examination of the relationship between staff demand, professional qualifications and the communication requirements needed to practise an occupation with direct implications for public safety. At the same time, the analysis clearly separates what the data demonstrate from what remains a hypothesis requiring further verification.

The research is limited by the fact that institutions do not collect or do not hold all the information needed for a complete assessment. Data on documentation for employment purposes cannot automatically be equated with the number of persons actually employed, and records on driving licences do not in themselves indicate how many foreign nationals work as professional drivers. Likewise, the available information does not make it possible to fully establish the distribution of foreign workers by occupation and wage level, nor to quantify their subsequent migration path. These gaps do not demonstrate that the phenomena in question do not exist, but they limit the conclusions that can be drawn on the basis of the available official data.

Therefore, the objective of this research is to establish to what extent the growth in the recruitment of foreign workers reflects real labour market shortages and to what extent it reveals unresolved problems regarding the use, qualification and remuneration of the domestic workforce. The answer to this question is essential for shaping a balanced policy in which international recruitment responds to demonstrated economic needs, while the retention, development and use of the human capital of the Republic of Moldova remain strategic priorities.

1. From exporting labour to importing it

The Republic of Moldova is undergoing a significant transformation of its labour market. While the emigration of the active population continues to affect the availability of human resources and the economy's ability to meet its staffing needs, more and more employers are resorting to recruiting foreign nationals. This development raises a fundamental question: to what extent does the import of labour respond to real staff shortages, and to what extent does it reflect the national economy's difficulties in mobilising, qualifying, paying and retaining its own workforce?

Data provided by the General Inspectorate for Migration (IGM) indicate a considerable increase in the number of documentations for employment purposes over the period analysed. In 2020, the institution reported 1,305 grants and 776 extensions, while in 2025 the number of grants reached 4,063 and that of extensions 1,644. For the period 1 January–30 June 2026, IGM reported 3,918 grants and 958 extensions.[1]

Table 1. Documentation of foreign nationals for employment purposes, 2020–30 June 2026

Period	Grants	Extensions
2020	1.305	776
2021	1.753	904
2022	2.627	1.002
2023	2.991	1.197
2024	3.002	1.433
2025	4.063	1.644
H1 2026	3.918	958

Source: General Inspectorate for Migration, reply No. 5/12–4706 of 28 August 2026 and the related statistical annex.

Administrative data on the documentation of foreigners must be analysed together with signals regarding actual employment conditions. On 23 September 2026, the head of the General Inspectorate

[1] General Inspectorate for Migration (IGM). Official reply No. 5/12–4706 of 28 August 2026 and statistical annex on the documentation of foreign nationals for employment purposes and the legal entities that hired foreign nationals, period 2020–30 June 2026. Administrative document obtained in the course of the research.

for Migration stated that, by 1 September, more than 6,300 foreign nationals had been documented for employment purposes for the first time.[2] He also stated that many of the contracts submitted to IGM indicated wages below 10,000 lei, citing a contract for 8,700 lei, and reported cases of subsequent reductions in pay. These statements raise the issue of verifying the wage actually paid and compliance with contractual conditions, but they do not on their own support the conclusion that all foreign workers are paid below the level of local workers.

The wage level of 8,700 lei is not arbitrary; it corresponds to the statutory minimum threshold applicable to immigrant workers since July 2025, representing 50% of the forecast average monthly wage in the economy for 2026, which amounts to 17,400 lei.[3] Under these circumstances, setting contractual pay at that level may comply with legal requirements, but the existence of a relatively low minimum threshold raises the question of its influence on pay policies and on employers' decisions regarding recruitment from abroad.

The acceleration of the documentation of foreign nationals in 2026 – 3,918 grants in the first half and more than 6,300 initial documentations by 1 September – comes in the period immediately following the change in the wage threshold. Although the temporal sequence does not allow a direct causal relationship to be established, this development justifies examining the impact of the regulatory change on the dynamics of external recruitment.

At the same time, the actual cost of hiring a foreign worker is not limited to the wage set out in the individual employment contract. It may include recruitment, documentation, accommodation and other related costs. In this context, the information that, in certain situations, employers are asked to provide pay of approximately 12,000 lei net, as well as accommodation, indicates the need for an analysis that goes beyond a simple comparison between the statutory wage threshold and the wages offered to local workers.

Therefore, the hypothesis that recruiting foreign nationals is a way of reducing wage costs must be examined with caution. Depending on the economic sector and the specific employment conditions, external recruitment may also be a response to difficulties in filling vacancies, to the limited availability of local labour or to candidates' reluctance to accept certain working conditions.

Assessing this hypothesis requires comparative data on wages actually paid, the total costs borne by employers for foreign workers, accommodation and pay conditions, as well as the profile of the positions for which external recruitment is used.

What do these figures actually measure?

For a correct interpretation of the data, a distinction must be drawn between administrative documentation operations and the number of natural persons actually working in the Republic of Moldova. Grants and extensions are distinct administrative indicators that cannot automatically be equated with the number of foreign workers.

---

[2] "The scheme of foreign workers being brought to Moldova! 'They are promised Europe, then caught crossing the Prut'", 23 September 2026, Bani.md, https://bani.md/schema-muncitorilor-straini-care-sunt-adusi-in-moldova-li-se-promite-europa-apoi-sunt-prinsi-cum-trec-prutul/

[3] Government Decision on setting the forecast average monthly wage in the economy for 2026, press release of 17 December 2025, available at: https://gov.md/ro/node/5613

A person may initially be documented for employment purposes and may subsequently benefit from one or more extensions. Consequently, the number of administrative operations does not necessarily represent the number of distinct persons. Moreover, the issuance of a document for employment purposes does not in itself demonstrate that the holder actually started work, that he or she was employed for the entire validity period of the document, or that he or she was still in employment on the reference date.

Therefore, the 4,063 grants reported for 2025 should not be interpreted as proof that exactly 4,063 distinct persons worked in the Republic of Moldova in that year. Likewise, the 3,918 grants reported for the first half of 2026 do not necessarily represent the number of persons newly entering the labour market in that period. Determining the number of distinct persons would require statistical records that eliminate possible repeated entries, and establishing the number of those actually employed would require correlating migration data with employment information.

This clarification does not diminish the relevance of IGM statistics, but delimits what we can conclude on their basis. The data demonstrate the growth in the volume of grants reported for employment purposes, but they do not on their own make it possible to establish the total number of foreign nationals actually carrying out a professional activity in the Republic of Moldova.

The absence of a cumulative limit on stay: the risks of repeated extensions

Law No. 200/2010 on the regime of foreigners sets different periods of stay for employment purposes depending on the category of worker. An important aspect of the legal regime of foreign workers in the Republic of Moldova is that, for certain categories of employees, the legislation sets the initial duration of the right of stay but does not specify in the relevant provision a maximum cumulative duration of stay for employment purposes. For example, under Art. 43^{4}(2) of Law No. 200/2010 on the regime of foreigners, the right of stay of immigrant workers is granted for a period of up to one year, with the possibility of extension for a new term. For foreigners whose specialities are included in the list of priority occupations, Art. 43^{5}(2) provides for an initial term of two years, which may also be extended.

Under Art. 45(1)(b) of Law No. 200/2010, foreign nationals may apply for the right of permanent residence after at least five years of legal and continuous temporary stay on the territory of the Republic of Moldova, including for employment purposes, subject to the legal conditions on knowledge of the Romanian language at an intermediate level.

Table 2. Duration of the right of stay for employment purposes under Law No. 200/2010

Category of workers	Article of the law	Duration provided	Express cumulative limit in the provision analysed
Regular immigrant workers	Art. 43^{4}(2)	Up to 1 year, with the possibility of extension	Not specified
Workers in priority occupations	Art. 43^{5}(2)	2 years, with the possibility of extension	Not specified
Highly qualified workers	Art. 43^{9}(3)	Up to 3 years, as provided by law	No general cumulative limit is specified here
Posted workers	Art. 43^{10}(2)	Under the special regime	Up to 3 years cumulatively
Certain categories of employees of free economic zone residents	Art. 43^{13}(2)	Under the special regime	Up to 5 years cumulatively
Seasonal and cross-border	Art. 43^{14}(2)	Under the special regime	Up to 9 months in any

Category of workers	Article of the law	Duration provided	Express cumulative limit in the provision analysed
workers			12-month period
Certain categories in education, culture, health and sport	Art. 43[11](3)	Up to 1 year, with the possibility of extension	Not specified

Source: Law No. 200/2010 on the regime of foreigners. The table presents the terms set out in the provisions indicated; the existence of other limits or conditions must be checked against the entire applicable regulatory framework.

From 1 June 2027, the regulatory framework governing the residence regime of immigrant workers in the Republic of Moldova will be amended by Law No. 66/2026. The new provisions establish a temporary residence regime with an initial duration of two years for foreign workers, and of three years for those employed in free economic zones and in the information technology (IT) sector, with the possibility of successive extensions without a predetermined limit, subject to meeting the legal conditions. At the same time, the legislative changes provide for the possibility of acquiring the right of permanent residence after a period of at least five years of continuous temporary stay, under the conditions laid down by the legislation in force, while also introducing the requirement to submit proof of payment of state social insurance contributions (Art. 36 and Art. 99). The new regulation no longer expressly provides for the condition of knowledge of the Romanian language at an intermediate level. Moreover, regular immigrant workers are not among the categories excluded from the application of this provision, according to Art. 99(8).

Table 3. The legal regime of temporary stay of foreign workers in the Republic of Moldova under Law No. 66/2026

Category of workers	Article of the law	Duration of grant/extension of the right of stay	Conditions/possibility of extension	Express cumulative limit
Immigrant worker – salaried employment in free economic zones (FEZ)	Art. 35–36(a)	3 years	Grant/extension under the conditions of Art. 35; requires a request from the principal administrator of the FEZ.	No general cumulative limit is provided for in Art. 36.
Immigrant worker – salaried employment in the information technology (IT) sector	Art. 35–36(b)	3 years	Grant/extension under the conditions of Art. 35; requires the approval of the IT park administration.	No general cumulative limit is provided for in Art. 36.
Immigrant worker – regular salaried employment	Art. 35–36(c)	2 years; if the duration of the individual employment contract is shorter, the duration of the contract applies.	Extension under the conditions of Art. 35; confirmation of the registration of the vacancy is not required for an extension.	No general cumulative limit is provided for in Art. 36.
Immigrant worker	Art. 35–36(d)	1 year	Grant/extension under the conditions of Art.	No general cumulative

– independent economic activity			35; the service contract must be submitted.	limit is provided for in Art. 36.
Intra-corporate transferee (ICT) – managers and specialists	Art. 38–39(a)	For the entire duration of the transfer	Extension is granted under the conditions of Art. 38.	Maximum 3 years per transfer.
Intra-corporate transferee (ICT) – trainee employee	Art. 38–39(b)	For the entire duration of the transfer	Extension is granted under the conditions of Art. 38; a higher education diploma must be submitted.	Maximum 1 year per transfer.
Seasonal worker	Art. 41–42(1)	The period corresponding to the seasonal work	Extension is possible only under the conditions of Art. 41(2), including extension of the contract with the same beneficiary.	Maximum 6 months cumulatively in any 12-month period.
Cross-border worker	Art. 41–42(2)	1 year	Extension is possible under the conditions of Art. 41(2), including extension of the contract with the same beneficiary.	The grant/extension period is 1 year.
Highly qualified worker	Art. 44–45	For the entire validity of the individual employment contract, plus 3 months	Extension is granted under the conditions of Art. 44.	Maximum 4 years cumulatively.

This wording raises a public policy question: to what extent can a foreign worker's stay be extended in the absence of an explicit cumulative limit, and what mechanisms exist to assess the effects of his or her long-term stay on the labour market? The fact that the law does not set a cumulative ceiling in these provisions does not mean that extension is automatic or guaranteed. The applicant must continue to meet the legal conditions, and the authorities may refuse an extension when these are not met. The issue is, rather, whether the system has sufficient criteria and data to assess the consequences of repeated extensions over the long term.

The first risk is **the transformation of a temporary solution into a structural dependence on foreign labour**. Given that an employer can apply for an extension of the right of stay as long as the legal conditions are met, a position may be filled by a foreign worker over the long term. Without a periodic assessment of the real needs of the labour market, the state risks failing to distinguish sufficiently between a temporary shortage of staff and the structural lack of attractiveness of certain jobs for citizens of the Republic of Moldova.

The second risk relates to **employers' economic incentives**. If recruitment from abroad becomes a stable and relatively predictable solution, some enterprises may have fewer reasons to invest in the vocational training of local workers, improve working conditions or raise wages to attract staff. This is a hypothesis that must be tested with data on wages, working conditions, shortage occupations and the reasons why employers resort to international recruitment; it cannot be considered a consequence demonstrated merely by the existence of the possibility of extension.

A third risk concerns **the state's capacity to monitor long-term stay and professional activity**. The annual number of grants and extensions of the right of stay does not show how many workers remain in the country for three, five or more years. A person may appear in the statistics in several consecutive years, and an extension is an administrative action, not necessarily a new worker. Without longitudinal data, authorities and researchers cannot accurately establish the cumulative length of stay, the

frequency of successive extensions or the extent to which foreign workers change employer and sector of activity.

Finally, the absence of an explicit cumulative limit raises the issue of **the balance between economic flexibility and the objectives of migration policy**. A flexible regime can help employers cover staff shortages and can allow foreign workers to have professional continuity. However, this flexibility must be accompanied by monitoring, statistical transparency and periodic assessment of the effects on wages, employment and the vocational training of the local population.

To determine the real scale of the phenomenon, data would be needed from the General Inspectorate for Migration on the number of persons who have benefited from two or more extensions, the cumulative length of stay for employment purposes, the continuity of employment relationships and the reasons for their termination. These data would make it possible to assess whether successive extensions are a justified response to the needs of the economy or whether, in certain sectors, they help maintain a long-term dependence on recruitment from abroad.

Therefore, the problem is not that foreign workers should necessarily leave the Republic of Moldova after a fixed number of years, but that **the long-term extension of stay must be capable of being assessed on the basis of clear criteria and verifiable data**. Before proposing the introduction of a cumulative limit, the state should analyse the actual length of stay, the needs of the economic sectors and the effects on local workers. Any limit or additional assessment mechanism should be grounded in these data, and not merely on the assumption that the long-term stay of foreign workers is in itself problematic.

The need for a cumulative limit for unskilled and low-skilled workers

From the perspective of protecting the domestic labour market, we consider it necessary to examine the introduction of a cumulative limit on stay for employment purposes for unskilled and low-skilled workers. Labour migration intended to cover staff shortages can be temporary in nature, while permanent settlement on the country's territory is a distinct option that must be assessed within its own legal regime, subject to eligibility conditions.

A relevant comparative model is that of Israel, where the stay of foreign workers for employment purposes is, as a general rule, limited to 63 months, with exceptions provided for certain categories and special situations, including in the field of personal care.[4] This example demonstrates that setting a time ceiling can be a migration policy instrument, without excluding derogation mechanisms based on specific needs.

From the perspective of European law, Directive 2003/109/EC concerning the status of third-country nationals who are long-term residents offers a comparative benchmark. Article 3(2)(e) excludes from its scope certain categories of persons whose stay is formally limited or exclusively temporary in nature. The Directive does not in itself constitute a direct legal basis for introducing a limit in the Republic of Moldova, but it may serve as a reference in analysing the compatibility of such a measure with the objectives of European migration policy.

To be effective, any cumulative limit must be accompanied by measures that encourage local recruitment, reduce employers' dependence on the successive replacement of foreign workers and

[4] Israel, the regime of stay and visa extension for foreign workers in the care sector: https://lawoffice.org.il/en/visa-renewal-for-a-foreign-worker-in-the-nursing-field/

provide for a differentiated regime for highly qualified specialists. At the same time, it must be expressly linked to the conditions for granting the right of permanent residence. IGM data on successive extensions and the cumulative length of stay would make it possible to substantiate the appropriate threshold and assess its effects.

Linking the cumulative limit to access to permanent residence

The need for such linkage also stems from the legal regime of permanent residence. Under Art. 45(1)(b) of Law No. 200/2010, foreigners in categories other than those provided for in letter (a) may apply for the right of permanent residence after at least five years of legal and continuous temporary stay, subject to the other conditions laid down by law. From 1 June 2027, Art. 99(1)(b) of Law No. 66/2026 maintains the five-year time requirement and introduces the requirement of proof of payment of state social insurance contributions. The new regulation no longer expressly provides for the condition of knowledge of the Romanian language at an intermediate level.

Art. 99(8) of Law No. 66/2026 excludes certain categories of foreigners from being granted the right of permanent residence, including seasonal and cross-border workers, intra-corporate transferees, students and other categories admitted for temporary purposes. Regular immigrant workers are not listed among these excluded categories. Consequently, access to permanent residence remains possible for them, provided they meet the legal requirements.

This difference in regulation highlights an asymmetry in the architecture of the labour migration regime. For highly qualified workers, Art. 45 of Law No. 66/2026 provides for a cumulative limit of four years, while the regime for regular immigrant workers does not, in the provisions analysed, establish an equivalent cumulative ceiling. This situation justifies examining whether differentiated regulation is also appropriate for unskilled and low-skilled workers, particularly in sectors where external recruitment may, in the long term, substitute for efforts to attract and train the local workforce.

In this context, any introduction of a cumulative limit must avoid creating an incompatibility between the regime of successive extensions of the right of stay and the possibility of acquiring permanent resident status. A limit set below the five-year threshold could restrict immigrant workers' access to this form of residence, while a limit linked to the legal eligibility period could maintain consistency between the temporary and permanent residence regimes.

Therefore, introducing a cumulative limit must take into account the legal period required to apply for the right of permanent residence, the conditions attached to this status and the need to ensure a predictable legal transition for immigrant workers who meet the legal criteria. Before adopting such a measure, the public policy choice must be clarified: maintaining the possibility of access to permanent residence for regular immigrant workers, or establishing a strictly temporary residence regime for certain categories of workers, with their express exclusion from the permanent residence route.

Dynamics of documentation for employment purposes

Between 2020 and 2025, the number of grants rose from 1,305 to 4,063, an increase of approximately 211%, i.e. more than a threefold increase. The trend was not uniform, however: after the growth in 2020–2023, the number of grants remained almost constant in 2024, before rising again in 2025.

The situation in the first half of 2026 is particularly relevant. In just six months, IGM reported 3,918 grants, a level close to that recorded for the whole of 2025. This comparison highlights the scale of the

documentations reported in that period. However, it must be treated with caution: a half-year is not a full year, and the data do not allow the result to be automatically extrapolated to the whole year, nor do they support the conclusion that the number of persons actually employed rose in the same proportion.

The distinction between grants and extensions is also essential. Grants reflect the issuance of documents for employment purposes, while extensions indicate administrative operations concerning the continuation of the relevant status. The two categories must be analysed separately and should not be added together to determine the number of foreign workers without clarifying the recording methodology.

The expansion of the employer base

A second indicator provided by IGM is the number of legal entities that hired foreign nationals. It rose from 615 in 2020 to 1,109 in 2023, after which it declined moderately, to 1,073 in 2024 and 1,050 in 2025. For the first half of 2026, 748 legal entities are reported.

Table 4. Legal entities that hired foreign nationals, 2020–30 June 2026

Year	Number of legal entities that hired foreign nationals
2020	615
2021	711
2022	906
2023	1.109
2024	1.073
2025	1.050
H1 2026	748

Source: General Inspectorate for Migration, reply No. 5/12–4706 of 28 August 2026 and the related statistical annex.

Between 2020 and 2025, the number of legal entities that hired foreign nationals rose by approximately 71%. This trend indicates the expansion of the base of employers resorting to international recruitment, even though in the last two years of the full period analysed their number was slightly lower than that recorded in 2023.

The indicator must be interpreted together with the data on grants and extensions, but not confused with them. The number of employers does not indicate how many persons each entity hired, nor the total number of active foreign workers. The two statistical series describe different dimensions of the phenomenon: one reflects administrative documentation operations, and the other the number of legal entities that hired foreign nationals, according to the institution's records.

What do these data tell us about the labour market?

Taken together, IGM data confirm the growth of international recruitment in the Republic of Moldova. They highlight both the increase in the number of grants reported for employment purposes and the expansion, compared with 2020, of the number of legal entities employing foreign nationals.

However, these statistics describe the administrative scale of the phenomenon, not its economic causes. They do not make it possible to establish the extent to which external recruitment is driven by an actual lack of persons with the necessary qualifications, by a mismatch between labour demand and supply, by wage levels or by the conditions offered by employers. To answer these questions, IGM data must be

correlated with ANOFM information on vacancies and registered unemployed persons, with BNS data on inactive persons and labour underutilisation, and with information on the reasons for refusing job offers and the results of vocational training programmes.

Therefore, the growth in documentations for employment purposes is the starting point of the study, not its conclusion**.** The fundamental question is whether external recruitment responds to a staff shortage that cannot be covered by domestic resources or whether, at least in certain sectors, it occurs before the opportunities for employing, retraining and retaining domestic workers have been fully exploited. Clarifying this distinction is indispensable for evaluating labour immigration policy and for formulating measures that address both the needs of enterprises and the long-term economic interest of the Republic of Moldova.

2. Who comes to the Republic of Moldova, and from where?

The annex of the General Inspectorate for Migration (IGM) breaks down documentations for employment purposes by citizenship and sex. The data indicate a change in the citizenship structure over the period analysed. In the first years of the series, the numerically significant categories include citizens of Turkey, Ukraine and Romania. In 2023–2025, other countries become increasingly visible, in particular Nepal and Uzbekistan, followed by India and Bangladesh in the data for the first half of 2026.

Table 5. The most numerous citizenships in the IGM table, 2020–H1 2026

Reference year	The most numerous citizenships in the IGM table*
2020	Turkey 515; Ukraine 383; Romania 250; Russian Federation 88; Azerbaijan 63
2021	Turkey 809; Ukraine 397; Romania 307; Azerbaijan 107; Russian Federation 96
2022	Turkey 1,032; Ukraine 451; Romania 248; Russian Federation 229; Azerbaijan 118
2023	Turkey 659; Ukraine 630; Russian Federation 315; Nepal 267; Romania 220
2024	Turkey 858; Ukraine 464; Nepal 412; Uzbekistan 303; Romania 230
2025	Turkey 754; Uzbekistan 595; Nepal 591; Ukraine 341; India 292
H1 2026	Nepal 1,068; Uzbekistan 526; Bangladesh 357; India 264; Turkey 181

Methodological note: The values are taken from the IGM table on distribution by citizenship. They should not automatically be interpreted as the number of new entries, distinct persons or the stock of workers in activity at the end of the period. The totals of this table do not coincide with the separate series of grants of documents for employment purposes. The difference may reflect distinct definitions, categories or recording units, which require clarification from the institution.

The changing geography of recruitment

The data for 2025 and the first half of 2026 indicate an important change in the structure of the citizenships recorded. While Turkey and Ukraine had a significant presence in the first years of the period analysed, the most recent data show Nepal and Uzbekistan standing out, alongside India and Bangladesh. In the first half of 2026, Nepal ranks first in the table analysed, with 1,068 records.

This development suggests a geographical diversification of recruitment and increased visibility of countries located far away from the Republic of Moldova. However, the available data do not make it possible to establish precisely the mechanisms that produced this change: we do not know whether it reflects recruitment agreements, specialised intermediaries, demand from certain employers for particular categories of workers, or other mobility mechanisms.

The distinction between growth in the number of records and growth in the actual number of foreign workers is also important. Without clarification of the recording unit and possible overlaps between administrative categories, the values in the table cannot be used as a direct measure of the number of persons employed in the Republic of Moldova.

What the citizenship data tell us and what they do not

The distribution by citizenship offers a first indication of the geographical structure of the documented foreign workforce, but does not in itself explain its economic role. The table does not indicate the occupations of the persons concerned, the sectors in which they work, their wages, contractual conditions or actual length of stay. Therefore, automatically associating a particular citizenship with a particular occupation or type of employer is not justified.

Likewise, citizenship is not equivalent to the country from which the person was recruited, the country in which he or she previously lived, or his or her migration path. These variables may differ and must be analysed separately when administrative records allow.

To understand whether the import of labour responds to real labour market shortages or whether there is a risk of substituting local workers who could be attracted by better wages and conditions, citizenship data must be correlated with occupation, economic sector, employer, wage offered and the duration of the employment relationship. In the absence of these correlations, we can describe the change in the structure of the citizenships recorded, but we cannot establish whether recruitment is economically justified in each case.

This is one of the important limitations of the available administrative data: they make it possible to observe certain trends in the documentation of foreign nationals, but do not yet offer a complete picture of their contribution to the labour market or of the relationship between external recruitment and the labour potential available within the country.

3. Where are foreign workers employed? What we know and what we do not know

The territorial distribution of the documentations reported by IGM shows a pronounced concentration in Chișinău municipality. According to the data in the institution's table, the values for the capital rose from 1,052 records in 2020 to 1,292 in 2021, 1,967 in 2022, 2,465 in 2023, 2,564 in 2024 and 4,279 in 2025. For the first half of 2026, 2,290 records are reported.

Table 6. Territorial distribution of IGM documentations in selected localities

Territory	2020	2023	2025	H1 2026
Chișinău	1.052	2.465	4.279	2.290
Anenii Noi	11	93	181	217
Orhei	4	26	98	219

Ialoveni	8	44	188	101
Criuleni	11	31	167	108

Note: The values are taken from the IGM territorial table. They represent the administrative indicator reported by the institution and should not automatically be equated with the number of distinct persons actually employed in each territory. The data for the first half of 2026 cover a shorter period than those for full calendar years. The data in Table 6 also include permit extensions.

The concentration in the capital is evident, but the data also show relevant developments in other territories. In Anenii Noi, the indicator rose from 11 records in 2020 to 181 in 2025, and in Orhei from 4 to 98. In the first half of 2026, the values reported for these two territories reached 217 and 219 respectively.

These developments justify a closer examination of the geographical distribution of external recruitment. However, the values do not in themselves explain the causes of the increase or the economic activities in which foreign workers are engaged. Moreover, the data for six months of 2026 cannot be compared directly with annual totals without taking into account the difference in reference periods.

Limitations of the territorial data

The IGM reply does not provide a consolidated breakdown that would allow the exact identification of the sectors and occupations in which foreign nationals are employed. From the available information it is impossible to establish how many work in agriculture, construction, manufacturing, HoReCa or transport, or how they are distributed between skilled and unskilled occupations.

Likewise, the territorial data do not make it possible to establish a direct link between the presence of foreign workers in a given district and the existence of local staff shortages. For that, the actual occupation, economic sector, employer and place of work would need to be known. The recording unit used by IGM also needs to be clarified, so that administrative documentations can be distinguished from the number of distinct persons.

Therefore, the available data mainly describe the geographical distribution of the administrative indicator reported by IGM, not the entire structure of the employment of foreign nationals on the labour market of the Republic of Moldova.

To complete this picture, IGM information must be placed in the context of BNS statistics on employment and vacancies, as well as ANOFM data on the occupations sought by employers. These sources can help identify the areas where there is demand for staff, but in the absence of common variables they do not allow vacancies to be attributed directly to foreign workers.

Thus, the first finding is a territorial one: the documentations reported by IGM are concentrated in Chișinău municipality, but the phenomenon also occurs in other districts. It remains unclear, however, to what extent this distribution reflects the structure of labour demand and which occupations are actually covered through external recruitment. This data limitation must be borne in mind in the subsequent analysis of shortage occupations and of the relationship between recruitment from abroad and the needs of the domestic labour market.

Moldova: a work destination or a stepping stone to the EU?

A distinct research question is whether foreign nationals who obtain the right of stay for employment purposes remain in the Republic of Moldova for the duration of their employment relationship or whether some of them intend to leave subsequently for other states, including the European Union. The statements of some foreign workers that the Republic of Moldova is only a temporary stage of their migration journey are relevant indications for this hypothesis and should not be ignored. However, a declared intention does not in itself demonstrate that the person subsequently left the country or reached the stated destination.

The IGM reply provides information on the revocation of documentations and the grounds for it, but does not allow the subsequent path of each person to be tracked systematically. At the same time, IGM has reported on recruitments in which foreigners were allegedly promised free access to the European Union, as well as on the increase in the number of persons placed in temporary custody, with costs initially borne by the state.[5]

Therefore, the hypothesis that the Republic of Moldova is being used as an intermediate stage towards the EU must be investigated by correlating administrative data with the testimonies of foreign workers and, where available, with data on subsequent departures. In the absence of such correlated data, neither the scale of the phenomenon nor the proportion of persons who leave the country after a period of work can be established.

Table 7. Revocations of documentations for employment purposes, according to IGM data

Period	Total revocations	At the request of the foreigner/employer	No longer meets the conditions/does not comply with the purpose of stay	Other grounds	Annulments under Art. 48
2020	337	112	62	163	2
2021	1.250	266	776	208	1
2022	1.225	707	428	90	7
2023	1.318	1.140	141	37	2
2024	1.211	1.033	167	11	3
2025	1.318	1.123	162	33	6
H1 2026	953	796	93	64	2

Source: IGM, official reply of 28 August 2026 and the related statistical annex. The data for 2026 refer only to the first half of the year.

The table shows variations in the number of revocations and in the grounds recorded. In 2023, 2024 and 2025, most revocations were recorded at the request of the foreigner or the employer. In the first half of 2026, this category accounted for 796 of the 953 revocations reported.

These figures describe the termination or withdrawal of administratively recorded documentations, but do not fully explain the economic and personal reasons behind each case. The request may come from

[5] "The scheme of foreign workers being brought to Moldova! 'They are promised Europe, then caught crossing the Prut'", 23 September 2026, Bani.md, https://bani.md/schema-muncitorilor-straini-care-sunt-adusi-in-moldova-li-se-promite-europa-apoi-sunt-prinsi-cum-trec-prutul/

the foreigner or from the employer, and the aggregated data do not allow the specific cause to be identified in each situation. Similarly, the category relating to failure to meet the conditions or to comply with the purpose of stay does not in itself indicate the person's subsequent destination.

Data on the revocation of the right of stay for employment purposes do not in themselves make it possible to establish the number of foreign nationals who subsequently leave the Republic of Moldova to reach the European Union. However, information published by the border authorities shows that there are concrete cases in which persons holding valid work documents in the Republic of Moldova attempt to reach EU states illegally.

A relevant example is the case announced by the Border Police on 26 April 2025 concerning the dismantling of a group specialising in organising the illegal migration of Nepalese citizens. According to the official press release, the group facilitated the illegal crossing into the EU of Nepalese citizens who held valid work visas in the Republic of Moldova. On 25 March 2025, four Nepalese citizens were intercepted in the Lipcani–Rădăuți Prut area before illegally crossing the Prut River. The sums demanded from the migrants for organising the border crossing ranged from 2,000 to 5,000 euros.[6]

This case is documented evidence that, at least in certain situations, the status of foreign worker in the Republic of Moldova may be associated with subsequent attempts at irregular migration to the EU. However, it does not demonstrate that the persons concerned initially obtained their work visas solely in order to transit through the Republic of Moldova.

The existence of networks facilitating illegal migration is also confirmed by other investigations. In February 2026, the Border Police reported a case in which four citizens of Bangladesh, India and Pakistan were allegedly transported towards the Moldovan–Romanian border with a view to travelling illegally to EU states.[7] However, in this case the authorities did not specify whether the persons concerned held the right of stay for employment purposes in the Republic of Moldova.

Eurostat statistics on first residence permits issued in the EU can provide information on the scale of legal migration by citizens of countries such as India, Bangladesh or Nepal. However, these statistics are organised by citizenship, the state issuing the permit and the reason for stay, without systematically identifying the states in which the beneficiaries previously lived or worked. Consequently, they cannot be used to calculate directly how many foreign workers left the Republic of Moldova for the EU.

The results of the investigation therefore allow a more precise conclusion than the mere formulation of a hypothesis: **there are documented cases of foreign nationals who held Moldovan work visas and attempted to reach the European Union illegally.** What remains unknown is the scale of the phenomenon, its share of the total number of foreign workers and the extent to which the intention to transit already existed at the time of recruitment.

To quantify the phenomenon, aggregated data are needed from IGM and the General Inspectorate of the Border Police on persons documented for employment purposes who were subsequently detected attempting to cross the border illegally, as well as data on their exits from and returns to the Republic of Moldova. Without this information, the documented cases cannot be extrapolated to the entire population of foreign workers.

---

[6] Border Police, 26 April 2025 https://border.gov.md/grupare-criminala-specializata-organizarea-migratiei-ilegale-cetatenilor-nepalezi-destructurata-de

[7] Border Police, 6 February 2026, https://www.border.gov.md/index.php/retea-de-migratie-ilegala-destructurata-la-frontiera-moldo-romana

5. The labour market paradox: vacancies, unemployed persons and recruitment from abroad

One of the paradoxes of the labour market in the Republic of Moldova is the simultaneous existence of a significant number of vacancies, of persons registered as jobseekers and of the recruitment of foreign nationals. These phenomena raise an essential question for the research: to what extent does recruitment from abroad respond to a real staff shortage, and to what extent could vacancies be filled by making use of the workforce available in the country?

In 2025, the National Employment Agency (ANOFM) reported 41,575 vacancies declared by employers and 18,482 persons with registered unemployed status. However, these indicators do not describe the same population: the first refers to declared positions, and the second to the persons on the agency's register. Therefore, the difference between the two values demonstrates neither that there are enough candidates for all positions nor that external recruitment is inevitable.

To better understand this problem, it is necessary to examine the situation at the level of occupations. ANOFM data make it possible to identify areas in which employers repeatedly declare vacancies. A relevant example is drivers, an occupation for which the agency reports both vacancies and persons registered as jobseekers.

Table 8. Vacancies and registered unemployed persons in the occupation of driver

Year	Vacancies for drivers	Registered unemployed in the occupation
2020	1.006	2.658
2021	1.147	2.012
2022	1.040	1.488
2023	1.424	1.257
2024	1.350	686
2025	1.996	660
2026, data submitted	1.522	489

Source: ANOFM, official reply and statistical annexes for the period 2020–H1 2026. The data for 2026 refer to the first half of the year.

The trend indicates an important change in the ratio between declared demand and the number of registered unemployed persons in this occupation. In 2020, ANOFM reported 1,006 vacancies and 2,658 registered unemployed persons. In 2025, the number of vacancies had reached 1,996, while the number of registered unemployed persons had fallen to 660.

These figures suggest difficulties in matching employers' demand with the registered labour supply. However, they do not demonstrate that the persons on ANOFM's register can immediately fill those positions. There may be differences in licence category, experience, qualifications, locality, working hours and employers' specific requirements. Moreover, the data do not show how many of the vacancies were filled by Moldovan citizens and how many through recruitment from abroad.

This last distinction is essential for the subject of the research. ANOFM data describe the staff demand declared by employers, while data from the General Inspectorate for Migration (IGM) describe the administrative documentations associated with the work of foreign nationals. In their available form,

the two sources do not allow a direct link to be established between vacancies in a given occupation and the foreign workers recruited to fill them.

Therefore, we cannot conclude that foreign nationals are hired to cover exactly the shortage identified by ANOFM in the occupation of driver. Likewise, we cannot claim that persons registered as jobseekers could fully cover this shortage. Such a conclusion would require comparable data on the actual occupation of foreign workers, their qualifications, the positions filled and the results of local recruitment.

Drivers are not the only occupation in which ANOFM repeatedly reports vacancies. The list submitted by the agency includes seamstresses, trolleybus drivers, operators in various fields, cooks, salespersons, cashiers, cable and wire workers, steel fixers, concrete workers and welders, as well as doctors, engineers, inspectors and IT specialists. The diversity of these occupations shows that employers' needs are heterogeneous and that staff shortages must be analysed separately according to qualifications and professional requirements.

In relation to labour migration, the relevant question is not only how many positions remain vacant, but also whether external recruitment takes place in the same occupations and sectors in which ANOFM identifies recruitment difficulties. Answering it requires correlating vacancy data with IGM records broken down by occupation and economic sector.

The labour market paradox does not automatically demonstrate either that the Republic of Moldova lacks workers for all shortage occupations or that recruitment from abroad can be entirely replaced by mobilising domestic resources. It highlights the need to distinguish between declared staff demand, the actual availability of local candidates and external recruitment. This distinction will be examined in more detail in the case study of drivers, where data on staff demand can be analysed against the available information on foreign nationals and the practice of the profession.

Correlating staff shortages with the employment of foreign nationals

Comparing ANOFM data with information published by IGM makes it possible to identify certain overlaps between the economic sectors in which employers report recruitment difficulties and the areas in which foreign nationals are already employed. However, this correlation is only partially possible, because the sources do not use the same statistical structure and do not provide comparable data for the same period on the number of foreign workers by occupation and economic sector.

The case of the wiring harness manufacturer in Orhei district offers an additional indication of the reasons for external recruitment. In March 2024, ANOFM announced that SRL SE Bordnetze had more than 100 vacancies and that the agency would support the recruitment and selection of staff from among unemployed persons and jobseekers. The minimum wage announced for the company was to be 11,000 lei from 1 April 2024.[8] In July 2026, IGM informed approximately 150 Nepalese citizens employed at an enterprise in the Orhei Free Economic Zone specialising in the production of wiring harnesses.

This information suggests that local recruitment through public employment services and the employment of foreign workers can coexist in the same economic sector. However, the available sources do not explicitly confirm that the enterprise mentioned by IGM in 2026 is the same as SRL SE

[8] ANOFM on a working visit to a business in Orhei to strengthen cooperation, https://www.anofm.md/ro/node/20659

Bordnetze, nor do they show the results of the local recruitment in 2024. Consequently, it cannot be established whether the employment of Nepalese citizens was driven by an insufficient number of local candidates, staff turnover, business expansion or other economic considerations.

To clarify the situation, information would be needed on the number of local candidates referred by ANOFM to the enterprise, the results of the selection, the wages and conditions offered at the time foreign workers were recruited, and the reasons why the positions remained vacant. Without these data, the case demonstrates the simultaneous existence of vacancies and the employment of foreigners, but does not allow the direct cause of external recruitment to be established.

A similar overlap can be observed in construction and infrastructure. ANOFM includes construction among the sectors in which staff shortages exceed the national average, and IGM has documented the presence of workers from Bangladesh at an enterprise in Cahul district that builds and installs gas pipelines and water supply and sewerage systems. This example shows that foreign recruitment is used in activities that fall within a sector with reported recruitment difficulties. However, no data are available to confirm whether the shortage identified at sector level led to the hiring of these workers or whether the enterprise in question had previously tried to recruit local candidates.

A relevant situation also emerges in the case of drivers. ANOFM data indicate an increase in the number of vacancies for this occupation, from 1,006 in 2020 to 1,996 in 2025, while the number of registered unemployed persons in the same occupation fell from 2,658 to 660. In 2026, the available data indicate 1,522 vacancies and 489 registered unemployed persons. This trend suggests a discrepancy between the recorded demand for drivers and the number of persons registered as unemployed in this occupation. However, the data do not make it possible to establish the number of persons actually available, the compatibility of qualifications or the working conditions offered. Moreover, no comparable breakdown of documentations for employment purposes for the occupation of driver was identified in the IGM information examined. Therefore, a direct statistical link between the shortage of drivers and the recruitment of foreign nationals cannot be established.

ANOFM data on employer behaviour complete this picture. In 2025, approximately 15% of the companies included in the survey reported staff shortages. Of the employers that faced this problem, 48.8% stated that the recruitment process took longer than usual, and 31.6% said they had been unable to recruit staff. At the same time, 14.3% stated that they had offered higher wages to attract candidates. These results indicate the existence of real recruitment difficulties, but also that raising wages was not a solution reported by the majority of affected employers.

Overall, the available data support the conclusion that the recruitment of foreign nationals and staff shortages coexist in at least some segments of the economy of the Republic of Moldova, especially in manufacturing and construction. However, they do not make it possible to quantify the proportion of external recruitments that respond to real shortages, nor to separate them from situations in which employers pursue other economic objectives. A complete assessment would require IGM data on the occupation and economic sector of each worker documented for employment purposes, correlated with ANOFM statistics on vacancies and recruitment difficulties in the same sectors and periods.

6. Why do people turn down jobs?

One of the relevant indicators for understanding the relationship between labour demand and supply is the statistics on refusals recorded by ANOFM. The institution's data show that refusals are classified

into several categories: territorial reason, qualification, working conditions, nature of the work, wage and other reasons. These data make it possible to identify certain factors associated with turning down offers, but they do not fully explain the decisions of jobseekers.[9]

Table 9. Job refusals recorded by ANOFM, by reason

Reason for refusal	2023	2024	2025	H1 2026
Territorial reason	563	203	104	62
Qualification	63	28	9	7
Working conditions	401	243	174	103
Nature of the work	409	146	124	76
Wage	329	148	133	70
Other reasons	3.350	1.704	1.253	773
Total	5.115	2.472	1.797	1.091

Source: ANOFM, official reply No. 10-781 of 26 August 2026, statistical annex on job refusals and the reasons for them.
Note: the table in ANOFM's reply contains a calculation error: the totals for 2023–2025 do not include the "Qualification" row

In 2025, ANOFM recorded 1,797 refusals of job offers. Of these, 133 were classified under "Wage", 174 under "Working conditions", 124 under "Nature of the work" and 104 under "Territorial reason". These categories indicate that pay, working conditions and location are among the officially recorded reasons. However, they should not be interpreted as a complete measure of the importance of each factor in the decision to accept or reject an offer.

An important limitation of the data is the share of the "Other reasons" category, which totalled 1,253 cases in 2025, approximately 69.7% of all refusals. In the absence of a more detailed classification, it is impossible to establish what caused most of these refusals. It would be unjustified to assume that they relate exclusively to wages, working conditions or personal responsibilities.

Nor does the decrease in the total number of refusals, from 5,115 in 2023 to 1,797 in 2025, in itself demonstrate that job offers have become more attractive. Such a conclusion would also require data on the number of offers made, the number of persons to whom jobs were offered and how refusals were recorded. The available statistics describe the refusals recorded by ANOFM, not all interactions between employers and potential employees in the economy.[10]

Refusals of job offers and the recruitment of foreign workers

Data on refusals of employment must also be analysed in the context of legislative changes affecting the recruitment of foreign workers. In July 2025, AmCham Moldova announced the adoption of a legislative amendment reducing the minimum wage threshold applicable to certain categories of foreign workers from 100% to 50% of the average monthly wage in the economy. According to the organisation, the measure was intended to facilitate recruitment in sectors facing shortages of local staff and to reduce the costs borne by enterprises. [11]

[9] National Employment Agency (ANOFM), Official reply No. 10-781 of 26 August 2026, statistical annex on job refusals and the reasons for them, period 2023–H1 2026. Administrative document provided in the course of the research.
[10] Idem
[11] AmCham Moldova, "Adjustment of the Minimum Salary Threshold for Foreign Workers", 29 July 2025. Available online.

The 50% threshold is provided for in Art. 43⁴(1)(e) and Art. 43⁵(1)(b) of Law No. 200/2010 on the regime of foreigners in the Republic of Moldova. It is also carried over, as a general threshold, into Art. 7(1)(d) of Law No. 66/2026, which governs the regime of immigrant workers, while also respecting the principle of pay equal to that granted to citizens of the Republic of Moldova for similar activities.

The regulation does not remove the employer's obligations regarding social and health contributions. Under Art. 43¹(7)(d) of Law No. 200/2010, the employer undertakes to make the related transfers, and failure to fulfil this obligation constitutes grounds for refusing to extend the right of stay, under Art. 43³(1)(f). At the same time, payment of social insurance contributions is provided for as a condition for applying for the right of permanent residence, under Art. 99(1)(f) of Law No. 66/2026.

From a labour market perspective, the change in the wage threshold may be a factor influencing decisions on external recruitment, especially in sectors where employers have difficulty finding local staff. However, the reduction of the statutory threshold does not in itself demonstrate that foreign workers are actually paid lower wages than citizens of the Republic of Moldova for similar activities. The wage threshold laid down by law and the contractual or actually paid wage are different indicators.

Therefore, the analysis of refusals of employment must be correlated with changes in the regulatory framework on the recruitment of foreign workers, without assuming that the reduction of the wage threshold is in itself the cause of the growth in external recruitment or of local workers' refusal to take certain positions. This source is relevant to the analysis because it shows that the reduction of employment costs was explicitly cited as one of the advantages of facilitating the recruitment of foreign workers. However, it does not demonstrate that employers actually pay foreign workers lower wages than citizens of the Republic of Moldova for the same work. The wage threshold laid down by the legal framework and the wage actually paid to an employee are different indicators. Likewise, the information published by AmCham expresses the organisation's view of the amendment and should not automatically be presented as an official finding on the effects already produced by the law.[12]

Therefore, two aspects must be examined in parallel. On the one hand, ANOFM data record refusals associated, among other things, with the wage, conditions and location of the job. On the other hand, the change in the wage threshold for foreign workers was also presented by AmCham in terms of reducing costs for employers. These elements justify investigating the possibility that, in certain sectors, external recruitment is more economically convenient for some enterprises than improving the offers made to local workers. They justify formulating a research question, but they are not sufficient to demonstrate that this is the actual main reason for recruitment.

To test the hypothesis, comparable data would be needed on the contractual and actually paid wages, working hours, overtime, benefits and contractual conditions of local and foreign workers occupying similar positions. The occupations and sectors in which foreign nationals are employed would also need to be known. The IGM reply used in this research does not provide a complete breakdown that would allow such a comparison.[13]

Consequently, the refusal of a specific offer should not be confused with a refusal to work. At the same time, the hiring of a foreign worker does not automatically demonstrate that the position could not have been filled by a citizen of the Republic of Moldova, or that it was offered to a citizen. To establish

[12] Idem.

[13] General Inspectorate for Migration (IGM), Reply No. 5/12–4706 of 28 August 2026 and the statistical annexes for the period 2020–30 June 2026, on documentation for employment purposes, territorial distribution and the number of legal entities employing foreign nationals. Administrative document provided in the course of the research.

whether external recruitment responds to a real staff shortage or offers a cost advantage, data on refusals must be correlated with the wage offered, working conditions, occupation, location and the results of local recruitment.

ANOFM's public data make it possible to analyse certain results of employment policies, including the number of persons employed through intermediation services, participation in vocational training programmes and the structure of vacancies by economic activity and wage level. For example, in 2024 the agency reported 59,354 jobseekers, of whom 18,831 had unemployed status, while 16,699 persons were employed following intermediation services. Separately, 691 unemployed persons completed vocational training courses, and 572 persons were reported as placed in employment after completion, an indicator that also includes persons enrolled in courses in the previous year.[14]

This information offers a picture of employment activity, but does not allow the individual path of persons who refused a job offer to be tracked. In particular, the public data identified do not sufficiently explain the "other reasons" category in the refusal statistics and do not make it possible to establish the number of persons who, after refusing, took a job with another employer or left the agency's register for other reasons.

Improving the records would involve breaking down the "other reasons" category in ANOFM statistics and publishing data by occupation, region and wage band. It would also be useful to track the situation of persons after a refusal: whether they subsequently take a job elsewhere or leave the agency's register. This information would allow a clearer distinction between a lack of availability for a particular position and structural employment difficulties.

7. Is there a domestic labour reserve? BNS data

The reply from the National Bureau of Statistics (BNS) brings into the discussion two categories relevant to labour market analysis: persons outside the labour force who would like to work, and persons already employed who would like to change their professional situation. These categories should not be confused with the unemployed registered with ANOFM, nor automatically considered available for any position. They do show, however, that the assessment of domestic labour resources cannot be limited to the records of registered unemployment.[15]

Table 10. Indicators of the potential labour reserve

BNS indicator (thousand persons)	2023	2024	2025*
Inactive persons who would like to work	44.6	40.5	57.9
Of whom available for work	20.9	20.3	40.5
Underutilised labour force – total	96.3	80.3	87.0
Potential labour force	24.3	21.8	43.1
Employed persons who wish to change their	108.7	101.4	57.7

[14] ANOFM Activity Report 2024, https://anofm.md/sites/default/files/2025-04/Raport_2024_final.pdf
[15] National Bureau of Statistics of the Republic of Moldova (BNS), "Labour force: employment and unemployment in 2025". https://statistica.gov.md/index.php/ro/forta-de-munca-ocuparea-si-somajul-in-anul-2025-9430_62388.html

situation at work			

Source: BNS data from the Labour Force Survey (LFS/AFM), presented in the institution's reply used in the research. For definitions of the indicators and methodological information on the LFS, see BNS, "Labour force: employment and unemployment in 2025".

In 2025, BNS estimated that 57,954 persons outside the labour force would have liked to work, of whom 40,556 were available for work. These values indicate the existence of potential for mobilising domestic resources, but they do not demonstrate that all these persons have the required qualifications, can immediately fill vacancies or are willing to accept the wages and conditions offered. Making use of this potential could require career guidance services, training programmes, childcare support, transport solutions and more flexible working hours.

BNS data on employed persons who would like to change their professional situation offer an additional perspective. In 2025, 38,187 persons cited the desire for higher hourly pay as their reason, and 7,504 would have liked to work more hours, with a corresponding increase in income. Other reasons included the desire to work under a contract and to receive the full official wage, the temporary nature of the work or a more appropriate use of their qualifications. These data come from the BNS information used in the research; their interpretation must take into account the methodological changes of 2025.[16]

In previous years, the desire to obtain higher hourly pay was also the most frequently cited reason in the series analysed: 69,133 persons in 2023, 63,949 in 2024 and 57,162 in 2022. In 2024, a further 17,527 persons mentioned the desire to work with a contract and/or to receive the full official wage. These values suggest that labour market analysis must take into account not only the number of available persons, but also the quality of employment relationships, the level of pay and whether jobs match workers' qualifications and expectations.[17]

These findings do not necessarily demonstrate that raising wages would eliminate staff shortages, nor that persons who wish to change jobs could automatically fill vacancies. They do, however, indicate the need to examine whether some of the recruitment difficulties could be reduced by improving working conditions, pay and opportunities for professional development.

BNS data do not allow each inactive person or person available for work to be matched directly with a specific vacancy. However, they indicate the existence of a potential reserve that cannot be ignored in the analysis of external recruitment. In 2025, the underutilised labour force amounted to 87,000 persons, including 43,100 persons classified as the potential labour force. Separately, 12,900 employed persons were underemployed and would have liked to work more hours. These categories do not represent a number of persons who can immediately fill vacancies, but they indicate the existence of insufficiently used labour resources.

ANOFM data also show that positions with wages of 20,000 lei or more are declared on the local market, including in certain occupations in construction, auxiliary work and technical trades. For example, the list of the best-paid vacancies in March 2025 included 40 positions for auxiliary workers with a declared wage range of 15,000–20,000 lei and 30 positions for unskilled construction workers with a range of 10,000–25,000 lei. These examples demonstrate that such wage levels are offered for

[16] National Bureau of Statistics of the Republic of Moldova (BNS), Letter No. 18-08/13 of 01.09.2026, official reply and statistical data on inactive persons who wish to work and employed persons who wish to change their situation at work.
[17] National Bureau of Statistics of the Republic of Moldova (BNS), Letter No. 18-08/13 of 01.09.2026, official reply and statistical data on inactive persons who wish to work and employed persons who wish to change their situation at work.

some local positions, but they do not show how many of them were filled or how many Moldovan candidates applied.

Therefore, the possibility cannot be excluded that some available Moldovan citizens might be interested in such jobs but are not selected, do not meet the employer's requirements or never come into contact with the employer. At the same time, the existing data do not demonstrate that employers systematically prefer foreign workers over local candidates who would accept the same wage.

To test this hypothesis, data would be needed on the number of local candidates for positions subsequently filled by foreign nationals, their qualifications and experience, the wages actually offered, the reasons for rejection and the outcome of the recruitment. Such an analysis would make it possible to distinguish between a real shortage of candidates, a skills mismatch, the unattractiveness of certain working conditions and any recruitment practices that limit local workers' access.

Thus, the existence of a potential labour reserve justifies investigating the possibilities for internal mobilisation before considering external recruitment the only solution. This does not mean that foreign workers are not needed, but that decisions on the import of labour should be based on a documented assessment of domestic resources, the conditions offered and the real opportunities for professional training and integration.

8. Retraining: a necessary but not instant solution

Vocational training and retraining are instruments through which some jobseekers can acquire the skills employers are looking for. ANOFM data show that these programmes are used in the Republic of Moldova, but the results must be analysed carefully: the number of graduates is not sufficient to assess the effectiveness of the measure unless it is correlated with actual employment and job retention.

According to the ANOFM data used in the research, in 2020–2025, 692, 886, 1,062, 786, 691 and 561 persons respectively completed vocational training courses. For the first half of 2026, 566 graduates are reported. The number of persons reported as employed after completion was, in the same sequence of periods, 639, 532, 720, 521, 572, 279 and 392.[18]

Table 11. Graduates of vocational training courses and persons employed after completion

Period	Course graduates	Employed after completion
2020	692	639
2021	886	532
2022	1.062	720
2023	786	521
2024	691	572
2025	561	279
H1 2026	566	392

Source: ANOFM, activity reports and information on the results of vocational training measures. For 2023 and 2024, the institution specifies that the number of graduates also includes persons who started the courses in the previous year. ANOFM, "Results of the implementation of the vocational training measure through voucher-based courses in 2024", 27 January 2025.

[18] National Employment Agency (ANOFM), Activity Report for 2025, Chapter II, "Implementation of active labour market measures". Official report

An important methodological point is that the number of persons employed in a given year should not automatically be divided by the number of graduates in the same year and presented as a placement rate for the same cohort. For example, ANOFM shows that, in 2024, of the 691 graduates of voucher-based courses, 572 were placed in employment; the institution specifies that this result also includes persons who began training in 2023. In the reporting for 2025, 279 unemployed graduates of voucher-based courses were placed in employment, representing 50% of all graduates reported for this measure. For a correct interpretation of the annual trend, the distinctions between graduate cohorts and the employment indicators used by ANOFM must be maintained.[19]

As regards professions, ANOFM's 2025 report lists drivers, seamstresses, cooks, salespersons and operators in various fields among the shortage occupations. At the same time, the graduates of voucher-based courses who found employment include persons trained as data entry, validation and processing operators, manicurists, accountants, confectioners, hairdressers and cooks.[20] These lists indicate only a partial overlap between some shortage occupations and those for which ANOFM reports training results. However, the comparison is not sufficient to conclude that the training system does not respond to demand: the number of trainees per profession, the jobs available, the regional distribution and employment outcomes would also need to be analysed.

Retraining cannot instantly replace professional experience, regulated qualifications or specific technical skills. A person cannot immediately become a professional driver, welder or specialised operator simply by attending a course. Nevertheless, the state can facilitate career transition through dual training, apprenticeships, internships with employers and the certification of skills acquired through experience or in non-formal and informal settings. These instruments are also included in the list of employment promotion measures presented by ANOFM.[21]

For occupations in which employers repeatedly request workers from abroad, a prior assessment of the possibilities for local training and recruitment would be justified. Employers could contribute to the design of training programmes, the organisation of practical placements and the definition of the necessary skills. The effectiveness of these programmes should be measured not only by the number of persons trained, but also by the proportion of those employed in the field for which they were trained, how long they stay in the job and the level of pay.

Therefore, retraining must be seen as a component of a broader policy of mobilising the domestic workforce, not as an immediate solution to all staff shortages. Before considering external recruitment the only option, the state should be able to demonstrate to what extent the possibilities for training, on-the-job training and employment of persons available on the domestic market have been assessed.

9. Foreign drivers: licences, recruitment and communication requirements

Road transport is a relevant case study for analysing labour shortages in the Republic of Moldova. On the one hand, ANOFM reports a significant number of vacancies for drivers. On the other hand, data from the Public Services Agency (ASP) indicate an increase in the number of foreign nationals holding valid Moldovan driving licences. These developments justify investigating recruitment in the transport

[19] ANOFM, "Results of the implementation of the vocational training measure through voucher-based courses in 2024", 27 January 2025. Official source
[20] ANOFM, Activity Report for 2025, section on vocational training through voucher-based courses and the situation of shortage occupations. Official report.
[21] ANOFM, "Employment promotion measures". Official source

sector, but, in the absence of additional data, they do not demonstrate that foreign licence holders actually work as professional drivers in the Republic of Moldova.

Trends in licences held by foreign nationals

According to the ASP data used in the research, the number of foreign holders of a valid Moldovan licence rose from 1,401 in 2020 to 2,389 in 2025. For 2026, the table indicates 2,595 holders. In parallel, the number of foreign nationals who obtained a Moldovan licence varied from year to year.

Table 12. Moldovan driving licences held by foreign nationals

ASP indicator	2020	2021	2022	2023	2024	2025	2026*
Foreign nationals who obtained a Moldovan licence	210	286	345	309	458	446	328
Licences issued during the year	212	288	349	316	466	451	335
Foreign holders of a valid Moldovan licence at year-end / reference date	1.401	1.485	1.691	1.877	2.141	2.389	2.595

Source: Public Services Agency (ASP), statistical data submitted for the research.

Note: the values for 2026 are partial; the exact reference period must be specified according to the original document. The number of persons who obtained a licence in a given year, the number of licences issued and the stock of holders of valid licences are different indicators and must not be added together.

The growth in the stock of foreign holders of valid Moldovan licences indicates an increase in the number of foreign nationals who hold the right to drive in the Republic of Moldova. However, this indicator does not make it possible to establish the number of those employed in commercial transport, those who drive heavy goods vehicles or those recruited by Moldovan enterprises. A driving licence certifies the right to drive vehicles of the corresponding categories, but does not in itself prove the existence of an employment relationship or the possession of all the professional qualifications required for commercial road transport.

ASP data on categories C, CE, D and DE are relevant to investigating this subject, as they relate to the right to drive goods vehicles and passenger transport vehicles respectively. However, to determine how many foreign holders can legally work in professional transport, it is necessary to verify the requirements applicable to each activity, including certificates of professional competence, where these are mandatory.

ASP specifies that the State Register of Vehicle Drivers contains information on the right to drive and licence categories, but does not include data on the certificates of professional competence of road transport drivers. For this component, the competent road transport authority must be consulted. Consequently, ASP data do not allow the exact number of active foreign professional drivers to be quantified.

The shortage of drivers and external recruitment

ANOFM data provide a second reference point for the analysis. In 2025, the institution reported 1,996 vacancies for drivers and 660 registered unemployed persons in this occupation. The difference between the two values indicates a discrepancy between the number of positions declared vacant and the number of persons registered as unemployed in the occupation concerned. However, it does not demonstrate that all positions could be filled by registered persons: there may be differences in qualifications, experience, location, working hours and pay.

Correlated with the increase in the number of foreign holders of Moldovan licences, these data justify a more detailed analysis of recruitment in transport. To demonstrate the extent to which foreign workers help cover the shortage, data would be needed on the number of foreign drivers actually employed, the categories of vehicles driven, the professional certificates held and their distribution by enterprise and occupation.

Language and operational communication

Another relevant aspect is drivers' ability to communicate in professional situations. According to the ASP reply analysed in the research, the regulatory framework for obtaining a licence does not establish a distinct obligation to present a certificate of knowledge of the Romanian language, nor a separate language test for foreign candidates.

The theory test can be taken in the languages available in the examination system — Romanian, Russian or English. In the practical test, the candidate must directly understand the examiner's instructions, without an interpreter. Therefore, it is not correct to say that obtaining a licence requires no communication ability at all. More precisely, no separate language certification is required, but the practical examination requires understanding instructions in one of the languages used.

ASP also specifies that the differences between the examination for driving goods vehicles and that for passenger transport relate to the vehicle category and the practical skills tested, not to the existence of distinct language requirements. The reply analysed therefore does not indicate a separate language certification regime for bus drivers compared with lorry drivers.

However, the ability to understand instructions during the practical exam does not, on its own, provide a complete picture of communication in professional activity. Depending on the type of transport, drivers may need to communicate with dispatch, passengers, the police, emergency services and other road users. These situations justify examining operational communication skills and training in emergency procedures, especially in passenger transport.

However, the data analysed contain no evidence that would allow road or occupational incidents to be attributed to language barriers. Such a conclusion would require statistics on incidents, their causes and any documented communication difficulties.

Verifying driving competence in commercial activities

Regardless of whether there are documented incidents, the state must know whether persons who drive professionally on public roads – including couriers making deliveries in the city and taxi drivers – have demonstrated knowledge of the traffic rules of the Republic of Moldova. Foreigners with a right of stay are required to exchange their foreign licence within a maximum of 6 months, but it remains to be clarified for which states the exchange is made without an examination and how many foreign workers drive, during this period, on licences issued abroad.

The Republic of Moldova applies an examination-based regime for converting foreign driving licences, except for licences issued by states with which there are bilateral conversion agreements or to which the principle of reciprocity applies. According to the list published by the Public Services Agency, the bilateral agreements cover, among others, Albania, Greece, the United Arab Emirates, France, Germany, Ireland, Italy, Israel, Lithuania, the United Kingdom, Romania, Spain and Turkey. However, recognition of the theory and practical tests is not uniform for all vehicle categories: for example, for certain categories of licences issued by France, Germany, Israel or Lithuania, ASP requires certain examination tests to be taken.[22]

This framework governs the conversion of driving licences, but their use in commercial activities – taxi, deliveries, goods or passenger transport – raises a separate issue relating to the verification of drivers' competence and road safety.

We propose introducing an obligation for persons who drive for commercial purposes and hold licences issued by states whose driving competences the Republic of Moldova does not recognise on equivalent terms to pass the Moldovan theory and practical examination before starting work. Delivery and transport platforms, as well as employers, would be required to verify that these conditions are met.

The criterion for application must be the state that issued the licence, its category and the nature of the activity carried out, not the person's citizenship. Such an approach would make it possible to establish a verification standard based on driving competence and road safety, avoiding unjustified differentiation between drivers on the basis of nationality.

What must be verified before drawing conclusions

For a rigorous assessment of the recruitment of foreign drivers, the authorities should correlate ASP licence data with the records of the competent road transport authority and with data on actual employment. It would be useful to publish indicators on:

- the number of foreign drivers actually employed in commercial transport, by vehicle category;
- possession of the required certificates of professional competence;
- the occupations, regions and sectors in which staff shortages persist;
- the wages and working conditions offered by employers;
- training in operational communication and emergency procedures.

The available data show both a significant number of vacancies for drivers and an increase in the number of foreign nationals holding valid Moldovan licences. They justify investigating the link between staff shortages and external recruitment, but they do not demonstrate how many foreign holders actually work as professional drivers or whether there are safety problems caused by language barriers. Public policy must be based on correlated data on employment, qualifications, working conditions and professional competence, not merely on the number of licences issued.

11. Importing labour: a solution to shortages or a substitute for domestic reforms?

[22] Public Services Agency, "List of states with which the Republic of Moldova has bilateral conversion agreements" https://www.asp.gov.md/ro/servicii-info/conducatori-auto/lista-statelor-acorduri-conversiune-permis?utm_source=chatgpt.com and "List of states to whose authorities' driving licences the principle of reciprocity applies in conversion", https://www.asp.gov.md/ro/servicii-info/conducatori-auto/lista-conversiune-permise-principiul-reciprocitatii?utm_source=chatgpt.com

The data analysed and the additional sources make it possible to identify four possible explanations for the recruitment of foreign nationals in the Republic of Moldova. They are not mutually exclusive and may vary in importance depending on the sector, occupation and employer. The available sources confirm the existence of recruitment difficulties and point to the relevance of wages and employment costs, but they do not make it possible to establish the weight of each factor in specific recruitment decisions.

The first explanation: real staff shortages and recruitment difficulties.

The decline in the available workforce, the emigration of the active population and persistent vacancies put pressure on enterprises. The ANOFM survey on labour market prospects for 2026, conducted among 2,862 companies, shows that approximately 15% of participating companies reported staff shortages in 2025. Of the employers that faced this problem, 48.8% stated that they needed more time to recruit, and 31.6% were unable to recruit staff. These results point to concrete difficulties in filling positions, without, however, demonstrating that none of those positions could have been filled by mobilising or training the local workforce.[23]

In such situations, recruitment from abroad may be a legitimate economic solution, especially when enterprises need to maintain production, fulfil orders or ensure the continuity of services. To assess whether it is necessary, however, the occupations affected, the duration of the shortage, the qualifications required and the conditions offered to candidates must be known.

The second explanation: the insufficient attractiveness of certain job offers.

Staff shortages must be analysed in relation to wages, working hours, working conditions, the location of jobs and the stability of employment. ANOFM data on the reasons for refusals show that wages, conditions and the nature of the work are among the recorded reasons. However, the "other reasons" category accounts for a large share of the total, which limits the ability to establish the causes of refusals precisely.[24]

BNS data, for their part, indicate that obtaining higher hourly pay is an important reason why some employed persons wish to change their professional situation. This finding shows that pay matters in employment decisions, but it does not allow a direct link to be established between these persons and the positions subsequently filled by foreign workers.[25]

The ANOFM survey offers another indication: of the employers that reported staff shortages, 14.3% stated that they had offered higher wages to attract candidates. This proportion shows that raising pay is one of the possible responses to shortages, but not a measure reported by the majority of employers in this category. The result does not demonstrate that the other employers deliberately refused to raise wages, since they may have resorted to other measures or faced different constraints.[26]

---

[23] National Employment Agency (ANOFM), Labour market forecast for 2026 from the employers' perspective, survey conducted among 2,862 enterprises. https://anofm.md/view_document?nid=21259

[24] ANOFM, official reply No. 10-781 of 26 August 2026, statistical annex on job refusals and the reasons for them, 2023–H1 2026.

[25] National Bureau of Statistics (BNS), Letter No. 18-08/13 of 01.09.2026, official reply and statistical data on inactive persons who wish to work and employed persons who wish to change their situation at work.

[26] National Employment Agency (ANOFM), Labour market forecast for 2026 from the employers' perspective, survey conducted among 2,862 enterprises. https://anofm.md/view_document?nid=21259

The third explanation: recruitment costs and the regulatory framework on the pay of foreign workers.

The cost of labour is a relevant element in the analysis of external recruitment. In July 2025, AmCham Moldova reported on the change in the minimum wage threshold applicable to certain categories of foreign workers, from 100% to 50% of the average wage in the economy. The organisation presented the change, among other things, in terms of reducing costs for enterprises and facilitating recruitment in sectors facing shortages of local staff.[27]

This change is relevant because it shows that the level of wage costs was part of the economic arguments used in the debate on facilitating the employment of foreign workers. However, it does not demonstrate that employers recruit foreign nationals solely in order to pay lower wages, nor that they actually receive lower pay than Moldovan citizens for comparable activities. The applicable statutory threshold is not equivalent to the wage actually paid. A conclusive comparison would require data on the pay, occupation, experience, working hours and working conditions of local and foreign employees.

The fourth explanation: the possibility that external recruitment substitutes for necessary labour market reforms.

One hypothesis worth examining is that, in certain situations, recruiting foreign workers may reduce the pressure on employers to raise wages, improve working conditions or invest in staff training and productivity. This is a plausible economic possibility, but the data analysed do not allow it to be presented as a widespread practice in the Republic of Moldova.

To test the hypothesis, positions filled by foreign workers should be compared with similar positions offered locally: the advertised wage and the wage actually paid, working conditions, the duration of recruitment, the number of local candidates and the reasons why they were not hired. It should also be analysed whether the employer tried to adjust the offer, train local candidates or improve staff retention before resorting to international recruitment.

The current legal framework: a largely declarative labour market test

The legislation of the Republic of Moldova enshrines, at least in principle, the priority of domestic human resources in the process of recruiting foreign workers. Thus, Art. 43¹(1) of Law No. 200/2010 on the regime of foreigners provides that immigration for employment purposes takes place according to the national economy's needs for skilled labour, where vacancies cannot be filled with domestic human resources.[28]

However, an examination of the regulatory enforcement mechanism reveals an important difference between the principle of priority for the domestic workforce and the concrete obligations imposed on the employer. Under Art. 43¹(7)(a) of Law No. 200/2010, the applicant beneficiary may request the grant of the right of temporary stay for employment purposes by submitting, on its own responsibility, a declaration that it has completed the national procedures for advertising and registering vacancies. As worded, the provision does not establish an obligation to submit confirmation that no suitable local

[27] AmCham Moldova, "Adjustment of the Minimum Salary Threshold for Foreign Workers", 29 July 2025, https://amcham.md/index.php?go=news&n=4260

[28] Law No. 200 of 16 July 2010 on the regime of foreigners in the Republic of Moldova, Art. 43¹(1) and (7)

candidates were identified, that any applications from domestic persons were examined or that they were rejected on the basis of objective criteria.[29]

In this sense, the general regime of labour immigration does not establish a mandatory mechanism for prior verification of the availability of domestic human resources. The documents submitted for the grant of the right of stay, under Art. 43²(2) and Art. 43⁴(1), do not include a document issued by ANOFM confirming the unavailability of local candidates. Nor does the existence of domestic candidates available to fill the vacancy appear among the grounds for refusal listed in Art. 43³. The decision on granting the right of stay is issued within 15 calendar days, under Art. 43²(8), and ANOFM is informed by the General Inspectorate for Migration only quarterly, after the right of stay has been granted, under Art. 43¹(11).[30]

Another particularity of the legal regime concerns the wage thresholds applicable to different categories of foreign workers. For immigrant workers under the general regime and those in priority occupations, the minimum wage threshold is set at 50% of the forecast average monthly wage in the economy, under Art. 43⁴(1)(e) and Art. 43⁵(1)(b). By contrast, for persons in management positions, employees of investment projects of national importance and employees of free economic zone residents, the law provides for a wage at least equal to the average wage in the economy.[31]

Another particularity of the legal regime concerns the wage thresholds applicable to different categories of foreign workers. For immigrant workers under the general regime and those in priority occupations, the minimum wage threshold is set at 50% of the forecast average monthly wage in the economy, under Art. 43⁴(1)(e) and Art. 43⁵(1)(b). By contrast, for persons in management positions, employees of investment projects of national importance and employees of free economic zone residents, the law provides for a wage at least equal to the average wage in the economy.[32]

This differentiation of wage thresholds raises the question of the extent to which the general regime for immigrant workers provides adequate safeguards against potential competition for jobs that are also accessible to domestic workers. At the same time, although Art. 43¹(1) refers to the needs of the national economy for skilled labour, the general regime for immigrant workers does not require the submission of an educational certificate. Under Art. 43¹(7)(b), the employer's declaration that the foreigner's training corresponds to the position is sufficient, unlike the regime for priority occupations, for which Art. 43⁵(1)(d) lays down distinct qualification requirements.[33]

To clarify what the national advertising and registration procedures entail, it is necessary to examine Law No. 105/2018 on the promotion of employment and unemployment insurance and the procedure approved by ANOFM.

In the version applicable at the time of the research, Art. 14(1)(b) of Law No. 105/2018 requires employers to inform the territorial employment subdivision of all vacancies within five working days of the vacancy arising, using the form approved by ANOFM.[34] Art. 10(7)(b) and Art. 25(4)–(5), in turn,

---

[29] Ibid., Art. 43¹(7)(a)

[30] Ibid., Art. 43²(2) and (8), Art. 43³, Art. 43⁴(1), Art. 43¹(11).

[31] Ibid., Art. 43⁴(1)(e), Art. 43⁵(1)(b), as well as the provisions applicable to persons in management positions, investment projects of national importance and residents of free economic zones.

[32] Ibid., Art. 43⁴(1)(e), Art. 43⁵(1)(b), as well as the provisions applicable to persons in management positions, investment projects of national importance and residents of free economic zones.

[33] Ibid., Art. 43¹(7)(b) and Art. 43⁵(1)(d).

[34] Law No. 105 of 14 June 2018 on the promotion of employment and unemployment insurance, Official Gazette of the Republic of Moldova, No. 295–308 of 10 August 2018, Art. 14(1)(b).

regulate the registration of vacancies and the establishment of the related procedure, and Art. 16(3) provides for the publication of the register of vacancies on ANOFM's website, updated daily.[35]

The procedure for registering vacancies, approved by ANOFM Order No. 28 of 20 March 2019, details the administrative nature of this obligation. The employer submits the form with information about the vacancy; the territorial subdivision checks the completeness of the information and enters the data in the labour market information system. The procedure also includes periodic monitoring of vacancies and contacting the employer to clarify why they have not been filled or to discuss a possible adjustment of the requirements.[36]

Nevertheless, the procedure does not set a mandatory minimum period for publishing the advertisement before a foreign worker is recruited. Nor does it provide for an obligation on the employer to demonstrate that there are no domestic candidates available, to present the results of the examination of local applications, or to obtain from ANOFM a finding on the unavailability of the domestic workforce. Consequently, registering a vacancy does not amount to conducting a substantive labour market test.

This distinction is essential for interpreting the regulatory framework: the legislation requires the employer to advertise and register the vacancy, but the mechanism described does not, as a general rule, require it to demonstrate that its staffing needs cannot be met by recruiting domestic workers. Therefore, the declared priority of domestic human resources is not accompanied by a procedural mechanism rigorous enough to verify its actual application.[37]

Data provided by the National Employment Agency (ANOFM) on refusals of job offers provide an additional reference point for examining the availability of the domestic workforce. In 2025, 1,797 refusals were recorded, of which 133 were attributed to wages, 174 to working conditions, 124 to the nature of the work and 104 to territorial reasons. The "Other reasons" category totalled 1,253 cases, approximately 69.7% of the total. The high share of this category limits the possibility of identifying the factors that actually influence the acceptance or rejection of job offers.

These statistics do not allow a direct relationship to be established between the refusals recorded and the recruitment of foreign workers. They do, however, highlight the limits of the information available for assessing the compatibility between employers' demand and the availability of the domestic workforce. In the absence of correlated data on vacancies, local applications, the results of recruitment processes and the reasons why jobs were not filled, it cannot be rigorously verified whether the recruitment of foreign workers responds to a real shortfall in domestic human resources.

The law does, however, contain a useful precedent with regard to establishing safeguards for the employment of the domestic workforce. For investment projects of national importance, Art. 43^{7}(1) permits the employment of foreigners only if the implementation agreement provides for a reduction in their number in favour of domestic employees, so that after five years foreign workers do not exceed 50% of all employees. When the right of stay is extended, the employer presents the trend in the employment of domestic workers, under paragraph (4).[38]

The existence of this mechanism demonstrates that legislation can provide concrete instruments for monitoring and reducing the share of foreign workers in favour of domestic ones. However, its

[35] Ibid., Art. 10(7)(b), Art. 25(4)–(5) and Art. 16(3).
[36] ANOFM, Order No. 28 of 20 March 2019, Procedure for registering vacancies, points 4–17 and 25–31.
[37] Law No. 105/2018, Art. 14; ANOFM, Order No. 28/2019.
[38] Law No. 200/2010, Art. 43^{7}(1) and (4)

application is limited to investment projects of national importance and does not constitute a general rule for the recruitment of foreign workers.

Overall, the regulatory gap and the limits of the available statistical information may reduce the authorities' capacity to assess whether the recruitment of foreign workers responds to a real shortfall in the domestic workforce or whether, in certain situations, it is a more convenient alternative for employers than local recruitment and adjusting working conditions.

Law No. 66/2026: strengthening employer obligations, without a substantive labour market test

Law No. 66 of 30 April 2026 on the admission, stay and supervision of foreigners in the Republic of Moldova, which will replace Law No. 200/2010 from 1 June 2027, introduces a series of additional safeguards for foreign workers and obligations for employers.[39] These include the employer's obligation to provide a wage that is not lower than that granted to a citizen of the Republic of Moldova for similar activity in the same branch and that amounts to at least 50% of the forecast average monthly wage in the economy (Art. 7(1)(d)). The employer must also provide adequate accommodation and inform the foreign worker of his or her rights and of the possibility of taking Romanian language courses (Art. 7(1)(e)).[40]

With regard to recruitment, the new law provides for the submission of confirmation of the registration of the vacancy, using the form approved by the director of the National Employment Agency (ANOFM), as one of the conditions for granting the right of temporary stay to an immigrant worker (Art. 35(1)(c)). At the same time, the law introduces grounds for refusing the right of stay where the employer has been sanctioned twice for undeclared work or was set up for the purpose of facilitating the entry of foreigners (Art. 37(e)–(f)). For the grant of the right of permanent residence, the conditions include, among others, the submission of proof of payment of social insurance contributions for the entire period of stay (Art. 99(1)(f)).[41]

Nevertheless, the mechanism for verifying the availability of the domestic workforce remains predominantly formal. ANOFM's confirmation certifies the registration of the vacancy, without demonstrating that there are no local candidates available or that they were considered in a recruitment process. The law does not establish a mandatory minimum period for publishing the advertisement, nor a procedure through which ANOFM would establish the unavailability of domestic human resources. The existence of available domestic candidates is not among the grounds for refusal provided for in Art. 37.

In addition, confirmation of the registration of the vacancy is required for the initial grant of the right of stay, while its extension takes place without repeating the same condition, under Art. 35(2). A change of employer is subject to notification to the General Inspectorate for Migration, under Art. 6(10). Consequently, the verification of the availability of the domestic workforce, to the extent that it is carried out through the registration of the vacancy, is not systematically repeated during the foreign worker's stay.[42]

[39] Law No. 66 of 30 April 2026 on the admission, stay and supervision of foreigners in the Republic of Moldova, published in Official Gazette No. 231–234 of 4 June 2026, Art. 226; Art. 158(1) and (3). The law enters into force on 1 June 2027, the date on which Law No. 200/2010 is repealed.
[40] Law No. 66/2026, Art. 7(1)(d)–(e).
[41] Ibid., Art. 35(1)(c), Art. 37(e)–(f), Art. 99(1)(f).
[42] Ibid., Art. 35(2), Art. 6(10), Art. 37.

Another relevant change concerns the wage regime. The rule that a foreign worker's wage may not be lower than that granted to a citizen of the Republic of Moldova for similar activity in the same branch is an additional safeguard. However, the law does not expressly specify the institutional mechanism for verifying this wage comparison, the criteria for identifying similar activity or the specific consequences of failure to comply with the obligation for the right of stay. At the same time, the threshold of 50% of the forecast average monthly wage in the economy becomes the general threshold applicable to regular immigrant workers.

This change is relevant in relation to Law No. 200/2010, which provided for a wage threshold of 100% of the average wage in the economy for certain categories, including persons in management positions, employees of investment projects of national importance and employees of free economic zone residents. Under the new regime, among workers employed in the Republic of Moldova, the threshold of at least one average wage in the economy is provided for highly qualified workers, under Art. 44(1)(c).[5]

Furthermore, the new law no longer carries over the mechanism provided for in Art. 43^{7} of Law No. 200/2010, which required certain employers involved in investment projects of national importance to gradually reduce the share of foreign workers in favour of domestic employees. The disappearance of this provision removes, for the general regime established by the new law, an example of a regulatory instrument explicitly geared towards the progressive replacement of foreign labour with domestic labour.

A distinct regime is established for economic mobility, defined in Art. 3 point 33 by reference to the specialities included in the list of priority occupations established by the Government. Under Art. 80–81, the right of stay for this category is granted for a period of four years and may be extended. The regime benefits from distinct conditions, including exemption from ANOFM confirmation and from the state fee, and the law does not require, as a general condition for granting this right, the submission of an individual employment contract. Therefore, the actual scale of this mechanism will depend on the list of priority occupations approved by the Government and the criteria used to include specialities in it.[6]

For regular immigrant workers, the right of stay is granted for two years, or three years in free economic zones and in the information technology sector, and may be extended under the conditions of Art. 36. The five-year cumulative limit previously applicable to certain categories of employees in free economic zones under Art. 43^{13} of Law No. 200/2010 thus disappears. After five years of continuous stay, the immigrant worker may apply for the right of permanent residence under the conditions of Art. 99(1)(b).[43]

As regards family integration, Art. 89(3) allows the immigrant worker to apply for family reunification after one year of legal stay, and Art. 31(5)(a) provides for the possibility for family members to work without obtaining a right of stay for that purpose. This facility extends access to the labour market for family members, without subjecting them, in that capacity, to the procedure for confirming the registration of the vacancy provided for in Art. 35(1)(c).[44]

Overall, Law No. 66/2026 introduces additional safeguards regarding working conditions, wages, accommodation and employer responsibility, but does not establish a substantive and mandatory test of the availability of the domestic workforce. At the same time, the possibility of extending the right of

[43] Ibid., Art. 7(1)(d), Art. 44(1)(c); Law No. 200/2010, Art. 43^{4}, Art. 43^{5} and Art. 43^{7}.
[44] Law No. 66/2026, Art. 89(3), Art. 31(5)(a), Art. 35(1)(c).

stay, access to permanent residence after five years and the family reunification facilities indicate a regime that may lead to the long-term settlement of foreign workers. This model is not in itself incompatible with immigration policy, but it requires the state to clarify its objectives: temporary recruitment to cover cyclical shortages, or attracting foreign labour and its long-term settlement.

Since Law No. 66/2026 enters into force on 1 June 2027, the study's recommendations on protecting the domestic labour market must be directed primarily at supplementing the verification and monitoring mechanisms provided for by the new regime. In particular, it would be necessary to establish a procedure that allows effective verification of the availability of domestic candidates, examination of the results of local recruitment and monitoring of compliance with wage conditions throughout the foreign worker's stay.

The law on the integration of foreigners: publicly supported integration, with limited responsibilities for the employer

The amendments to the regulatory framework on the integration of foreigners, made by draft law No. 296/2026 adopted by Parliament in second reading on 29 October 2026, extend integration measures to foreigners holding the right of temporary stay, under the new wording of Art. 2(1)(a) of Law No. 274/2011. [45] Exceptions are provided for certain categories, including seasonal and cross-border workers, intra-corporate transferees, students and other categories admitted for short-term activities or for a specific purpose. Consequently, regular immigrant workers become beneficiaries of integration measures from the moment they obtain the right of stay, under Art. 8(1) as proposed.

Integration measures include socio-cultural adaptation sessions, Romanian language courses at levels A1–A2, employment measures and information on obtaining citizenship of the Republic of Moldova, under Art. 5(1). They are to be implemented by public authorities, including through integration centres set up by the competent authority for foreigners, under Art. 7(1^1). Socio-cultural adaptation sessions are organised from the financial resources of the responsible authorities and from external sources, under Art. 10(6), and for Romanian language courses annual allocations are provided in the budget of the Ministry of Education and Research, under Art. 10(12). At the same time, for categories other than beneficiaries of international protection, Romanian language courses are fee-paying, under Art. 10(11). The Ministry of Labour and Social Protection, through ANOFM, ensures the registration of foreigners seeking employment, under Art. 30(a).[46]

As regards the employer, the draft law provides for the possibility, but not the obligation, to cooperate in integration measures, under Art. 5(2) and Art. 8(5). Law No. 66/2026 requires the employer to inform the foreign worker of the possibility of taking Romanian language courses, under Art. 7(1)(e), without establishing a general obligation to fund them. Therefore, part of the responsibility for organising and supporting the integration process falls on public institutions, while the employer's involvement remains limited to the obligations expressly provided for by law.

Participation in integration measures is not established as a general condition for granting or extending the right of stay for employment purposes. In this respect, neither participation in Romanian language courses nor the level of language knowledge is, as a general rule, linked to the extension of an

[45] Draft law No. 296/2026 amending certain regulatory acts on the integration of foreigners in the Republic of Moldova, adopted by Parliament in second reading on 29 October 2026.
[46] Ibid., proposed amendments to Law No. 274/2011, Art. 5(1)–(2), Art. 7(1^1), Art. 8(5), Art. 10(6), (11)–(12), Art. 30(a).

immigrant worker's right of temporary stay. Knowledge of the Romanian language is relevant to the conditions applicable to permanent residence, under Art. 99(1)(e) of Law No. 66/2026.[47]

From the perspective of protecting the domestic labour market, this framework raises two public policy issues. First, the organisation and funding of integration measures involve the use of public resources and external funding, while the employer that benefits from recruiting the foreign worker is not, as a general rule, required to contribute financially to the integration process. Second, the extension of integration measures to regular immigrant workers, including information on obtaining citizenship, is consistent with the possibility of their long-term settlement under Law No. 66/2026, but raises questions about consistency with the objective of strictly temporary labour migration.

These two aspects do not in themselves constitute arguments against the integration of foreigners. They do, however, highlight the need for an explicit public policy on the relationship between the recruitment of foreign workers, employers' responsibility, the funding of integration and the state's long-term objectives in the field of labour migration. If the Republic of Moldova seeks to attract foreign workers and have them settle durably, integration measures are a natural component of that policy. If, on the contrary, labour immigration is conceived as a temporary solution to cyclical shortages, the regulatory framework should reflect this orientation more clearly and link recruitment, length of stay and employer responsibilities.

What can we conclude from the available data?

The sources analysed support the existence of recruitment difficulties and show that pay, working conditions and employment costs are relevant elements for understanding the labour market. However, they do not make it possible to establish the weight of each explanation or to identify the decisive reason for each employer that recruits foreign nationals.

It would be equally unjustified to claim that all employers resort to external recruitment to avoid raising wages and to assume that every hiring of a foreigner responds to a shortage that is impossible to cover domestically. The public policy issue is not the recruitment of foreign nationals as such, but the capacity to assess its necessity in a transparent and verifiable manner.

For occupations for which workers from abroad are requested, the authorities should correlate information on vacancies, the wages and conditions offered, attempts at local recruitment, the qualifications required and the duration of the shortage. The assessment should also take into account opportunities for vocational training, the availability of persons with similar skills and measures that could improve employee retention.

Where a shortage persists despite competitive offers and reasonable efforts at local recruitment and training, the import of labour may be justified. Conversely, if positions remain vacant because of uncompetitive offers, external recruitment risks treating the symptom without correcting the underlying problem.

The principle that should guide public policy is the following: foreign workers must help cover the economy's real shortages, without external recruitment becoming a substitute for the necessary investment in wages, working conditions, vocational training and productivity.

12. Recommendations and conclusions

[47] Law No. 66/2026, Art. 99(1)(e); draft law No. 296/2026, proposed amendments to Law No. 274/2011, Art. 2 and Art. 8.

12.1. Public policy priorities

The data analysed indicate the need for a workforce policy based on assessing shortages by occupation, making use of domestic human resources and improving statistical records. The recruitment of foreign workers may respond to real economic needs, but the scale of these needs and the results of external recruitment must be assessed on the basis of verifiable, comparable and transparent indicators.

Labour immigration policy should seek a balance between covering real staff shortages, protecting employment opportunities for citizens of the Republic of Moldova, increasing the attractiveness of jobs and respecting the rights of foreign workers. In this sense, external recruitment must not substitute for investment in wages, working conditions, vocational training and productivity.

1. Transparent assessment of staff shortages and protection of the domestic labour market

For occupations for which the recruitment of foreign workers is requested, the authorities should publish data on vacancies, the wages and conditions offered, the duration of recruitment and the results of attempts at local employment. A distinction must be drawn between positions for which no candidates with the necessary training are identified and those for which recruitment is difficult because of pay, working hours, location or other working conditions. The aim is not to oblige employers to hire persons who do not meet the professional requirements, but to verify in a documented manner the shortage and the real possibilities of covering it.

In this context, ANOFM's procedure for confirming the vacancy, provided for in Art. 35(1)(c) of Law No. 66/2026, should be strengthened so that it certifies not only the registration of the position, but also that a minimum period of local recruitment, set by law, has taken place, as well as its outcome. Where local candidates who meet the professional requirements are identified, this should be able to constitute a ground for refusing the admission of the foreign worker, by expressly supplementing Art. 37. Such a solution should provide for objective criteria for assessing candidates and avoid arbitrary refusals.

The labour market verification procedure should also apply to the extension of the right of stay for employment purposes, by revising the exception provided for in Art. 35(2), and to changes of employer, instead of a mere notification, under Art. 6(10). Until Law No. 66/2026 enters into force on 1 June 2027, it would be appropriate to consider replacing the declaration on own responsibility provided for in Art. 43^{1}(7)(a) of Law No. 200/2010 with a documented labour market verification procedure.

At the same time, the mechanism on the trend in the employment of domestic workers, previously provided for in Art. 43^{7} of Law No. 200/2010 and not carried over into Law No. 66/2026, should be reintroduced and extended. For employers that repeatedly or in significant numbers resort to external recruitment, the extension of the right of stay could be made conditional on the submission of data on the trend in the employment of citizens of the Republic of Moldova. The mechanism should aim to encourage local recruitment and be adapted to the sector and occupation, without imposing mechanical reductions in the number of foreign workers where a staff shortage is demonstrated.

2. Aligning education, vocational training and working conditions with market demand

The Ministry of Education and Research, ANOFM, technical vocational and higher education institutions, training centres and employers should align study programmes, the number of admission places and the skills developed with the real needs and development prospects of the economy of the Republic of Moldova. Planning should not be based solely on employers' current requests, but also on

forecasts of how occupations will evolve, the development of productive sectors and the need to develop transferable skills.

For occupations with persistent shortages, training programmes adapted to professional requirements, practical training, apprenticeships and on-the-job training are needed. In parallel, the reasons why graduates do not find employment in their field of study or quickly leave their first job must be assessed, including the level of pay, working conditions and career prospects.

The effectiveness of programmes must be assessed by the employment rate after graduation, the match between the qualification obtained and the occupation practised, the level of pay and subsequent job stability. Publishing results by institution, study programme, occupation and region would make it possible to identify the areas in which the educational offer exceeds demand, as well as those in which the training of specialists is insufficient. The objective is to train specialists who can be integrated into the labour market of the Republic of Moldova, without limiting access to education and without turning employers' immediate needs into the sole criterion for organising education.

ANOFM data on the reasons for refusals and BNS data on persons who want higher pay justify examining the attractiveness of job offers. For shortage occupations, the wage actually offered, working hours, location, professional requirements and working conditions should be analysed together. It is also important to compare advertised wages with those actually paid, where data exist. The objective is to identify situations in which the shortage reflects a lack of available skills and those in which the job offer could be improved.

3. Mobilising the human resources available in the country and facilitating the return of the diaspora

BNS data on inactive persons who would like to work, persons available for work and employed persons who would like to change their professional situation indicate potential that is worth investigating. Making use of it may require career guidance, retraining, access to transport, childcare services and adapted working hours. These persons should not automatically be considered available for any position, but nor should they be excluded from the planning of employment policies. The assessment must take into account qualifications, experience, location and the wages offered. Developments in 2025 must be interpreted with caution, given the methodological changes in the Labour Force Survey.

The experience and skills acquired abroad by citizens of the Republic of Moldova can be a resource for the economy. Accessible mechanisms for the recognition of qualifications, information on employment opportunities and support for professional reintegration are useful. The effectiveness of the measures should be assessed through concrete results in terms of employment, the match between skills and occupation, and the employment stability of returnees.

4. External recruitment under transparent and fair conditions: wages, contributions and regulatory instruments

Labour immigration policy should make it possible to cover real shortages while respecting the rights of foreign workers and labour legislation. The assessment of the need for recruitment must take into account the occupation, sector, qualifications, wage, contractual conditions and duration of the shortage. It is also important to monitor respect for workers' rights, including actual employment conditions.

The wage threshold provided for in Art. 7(1)(d) of Law No. 66/2026, set at at least 50% of the forecast average monthly wage, should be reassessed. One public policy option would be to raise it at least to the level of the average wage in the economy, or to link it to the average wage in the sector of activity, depending on the nature of the occupation. In parallel, the principle of equal pay for similar activities should be accompanied by a verification mechanism. Employers requesting external recruitment could declare the wages paid to domestic workers performing comparable activities, and failure to comply with wage rules could constitute grounds for refusing an extension or revoking the right of stay, subject to express regulation.

The possibility of introducing a levy paid by the employer for each foreign worker recruited, earmarked for the vocational training of local workers, should also be assessed. Such a measure would require a clear definition of the calculation base, the use of the funds, the administration mechanism and safeguards against the cost being passed on to the foreign worker.

To manage external recruitment, the Government could approve an annual quota of foreign workers by occupation or sector, after consulting the social partners and on the basis of ANOFM data on staff shortages. Quotas should be flexible, reviewed periodically and based on market indicators, avoiding arbitrary limitations that could harm sectors with persistent shortages.

In addition, it is necessary to assess the impact of the reduction of the wage threshold applied since July 2025. The Ministry of Labour and Social Protection should publish an analysis of the effects of this change on the number of foreign workers admitted, their distribution by occupation and sector, the level of pay and employment conditions. Without comparative data on persons performing similar activities under comparable conditions, it cannot be assumed that foreign nationals are paid less than local workers. At the same time, the presence of foreign workers in a sector with staff shortages does not in itself demonstrate that external recruitment was driven by the impossibility of hiring locally.

5. Managing stay for employment purposes, priority occupations and family reunification

The duration and conditions of the stay of foreign workers should reflect the temporary nature of recruitment, where it is justified by a concrete staff shortage. In this sense, the introduction of a cumulative limit on stay for employment purposes for unskilled and low-skilled workers could be examined, by amending Art. 36 of Law No. 66/2026. Such a limit should be set following an assessment of economic needs and the effects on the labour market, with provision for justified exceptions and procedural safeguards.

In parallel, the inclusion of certain categories of unskilled and low-skilled workers among the persons excluded from the right of permanent residence could be analysed, by amending Art. 99(8), while maintaining distinct and transparent criteria for access to this status. In this context, knowledge of the Romanian language, social contributions paid and the absence of relevant criminal records may constitute integration criteria, but the specific language levels should be expressly laid down in law.

Reference to Directive 2003/109/EC concerning the status of third-country nationals who are long-term residents must be used with caution. The Directive provides for certain exclusions for categories of temporary or formally limited stay, but does not in itself constitute a general authorisation for introducing a cumulative ceiling on stay into the legislation of the Republic of Moldova. Such a solution must be grounded in national regulation and in an assessment of its compatibility with the principles of proportionality and legal certainty.

The "economic mobility" regime provided for in Art. 80–81 of Law No. 66/2026 should be subject to control requirements comparable to those applied to other forms of recruitment for employment purposes. An individual employment contract, ANOFM confirmation and payment of the state fee could be required, as appropriate. The list of priority occupations should be approved by the Government after consulting the social partners, on the basis of ANOFM data, and reviewed annually. Including an occupation in the priority list should not constitute a general derogation from the verification of employment conditions.

As regards family reunification, increasing from one year to two years the minimum period of stay of the sponsor, provided for in Art. 89(3) of Law No. 66/2026, could be examined. At the same time, family members' access to the labour market could be made conditional, for an initial period of no more than 12 months, on a check of the labour market situation. These options are reflected, for comparison, in Art. 8 and Art. 14(2) of Directive 2003/86/EC on the right to family reunification. The Directive applies to the Member States of the European Union and can serve the Republic of Moldova as a legislative policy benchmark, not as a basis for direct application.

6. Linguistic and professional integration, including employer responsibility

The integration of foreign workers should be treated as a shared responsibility of the authorities, employers and workers, with obligations proportionate to the length of stay and the nature of the activity. Art. 7(1)(e) of Law No. 66/2026 provides for the employer's obligation to inform the foreign worker of his or her rights and of the possibility of attending Romanian language courses, and to provide adequate accommodation. With a view to strengthening integration, consideration could be given to turning the obligation to provide information on language courses into an obligation for the employer to bear the costs of introductory A1–A2 courses and professional adaptation sessions. Such an obligation should be expressly introduced into Law No. 66/2026 and aligned with Law No. 274/2011 on the integration of foreigners in the Republic of Moldova, which currently allows employers to contribute to integration courses and activities, without establishing a general funding obligation.

For immigrant workers who drive for commercial purposes or carry out activities involving direct contact with the public, the first extension of the right of stay could be made conditional on demonstrating a minimum level of knowledge of the Romanian language, for example A2, depending on the nature of the activity and the communication requirements. For applications for the right of permanent residence, Art. 99(1)(e) of Law No. 66/2026 could specify the required language level, for example B1. These levels are public policy proposals and should not be presented as requirements already laid down by law.

In the case of professional drivers, the introduction of a procedure for verifying driving competence for commercial purposes should be examined for holders of licences issued by states with which the Republic of Moldova has no mutual recognition agreements, in accordance with the applicable legislation. The verification should take into account road safety requirements and professional competence, and employers and delivery platforms should have clear obligations to check the documents required for the activity.

Finally, long-term integration measures and information on the possibility of acquiring citizenship should be linked to the permanent residence regime. Law No. 66/2026 and Law No. 274/2011 should consistently reflect the distinction between temporary labour migration, long-term integration and the acquisition of permanent residence status, without creating unclear legal expectations.

7. Improving statistical records on labour migration and employment

IGM should clarify the definitions of, and the relationship between, documents granted, extensions, holders and distinct persons, to the extent that the institution's records allow this differentiation. It would be useful to publish comparable annual series and aggregated data by citizenship, territory, occupation and economic sector, where the information is available.

In parallel, ANOFM should break down the "other reasons" category in its statistics on refusals of job offers and publish aggregated data on the occupation, region and wage band of the refused offers. It would also be useful to track the subsequent situation of the persons concerned: employment with another employer, participation in training programmes, remaining on the register or leaving it for other reasons. To interpret the indicators correctly, the institution should specify whether it counts distinct persons or refusal events.

In 2025, the "other reasons" category accounted for approximately 70.1% of all refusals reported in the official ANOFM reply used in this research. This share justifies a methodological clarification, but it does not allow the specific reasons for the refusals to be inferred.

To correlate migration with the labour market, IGM, ANOFM, BNS and the other competent authorities should identify the indicators that can be compared legally and methodologically, including occupation, sector of activity and the results of local recruitment. The data should be published in aggregated form, in compliance with personal data protection.

In addition, IGM should publish aggregated data on the number of persons benefiting from two or more extensions of the right of stay for employment purposes, the cumulative length of stay and the documented continuity of employment relationships. This information would make it possible to distinguish between annual administrative operations and the long-term development of the population of foreign workers. The authorities should also periodically assess whether successive extensions continue to respond to demonstrated economic needs and whether the regulatory framework provides sufficient instruments for monitoring long-term stay.

8. Completing the data on drivers and other regulated occupations

ASP data on driving licences are not sufficient to establish how many foreign nationals actually work as professional drivers. The competent road transport authority should provide aggregated data on certificates of professional competence, actual occupation and type of transport, within the limits of the available records.

Operational communication and safety requirements must be assessed in relation to professional activities and concrete risks, without assuming that citizenship automatically indicates the presence or absence of certain skills. The data thus obtained could underpin training, verification and recruitment policies tailored to the specific nature of regulated occupations.

Overall, public policy priorities should aim to establish a system of external recruitment based on demonstrated shortages, competitive wage conditions, verification of local recruitment, proportionate integration and comparable statistical records. Recruiting foreign workers can be a legitimate instrument for developing the economy, but its effectiveness must be assessed against its capacity to contribute to sustainable employment, higher productivity and better working conditions in the Republic of Moldova.

12.2. General conclusion

The Republic of Moldova is facing two developments that must be analysed together: the emigration of part of its population and the recruitment of foreign nationals by employers. These phenomena may influence the availability of labour, but data on population migration should not be confused with data on the emigration of economically active persons.

The IGM data analysed in the research indicate an increase in documentations for employment purposes and in the number of legal entities employing foreign nationals compared with 2020, although the trend was not upward every year. These values describe administrative activity and the presence of employers that recruit foreigners, but they do not in themselves represent the number of distinct persons actually working in the country throughout the period analysed.

ANOFM reports vacancies and recruitment difficulties in certain occupations, but also persons registered as jobseekers. BNS identifies persons outside the labour force who would like to work and employed persons who would like to change their professional situation or obtain higher pay. These categories indicate the existence of human resources that merit analysis, but they do not represent a number of persons automatically available for any vacancy. Qualifications, experience, location, working hours and wage conditions must be assessed for each occupation.

The ANOFM survey for 2026, based on the responses of 2,862 companies, shows that approximately 15% of the employers included in the analysis reported staff shortages in 2025. Of the employers that reported shortages, 48.8% needed more time to recruit, 31.6% stated that they had been unable to recruit, and 14.3% said they had offered higher wages to attract candidates. These results confirm the existence of real recruitment difficulties in certain enterprises, but they do not demonstrate that the shortage is generalised across the whole economy or that no vacancy can be filled through local recruitment and training.

An additional aspect highlighted by the research concerns the length of stay of foreign workers and the possibility of successive extensions of the right of stay for employment purposes. For certain categories of workers, the provisions of Law No. 200/2010 analysed provide for initial terms and the possibility of extension, without expressly indicating a maximum cumulative limit in the same provisions. This does not mean that extension is automatic or that the stay may continue unconditionally, but it raises the question of how the state monitors long-term stay and assesses the need for it to continue.

IGM data on grants and extensions do not make it possible to establish the number of workers who have benefited from several consecutive extensions, nor the total length of their stay. In the absence of longitudinal records, it cannot be assessed with sufficient precision whether successive extensions reflect persistent economic needs, professional mobility or a long-term dependence of certain sectors on external recruitment.

Therefore, labour migration policy must aim not only at the initial justification of recruitment, but also at subsequent monitoring of the relationship between the length of stay, continuity of employment and the real needs of the labour market. IGM should publish, within the limits of the law and personal data protection, aggregated statistics on the number of extensions per person, the cumulative length of stay and the status of employment relationships. On the basis of this information, the authorities should establish an explicit cumulative limit on stay for employment purposes for unskilled and low-skilled workers, as well as additional criteria for repeated extensions.

Correlating ANOFM data with information published by IGM identifies overlaps between some sectors with recruitment difficulties and the areas in which foreign workers are employed. In manufacturing, for example, ANOFM identifies a staff shortage above the national average, and IGM has reported on Nepalese citizens employed in the production of wiring harnesses and on workers from Nepal, Bangladesh and Uzbekistan employed at a brick factory. In construction and infrastructure, ANOFM also identifies recruitment difficulties, and IGM has documented the presence of workers from Bangladesh at an enterprise that builds and installs gas pipelines and water supply and sewerage systems.

These examples demonstrate that foreign recruitment and the shortages reported by employers coexist in certain economic segments. However, they do not establish whether the employers concerned were unable to find local candidates, whether the wage offers and working conditions were sufficiently attractive, or whether external recruitment was driven by other considerations. Answering these questions requires data on local candidates, the results of selection and the contractual conditions offered to foreign workers. In their absence, the sectoral overlap is a relevant indication, not a demonstration of causality.

At the same time, the existence of persons who would like to work and of wage offers of 15,000–25,000 lei for certain occupations shows that the analysis cannot be limited to the number of registered unemployed persons or the total number of vacancies. To establish whether some of the positions could be filled by Moldovan citizens, the compatibility of qualifications, actual availability, location, wage and the conditions offered must be analysed. The existing data do not demonstrate that available local persons were rejected in favour of foreign workers, but neither do they allow this possibility to be ruled out in individual cases.

The research demonstrates neither that the recruitment of foreign workers is unnecessary, nor that every hiring from abroad responds to a shortage that is impossible to cover domestically. The available data do not yet allow a complete assessment of the relationship between shortage occupations, the wages actually paid, contractual conditions, attempts at local recruitment and the profile of foreign workers. Therefore, the share of recruitments driven by a real lack of staff, and of those influenced by the attractiveness of offers, working conditions or employment costs, cannot be established precisely.

The central public policy problem is not the choice between local and foreign workers, but the state's capacity to assess the needs of the economy transparently and to use the available human resources efficiently. This requires improving working conditions, developing vocational training, supporting the return of the diaspora and collecting data that make it possible to assess the results of external recruitment and the real opportunities for local employment.

International recruitment may be justified where a shortage persists and the necessary skills cannot be mobilised domestically within a reasonable time. Conversely, if some positions remain vacant because of uncompetitive offers, mismatches between requirements and available skills, or insufficient investment in training and productivity, external recruitment will not eliminate the structural causes of the problem.

The public policy principle: We are not opposed to foreign workers, but we refuse to let the import of labour become the cheapest option for employers and the most convenient one for the state. Recruitment from abroad must be the last resort, not the first: after the position has been offered to citizens of the Republic of Moldova, at a competitive wage and with the same obligations for the employer. Labour migration must remain temporary by law, and safety on public roads cannot depend on an unverified licence.