

# Reintegration with or without EU enlargement: Can Transnistria be co-opted in Moldova's EU accession process?

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# 1. Introduction

Moldova has made notable progress in its relations with the European Union (EU). In just three years, from 2022 to 2025, the EU's smallest Eastern neighbour advanced from being an “associated” partner to a candidate country ready to begin accession negotiations. Conversely, Moldova stagnated regarding territorial reintegration, another long-term goal. Despite the weakest economic situation since the conflict's inception in the early 1990s affecting the Transnistrian breakaway region (Transnistria), Chişinău missed the opportunity to leverage it to push forward the reintegration agenda. As a result, Chişinău has demonstrated better skills in rapprochement with Brussels than in bringing Transnistria closer. Partly, Chişinău

has been less proactive in pursuing the reintegration agenda because EU officials admitted the possibility of the Cypriot precedent. In fact, by advancing the EU accession process, the Moldovan government is indirectly turning the Transnistrian conflict into an “EU issue”. Therefore, Cyprus's example of joining the EU more than a decade ago, with Turkish-controlled territories remaining un-reintegrated, might serve as an inspiration for Chişinău. This could explain why the Moldovan government works so confidently on the EU accession track without fearing obstacles that could arise from an unresolved Transnistrian issue from an EU membership perspective.

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## 2. The survival mode in Transnistria

While Chişinău has been speeding up dialogue with the EU since mid-2022, Transnistria has been preoccupied with maintaining public order and preventing the separatist regime from collapsing. The administration of Transnistria has adopted a survival mode to withstand the security threats caused by the ongoing Russian military aggression against Ukraine. In early 2024, Transnistria underwent another stress test when Chişinău implemented new customs provisions ([the 2021 Customs Code](#)), partly transposing the EU acquis, which introduced [equal tax rules for all Moldovan companies](#), including those from the breakaway region.

The projection of control over the situation was essential for Tiraspol's internal stability, especially after various "false flag" [operations](#) that occasionally occurred from April 2022 to 2024. In this sense, in April 2022, Tiraspol imposed a "red" terrorist threat level, which was soon downgraded to "yellow", enabling the administration to tighten control over the population. The provocations, treated in Tiraspol as ["terrorist attacks"](#), involved allegedly staged [explosions](#) targeting official buildings (the so-called "Ministry of State Security") and outdated civilian and [military infrastructure](#). In practical terms, the anti-terror regime was meant to foster the public's fear of "external enemy", a role essentially attributed to Chişinău. In anticipation of the separatist regime's contestation, Tiraspol took restrictive measures such as [banning public](#) manifestations. With regional security distress, economic losses, and clear attempts by Russian special services to stage low-scale provocations, the Transnistrian administration repeatedly extended the anti-terror special regime, as of now, [until early January 2026](#).

Transnistria's manoeuvring space relative to Moldova remained restricted by Ukraine. As Kyiv warned it could provide an ["adequate response"](#) if Transnistria poses a direct security threat, the region's elites adopted a "wait and see" approach. The Ukrainian close eye on Transnistria served as a sort of "security guarantee" for Chişinău. Another factor that in-

creased Moldova's leverage was Ukraine's refusal to extend the transit contract for Russian gas exports to the EU at the end of 2024, which led to the suspension of gas supplies to Transnistria. The [energy crisis](#) that arose in the breakaway region in early 2025, with a gas shortage extending into 2026, was tested by a light form of the EU's conditionality. However, this was limited to a disbursement of [20 million euros](#) in aid for the residents of the breakaway region, in exchange for a short list of concessions. Among the most consequential concessions are the dismantling of the final [control posts](#) installed by Tiraspol during the 2022 pandemic and the release of [political prisoners](#) ([Anton Malişev](#)). One reason Transnistria avoided a political-economic collapse was the resumption of gas supplies via Hungary. Between renewing Russian energy influence in Transnistria and preventing a humanitarian crisis in Moldova, the EU prioritised the former. The Russian gas flowing into the breakaway region from Hungary, transiting Romania and Moldova, bought time for Chişinău to reduce the impact of Russian electoral interference in the presidential and legislative elections in 2024-2025, exploiting the energy crisis in Transnistria. While aiming to keep the Brussels-aligned Action and Solidarity Party in power, Moldova missed clear signals of the breakaway region's weaknesses, losing a unique chance to tailor an ambitious reintegration plan.

Finally, driven by a strong survival instinct, the Transnistrian elites attempted to keep the discussion about the usefulness of the "5+2" negotiation format alive. Since its inception in 2006, this format has been the only platform where Transnistria could present its case to an external audience. However, the regional geopolitical context has not only halted the "5+2" format but also created uncertainties about its continuity. If the current Transnistrian conflict settlement is not brought back to life, the future frameworks for its resolution will stem from the peace arrangements in Ukraine. In any scenario, the most challenging issue to navigate will be the withdrawal of the Russian peacekeepers and the fragile transportation of military stocks in Transnistria.

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# 3. Moldova's EU accession before or after reintegration

Decision-makers in Brussels and Chişinău indicated [positive signals](#) concerning the Transnistrian settlement, which will later aid Moldova's EU accession process. In this context, the EU's Commissioner for Enlargement, Marta Kos, mentioned the reintegration of the separatist region as part of Moldova's preparations for EU membership. According to Kos, the EU treats Moldova [as a whole](#) in the accession process. Similar sentiments are reflected in the 2025 Enlargement Package report. The document notes that, currently, the trade aspect of the EU-Moldova Association Agreement, which has been in effect since 2014, has legal implications for Transnistria. That is how the breakaway region first established links with the EU, when Transnistrian exports reached the European market. This achievement could be replicated in Moldova's EU accession process, but on a much larger scale. This can only happen if Chişinău's approach to integrating Transnistria into the EU follows the Cyprus model, something which the administration in Tiraspol described as coercive and unsustainable.

Currently, Brussels does not link Moldova's EU membership to the reintegration of Transnistria, at least not officially. Previously, in [June 2023](#), the former High Representative of the EU, Josep Borrell, admitted that EU accession with divided territories is possible based on the "Cypriot precedent". This option might be a salvation if the conflict is not resolved before Chişinău is ready to join the EU. Nevertheless, the Moldovan government acknowledged that a ["reintegration plan"](#), which has not yet been made public, has been presented to the EU. The increasing dependencies that Transnistria is forming with the EU, mainly in trade (80% of exports) and in new gas supply routes (through EU territory), create preconditions for a future "reintegration plan". To further connect Transnistria with the EU, the rest of Moldova needs to achieve tangible progress in the EU accession process, starting with the formal opening of negotiations.

## Cypriot model

Even if the repetition of the "Cypriot model" is possible in the case of Moldova, the choice between what comes first – reintegration or EU accession – is not clear-cut. The EU does not want to link Moldova's accession with reintegration. At the same time, there is a conviction that reintegration is achievable due to "Transnistria's vulnerabilities". The Cyprus model offers a safe option, in line with which the breakaway region will enter the EU alongside Moldova, with or without prior reintegration.

The case of Cyprus, enshrined in [Protocol No. 10 to the Accession Agreement](#), provides a legal pathway for Moldova to become a European member state without having effective control over the separatist regions. When Cyprus joined in 2004, it was agreed that the application of the EU acquis would be paused until the EU Commission proposed to the EU Member States to decide unanimously whether the obligations of Cyprus's membership could apply across the whole island. Consequently, the reunification of Cyprus would then mean that Nicosia must be able to extend the entire country to the EU normative framework. To some extent, Moldova is a step ahead because some trade-related aspects (such as technical standards alignment) of the EU-Moldova Association Agreement, including the EU acquis, have been enforced on Transnistria. Therefore, if Cyprus's logic becomes relevant, then Moldova's EU accession will depend on the mechanism used during the implementation of the trade-related EU acquis since 2016.

Brussels has expressed a desire to see a solution to the Transnistrian conflict [before](#) Moldova's accession, set for 2030, the timeline specified by the current Moldovan government. Despite that, there is no, even hypothetical, deadline for reintegration. One way to make reintegration more actionable could be to learn from the EU's recent experience of reward-

ing Transnistria's concessions with financial aid to mitigate the energy crisis's impact. However, a realistic conditionality mechanism by the EU towards the elites in Tiraspol, including Viktor Gushan's oligarchic network with wealth held in [European banks](#), should also involve an operational sanctions regime (including [individual sanctions](#) on the Transnistrian elite). In other words, "negative" and "positive" and "positive" conditionality ("sticks and carrots") could be designed to encourage Transnistria towards reintegration. This would create the fertile ground for integrating the reintegrated Transnistria into the EU accession process. Such a mechanism, if implemented for Northern Cyprus, might not work due to potential retaliation measures by Türkiye. Any future conditionality employed to persuade Transnistria will need to consider Russia's post-war capacity to intervene under the pretext of protecting its citizens.

### **The three scenarios: reintegration before, after, or not at all**

Scenarios regarding the synchronisation of the EU accession and reintegration processes of Transnistria will be influenced by several critical factors: war developments in Ukraine, the cost-benefit analysis of the political-economic elites of Transnistria, and Russia's ability to aid the breakaway region in the aftermath of the future peace arrangements.

The primary and most evident scenario is that Moldova's EU accession occurs without reintegration. Although Chişinău aims to join the EU by 2028-2030, the administration in Tiraspol might oppose reintegration for political survival reasons, possibly under Russian pressure. In such a case, Moldova could adopt the Cyprus model, joining the EU without effective control over Transnistria.

A second plausible scenario to consider is that, by co-opting Transnistria's elites through the aforementioned conditionality mechanism, the EU could facilitate Moldova's reintegration before the 2030 accession deadline. Although substantial EU funding will be necessary, the required funds could be identified, even when considering the billions of dollars in gas debts owed by Transnistria to Gazprom.

Last but not least, a worst-case scenario where Moldova's accession is postponed due to internal political crises should also be examined. Any significant obstruction to Moldova's European integration following the 2028-2029 elections could be exploited

by Transnistria's elites as another excuse to boycott reintegration. Such development could stem from Russia's ability to restore its influence in Moldova if post-war arrangements include security-related concessions imposed on Ukraine.

### **Conclusions**

The situation regarding Moldova's reintegration has remained stagnant, in contrast to the rapidly progressing EU accession process. The Cyprus model of EU membership, which does not require the exercise of effective control over the entire national territory, offers a political-legal solution to the Transnistrian issue. While it is desirable to integrate Transnistria into Moldova's legal and constitutional frameworks, the failure to do so should not undermine the country's geopolitical direction.

The partial implementation of the trade aspects of the EU-Moldova Association Agreement in Transnistria since 2016 offers hope that Brussels and Chişinău can find innovative ways to engage with the administration in Tiraspol. The optimistic scenario rests on the assumption that Moldova is granted EU membership, which will automatically extend to Transnistria, with full legal effects upon reintegration. However, the worst-case scenarios can also arise, especially if Russia succeeds in reasserting its influence in Moldova by extracting concessions from Ukraine. Without delay, the EU can explore mechanisms that combine "positive" and "negative" conditionality to influence the cost-benefit calculations of the political-economic elites in Transnistria.

The EU and the current government in Chişinău have limited time before Russia attempts to substitute the resources that weakened Transnistria might receive in exchange for joining a reintegration plan. Lastly, given the geopolitical uncertainties, Moldova should pursue serious efforts towards reintegration while drawing on the Cyprus precedent.

