



ARMENIA

JOINT submission by a Group of Civil Society Organizations* to the UN Human Rights Council 49th Session of the Universal Periodic Review (April-May 2025)

Justice and Anti-corruption Reforms, Protection of Human Rights Defenders, Prevention of Torture and Ill-treatment, Right to Life, Combating Gender-based Violence, Freedom of Assembly and Expression, Freedom of Information, Right to Free Elections, Right to be Free from Discrimination, Right to Property, Right to Live in a Healthy and Safe Environment, Right to Health, Right to Education

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Preface

This is a joint submission by a coalition of NGOs with extensive experience in monitoring, documenting and reporting human rights violations in Armenia. The report covers the areas of justice and anti-corruption reforms, protection of human rights defenders, prevention of torture and ill-treatment, right to life, combatting gender-based violence, freedom of assembly and expression, freedom of information, right to free elections, right to be free from discrimination, right to property, right to live in a healthy and safe environment, right to health and education. The report has been prepared following broad consultations with NGO partners and is based on the first-hand data collected during their monitoring and field work with the victims and beneficiaries. Preparation of the report was coordinated by the Democracy Development Foundation.

Since the last UPR review of Armenia in 2020, some serious advancement has been registered in honoring and protecting human rights in Armenia. The right to freedom of expression and freedom of media have substantially improved in practice. Armenia had another round of snap elections that were conducted in line with international standards. Armenia joined the Rome Statute of International Criminal Court and embarked on large-scale justice, and anti-corruption reforms. Nevertheless, civil society in Armenia continues to report about the lack of accountability for torture and ill-treatment, poor guarantees for the protection of the rights of LGBTQI, lack of accountability for non-combat death cases, lack of effective anti-discrimination legislation, etc. These problems are discussed in detail below.

Justice and anti-corruption reforms

During its 2020 review, Armenia has received a series of recommendations aimed at enhancing reforms in the justice system and anti-corruption field and protecting the independence of the judiciary, which were supported by the government. Despite sizeable institutional developments, there is still room to enhance the independence and integrity of the justice sector and start prosecuting grand corruption cases. The Government adopted the Strategies on Legal and Judicial Reforms (Action Plan 2019-2023) and Anti-corruption Reform (Action Plan 2023-2026). As a result of several law amendments, the Government introduced integrity checks for candidates and all sitting judges, prosecutors and investigators. Despite the promised periodic integrity checks, only a one-time check was introduced. No integrity check is foreseen for police officers, including those in highest positions.

During the last 3 years, a wholistic institutional framework has been created for combatting corruption, including Corruption Prevention Commission, Anti-corruption Committee (specialized investigative body), specialized department in the General Prosecutor's office, the Anti-corruption court, as well as special department in the General Prosecutor's office for non-conviction-based asset forfeiture. The new **Anti-corruption Reform Strategy and Action Plan 2023-2026** foresees further advancement of specialized anti-corruption bodies, asset management and integrity checking mechanisms. The anti-corruption policies are debated on the level of the **senior leadership** of the country, as the Prime Minister spearheads the Anti-corruption policy Council that tracks the progress of the reforms. CSOs are also represented in this Council.

However, the recommendations on promotion of justice and anti-corruption reforms 153.120, 153.124, 153.126-153.128; 153.114-153.123 are still partially implemented, due to a number of persisting problems in the system. According to public polls, courts remain among the **least trusted** institutions in Armenia.¹

Civil society organizations have been reporting about lack of merit-based appointments of judges and candidates in the First instance, Anti-corruption courts by Supreme Judicial Council and to the Cassation Court by the Parliament, despite having **negative integrity assessment**. The Supreme Judicial Council argues that they have full discretion in selection of judges, underlying the mere advisory nature of integrity checks. Unfortunately, integrity check reports about the judges, prosecutors, investigators are not public and cannot be used for accountability purposes.² While the publication of integrity check conclusions is a commitment under the new Anti-Corruption Reform Strategy and Action Plan 2023-2026, there has been no progress on introduction of the relevant legislation yet.

Failing to conduct profound vetting of judges, the disciplinary sanctions against judges are currently used to filter the system. Civil society monitoring revealed that the objectiveness of **disciplinary proceedings against judges** has

been compromised in certain cases, as judges tried under similar factual circumstances were treated differently in terms of applied sanctions. Similarly, the disproportionality and poor reasoning of selected sanctions remains concerning. The overwhelming majority of disciplinary proceedings are initiated by the Ministry of Justice, creating risks for politicization of the proceedings. The Disciplinary and Ethics Commissions of has proven to be extremely inefficient in investigating reports of disciplinary violations, as the majority of the judge members of the Commission are guided by corporate interests.

The election procedure of the General Prosecutor by the Parliament is neither merit-based, nor transparent, which undermines its integrity. The appointment and promotion of prosecutors by the General Prosecutor is not accountable either.

The budget for the **Anti-corruption Reform Strategy and Action Plan 2023-2026** does not stipulate any allocations of state funds for implementation of strategic activities. The entirety of envisaged initiatives is anticipated to be financed through donor funding. **The Corruption Prevention Commission (CPC)**, an independent state institution in charge of integrity checks for the key appointments in the judiciary, faces challenges due to a lack of financial and human resources, significantly affecting its effectiveness. Experts have rated the institution poorly in terms of internal accountability and integrity.³ The institutional setup should be developed for accountable and objective **management of the assets recovered by the General Prosecutor's office**. Instead, currently all recovered assets are handed over to the Government and financial means to the separate state budget account without any public oversight on their further use.

Recommendations:

- *Publicize the concluding parts of integrity checks for judges, prosecutors and investigators; oblige the Supreme Judicial Council to substantiate their decisions on appointment and promotion of judges.*
- *Allocate sufficient resources to Corruption Prevention Commission to ensure efficiency of their work.*
- *Improve the quality of disciplinary proceedings against judges through ensuring transparency of all motions, increase the number of NGO members of the Ethics and Disciplinary Commission and revise their selection mechanism.*
- *Ensure accountable and merit-based appointments and promotions of prosecutors based on fair competition.*
- *Develop an institutional framework for accountable and transparent management of the recovered assets by the Government, include CSOs in deciding further use of the recovered assets.*

Protection of human rights defenders

During recent years, mining companies in Armenia have brought at least 29 court cases (SLAPP cases⁴) against environmental activists and journalists to intimidate and silence those who publicly criticize their actions. Most of these cases are brought by Lydian Armenia and Zangezur Copper-Molybdenum Combine, where the Armenian Government has shares. These lawsuits impose significant financial and psychological burden on activists, effectively hindering their work and having chilling effect on their further activism. These patterns pose significant risks to democratic principles and environmental protection opportunities.

The law does not allow NGO to apply to court for protection of public interest, except for the NGOs that represent interests of environment and persons with disabilities. Meanwhile, actio popularis mechanism is important for questioning government actions and by-law.

- Adopt and enforce anti-SLAPP legislation in line with Council of Europe's Committee of Ministers' Recommendation CM/Rec(2024)2 on countering the use of SLAPPs;
- Amend the legislation to allow NGOs to apply to court for protection of public interests.

Torture and ill-treatment

The recommendations from the previous UPR cycle related to combatting torture (153.84-153.91) have not been

implemented by Armenia. After introduction of the crime of torture in the Criminal Code of Armenia, there has been only two **convictions for torture crimes**. **The National Strategy on Human Rights Protection and its Action Plan for 2023-2025** foresees introduction of centralized torture reporting mechanism (collected under one state agency), which has not been introduced yet. The actions of the Strategy's Action Plan focus mainly on capacity building of the state officials, the effectiveness which is dubious.

Due to the **Criminal code amendments**, statutory limitations are not applied for torture crimes (Article 83, part 9), amnesty cannot be applied for the persons convicted for torture (Article 91, part 2), definition of public officials has been expanded to cover more state and state related agents (Article 3, part 20). The new Penitentiary Code provides for medical documentation of torture and other forms of ill-treatment (Article 94).

The Criminal Code of Armenia does not define or criminalize other cruel, inhuman, or degrading treatment. In the result, many crimes which do not amount to torture are tried under articles which are not related to ill-treatment category prescribed under UNCAT, and hence are not reflected in the official statistics. In July 2023, the Government proposed changes to the Criminal Code of Armenia, which were boycotted by NGOs. According to Article 81 of the Code, those convicted of grave and particularly grave crimes for the first time can be exempt from criminal responsibility on the basis of proactive repentance, which is not only in conflict with the Constitution of Armenia, but also all international human rights commitments of Armenia.

Persistent challenges remain regarding the situation in closed institutions, overall police conduct, as well as the quality and speed of the State response to these cases.

A significant setback in this area since the previous UPR cycle has been the dissolution of the Special Investigative Service which was investigating gross violations committed by public officials. Instead, the torture crimes are now investigated by the designated unit of the Investigative Committee of Armenia, which does not have the capacity and necessary independence guarantees for this assignment.

There is substantiated evidence that ill-treatment by the police has been on the rise both inside and outside police departments. The lack of accountability is a serious issue. Despite launch of several criminal cases, the State's response is unsatisfactory, and often, police officers suspected of ill-treatment have been **promoted to other positions** in the law-enforcement system while the trials were underway. There have been **three cases of violence against attorneys in police departments in 2023**. One of the victim lawyers, Karen Alaverdyan, reported that he had been subjected to "undue physical force," handcuffed and detained after trying to stop several officers kicking and punching his client at a police station in Yerevan.⁵ The initiated criminal investigations have not been effective yet.

The **Committee for Prevention of Torture in 2023 informed about the** allegations of excessive use of force at the time of apprehension (punches and kicks) applied on persons who did not resist/no longer resisted, arrest and who were sometimes handcuffed.⁶ Other allegations referred to physical ill-treatment (punches, slaps, and kicks) by police officers during initial questioning in a police establishment and even physical ill-treatment by police officers in the holding cell on court premises. A common concern was that cameras are not used by police officers, and initial questioning in police stations (before bringing detained persons before an investigator) is not audio and video recorded.

The psychological conditions in Nubarashen Prison and partially in the Armavir Prison (ventilation, dilapidation, poor hygiene and vermin infestation) continue to be degrading for the prisoners and demand immediate actions. The visiting rooms, especially for long-term visits, are in miserable condition, which affects the family members and particularly children of inmates. The number of suicides⁷ and self-harm incidents have risen in recent years, partly due to inadequate psychological services and limited access to medical care. Lack of basic diagnostic equipment and insufficient medical support for chronic diseases in certain institutions is deeply concerning.

- *Amend the Criminal Code to criminalize other forms of ill-treatment, including cruel, inhuman, and degrading treatment, in alignment with UNCAT standards, and remove the exemption from criminal responsibility in case of proactive repentance (Article 81).*
- *Enhance the capacity and independence guarantees of investigators to investigate effectively torture and ill treatment reports.*
- *Establish a mechanism for anonymous reporting of torture and ill-treatment cases in closed or semi-closed institutions.*

- *Amend the legislation to ensure permanent audio-visual recording in the police departments, prolong the storage of the recorded videos (up to 8-12 months) to support the investigation into potential police abuses.*
- *Take immediate steps to ensure adequate conditions in the prison cells and visiting rooms.*

Right to Life

Non-combat deaths in the armed forces continue to pose a significant concern. In the first quarter of 2024, local human right defender NGO has reported 27 cases of death in the armed forces, out of which only 4 were the result of cease-fire violation by Azerbaijan. The rest of the non-combat death cases were conditioned by car accidents- 9, health problems- 4, suicide- 4, murder- 3, etc.⁸ **In comparison**, in 2023, the number of fatalities in the army surged by 30%, with 83 reported deaths compared to 64 in 2022. The main reported reasons of non-combat death cases were vehicle accidents in the army, health issues, suicide, and murder. Investigations into these incidents face significant challenges, often failing to promptly identify perpetrators. Moreover, human rights organizations highlight the Ministry of Defense's insufficient efforts in analyzing the root causes and implementing measures to prevent recurrence.

- *Ensure effective, independent and expedient investigation into all non-combat death cases; provide remedies to the families of victims.*
- *Establish hotline protocols to ensure the early detection of suicidal tendencies within the military and penitentiary systems.*

Combatting Gender-based violence

A number of states recommended Armenia to ratify the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention) during the previous UPR cycle, but this recommendation has not been fully implemented yet.

During recent years, the anti-gender movement gained momentum, particularly in its opposition to the ratification of the Istanbul Convention. This movement has specifically targeted the ruling government, positioning the Convention as a threat to traditional values and societal norms. The women rights defenders were among the primary targets of the smear campaigns. Rather than actively countering the misinformation spread by these groups, the state has remained largely passive. This lack of response has allowed false narratives to take root, leading to widespread misconceptions about the Convention among the public.

Although Armenia has signed the Istanbul Convention, but reservation was made concerning the provision in Article 30, Paragraph 2, which obliges the state to provide adequate compensation to individuals who have suffered serious bodily harm or health impairment as a result of gender-based violence. This essentially undermines the prospects for protection of victims' rights.

- *Ratify the Istanbul Convention without reservations, ensuring full protection for victims of gender-based violence, including state compensation for serious bodily harm.*
- *Implement a sustained, comprehensive public awareness campaign to educate the population on the principles and objectives of the Istanbul Convention, countering misinformation.*
- *Take proactive steps to protect women's rights defenders from harassment and retaliation.*

Freedom of assembly

Human rights organizations have reported a number of cases of repeated **police violence** and disproportionate use of force against protesters, journalists, and even citizens during the raids in the clubs.⁹ These operations have been marred by beatings of the club visitors, ordering them to get naked in police departments for police searching, psychological pressure and targeting especially LGBTQI. There has been no effective investigation into these police raids, there are no suspects identified.

On June 12, 2024, the Police forces used more than a dozen 'special' measures, including stun grenades, which resulted in injuries to for around 100 protesters and police officers. 10 journalists were also injured. Human rights

defenders consider that the use of such measures was not proportionate to the needs of crowd control. Criminal cases were launched both into the actions of the protesters and police officers, however no police officer has been held accountable to date. Police continues to resort to disproportionate force and administrative arrests of protesters' participants.

Since the last UPR cycle, the state has not ensured effective probe into the police violence cases from 2015 and 2016 mass protests. In most of the cases, the investigative bodies stated it was not possible to identify the perpetrators, despite the existence of plenty of open-source evidence.

- *Improve the training curricula for the police officers, introduce human rights-based protocols.*
- *Ensure effective and independent investigation into the cases of police abuse against protesters, journalists during rallies, and ensure accountability for perpetrators.*

Freedom of Expression and Information

Armenia has demonstrated commendable progress in terms of press freedom during recent years.¹⁰ However, the recommendations related to freedom of expression and information (153.108-153.111) have not been fully implemented by the State for the following reasons.

Polarization in the media persists due to the political divide within the country: some media outlets are aligned with the authorities, while others, with questionable funding, exhibit unwavering loyalty to the former regime, often nourishing anti-democratic narratives. The lack of regulation for ensuring transparency and disclosure of information on the beneficial owners and funders of the media outlets remains a major issue hindering media independence. Only a handful of media sources are truly independent in their reporting, but those struggle with lack of funding.

Several media-related NGOs have signed a memorandum with the government and parliament to jointly develop the general concept of the new law, which includes also regulations on financial and ownership transparency. In 2024 the government has proposed legislative amendments to the Law on Mass Media, which promote media-self-regulation system and incentivize media outlets to adopt the code of ethics and self-regulation mechanism,¹¹ however the progress is very slow on the overall legislation. Instances of violence against journalists have been reported, particularly during political rallies in 2023 and 2024. Reporters Without Borders reported at least 6 reporters and cameramen were injured when the police fired stun grenades in their direction on June 12, 2024, as they were covering the protest outside the Parliament building¹². The investigation into these cases is extremely inefficient.

- *Expedite the adoption of new Media legislation in line with the concept agreed upon with NGOs.*
- *Ensure effective investigation into the cases of attacks against journalists.*

Since 2011, Armenia holds the 37th place among 140 countries in its "Right to Information Index" rating. Armenia has ratified the Council of Europe Convention on Access to Official Documents and made amendments to the Law on Freedom of Information that are aimed to standardize access to official documents and improve the procedures of information requests. Parliament adopted amendments to the Code on Administrative Offenses, which set higher fines for information holders, aiming at safeguarding citizens' access to information. The government adopted commitments for further improvement of the procedures for the full realization of the right to freedom of information within the OGP 5th Action Plan for 2022-2024 and the Public Administration Reform Strategy for 2023-2025.

Nevertheless, the Law on Freedom of Information has many problems. There is no independent oversight body to examine disputes regarding access to information. Exceptions to the access to information in practice are not based on the application of the "harm test" or "public interest" criteria. Many state institutions are not cooperative in providing sufficient and comprehensive information to journalists and citizens. In March 2023, the National Assembly adopted amendments to the Law "On State Secrets," according to which inquiries for the provision of official data under the Freedom of Information Law are subject to rejection if they contain "official information of limited distribution." This is a vague ground which can be used arbitrarily by state officials to deny access to information.

- *Establish an independent specialized oversight body for access to information disputes.*
- *Amend the Laws on State and Official Secrets, Freedom of Information and “On the Legal Regime of Martial Law” to remove the unlawful restrictions on freedom of expression and information.*

Right to free elections

Armenia managed to hold free and fair elections largely in line with international standards since 2018. The Electoral Code has been amended over the course of several years, however, problems remain on policy and practical levels.

According to the Electoral Code, the decisions and actions of the electoral commissions may be appealed by citizens and observers only in case their individual rights are violated, e.g. the right of the observer to attend the session of the electoral commission or the right of the voter to vote. The observer organizations do not have legal standing either in the context of violations of the electoral code, or in case of violation of the rights of individual observers of their observation missions. Moreover, the Venice Commission and the OSCE/ODIHR in multiple reports recommending Armenia to allow citizens, observers, and NGOs to file complaints against the decisions and actions of election commissions and election results.¹³ No steps have been taken in this regard yet.

In 2022, the Ministry of Justice launched inclusive public consultations with the key stakeholders to develop a **package of draft law amendments to Electoral Code and relevant laws**. The Venice Commission’s review of the draft legislative package¹⁴ has shown the necessity to reconsider the proposed architecture of political finance oversight split between the Oversight and Audit Service /CEC and the Corruption Prevention Commission. They argue that the monitoring authority should be vested with sufficient tools and resources, including sufficient staff specialized in financial auditing, as well as a clear mandate and obligation to audit financial reports of political parties and electoral contestants, to verify the accuracy of the information submitted, and to initiate investigations of possible irregularities.¹⁵

Women’s participation in local self-government elections is often purely formal to uphold the gender quota in the community councils prescribed by the law. Most of elected women in the local councils resign after elections and give up their positions to the male candidates from the same party list.

Polling stations remain largely inaccessible for many **persons with disabilities**, limiting their right to vote. Additionally, persons with intellectual and psychosocial disabilities who have been deprived of legal capacity are barred from voting. In parliamentary elections, mobile ballot boxes are limited to hospitals and detention facilities, excluding those unable to leave their homes due to inaccessibility. There is no opportunity for electronic voting. Furthermore, political campaigns are frequently inaccessible to the deaf community, limiting their access to essential electoral information.

Recent capital **Yerevan municipality elections** (September 2023) were marred with mass-scale use of administrative resources. The current legislation does not provide effective safeguards against this. NGOs also raised the issue of ineffective appeals (both in terms of work of law enforcement and Central Electoral Commission) procedures for the reports on electoral rights violations.¹⁶ Serious problems remain concerning party funding both in terms of effective and timely investigation and accountability.¹⁷ In July 2024, law-enforcement authorities launched a criminal investigation into the Ruling Party’s 2022 and 2023 financial reports conducted by a private firm, based on the results of the mandatory audit conducted by a private company Trust Audit.¹⁸ The investigation is still in progress.

- *Amend the Electoral Code to allow citizens, observers, and NGOs to challenge the unlawful decisions and actions of the electoral commissions, as well as to introduce effective guarantees for prevention of abuse of administrative resources, raise effectiveness of appeals.*
- *Strengthen the oversight mechanisms for the mandatory audit for party funding.*
- *Enhance women's participation in elections and prevent the substitution of female candidates with male candidates from the party list following the elections.*
- *Take immediate measures to ensure full accessibility of elections, including campaign materials and polling stations, and introduce alternative voting methods for persons with disabilities.*

Right to be free from discrimination

Adoption of anti-discrimination legislation and protection of vulnerable groups from discrimination have been one of the dominant recommendations given to the Government of Armenia during the previous UPR cycle (2020), specifically the recommendations 153.43-153.46; 153.48; 153.52-153.71. However, these recommendations have not been implemented by the State yet.

In June 2024, the Ministry of Justice published the draft law "On Ensuring Equality and Protection from Discrimination" and related draft laws for public discussion. The local CSOs welcomed the Government's efforts to enact the long-awaited standalone anti-discrimination law, however it still has certain problematic aspects. Specifically, Human Rights Defender will be the designated Equality body, which will have an adjacent Council on Discrimination Issues. According to the Constitution of Armenia, **Human Rights Defender/Ombudsperson has a limited mandate** and can consider only the cases where the perpetrators of human rights are state and local self-governing authorities and their officials. This would preclude receiving applications regarding violations by private entities and other individuals. Besides, the Council on Discrimination Issues has declarative functions in the draft law without specific mechanisms and tools to fulfill its mandate. Besides, the draft law does not prescribe merit-based requirements and procedure for selection of the Council members.¹⁹

Simultaneously, the draft legislation does not mention sexual orientation and gender identity explicitly as protected grounds. The law does not provide the NGOs with the right to apply to court on behalf of the victims of discrimination. One of the main issues with the Draft is the lack of guarantees and mechanisms for the victims of discrimination to **claim non-pecuniary damages** in case the perpetrators are private entities.

For 2023, LGBTIQI organizations reported murder of a transgender person, suicides of young people, police violence against community members during police raids in the clubs, as well as more than eight dozen offenses based on SOGIE.²⁰ The hate speech calls against them on online platforms were not adequately investigated by the law enforcement. Armenia still does not record hate crimes as such and does not keep disaggregated statistics. Cases of domestic violence against LGBTIQI persons are underreported, no shelter services are available for them.

- *Adopt the draft law "On Ensuring Equality and Protection from Discrimination" including SOGIE in the prohibited grounds and effective mechanisms for enforcement of the legislation.*
- *Enhance the capacity of the law enforcement and judges to investigate the crimes committed against LGBTIQI.*

Right to Property

The Law on Expropriation of Property for the Public Good lacks clarity in defining "society and state needs" and "exclusive supreme public needs," allowing the government to frequently misuse eminent domain powers. Private property is often seized without adequate compensation and transferred to private ventures linked to officials or offshore entities. The state provides no guarantees to protect citizens' rights during property expropriations, and the government avoids responsibility by delegating contract negotiations to former and new owners. Also, the state does not guarantee the compliance of the new owners to their contractual obligations. Many victims remain homeless due to failed promises of replacement housing by companies involved in these expropriations.

The ECHR has issued several judgments against Armenia, where the Court ruled that compensation, even with additional percentages, is often insufficient, particularly when the expropriated property is a primary source of income. Despite these rulings, new complaints continue to arise, and the Law on Expropriation of Property for the Public Good requires urgent amendment.

- *Revise the Law on "Expropriation of Property for the Public Good" to provide clearer criteria for defining "exclusive supreme public needs" require appropriate justification, and involve stakeholders in the assessment process.*
- *Establish state guarantees for fair compensation during the expropriation of private property and ensure that developers adhere to contractual obligations.*

Right to Live in a Healthy and Safe Environment

Armenia continues to violate its Aarhus Convention commitments, particularly regarding public participation and access to information in environmental matters. Amendments to the Environmental Impact Assessment (EIA) Law in 2023 weakened significantly the mechanisms of public participation. Requirements for Strategic Environmental Assessments (SEAs) have been obscured. Methodologies for both EIA and SEA are underdeveloped.

Armenia's legislation fails to ensure that public comments significantly impact environmental decisions, as required by the Aarhus Convention. Peculiar business interests strongly prevail over the human rights to live in a healthy and safe environment. Significant programmatic documents, such as Yerevan Master Plan or Mining Strategy are adopted without due SEA.

- *Revise the EIA legislation to ensure due methodologies for both EIA and SEA and effective mechanisms for public participation to prompt human-rights centered decision making.*
- *Take measures to ensure SEA for all the projects, program and policies that might affect the environment.*

Right to Health

Armenia has succeeded in implementing an e-health system to improve accessibility, quality of services and accountability. However, there are challenges related to legal regulations, system functionality and user awareness. Data security is a serious concern in this respect. The legislation does not specify the roles of all e-health uses to prevent data breaches.

In February 2023, the concept of Universal Health Insurance scheme was introduced in Armenia to ensure fair access to health services for all citizens. The government originally committed to adopt the law in 2024, however, it has not been adopted as per October 2024. The financial model of Universal Health Insurance, including funding sources and mechanisms for long-term sustainability, has not been adequately addressed, which may lead to inequitable access to health services.

In recent years Armenia improved its legislation to ensure adequate pain relief for people with life-threatening diseases. In 2023 the amount of morphine purchased by the RA MoH increased by 16.3%. However, the consumption of morphine by cancer patients does not exceed 1.9 kg of the total demand (estimated need for 2023 is 24.7 kg). Prescribing oral morphine by physicians remains a problem and patients are increasingly receiving injectable morphine, causing additional suffering and pain. In addition, police continue to exercise illegal control over the prescription process, resulting in a violation of the right to privacy.

- *Improve the legislation to ensure users' data security in E-Health system.*
- *Enhance patient awareness about data access and consent procedures.*
- *Adopt the Universal Health Insurance Law in broad consultations with NGOs and vulnerable groups.*
- *Ensure availability and accessibility of pain relief medications, including oral morphine for the beneficiaries.*
- *Ensure capacity building training for medical personnel on pain management.*
- *End police interference over narcotic drugs' prescription process.*

Right to Education

The right to education and equity of education have been systematically eroded in Armenia, which led to increase of learning poverty and illiteracy. Before 2018, the education system was reported as one of the most corrupt in Armenia. The post-revolutionary education reforms did not aim to restore the integrity of the system and mitigate the eroding equity. Systemic corruption was manifested through private tutoring by class teachers; politicization; and undue recognition of learning achievements. These problems have not been duly addressed by the National Plan for Education Development 2022-2030 or the recently adopted Anti-Corruption Strategy. Thus, the measures to

improve the situation remain symptomatic.

Despite the inclusion policies, most of public schools in Armenia are not accessible for persons with disabilities. Pre-school education is handed over to local self-government bodies, which do not have or have not allocated sufficient financial resources to provide this service to kids in communities.

- *Amend the NPED and its Action Plan with urgent steps to restore integrity and equity in education.*
- *Adopt effective assessment mechanisms to measure the needs of students to provide targeted education support to them.*
- *Create a centralized technical support mechanism to advise schools on accessibility standards for building and renovating schools.*
- *Provide sustainable funding to local budgets for ensuring access to pre-school education.*

(Endnotes)

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- ¹¹ [https://www.venice.coe.int/webforms/documents/?pdf=CDL-REF\(2024\)032-e](https://www.venice.coe.int/webforms/documents/?pdf=CDL-REF(2024)032-e)
- ¹² Reporters injured by targeted police violence while covering protest in Armenia | RSF; <https://rsf.org/en/reporters-injured-targeted-police-violence-while-covering-protest-armenia-0>
- ¹³ [https://www.venice.coe.int/webforms/documents/default.aspx?pdf=CDL-PI\(2021\)006-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdf=CDL-PI(2021)006-e); https://www.osce.org/files/f/documents/5/4/502386_0.pdf
- ¹⁴ [European Commission for Democracy Through Law \(Venice Commission\) and OSCE/ODIHR Joint Opinion on Draft Amendments to the Electoral Code And Related Legislation \(2023\); https://www.venice.coe.int/webforms/documents/default.aspx?pdf=CDL-AD\(2023\)030-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdf=CDL-AD(2023)030-e)
- ¹⁵ *Ibid.*
- ¹⁶ “Independent Observer Coalition” reports of September 2023. The members are renowned CSO, like Helsinki Citizens’ Assembly-Vanadzor office, Union of Informed Citizens, Epress media agency, etc.
- ¹⁷ Organized Crime and Corruption Reporting project (March 7, 2024). <https://www.occrp.org/en/investigations/coordinated-cash-donation-data-from-armenias-ruling-party-raises-questions-about-source-of-funds>
- ¹⁸ <https://www.azatutyun.am/a/33029749.html>
- ¹⁹ [Final Opinion on The Draft Law of The Republic of Armenia on Ensuring Equality Before the Law; https://www.osce.org/files/f/documents/2/b/443326.pdf, paragraph 104, page 23](https://www.osce.org/files/f/documents/2/b/443326.pdf)
- ²⁰ Ilga-Europe. Annual Review 2024. https://www.ilga-europe.org/files/uploads/2024/02/2024_full_annual_review.pdf