

## Armenia 2025

### Information from: Human Rights Defender of the Republic of Armenia

#### Independence, effectiveness and establishment of NHRIs

##### International accreditation status and SCA recommendations

The Human Rights Defender of Armenia (HRDA) was last re-accredited with A-status in [October 2024](#).

The SCA acknowledged that the HRDA had been actively engaged in publicly addressing key human rights issues in the country, including discrimination, and women's and LGBTQ+ rights. Recognising that in practice, that the HRDA interprets its mandate in a broad manner, the SCA recommended it to continue to advocate for the adoption of the proposed amendments to the enabling law which would make explicit functions to promote all human rights set out in international, regional and domestic instruments and encourage ratification and accession to international human rights instruments.

Additionally, it recommended that the HRDA advocates for an amendment to its enabling legal framework to provide that the term of office of the Human Rights Defender is limited to one reappointment.

Considering the relevance for single member NHRIs – such as Ombuds institutions – of pluralistic and diverse staff, the SCA recommended that the HRDA continues taking steps to ensure a pluralistic staff and advocating for pluralism, including minority representation, in its composition.

Further, the SCA acknowledged that the HRDA has sought to improve its budgetary situation and encouraged the HRDA to continue to advocate for an appropriate level of funding to be provided by the State to permit the employment and retention of staff with the requisite qualifications and experience to effectively carry out its mandate.

Regarding the selection and appointment process, following up to the previous SCA's recommendation, the HRDA reported that it advocated for amendments to its enabling law to formalise the consultation and participation of civil society. The SCA reiterated its recommendation that a clear, transparent and participatory selection and appointment process for membership of the NHRI's decision-making body must be included in relevant legislation, regulations or

binding administrative guidelines, as appropriate.

## Follow-up to international and European actors' recommendations on NHRIs and relevant developments

The Human Rights Defender of Armenia was re-accredited with the highest "A" status in October 2024. This re-accreditation reflects our continued commitment to upholding the highest standards in human rights protection and strengthening our institutional capacity. We are currently in the process of implementing the recommendations provided by the SCA. Our team is actively working on addressing the outlined areas to ensure full compliance with the recommended actions.

According to Recommendation [CM/Rec\(2021\)1](#) of the Committee of Ministers to member States on the development and strengthening of effective, pluralist and independent national human rights institutions, national human rights institutions should be easily accessible to everyone. Over the years, the Defender's Office has implemented the relevant measures to extend its presence in the provinces of Armenia; the Defender's Office has 5 regional subdivisions, which are located in areas which are accessible for residents of the provinces, including persons with disabilities. It should also be highlighted that the regional subdivisions of the Human Rights Defender's Office are located near the border communities and villages, taking into consideration the urgent needs of the residents in those areas.

Furthermore, as of November 15, 2024, the Government of Armenia adopted a decision on the 'On the Repossession and Consolidation of Real Estate', allocating new premises to the Office of the Human Rights Defender, which adheres to the principles of universal design. The Human Rights Defender highlights that the new building is in need of serious renovation work and is currently unfit for use in its current state.

The Defender's Office is currently working on the development of a new official website, with the aim of making it more accessible to all persons, including persons with disabilities and children.

As recommended by the Committee of Ministers, the institution of the Human Rights Defender is provided with a firm legal basis, namely the Constitutional Law on the Human Rights Defender of Armenia, which was adopted in 2016. The Constitutional Law established the Defender as an independent official, tasked with monitoring the respect for human rights and freedoms by state and local self-government bodies and officials, as well as by private organizations operating in the field of public service, and facilitating the restoration of violated rights and the improvement of the legislation related to human rights

and freedoms. Thus, the Human Rights Defender has a wide mandate to protect all human rights; specifically, the Constitutional Law provides the Defender's Office with the competency to conduct the independent monitoring of the implementation of convention provisions, in particular, the Defender's Office has the mandate of the National Preventive Mechanism under the Optional Protocol to the United Nations Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, and the mandates to monitor the implementation of the provisions of the UN Convention on the Rights of the Child, and the provisions of the UN Convention on the Rights of Persons with Disabilities.

Furthermore, the Committee of Ministers recommend that "have unfettered access to all relevant premises, including places of deprivation of liberty, and to all relevant individuals...to all relevant information...". the Constitutional Law provides the Human Rights Defender, within the context of her competencies during the course of the examination of a complaint, with the authority to visit in an unimpeded manner, any state or local self-government body or organisation, including military units, as well as places of deprivation of liberty. At the same time, the Defender has the competency to request and receive from state or local self-government bodies or officials the necessary materials, documents, information, clarification related to a complaint that is under consideration at the Defender's Office, or an issue that is being considered upon her own initiative.

The Defender's Office also highlights that the Committee of Ministers have recommended that the NHRIs should be provided with a broad mandate to protect and promote human rights. In this regard, the Defender's office is mandated to present reports, implements public awareness-raising campaigns and educational programs, conducts monitoring of the human rights protection system, makes decisions on human rights violations and/or cooperates with competent state bodies to restore violated rights, and contributes to the improvement of normative legal acts related to rights and freedoms.

## **NHRI's gender-sensitive approach**

In 2019, during the previous accreditation process of the Defender's Office, the SCA recommended the Defender's Office to strengthen the implementation of its anti-discrimination mandate, in particular regarding LGBTQ+ and women's rights.

In this regard, the Defender's Office has implemented concrete measures to ensure the implementation of its mandate. For example, the protection of women's rights is one of the priorities of the Defender's Office; in 2022, the Defender's Office established [the Public Council](#) on Women's Rights, which is composed of representatives of NGOs and independent specialists with necessary experience in the field of women's rights protection. The Council

supports the Defender in the implementation of her mandate, namely, ensuring women's legal equality, promoting political participation, preventing violence against women and gender-based violence, etc.

As stated in the 2024 State of the Rule of Law Report, Armenia still lacks a comprehensive legislative framework which prohibits discrimination; the Defender has highlighted the fact that Armenia does not have a standalone anti-discrimination laws that clearly define discrimination, its various forms, and establishes procedural safeguards to ensure effective protection of rights in cases of discrimination. The draft law "On Ensuring Equality and Protection from Discrimination", which was developed and circulated in 2019, however, as of this moment, has not been adopted, provides that the Defender will be entrusted with the mandate of the Equality body, providing broader opportunities for the protection of rights.

The Defender's Office highlights that the Human Rights Defender actively engages in public activities aimed at the promotion of the adoption of the law; for example, in 2024, the Human Rights Defender participated in a [working discussion](#) on the draft package of the law organized at the National Assembly. During the meetings and discussions, the Human Rights Defender has emphasized the imperative role of the above-mentioned law in terms of raising the guarantee of equality and the prohibition of discrimination to an adequate level.

The Defender's Office has also conducted activities aimed at protecting the rights and freedoms of LGBTQ+ people; in 2024, the Defender continued her activities in this regard. For example, a panel discussion was dedicated to protecting vulnerable groups, including LGBTQ+ persons, during the high-level conference dedicated to the 20<sup>th</sup> anniversary of the Human Rights Defender's Office; among the panellists of the conference was a representative from an NGO specialised in the protection of the rights of LGBTQ+ persons. The Human Rights Defender studies and analyses the application/complaints addressed to the Defender's Office; in 2024, the complaints addressed by LGBTQ+ person were related to discrimination, hate speech, and to applying for asylum (receiving refugee status) in Armenia. (Additional information on the activities of the Defender's Office regarding LGBTQ+ rights are covered in the "Human Rights Defenders and civil society space" section).

Among the most significant measures realised by the Defender's Office in this direction is the launching of the implementation of the [Gender Equality Seal](#) (GES) for public institutions in 2024, which is implemented for the first time in Armenia, and for the first time for a national human rights institution. The GES is a specifically designed methodology which aims at assisting State institutions to integrate gender equality principles of the 2023 Sustainable Development Agenda (SDG5) in the national legislation by employing and implementing gender-sensitive approaches in their operations. The primary

goal of the GES is to advance gender equality by improving the State system.

Therefore, the Human Rights Defender highlights that during the accreditation process of the Defender's Office in 2024, the SCA noted that *"the HRDA has been engaging actively to publicly address key human rights issues in the country, including discrimination, and the rights of women and LGBTQI people"*.

## Regulatory framework

The main legal act regulating the mandate of the Human Rights Defender of Armenia is the Constitutional Law on the Human Rights Defender (hereinafter also referred to as "the Constitutional Law"), which has not been amended since the last report.

The Human Rights Defender highlights that in 2024, the Draft Equality Law was actively discussed, during which the Defender highlighted the importance of the need to establish an equality body and assign the function to the Defender's Office.

As discussed in the previous ENNHRI [report](#), the Constitutional Law on the Human Rights Defender was amended on December 7, 2022, enlarging the mandate of the Human Rights Defender, extending the powers of the Office also on the protection of the whistleblowers. According to the amendments, the Defender has the competency to consider complaints from whistleblowers and affiliated persons regarding the violation of their rights by public bodies and officials.

In this regard, the Human Rights Defender for the first time summarized and published the report and statistics related to whistleblowing, based on the relevant statistical data of the state and local self-government bodies, within the framework of the 2023 Annual Report; likewise, the [2024 Annual Report](#) also includes the status of human rights protection of whistleblowers in Armenia. In this regard, no complaints were addressed to the Human Rights Defender regarding violations of the rights of whistleblowers.

Furthermore, the Defender's Office conducts capacity raising training for the representatives of the Office. For example, in 2023, the Defender's Office organized a workshop titled "The Role of the Human Rights Defender in the protection of whistleblowers", with the participation of international experts. During the workshop, international best practices in the sphere were presented, and the specifics of the role of national human rights institutions in this regard were discussed.

In 2024, the Defender's Office continued its awareness raising activities, through the publication of information materials on issues related to human rights and freedoms. For example, the Human Rights Defender published a

[guide](#) on the taxation system for micro-entrepreneurship; the guide provides information on what is “micro-entrepreneurship”, what are its benefits, the rights violations when persons can apply to the Defender. The guide was the result of the analysis of the complaints addressed to the Defender’s Office, where micro-entrepreneurs were not aware of their rights, thus they were suffering from the administrative decisions and practices of the State bodies, creating obstacles to the development of the sphere of micro-entrepreneurship, and the protection of small business and the guaranteeing of economic competitiveness.

Furthermore, the Defender has implemented [awareness raising activities](#), visiting different institutions, schools, receiving various groups, and presenting different human rights issues. During the mentioned meetings, issues related to the rights of the child, manifestations of violence against children, the right to education, the right to be heard and to express freely their opinion, the best interest of the child, the combat against bullying, issues related to intolerance and discrimination, the rights of national minorities, persons with disabilities, were discussed.

With regards to strengthening the NHRI’s regulatory framework, the Human Rights Defender has continuously raised the issue that the Constitutional Law does not provide an explicit mandate to the Defender to encourage ratification or accession to regional and international human rights instruments. This issue is also raised by GANHRI’s Sub-Committee on Accreditation (SCA).

In this regard, it should be highlighted that the Human Rights Defender already encourages and submits recommendations to the competent state authorities for the ratification of human rights treaties which will significantly improve the system of human rights protection in Armenia. For example, the Human Rights Defender had raised the importance of the ratification of the United Nations International Convention against the Recruitment, Use, Financing and Training of Mercenaries (the Mercenary Convention), which was ratified by the National Assembly of Armenia in 2020. Additionally, the Defender emphasized the significance of ratifying the Oviedo Convention (Convention for the Protection of Human Rights and Dignity of the Human Being with regard to the Application of Biology and Medicine, signed on May 16, 2024), as well as the Istanbul Convention on Preventing and Combating Violence Against Women and Domestic Violence.

To address the mentioned issue, the Human Rights Defender has cooperated with Deputies of the National Assembly of Armenia, as a result of which, amendments in the Constitutional Law have been initiated that envisage providing the Defender’s Office with the explicit mandate to submit recommendations regarding the ratification of (accession to) international conventions for the protection of human rights and freedoms, and the subsequent alignment of its domestic legislation with the international

obligations assumed by Armenia. All the other SCA recommendations are also covered by the draft amendments.

## **NHRI enabling and safe space**

### **State authorities' awareness of the NHRI's mandate, independence and role**

In general, the relevant state authorities have good awareness of the mandate of the Human Rights Defender. Addressing issues related to human rights protection effectively requires cooperation with both national institutions and international partners. The Human Rights Defender, within the scope of her mandate, cooperates with the legislative, executive, and judicial branches, local self-government bodies, law enforcement agencies, while at the same time maintaining the institutional independence of the Office.

In particular, during 2024, the Defender has participated in the sessions (sittings) of the Government. Additionally, the Defender also participated in the sessions of the National Assembly of Armenia; in this context, the Defender and the representatives of the Defender's Office participated in public discussions, parliamentary hearings, and consultations. In particular, in 2024, the Human Rights Defender presented the Annual Report of the Defender's Office and participated in the discussions of the parliamentarians and the [Standing Committees of the National Assembly](#).

## **NHRI's access to information, law- and policy-making processes**

The Constitution and Constitutional Law provide the Defender with the competences to improve the regulatory legal acts related to human rights and freedoms. In this regard, the Defender's Office has four different functions:

### *Drafting of legal acts:*

In this regard, when the Human Rights Defender reveals during the implementation of her activities that issues related to human rights and freedoms are not regulated by law or a legal act, and are not fully regulated, the Defender can submit to the competent state body recommendations, indicating the necessity and the extent of introducing amendments or supplements to the legal act.

For example, the Defender's Office developed draft laws providing for amendments to the Law on the Detention of Arrested and Detained Persons" and to the Penal Code of the Republic of Armenia. These drafts propose that non-smoking persons deprived of their liberty, due to their health condition and based on the conclusion of the head of the medical unit, be kept separate from smokers, including in medical units located in places of deprivation of liberty, as well as at events organized for prisoners.

The Defender's Office developed the draft based on the complaints addressed to the Human Rights Defender, and the analysis conducted by the Defender's Office. This issue has been continuously raised by the Human Rights Defender and is a systemic issue which is yet to be resolved. The drafts have been submitted to the competent state authorities.

*Providing legal opinions on the draft legal acts:*

The Constitutional law provides the Human Rights Defender with the explicit mandate to submit a written opinion on draft normative legal acts regarding human rights and freedoms prior to their adoption by the relevant body.

In 2024, 173 drafts of a number of constitutional laws, codes and laws and other legal acts, subject to new regulation or complete amendment, were submitted to the Defender for consideration, in respect of which 226 comments were prepared taking into account international standards, as well as legislative norms.

The Human Rights Defender highlights that 70 percent of the Defender's comments regarding the draft packages submitted to the Defender for an opinion and included in the agendas of ministerial committees and Government sessions were adopted by the competent authorities, and appropriate amendments were made to the drafts based on them.

*Work with the Constitutional court:*

The Constitutional Law provides the Human Rights Defender with the capacity to apply to the Constitutional Court on matters of compliance of laws, decisions of the National Assembly, decrees and orders of the President of the Republic, decisions of the Government and the Prime Minister, and sub-legislative normative legal acts.

In 2024, the Human Rights Defender presented three applications to the Constitutional Court and submitted two special opinions (amicus curiae).

For example, pursuant to an [application](#) submitted by the Human Rights Defender, the Constitutional Court has found the legislative restriction on the use of assisted reproductive technologies due to age to be unconstitutional.

In particular, the Constitutional Court recognized Article 12, Part 1, Paragraphs 1 and 2 of the Law "On Human Reproductive Health and Reproductive Rights", in terms of providing for an age limit for the exercise of the right to use assisted reproductive technologies, as contradictory to Article 31, Part 1 of the Constitution, and invalid.

The Defender's Office highlights that in an application addressed to the Constitutional Court on June 10, 2024, the Human Rights Defender challenged the establishment of an absolute ban on the use of assisted reproductive

technologies based on age.

It should be noted that amendments were made to the provisions challenged by the Defender on July 12, 2024, establishing a different age threshold. Nevertheless, the Defender maintained that the revised regulation remained inconsistent with the Constitution, as it continued to impose an absolute age-based prohibition.

In this regard, the Constitutional Court has noted that possible physiological changes affecting reproduction due to age are not absolute and unconditional in nature and are subject to individual professional assessment in each case.

#### *Work with the National Assembly:*

The cooperation between the Defender's Office and the National Assembly is imperative from the viewpoint of the promotion of human rights standards and the improvement of the system of human rights protection in Armenia. Within the context of the cooperation of the Defender's Office with the National Assembly, the Human Rights Defender and the representatives of the Defender's Office participate in public discussions, parliamentary hearings, and consultations. Furthermore, the Human Rights Defender cooperates with the National Assembly in the following directions: presentation of the annual reports, providing relevant recommendation, indicating the necessity and the extent of making amendments or supplements to the legal act related to human rights and freedoms. participation in the sittings of the Standing Committees of the National Assembly, providing legal analysis regarding human rights issues upon the application of the National Assembly.

For example, in 2024, the Human Rights Defender participated in [the working discussion](#) of the draft Law on Ensuring Equality and Protection from Discrimination, during which the Deputies of the National Assembly, representatives of State and local self-government bodies also participated.

The Defender also participated in [the parliamentary hearings](#) regarding issues that were intended to be presented in the national report of the Republic of Armenia during the fourth cycle of the Universal Periodic Review.

However, it should be underscored that in certain cases, the Defender's Office has faced certain obstacles or hindrances during the implementation of its mandate:

- Cases have been registered where several draft laws related to human rights and freedoms are not submitted to the Defender for an opinion. For example, instances where drafts concerning tax legislation or the rights of persons with disabilities were not submitted to the Defender.
- The Defender highlights that although drafts are submitted to the Defender for an opinion, the deadlines set by the relevant state

authorities for submitting a written opinion are often shorter in practice than those specified in the Decision of the Government of the Republic of Armenia No. 252-L of 25 February 2021 "On Approving the Operations Order of the Government". It is also important to emphasize that drafts submitted for opinion within short deadlines are often large in scale, requiring adequate time to study them thoroughly for the purpose of providing a comprehensive opinion.

## **NHRI's resources**

The Human Rights Defender underlines that the adequate funding of the Human Rights Defender's Office is provided for by the Constitution of Armenia. At the same time, according to the Constitutional Law, the budget of the Defender and the Defender's Office constitutes a part of the State Budget, which is funded in a separate line; furthermore, the activities of the Defender as the National Preventive Mechanism are also funded from the same budget line. It should be highlighted that the Constitutional Law provides that the State funding of the Defender's Office cannot be less than the amount provided in the year before (the budget cannot be reduced from year to year). This principle enhances the long-term efficiency and institutional independence of the Human Rights Defender. Nevertheless, while the budget financing meets the basic mandatory needs to ensure the continuous and effective function of the Defender's Office, the latter emphasizes the need to advocate for further increase in the salary level and guarantees for the Staff of the Defender's Office, to increase the attractiveness of service at the Defender's Office and taking into consideration the complex level of the activities and work conducted.

Moreover, as stated above, it should be highlighted that as a result of the discussions between the Defender and the competent authorities, a new building in Yerevan will be allocated to Human Rights Defender (for the main office), based on the [Government Decision N 1785-U](#) «On the Repossession and Consolidation of Real Estate».

The decision is highly significant, as it represents the initial step toward resolving the ongoing issue of improving the conditions for the effectiveness of the Human Rights Defender's Office. This particularly pertains to the necessity of effectively managing the improvement of the Office's working conditions and the recruitment of staff, as well as guaranteeing the proper and confidential handling of private interviews with individuals who have filed applications and complaints with the Defender. Additionally, it includes ensuring the building is accessible to people with disabilities and facilitating the organization of events within the Office building that involve their participation.

To guarantee the right of every person to apply to the Human Rights Defender, regional subdivisions of the Defender's Office have been established in five

provinces of Armenia (Syunik, Gegharkunik, Tavush, Lori, Shirak provinces). The subdivisions are located in areas which are accessible to people living in the mentioned provinces.

The Human Rights Defender's Office is also equipped with the necessary human resources to adequately implement the mandate of the Defender. In this regard, the Defender has raised the issue of ensuring an appropriate and sufficient salary level for the representatives of the Defender's Office, given the recent tendency of increasing the monthly salaries of investigators and prosecutors (by 92 percent of the official rate), while the Defender's staff salaries have remained unchanged.

### **Timely and reasoned responses to NHRI recommendations**

No specific changes have been implemented in this regard; every year, during the preparation of the annual report of the Defender's Office, inquiries are sent to various competent state bodies to gather information on the issues registered by the Defender throughout the year.

In 2024, the recommendations submitted in the 2023 Annual Report were sent to the relevant authorities to clarify the actions and steps taken to implement those recommendations during the year. The information will be covered in the [2024 annual report of the Defender's Office](#).

### **NHRI leadership and staff immunity**

The Constitution of Armenia provides the Human Rights Defender with universal immunity. According to Article 193 of the Constitution, the right to immunity which is prescribed to the Deputies of the National Assembly of Armenia is also extended to the Defender.

The National Assembly must approve the initiation of criminal prosecution or deprivation of liberty for the Defender, requiring at least three-fifths of the total number of Deputies to consent. Furthermore, Article 6 of the Constitutional Law further provides that the Defender cannot be prosecuted or held accountable for actions performed within the scope of his/her mandate, including opinions expressed in the National Assembly, both during and after his/her term in office. Criminal prosecution or deprivation of liberty can only occur with the National Assembly's consent, requiring a majority of three-fifths of the members of the National Assembly. Additionally, the Defender cannot, both during his/her term of office and afterward, be compelled to testify as a witness about any applications or complaints submitted to him/her, the content of documents gathered during the review or consideration of a complaint, or the decisions made by him/her. This is an absolute prohibition.

The Constitutional Law also provides protections for the representatives of the Human Rights Defender's Office; staff members, specialists, and independent

experts of the National Preventive Mechanism. Additionally, the Constitutional Law provides for immunity for the Defender and the representatives of the Defender's Office, protecting them from criminal and civil liability for actions taken in good faith while fulfilling their duties. The Constitutional Law also provides for the prohibition of the questionings as witnesses of the representatives of the Defender's Office and independent experts of the National Preventive Mechanism about the nature of applications or complaints addressed to the Defender or the decisions rendered by the Defender based on their examination (the questioning are only possible after obtaining the written consent of the Defender).

Overall, the Constitutional Law guarantees the functional immunity of the Defender and the representatives of the Defender's Office and the NPM and sufficiently safeguards them from criminal and civil liability on the basis of activities conducted in good faith in performing the mandate of the Defender's Office.

[The Criminal Code of Armenia](#), in particular Articles 492, 493, and 494 provide criminal liability for the obstruction of the exercise of the powers of the Human Rights Defender, threatening and committing violence against him/her, and insulting or publicly disrespecting him/her.

### **Threats faced by the NHRI**

In 2022, cases of offensive and sexist speech against the former Human Rights Defender of Armenia were registered. The gendered nature of the hate speech was highlighted, as mentioned in the ENNHRI's Report on the State of the Rule of Law in Europe in [2023](#). Furthermore, Ms. Grigoryan was the victim of hacking through the Pegasus spyware while she was still serving her tenure as the Human Rights Defender.

The ENNHRI's Report on the State of the Rule of Law in Europe in [2024](#) highlighted the fact that the Human Rights Defender Ms. Anahit Manasyan has been the target of gender-based hate speech and statements from certain political actors since her election in 2023. The Defender was targeted by certain political figures and their affiliates solely due to her efforts in advocating for the rights of vulnerable groups, such as persons with disabilities, LGBTQ+ persons, protection of persons with different religious beliefs, ethnic minorities, and her commitment and the concrete measures undertaken in the direction of ensuring gender equality. One of the most concerning circumstances in this context is that the gender-based hate and insulting speech against the Human Rights Defender has been spread by the candidate to the Human Rights Defender's position presented by certain political forces in 2023. The attacks on the head of the Armenian NHRI [continued](#) throughout 2024.

Amidst a disturbing trend, a number of statements containing hate speech and

insults have been directed towards the Defender, particularly during her public addresses on gender equality issues.

Furthermore, the groundless criticism and the cases of hate speech and insults directed against the Human Rights Defender created real threats to the proper function of the Defender's Office. It is particularly concerning that the targeting of the Human Rights Defender is carried out by "human rights defenders" and lawyers affiliated with certain political forces.

The harassment campaign against the Human Rights Defender has been mainly through online platforms; this has resulted in the hindering and obstructing the activities of the Defender's Office, including calls for not applying or addressing complaints to the Defender's Office, which is a Constitutional right in Armenia, and has distorted the public perception of the situation of human rights protection in Armenia. Furthermore, a case was registered where a political actor attempted to obstruct the communication of the citizens with the Defender when they were presenting their problems to the Human Rights Defender, by guiding them what they should tell or not mention during their dialogue.

In another case the advocate affiliated with the same political figures started targeting the representatives of the Defender's office by using insulting language. All those campaigns were organized and coordinated by certain political forces and actors affiliated with them. The latter have been regularly implementing hatred and insult campaigns against the Human Rights' Defender and the office. At the same time, during some political processes those campaigns became more and more threatening, as these figures started calling their followers not to apply to the Defender's office, as well as started factually obstructing the activities of the Defender. Noting the politically polarized atmosphere in Armenia, as well as politicization of all the human rights issues, this is used for political goals and is creating real threats for the proper activities of the Defender's office.

Taking into consideration the above-mentioned, in June 2024, the European Network of National Human Rights Institutions (ENNRI) released a [statement](#) urging all parties in Armenia to uphold international standards, which include protecting the Defender's Office from any acts that could undermine its independence and effectiveness. In the statement, ENNRI emphasized that national human rights institutions should function without political interference, and all stakeholders should support the efforts of building public trust in the Defender's Office. The statement issued by ENNRI also highlighted the fact that the campaign against the Defender's Office was organized and coordinated.

## **NHRI's recommendations to national authorities**

The Human Rights Defender's Office recommends the competent state authorities to:

- Protect the Defender's Office from intimidation and harassment by certain political actors, and persons affiliated with them, and address the threats issued against the Institution and its Head.
- Increase the awareness of the population in general, and politicians, public officials and figures about the role of the Human Rights Defender and her mandate.
- Submit draft laws for the opinion of the Defender's Office with a deadline set by the Government [Decision No. 252-L](#) (based on Council of Europe Recommendations on NHRIs).

## Armenia 2025

### Information from: Human Rights Defender of the Republic of Armenia

## Human rights defenders and civil society space

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### Laws and measures negatively impacting civil society and Human Rights Defenders

As a result of the monitoring activities conducted by the Defender's Office of assemblies, protests and gatherings during 2024, systemic issues of continuous nature were registered. For example:

- Mass administrative arrests (detention) of the participants of the assemblies in violation of national regulations and international standards,
- Procedural violations of deprivation of liberty (for example failure to submit a legal claim before deprivation of liberty, keeping a person deprived of freedom for more than the prescribed period and determining the initial moment of deprivation of liberty),
- Use of disproportionate force during administrative arrest, a disrespectful treatment by Police officers,
- Failure to comply with the requirement to immediately inform the person of the reasons for deprivation of liberty and to notify the rights arising from the status, etc.

The above-mentioned problems are particularly worrying in the context that they have been ongoing for years, while some of them are based on legislation that is no longer relevant and is unconstitutional. The issue of the relevance of

legislation on administrative offenses and their proceedings was already addressed in the Constitutional Court's Decision No. SDO-1339 of January 24, 2017, based on the application of the Defender. According to the decision, the adoption of a new Code on Administrative Offenses of Armenia is an urgent need from the perspective of establishing constitutional legitimacy in the country. These issues have a systemic nature, and their overcoming implies the need for serious systemic changes.

During 2024, assemblies and protests were held in Yerevan and several provinces of Armenia. To ensure the guaranteeing of the right of peaceful assembly, and the peaceful nature of the protests, the Defender's Office was working in a round-the-clock regime (emergency mode), based on the instructions of the Defender.

The rapid response groups of the Defender's Office visited the Police departments where the apprehended participants of the assemblies were taken, to hold private interviews with them, present them their rights, and register the situation of guaranteeing their human rights on the spot. Furthermore, the Defender's Office analysed the complaints which were addressed to the Defender and conducted monitoring of the mass media and social media platforms to register violations of rights, and to implement the necessary measures. It should be highlighted that during the intense period of protests and assemblies which were being held in Yerevan and the provinces of Armenia, the Defender released public statements calling on the State to ensure the peaceful nature of the assemblies.

As a result of the monitoring conducted by the Defender, cases of disproportionate use of force by the Police and the competent authorities were registered. In particular, the persons who were arrested by Police officers mentioned about the fact of the use of disproportionate force; furthermore, in certain cases Police officers did not present any legal demands to the protesters, while the reason for their arrest was based on non-fulfilment of the demands of the Police officers. Additionally, information has been received by the Defender's Office on [the use of disproportionate force](#) by Police officers on those arrested, when they were already under their custody. At the same time, during the private interview with the Police officers who were injured during the protests (and receiving medical assistance), it was registered that protesters threw objects in their direction, as a result of which they received physical injuries.

The Defender's Office also highlights that cases of the [use of special measures](#), for example stun grenades, by the Police during the protests and assemblies were also registered. The Defender requested that the competent state bodies examine the legality of the use of the special measures. The Human Rights Defender registers that criminal proceedings have been initiated regarding the incident of the use of a stun grenade. The Defender's Office notes that it is

essential to implement the examination in a rapid manner, and in case of violation, to hold those responsible accountable.

Furthermore, the Defender highlights the fact that during the protests and assemblies, cases of [obstruction of the professional activities of mass media representatives and journalists](#), their targeting and violence against them, were registered.

The Defender's Office has [underlined](#) that the targeting the representatives of mass media and journalists while implementing their professional activities is inadmissible, and the competent state authorities should investigate any case that might indicate the obstruction of the activities of the aforementioned.

## **NHRI's support to women human rights defenders (WHRDs) and LGBTQ+ HRDs**

In recent years, the Human Rights Defender has been actively involved in protecting and promoting the rights of LGBTQ+ persons.

In 2024, the Human Rights Defender, with the representatives of the Defender's Office, participated in discussions held in the National Assembly with representatives from state bodies, of the draft package of the Republic of Armenia's Law on "Ensuring Equality and Protection from Discrimination", as well as related legislation.

The Defender has also provided a number of comments on the draft package of the Republic of Armenia's Law on "Ensuring Equality and Protection from Discrimination".

A representative of the Human Rights Defender's staff participated in a conference dedicated to Pride Month, organized by the Public Organization for the Advancement of Rights.

On the International Day Against Homophobia, Biphobia, and Transphobia was observed, with its purpose being to unite the efforts and struggles of LGBTQ+ individuals, human rights defenders, and other stakeholders to raise awareness about the violations faced by LGBTQ+ people and to create an inclusive society free from discrimination, hatred, and intolerance. On this occasion, the 'Pink' Human Rights Organization organized a roundtable discussion titled 'The Situation of Human Rights of LGBQ+ Individuals in Armenia.' The discussion was attended by human rights defenders, LGBTQ+ individuals, as well as representatives from international organizations, embassies, and state bodies, including the Human Rights Defender, who delivered a welcoming speech.

The Human Rights Defender attended a reception dedicated to Pride Month at the U.S. Embassy in Armenia, where representatives of the LGBTQ+ community were also present. The Defender also delivered a welcoming

speech.

A representative of the Defender's Office participated in a meeting-discussion organized by the 'Diversity' socio-cultural and human rights organization, as part of the observance of Gender Equality Day in Armenia on July 27. The discussion focused on the prevention of violence against transgender individuals and sex workers in Armenia.

During 2023-2024, representatives of the Defender's Office also held numerous meetings with representatives of civil society, public organizations advocating for the rights of LGBTQ+ Persons, and members of the LGBTQ+ community.

The protection and promotion of women's rights is also among the priority directions of the activities of the Human Rights Defender. For example, in 2024, the Human Rights participated in the "Katarin-Tavush" women's political [leadership conference](#), and acted as a speaker on the topic "Promotion of women's rights as a guarantee of gender equality". The event was attended by more than 50 women from the educational, art and health sectors. The Human Rights Defender also joined the [16 Days of Activism against Gender-Based Violence](#), participated in a panel discussion organized as part of an Expanded Meeting of the Gender Thematic Group. The event aimed to review activities after the adoption of the Law on Prevention of Violence within the Family, Protection of Victims of Violence within the Family and Restoration of Peace in the Family, to identify the key priorities of the upcoming years, and to address challenges faced by women during humanitarian crises.

## **Practices negatively impacting civil society and human rights defenders**

In 2024, the Human Rights Defender received representatives of NGOs dealing with environmental issues. The purpose of the meeting was to discuss existing environmental issues in relation to the human rights protection system.

During the meeting, the representatives of the NGOs stated that there is ongoing pressure on environmental activists, environmental organizations, human rights defenders, and residents of affected communities in relation to harmful mining projects, including attempts to misrepresent their real objectives. According to these individuals, this is reflected in the presence of hate speech, insults, and defamatory publications, which appear, *inter alia*, in public speeches and interviews.

According to human rights defenders and environmentalists, this is also evident in the use of strategic lawsuits against public participation (SLAPPs). These issues have been ongoing since 2023, with various international actors focused on human rights, environmental issues, and public participation also expressing concern.

The Human Rights Defender highlights that, in 2023, the Berne Convention Standing Committee found allegations regarding restrictions on public involvement and the unprecedented number of SLAPPs aimed at hindering public participation to be concerning. The Armenian legislation does not contain any provisions aimed at the prevention of SLAPPs or the protection of the victims of SLAPPs.

During the meeting, civil society representatives also referred to perceived pressures on environmentalists, as well as obstacles to accessing and obtaining information on environmental issues.

As stated, concerns have been raised that in 2024, defamatory attacks and hate speech intensified following the publication of a statement on the controversial "Amulsar" mine project in January, which was signed by 118 NGOs and 57 Armenian citizens.

In 2023, the Defender's Office registered cases of interference in the activities of CSOs/NGOs and human rights defenders. For example, the president of the "Direct Democracy" NGO reported that during a meeting of the Council of Elders in the Vanadzor community of Lori province, the acting Head of the Community publicly insulted the chairman of the NGO and members of the "Armenian Deaf Society" NGO. In this regard the Defender addressed a letter to the Corruption Prevention Commission of Armenia. In response, the Commission provided clarification, stating that individuals holding public positions (excluding MPs, judges, members of the Central Committee, prosecutors, investigators), heads of communities, their deputies, heads of administrative districts of the Yerevan community, are subject to the rules of conduct outlined in the Code of Conduct. These rules are derived from the principles defined by the Law on Prevention Commission. The Commission, prompted by the letter from the Human Rights Defender, addressed the acting Head of the Vanadzor community. The Commission did not initiate an investigation because the Code of Conduct had not entered into force at the time of the incident. The Commission acknowledged the concerning nature of the incident described in the application. Thus, the Commission recommended taking appropriate measures, including raising awareness about the principle of the Code of Conduct, and the necessity to adhere to the rules.

In 2024, representatives of CSOs have presented to the Human Rights Defender the long-standing pressure in the Republic of Armenia against environmental activists, environmental organizations, human rights defenders, and residents of affected communities who speak out against harmful mining projects, including attempts to distort their true purpose. As stated in ENNRI's 2024 Report on the State of Rule of Law in Europe, according to representatives of CSOs, the aforementioned pressures were intensified by a statement raising concerns about the controversial Amulsar mine project and were expressed through hate speech, insults, defamatory publications, which

were included, *inter alia*, in public speeches and interviews, as well as strategic lawsuits against public participation (SLAPP).

In the Republic of Armenia, human rights defenders are frequently targeted for their efforts, particularly in advocating for vulnerable groups. In this light, it is imperative for the state to develop and implement robust mechanisms that effectively prevent and address such harmful actions, ensuring the safety of those conducting their activities to defend human rights.

## **Activities of NHRIs to support civil society space and Human Rights Defenders**

### **NHRI's initiatives to support civil society space and HRDs**

The Human Rights Defender highly values the role of civil society organizations (CSOs) and non-governmental organizations (NGOs) in an open, transparent, and democratic society; the role of these organizations is imperative in the effort to strengthen the system of human rights protection and perform a democratic oversight function over the State institutions. In 2024, the cooperation of the Defender's Office with CSOs and NGOs specialized in the various spheres of human rights protection was continuous.

It is important to highlight that the basis of cooperation of the Defender's Office is the Constitutional Law. For example, it provides that NGOs can apply to the Defender, with the written consent of the person, for the purpose of protection of his/her rights. Furthermore, the Constitutional Law provides that the Defender's Office can establish councils adjunct to the Defender; the councils are composed of NGOs, CSOs, and independent experts.

In this regard, the Defender's Office has established 6 public councils adjunct to the Defender: the Council on Children and Youth Rights, the Council for the Protection of the Rights of People with Disabilities, the Advisory Council for the Prevention of Torture, the Women's Rights Council, the Expert Council on Human Rights Protection in the Armed Forces, the Council on Protection and Promotion of the Rights of Persons Belonging to National Minorities. In 2024, more than 10 sessions of the adjunct councils were held.

Moreover, the Human Rights Defender also organizes workshops and discussions regarding specific human rights issues registered in the country. For example, based on the initiative of the Human Rights Defender, a [workshop/discussion](#) was organized on the use of special measures, physical force, and weapons in penitentiary institutions and detention centres in Armenia. The workshop was attended by representatives of State bodies, deputies of the National Assembly, Ambassadors, and representatives of CSOs and NGOs.

The Defender's Office and the Office of the United Nations High Commissioner for Refugees (UNHCR) jointly organized a [workshop](#) titled "Limitations and opportunities: Challenges of refugees and asylum seekers in Armenia" highlighting issues registered in the sphere of the protection of the rights of refugees, asylum seekers, and forcibly displaced persons, and the best practices in overcoming them, the achievements and existing challenges in the sphere, the current state of protection of their rights in our country, and the gaps in legislation; civil society organizations specialized in the field participated in the workshop, and provided their valuable input.

Highlighting the importance of the relationship and cooperation between civil society and State, the members of the Public Council on the rights of children and young people adjunct to the Defender were hosted by the National Assembly. During the [meeting](#), the members of the Council presented their priorities, direction of activities and issues registered in the sphere, among which are the provision of alternative care, provision of accessible environment for children with disabilities, and identifying and responding to bullying in educational institutions.

The Human Rights Defender also holds regular meetings with the representatives of CSOs and NGOs to discuss thematic issues in the field of human rights protection, and to collaborate on specific directions. Among the topics discussed during such meetings refer to the protection and promotion of [women's rights](#), and the measures undertaken in Armenia in this regard, [the rights of children, persons with disabilities, and national minorities](#), issues related to [environmental rights](#), and access to public services, medical facilities, and [adherence to professional ethics](#).

For example, the Defender's Office organized [discussion](#) on "the protection and promotion of women's rights in the field of business" in Gegharkunik province, during which more than 40 women engaged in various activities in the business sector of the region participated, including representatives of NGOs and forcibly displaced persons. Human rights issues, including socio-economic problems, were highlighted.

The Defender also highly values the role the representatives of CSOs and NGOs perform in the process of development and drafting of laws and legislation, and decisions that may affect the stakeholders of CSOs and NGOs. In this regard, the draft Law on National Minorities was discussed during a [session of the Public Council](#) for the Protection and Promotion of the Rights of Persons Belonging to National Minorities adjunct to the Defender. During the session representatives of NGOs that are members of the Council, as well as the representative of Yazidi Centre for Human Rights (non-member) participated in the works of drafting the document. The Human Rights Defender notes that the members of the Public Council presented their observations, comments, and suggestions regarding the draft law; the Defender's Office summarized the

suggestions and presented it to the competent state bodies.

## **NHRI's actions to protect civil society space and HRDs**

The Human Rights Defender is an independent official, tasked with monitoring the respect for human rights and freedoms by state and local self-government bodies and officials, as well as by private organizations operating in the field of public service, and facilitating the restoration of violated rights and the improvement of the legislation related to human rights and freedoms.

The Human Rights Defender continuously monitors the sphere and highlights the obligation of the State not to impede the lawful activities of human rights defenders and NGOs; in this regard, the Defender's Office underscores the importance of the imperative need for the State to prevent and eliminate obstacles which may exist which hinder the activities of human rights defenders and NGOs. The Defender also emphasizes the need to protect the activities of human rights defenders, denouncing intolerant and discriminatory treatment towards them, to address hate speech.

Additionally, the Defender has the competency to consider complaints from whistle-blowers and affiliated persons regarding the violation of their rights, by public bodies and officials.

The Defender's Office also highlights issues registered in the sphere of the protection of the rights of human rights defenders. CSOs and NGOs are one of the priorities of the activities of the Defender and are presented as a separate chapter in the annual reports of the Defender's Office.

Furthermore, as part of the commitment of the Human Rights Defender in supporting human rights defenders, the Defender's Office has actively engaged with international and regional mechanisms, including cooperating with OSCE/ODIHR.

The collaboration of the Defender's Office with OSCE/ODIHR has been instrumental in addressing key challenges and strengthening the protection mechanisms for those who face risks due to activities related to human rights.

The Defender's Office actively participates in various initiatives. This includes involvement in the annual NHRI Academy, which serves as a platform for capacity-building and knowledge sharing.

This year, the Academy will focus on enhancing the capacity of NHRIs to protect human rights defenders. The goal is to equip NHRIs with the tools and knowledge needed to address the threats and challenges faced by human rights defenders, leveraging their institution's mandate for protection, monitoring, promotion, and cooperation.

## NHRI's recommendations to national and regional authorities

- The Defender calls upon the State to develop and implement measures to prevent and eliminate any obstacles to the lawful activities of human rights defenders and CSOs/NGOs.
- The Defender recommends the State to conduct effective investigation of cases of hindering the lawful activities of CSOs/NGOs and establish clear mechanisms of accountability for violations of the rules of conduct.
- Ensure proper investigation of cases of targeting of and attacks against representatives of CSOs/NGOs.

## Armenia 2025

### Information from: Human Rights Defender of the Republic of Armenia

## Functioning of justice systems

Based on its human rights monitoring and reporting, the Defender's Office highlights that, as a result of changes to the Tax Code of the Republic of Armenia, starting from October 1, 2024, businesses providing legal services will pay a 10% tax instead of the previous 5%, negatively affecting access to legal aid. Additionally, starting from January 1, 2025, they will be subject to around 20% VAT and 18% corporate tax, which is calculated based on the difference between taxable profits and deductions attributed to the gross income of the tax year.

On April 25, 2024, the Human Rights Defender publicly released a position on the proposed changes to the Tax Code during the drafting phase and submitted it to the Ministry of Finance of Armenia. In the position, the Defender expressed concerns that the proposed draft did not include an assessment of the legality of the tax policy changes in accordance with international standards, nor did it present an evaluation of the potential impacts and risks of the new regulation on the human rights protection system. Furthermore, adequate public awareness efforts and necessary consultations with stakeholders had not been implemented.

The Defender has identified the issue of the emergence of tax obligations in the case of providing free legal assistance as the primary concern.

Given the aforementioned changes, the Human Rights Defender has made every effort within the scope of her mandate to address the concerns of all interested parties. This includes publicly expressing a position during the drafting phase of legislative changes, presenting issues raised by civil society organizations and the legal community to the Constitutional Court, and creating a platform for dialogue for all concerned parties. It is worrying that a final solution has not yet been reached regarding the tax obligations imposed on lawyers providing free legal aid.

The Human Rights Defender remains in ongoing communication with the competent state bodies regarding the legislative regulations on tax obligations for lawyers offering free legal aid, following recent amendments to the Tax Code. The Defender emphasizes the importance of continued efforts to address these issues.

At the same time, the Defender's Office has welcomed the steps taken by the competent authority to resolve the situation. In this context, the Defender also underscores the importance of the involvement of all interested parties in the decision-making process. The guarantee of free legal aid remains under the attention of the Defender's Office.

### **NHRI's actions to support implementation of European Courts' judgments**

The annual reports of the Human Rights Defender, in which issues related to human rights violations, and provides recommendations to the relevant state authorities to improve the system of human rights protection in Armenia, also refers to the judgments of the European Court of Human Rights. Thus, for example, in the 2024 annual report, the Defender's Office made reference to several judgments of the European Court of Human Rights, including the [Moskal v. Poland](#) (10373/05) regarding the pension rights and social security; [Brincat and Others v. Malta](#) (60908/11, 62110/11, 62129/11, 62312/11 and 62338/11) within the context of labour rights; [Buturugă v. Romania](#) (56867/15) related to the right of respect for private and family life,

Moreover, the Defender also highlights the importance of the judgments and the role of the ECtHR during events dedicated to human rights education; for example, in 2024, the Human Rights Defender presented a lecture during the [fourth course of the Academy of International Law](#), which was a two-day training organized in cooperation with the Defender's Office and the Armenian International Law Association. During the training, the students, *inter alia*, were introduced to the functions of the ECtHR and its judgments.

Regarding the raising of awareness about the judgements of the ECtHR among the general public, the Human Rights Defender refers to the judgements of the ECtHR in the statements published regarding human rights violations. For example, the Defender's Office released a [statement](#) regarding a violation of

the right to personal liberty of a person who was kept in a psychiatric institution for 3 months without justification for the need for inpatient treatment. In the statement, the Defender's Office referred to the judgement of the ECtHR in the case of [T.A. v. Armenia \(2648/22\)](#). The ECtHR ruled that a person cannot be deprived of their liberty as "having mental health issues" unless the following three minimum conditions are met:

1. The fact of having a mental health issue must be confirmed by the competent authorities based on an objective medical examination.
2. The mental disorder must be of such a type or degree that it requires mandatory deprivation of liberty.
3. The justification for continuing the detention of the individual depends on the continuity of the mental disorder.

Furthermore, the Human Rights Defender and the representatives of the Defender's Office participate in workshops/trainings regarding the implementation of the judgements of the ECtHR; for example, in 2024, the Human Rights Defender delivered the opening speech during the [interdepartmental workshop](#) on the implementation of the judgements of the European Court of Human Rights against Armenia, which was held within the framework of the Council of Europe's "Fostering Human Rights in the Armed Forces of Armenia" program. The aim of the workshop was to promote the resolution of the issues raised in the [Muradyan v. Armenian case \(11275/07\)](#).

Additionally, in 2025, the representatives of the Defender's Office participated in a [training](#) aimed at developing their capacities regarding submitting special positions (Rule 9 Submissions) to the Committee of Ministers of the Council of Europe. The training was conducted by a representative from the Department for the Execution of Judgements of the ECtHR. Inter alia, the representatives of the Defender's Office were presented with the process of executing ECtHR judgments, Armenia's experience, and the important role of the Human Rights Defender in the execution process.

In this regard, it should be highlighted that the representatives of the Defender's Office conducted a [study visit](#) to France. During the study visit, meetings were organized with representatives of the Office of the Commissioner for Human Rights of the Council of Europe and the ECtHR, and discussions were held on the problems of the displaced population, issues related to the protection of rights, as well as issues related to the protection of human rights in biomedicine. The study was implemented within the context of the "Protection of Human Rights in Biomedicine II", and "Strengthening Human Rights Protection for Displaced Persons in Armenia" projects of the Council of Europe.

The Defender's Office also submits Rule 9 communications to the Council of

Europe's Committee of Ministers as an independent assessment of the execution of ECtHR judgments by Armenia. For example, as discussed in the ENNHRI's [2023 Report on the State of the Rule of Law in Europe](#), the Defender submitted a Rule 9 communication related to the case of [Shirkhanyan v. Armenia](#) (54547/160), which is part of the "[Ashot Harutyunyan v Armenia](#)" case group. The case addresses the lack of proper medical care, support, and access to outdoor exercise for a detainee with health problems, which led to degrading treatment.

Currently, there are 70 [cases](#) against Armenia transmitted to supervision, which are pending execution, out of which 27 are leading cases.

The Human Rights Defender highlights that the Armenian authorities have taken relevant steps in the direction of the execution of the judgements of the ECtHR; for example, in December 2024, in the [Virabyan v. Armenia](#) (40094/05), one of the leading cases, the Committee of Ministers noted the important developments and progress which were achieved through a series of general measures which were adopted to address ill-treatment by police and ineffective investigation, and decided to close their supervision of the case.

Similarly, the Defender's Office also notes that the Committee of Ministers also closed its supervision of the [Ashot Harutyunyan v Armenia](#) (34334/04) case (leading case); in this regard, the Committee of Ministers encouraged the authorities to continue their efforts to improve the healthcare system of the penitentiary institutions, highlighting the progress achieved through the implementation of a series of general measures.

## Armenia 2025

### Information from: Human Rights Defender of the Republic of Armenia

### Media freedom, pluralism and safety of journalists

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In 2024, the issues in the field of mass media in Armenia, including the absence of an effective system of self-regulation for the media and a lack of terminology in line with international standards, continued to remain relevant. The Human Rights Defender's concerns and observations regarding the proposed amendments to the 'Law on Mass Media' were presented to the representatives of the Venice Commission delegation in 2024.

In this regard, the [Venice Commission](#) emphasized that the current legislative

and institutional mechanisms governing the media in Armenia have significant shortcomings. For example, among the issues registered by the Venice Commission in this regard were related to the definition of "mass media"; according to the Commission, the concept and definition of mass media are fluid, while the definition provided for in the current 'Law on Mass Media' has become outdated. Thus, the Commission has recommended revising the definition of "mass media" to ensure full compliance with Committee of Ministers Recommendation CM/Rec(2011)7 on a new notion of media. Furthermore, the Commission has also noted that the Law on Mass Media does not yet adequately regulate the functioning of the media self-regulation framework, including the definition of various media content types and the assessment of content accuracy and reliability.

Thus, the Venice Commission welcomed the initiative of the Armenian authorities to promote media self-regulation (the independence of media regulatory bodies), as the official recognition of self-regulatory bodies is of significant importance for the effective implementation of accountability mechanisms in the media.

Moreover, the Venice Commission noted that the proposed amendments have the potential to strengthen the role of the media; The Commission also noted that while some of the new definitions presented in the proposed amendments align with international standards, others still require clarification. Moreover, some provisions remain ambiguous due to the lack of comprehensive regulation and corresponding rules, as well as the use of unclear wording, making it difficult to draw final conclusions on these elements.

The opinion notes that clarification is needed regarding the terms 'prerequisites' related to journalist accreditation, 'media activity,' 'disseminator of public information,' as well as the consequences of accreditation.

In this regard, the Human Rights Defender highlights that the Defender's Office presented 7 comments on the draft Law on Mass Media, 6 of which was accepted by the competent State bodies of Armenia.

## **NHRI's recommendations to national and regional authorities**

- The Human Rights Defender urges the competent state bodies to develop and implement an adequate mechanism and system for the regulation of the media sphere in Armenia.

## **Armenia 2025**

## Information from: Human Rights Defender of the Republic of Armenia

### Other challenges to the rule of law and human rights

In 2024, the Human Rights Defender's Office received numerous complaints regarding [loud music and noises](#) from entertainment venues, restaurants, food courts, pubs, etc. Additionally, complaints were addressed to the Defender's Office regarding [construction](#) work being conducted, especially in Yerevan, and [frequent cuts in electricity and water supply](#)

Regarding the mentioned large-scale construction works, the complainants referred to the loud noise, dust, and issues related to safety due to construction and demolition works. Furthermore, the complaints addressed to the Defender's Office highlight the fact that construction activities are conducted on non-working days and hours.

The Defender registers the aforementioned construction activities have resulted in the violations of various human rights of the citizens. For example, certain complaints addressed to the Defender's Office have highlighted the disruption of school activities of the institutions which are located in the vicinity of the construction sites, violating the right to education of the child.

In this regard, the Defender has raised the mentioned issues with the competent state bodies, and has called for the development of mechanisms, including legislative, to resolve the problems. Although the State has clear obligations in this sphere, by taking the necessary measures to develop appropriate structures to address the issues, and ensure their consistent implementation, the Defender highlights that the mentioned issues have remained unresolved over an extended period of time.

In this context, the Defender's Office notes that the Municipality of Yerevan has questioned the competences of the Defender's Office and its mandate regarding several human rights issues, which is problematic and unusual and this attitude towards the HRDO should be excluded.

### NHRI's recommendations to national and regional authorities

- The Human Rights Defender calls on the Armenian authorities to take continuous steps, including through regular trainings, to exclude the

use of disproportionate force and ill-treatment by the Police, carry out a proper, objective and multi-faceted investigation regarding the use of disproportionate force and ill-treatment, guaranteeing the inevitability of responsibility.

- The Human Rights Defender calls upon the competent state authorities to make the cases of obstruction of the professional activities of journalists the subject of proper investigation.
- The Human Rights Defender urges the Municipality of Yerevan to take into consideration and implement the recommendations made by the Defender's Office regarding the cases of the violations of rights.

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