

Independent Reporting Mechanism

Results Report:
Armenia 2022–2024

Open
Government
Partnership



Independent
Reporting
Mechanism

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Executive Summary

Armenia's fifth action plan saw half of the commitments substantially or fully completed. Support from civil society and international organizations was key to the success of several commitments, particularly for introducing participatory budgeting in local communities. A new department in the Office of the Prime Minister will help to institutionalize the government's future efforts towards more open and participatory governance.

Implementation

Armenia's fifth action plan (2022–2024) included 10 commitments, focused mostly on improving government transparency. It introduced new commitments around government-held data, government communication, compliance with freedom of information regulations, participatory budgeting, and judicial transparency.

Six commitments showed early results, including three identified as promising in the IRM Action Plan Review. Half of the commitments were substantially or fully completed, slightly lower than the fourth plan (2018–2020), in which seven out of 11 commitments were substantially or fully completed by the end of the implementation period. As a result of Commitment 5, in 21 out of Armenia's 71 communities, the public can now participate in their community's development by submitting project proposals and voting for their implementation by the local self-government (with funding allocated from the municipal and state budgets). Commitment 2 resulted in the establishment of the Department of Participatory and Open Governance in the Office of the Prime Minister, set up to institutionalize the government's efforts toward open and participatory governance, including through future OGP action plans.

Many of the commitments envisaged digital platforms, such as a platform for participation in the budget processes (Commitment 4), an electronic gift registry for officials (Commitment 7), and a platform for e-procurement (Commitment 8). Some commitments failed in establishing their platforms due to technical, timing, or funding issues. However, Commitment 7

At a Glance

LEVEL OF COMPLETION

5/10

Complete or substantially complete commitments

EARLY RESULTS

6/10

Commitments with early results

2/10

Commitments with significant results

KEY OBSERVATIONS

- Strong political support for OGP and harmonization of commitments with government strategies and international recommendations drove implementation
- Civil society organizations and international organizations provided pivotal support in implementation and early results
- Open data and digital reforms faced technical and funding barriers

Met the minimum requirements during implementation: No

created a legal framework for registering and transferring gifts to the state, and public and internal oversight of gift restriction regulations, advancing the national anti-corruption strategy and addressing international recommendations.

Participation and Co-Creation

The Office of the Prime Minister (PMO) leads the OGP process in Armenia, with the government's OGP point of contact coordinating activities and the Chief of Staff overseeing the process. Under Commitment 2, a Department of Participatory and Open Governance was established within the PMO to better organize and coordinate public participation in an institutional manner and support OGP initiatives and other open government-related efforts.

The fifth action plan saw an active co-creation process that engaged a broad range of stakeholders through online and in-person meetings. However, participation during implementation was more limited. The government organized a public event in February 2023 to present the action plan and explore collaboration opportunities for implementation. At the end of the first year of implementation, the government amended the action plan to incorporate the feedback received from stakeholders and the IRM recommendations in the Action Plan Review.¹ The amendments provided more specific descriptions for some of the commitments, including data policy laws for Commitment 1, a new milestone on creating a participatory governance unit under Commitment 2, and a more extensive description of the e-procurement platform for Commitment 8. In August–September 2023, the amended action plan was posted on the legal draft publication (e-draft) platform for public discussion. Two online stakeholder meetings were held to report on implementation progress in mid-2023 and November 2024. At the same time, most commitments saw active engagement from civil society stakeholders (many of them supported by OGP grants), who provided public awareness-raising, analysis for draft legislation, and capacity-building. The PMO negotiated with international organizations to support OGP commitments through their cooperation with local CSOs. For example, participatory budgeting in communities (Commitment 5) benefited from strong support by international organizations and local CSOs raising awareness and providing technical assistance to municipalities.

Implementation in Context

Several domestic and international factors influenced the implementation of OGP commitments in Armenia. The displacement of the Armenian population from Nagorno-Karabakh in 2023 strained government resources and redirected attention toward humanitarian efforts. This shift in priorities delayed implementing some OGP initiatives, particularly those requiring substantial government coordination and investment. Another factor impacting the sustainability of the commitments beyond the action plan period could be the freezing of the US foreign assistance funding in early 2025, which further hindered the completion of commitments reliant on external financial support. This could affect the creation of a gift register (Commitment 7) and the development of a strategic communication architecture (Commitment 2), which were unfinished at the end of the action plan period.

Additionally, broader political and institutional factors, such as government restructuring and shifting policy priorities, influenced implementation timelines. E.g., leadership changes and high staff turnover in the Ministry of Justice slowed progress on anti-corruption initiatives. Despite these challenges, the government's commitment to advancing open and participatory governance remains evident, particularly through a dedicated department in the Office of the

Prime Minister. This development offers an opportunity for Armenia to continue expanding access to information and government openness.

¹ For more details see: The Government of the Republic of Armenia, *Action Plan of Open Government Partnership Initiative of the Republic of Armenia for 2022–2024*, Annex to the Decision of the Government of the Republic of Armenia N 1958-L of November 9th 2023 (9 Nov. 2023), https://www.opengovpartnership.org/wp-content/uploads/2022/10/Armenia_Action-Plan_2022-2024_Dec_Amended_EN.pdf.

Section I. Key Observations

The key observations below offer reflections from Armenia’s fifth action plan cycle. These lessons aim to support Armenia’s future action plans and broader open government journey.

Observation 1. Strong political support for OGP and harmonization of commitments with government strategies and international recommendations drove implementation.

Considerable efforts were made to harmonize commitments of the fifth action plan with other national strategies and action plans, such as the Public Administration Reform Strategy and the Anti-Corruption Strategy, which strengthened political support and enforced their implementation. Commitments aligned across these frameworks received strong institutional backing and political prioritization. Additionally, commitments that addressed international recommendations (e.g., Group of States against Corruption (GRECO), European Union integration benchmarks) tended to receive stronger government support, making harmonization with such frameworks a strategic advantage. For example, the gift registry (Commitment 7) benefited from making its way into Armenia’s anti-corruption strategy along with recommendations from international bodies like GRECO. Similarly, reforms in participatory government and strategic communication (Commitment 2) gained further momentum due to their connection to the Public Administration Reform. High-level political buy-in also advanced Commitment 5 (participatory budgeting) and Commitment 8 (e-procurement). Moreover, the OGP process helped to sustain these initiatives. For example, the Ministry of Finance set up an institutionalized mechanism for engaging CSOs in procurement monitoring and the government provided additional resources to communities for enlarging participatory budgeting initiatives.

In contrast, commitments without clear ties to strategic government priorities, such as Commitment 6 on access to cartographic spatial data and Commitment 9 on e-court statistics, saw less implementation. These commitments lacked a direct policy anchor or institutional champion in the government. Future commitments could be explicitly linked to ongoing government reforms for sustained political engagement and resources.

Observation 2. Civil society organizations and international organizations provided pivotal support in implementation and early results.

Civil society organizations (CSOs) and international organizations significantly contributed to the development of the action plan through their proposals during the co-creation process. Accordingly, in the implementation stage, they provided critical expertise, funding, and advocacy for many commitments. For Commitment 5 on participatory budgeting, for example, CSOs facilitated training, awareness campaigns, and technical support for municipalities. For Commitment 2, civil society experts played a key role in the expert group working on the communication architecture and respective procedures. The CSO that proposed Commitment 3 developed methodological guidelines and provided capacity-building for public institutions to pilot freedom of information self-assessments. Other commitments also saw CSOs’ engagement in legal analyses, initiating dialogue, and providing technical assistance.

In many commitments, the government relied on donor-supported projects of CSOs to implement awareness-raising and capacity-building. The point of contact (PoC) to OGP notes that it has been through the government’s proactive engagement and willingness to act as a constructive stakeholder that such support has materialized.¹ As a result, international

development partners channeled assistance, primarily through grants to CSOs. According to the PoC, this was made possible by the government's cooperation and facilitation. However, without dedicated government funding and institutional responsibility, such initiatives risk losing momentum if external support decreases. Future open government reforms should ensure that CSO contributions are embedded within government structures rather than treated as temporary external support. This requires securing national budget allocations for key initiatives and institutionalizing CSO-government collaboration, such as outsourcing relevant activities, setting up multistakeholder or advisory bodies, or other co-implementation mechanisms.

Finally, for future action plans, it will be important for the government to provide opportunities for civil society in overseeing implementation, particularly for commitments that lack embedded public engagement. This could involve regular updates with the multistakeholder group about the commitments, full use of the online repository, and holding public hearings or press conferences on implementation progress. Actively informing and engaging citizens during implementation is crucial for ensuring accountability and public trust.

Observation 3. Open data and digital reforms faced technical and funding barriers

Several digital transparency commitments experienced delays due to technical capacity gaps, procurement challenges, and funding issues. For example, while the government established a legal framework for the gift registry, the development of the online platform stalled due to limited resources of the Corruption Prevention Commission, the lack of offers for the first invitation for the United States Agency for International Development (USAID) tender, bureaucratic hurdles, and, ultimately, the closure of the USAID project after the end of the implementation period. Similarly, efforts to improve access to e-court statistics (Commitment 9) were limited by a lack of interoperability between digital platforms and challenges in creating a unified electronic platform for the justice system.

Looking forward, commitments on digital platforms should include clear implementation roadmaps with realistic technical and financial planning. Ensuring interoperability between new digital tools and existing government systems is essential, as is investing in IT training for public officials. Additionally, the government could conduct feasibility analyses to better predict timelines and capacity needs.

¹ Comment provided to the IRM by the point of contact to OGP in the Prime Minister's office during the pre-publication review of this report, 13 April 2025.

Section II. Early Results

This section analyzes commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments’ objectives, the country context, the policy area, and evidence of changes. The IRM early-results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time. This section includes all commitments that achieved ‘significant results’ and can include commitments that achieved ‘moderate’ results. The IRM uses commitments highlighted as promising in the Action Plan Review as a starting point for selecting commitments for this section. However, commitments that were not considered promising but exceeded expectations may also be featured in this section.

Table 1. Commitments with the Most Notable Early Results

Commitment 2: Strategic communication architecture Developed a concept and communication protocols to institutionalize strategic communication within the government and established a government unit for the monitoring and maintenance of participatory management procedures.
Commitment 5: Participatory budget on local level Expanded the participatory budgeting initiative from 3 to 21 communities and secured state budget support to encourage citizen-initiated community projects.
Commitment 7: Registry of gifts for public officials Established a legal framework for registering and transferring gifts to the state, regulated oversight of gift restrictions, and launched a temporary registry to enhance transparency on gifts received by officials that are allowed by the law.

Commitment 2: Strategic communication architecture

Lead agency: Office of the Prime Minister

Context and Objectives

This commitment aimed to develop a unified policy to guide all state bodies in their public communications, including information provision and soliciting public feedback. Prior to the commitment, Armenia did not have a government-wide policy for public communication, such as mandating the development of communication plans by state agencies or enforcing regular, proactive communication on policies and reforms. Government communication had been largely ad hoc, reliant on individual officials and press secretaries without standardized mechanisms across agencies. The commitment planned regulations for public government communication and to establish a special unit in the Office of the Prime Minister that would support more systematic public engagement in government initiatives.

Early Results: Significant Results

The Office of the Prime Minister (PMO), with an expert group and international organizations, developed a concept for strategic communication that identified key challenges, defined the main principles of the communication architecture, and proposed an institutional model for strategic communication within the government. This concept was informed by an analysis of

international experience and discussed with stakeholders, including media representatives, CSOs, and communication departments of state agencies. According to the concept, a centralized strategic communication unit would be established within the PMO to develop communication-related protocols and strategies, conduct assessments and analyses, implement capacity-building programs, and ensure inter-agency coordination.¹

An expert group supported by the EU-funded “Support to CEPA (Comprehensive and Enhanced Partnership Agreement) Monitoring, Implementation, and Communication” program drafted communication protocols for routine and crisis situations. These protocols include regulations for combating disinformation—an important component of the commitment. Additionally, the government planned to develop external communication protocols.² By the end of the implementation period, these protocols were not completed, and the strategic communication unit remained at the conceptual stage. The USAID-funded Strategic Communications Support Activity, implemented by Chemonics, also assisted the government in developing a transition plan for introducing strategic communication mechanisms and piloting the draft protocols. The transition plan aims to facilitate the introduction of the centralized unit and strategic communication functions within government bodies, while the simulations of protocols are designed to test and refine proposed procedures.³ However, in early February 2025, the program was put on hold due to a foreign aid freeze by the U.S. government.⁴

The government continues to face significant challenges in public communication, including fragmented information flows, inconsistent messaging, and over-reliance on individual officials for communication. A civil society stakeholder noted that the government’s communication around major reforms remains inadequate, as evident by negative public reactions to the introduction of the universal income declaration system and the ticketing system for public transportation in Yerevan.⁵ At the same time, the government has demonstrated greater awareness of the need for strategic communication and has reached a consensus regarding the direction of reforms. Achieving the Commitment’s long-term vision will require additional efforts, capacity, and resources. The lack of high-level expertise, professional human resources, and funding for digital solutions continues to slow progress on these activities, which could be further exacerbated in the future by the U.S. government’s foreign aid freeze.

A final milestone in the revised action plan also aimed to establish an institutional mechanism for monitoring and supporting participatory governance procedures. This milestone was completed with the adoption of the Prime Minister’s Decree on 26 December 2024, which established the Department on Participatory and Open Government within the PMO. This department is responsible for developing participatory governance mechanisms, monitoring and evaluating participatory processes, implementing open government programs, facilitating cooperation in this area, and addressing issues related to civil society organizations.⁶

The IRM assesses the early results of the Commitment as significant due to the establishment of the Department on Participatory and Open Government. This department is a major step toward institutionalizing open and participatory governance efforts. The commitment benefited from the sustained work of the PMO to improve public communication and participatory governance, recommendations from the OGP Support Unit to include participatory governance alongside strategic communication, and alignment with the Public Administration Reform Strategy and international best practices. As of the writing of this IRM Results Report, the department is still in its early stages of operation.

Looking Ahead

While important steps were taken to improve government communication, key procedural changes and institutional structures are still being developed. However, this commitment provides a foundation for future reforms in strategic communication and participatory governance. If sustained and properly resourced, these reforms could improve transparency, build public trust in government, and strengthen public engagement in decision-making.

To achieve effective and sustainable results, the following steps are recommended:

- **Finalize and mandate communication procedures:** The government could accelerate the introduction of communication protocols to address weaknesses in public communication. Once piloted and refined, the communication guidelines could be made legally binding for all state agencies. Clear responsibilities and enforcement mechanisms should be established to ensure effective implementation.
- **Establish a strategic communication unit:** The unit should have adequate financial and human resources and operate independently of political influence, particularly in anticipation of 2026 elections. At the same time, it must have sufficient authority to ensure interagency coordination.
- **Ensure transparent work of the Participatory and Open Governance Department and strengthen public engagement mechanisms:** The department should adopt transparent and accountable procedures, ensuring an open and non-discriminatory approach to civil society engagement and apply the same principles to processes within the public administration reforms. The department could use various outreach tools and mechanisms to expand public participation, focusing on engaging vulnerable social groups and regional stakeholders who have limited participation opportunities. Additionally, it could monitor state bodies' adherence to participation regulations, taking appropriate actions where necessary, and provide government bodies a clear methodology and technical support for public consultations.
- **Strengthen crisis communication and address disinformation:** The government could define transparent state response measures for mis- and disinformation and establish coordinated crisis communication protocols (e.g., regular press briefings and fact-checking initiatives).

Commitment 5: Participatory budget at the local level

Lead agency: Ministry of Territorial Administration and Infrastructure

Context and Objectives

This commitment aimed to increase public interest in budget development and expand opportunities for citizens to provide input on community projects. It planned to allocate a specific amount of the community budget for projects suggested by citizens and voted for by the local population in three pilot communities: Abovyan, Armavir, and Ashtarak. One of the communities in the pilot, Armavir, also adopted a participatory budgeting commitment in its OGP local action plan.⁷

Early Results: Significant Results

The commitment exceeded planned outcomes, expanding from three pilot communities to a fourth community—Jermuk—joining the pilot process; eventually, 21 out of 71 municipalities of

Armenia have joined the participatory budgeting initiative and received support from the state budget.

In 2023, the four pilot communities allocated between 2 and 10 million AMD (5,000–25,000 USD) from the community budget to citizen-proposed projects. Recognizing the initiative's success, the government supported participatory budgeting by introducing subvention funding, allocating 500 million AMD (around 1,250,000 USD) to the four communities to implement participatory budgeting projects in 2024.⁸ In 2024, 17 more municipalities joined the initiative and allocated between 2 and 20 million AMD (5,000–50,000 USD) from their budgets, with the expectation to be further funded from the subvention programs.⁹ In February 2025, after the end of implementation period, the government amended its decision to extend the subvention funding to 21 communities (the four pilot municipalities and the 17 municipalities that joined in 2024), which are allocated 1 billion AMD (2,500,000 USD) for 2025 according to the Law on State Budget 2025.¹⁰ To qualify, the municipalities must adhere to the procedures and allocate at least 20% of funding from their community budget.

The German Agency for International Cooperation (Deutsche Gesellschaft für Internationale Zusammenarbeit - GIZ) supported the commitment through the project “Good Governance for Local Development South Caucasus” (GGLD), which assists the government in territorial and administrative reforms and strengthening the capacities of municipalities.¹¹ This support, provided since 2014, included the introduction of the Municipal Management Information System (MMIS) in consolidated communities and its continuous development; guidance on preparing simplified budgets for selected communities; and the publication of the Participatory Budgeting Handbook in 2020 that has been periodically revised.¹² These efforts provided a solid groundwork for this commitment's implementation.

In December 2024, the Ministry of Territorial Administration and Infrastructure (MTAI) published methodological guidelines for participatory budgeting, which were developed with the support of the GGLD.¹³ Within the scope of the GGLD, the organization responsible for development and maintenance of municipal information systems—the Information Systems Development and Training Center (ISDTC) NGO—developed a participatory budgeting platform for community websites and has been continuously enhancing community websites to facilitate online voting and is training local officials on their use. To allow users' identification without ID cards, the ISDTC (with the support of the GGLD) set up automated identification of citizens in late 2024, allowing identification through passport data.¹⁴ The MTAI created a working group with the Ministry of Finance, GIZ, CSOs, international organizations, and municipal representatives to discuss and resolve issues and support implementing communities.¹⁵

The commitment has fostered greater citizen engagement, particularly among youth, who actively participated in awareness campaigns and discussions. It improved residents' understanding of local budgeting processes, including subventions and project costs. While it is too early to measure a broad cultural shift, increased participation in participatory budgeting suggests growing public interest. Skepticism persists due to historical distrust of government, low public awareness, and technical barriers like registering for online voting.¹⁶ However, tangible results—such as new playgrounds, park renovations, cultural and youth clubs—have demonstrated the impact of citizen participation and encouraged citizens to actively participate in the next stages.¹⁷ In several communities, additional projects were implemented beyond the winning projects, some of which were co-funded by the German and Swiss governments, local CSOs and companies.¹⁸ CSO representatives highlight that, while participatory opportunities existed in law, this initiative has translated them into meaningful practice. Further, the

participatory budgeting process requires municipalities to establish multistakeholder committees to serve as the primary governing bodies of the participatory budgeting process. These committees do a preliminary selection of the projects based on eligibility criteria, publish project-related decisions, provide feedback on rejected proposals, and organize public discussions before starting the voting on selected projects. Online voting is transparent, ensuring citizens that projects are selected based on public preference rather than municipal discretion.

Initially, engagement was low. Some projects from 2023 were selected with as few as five votes. Municipalities lacked outreach capacity and sometimes relied on staff from municipal organizations to generate proposals and votes.¹⁹ However, over a thousand votes were cast for most of the winning projects in the pilot municipalities in 2024, which points to the success of awareness raising and the motivational power of the projects implemented in 2023. The role of GIZ, CSOs, the MTAI, and the Ministry of Finance has been instrumental in raising awareness and providing technical support. In 2024–2025, in the scope of the GGLD implemented by GIZ, a CSO consortium including the Armavir Development Center and the NGO Center expanded outreach in all 21 municipalities. Another challenge related to the participatory budgeting committees is that, due to limited capacity, they may pre-select projects not only based on the defined criteria but also on perceived community priorities. In a few instances, the proposals that were not fully understood led to discretionary decisions by the committees. These cases might raise concerns about municipal bias in approving staff-initiated projects over citizen proposals.²⁰

Participatory budgeting projects receiving subvention are required to align with the goals of the government's Five-Year Action Program, the community development program, and strategic documents. While these criteria are reasonable, they allow for discretionary interpretation, potentially limiting citizen-driven initiatives. If projects approved through public voting are later disqualified by government review, this could undermine public trust—a crucial component of participatory governance. Additionally, the government decision stresses that initiatives should help develop communities' socio-economic infrastructure. Government representatives explained that this requirement pertains to construction projects, similar to the scope of traditional community subvention projects funded by the government since 2006.²¹ Restricting participatory budgeting initiatives to construction proposals could prevent communities from using participatory budgeting funds for procurement, services, or other initiatives that address immediate local needs. Stakeholders have also raised concerns about the strict timelines for participatory budgeting processes and implementation set by the government decision of February 2025.²² Limited timeframes for proposal submission and voting could narrow public participation and risk turning the process into a formality rather than a meaningful engagement opportunity. However, the significant financial commitment from the Government of Armenia reflects growing cooperation between local and national governments, increased capacity at the community level, and strengthening trust among stakeholders.

Looking Ahead

This commitment introduced new tools for participation and contributed to better transparency and accountability of local governments. It created a framework for other municipalities to adopt similar practices, and the allocation of subsidies provided strong encouragement for new communities to engage in participatory budgeting. The long-term success of participatory budgeting in Armenia depends on expanding the scope and amount of financial allocations; ensuring transparency in proposal selection; and building the capacity of municipalities and local

CSOs in raising public awareness and promoting engagement. Moving forward, the IRM recommends the following steps, based on the above analysis and stakeholders' suggestions:

- Institutionalize participatory budgeting through legal and policy frameworks:** Participatory budgeting could be embedded in Armenia's legal and policy frameworks to ensure continuity beyond the action plan cycle, the ad-hoc government decision, and donor support. This could involve amending relevant laws on local self-government to mandate participatory budgeting as a standard practice for municipalities. Clear legal provisions could define key aspects such as budget allocation requirements, the responsibilities of local authorities, and public participation mechanisms. This could ensure that participatory practices are maintained during political changes.
- Ensure clear and inclusive project eligibility criteria:** To mitigate the risk of discretionary decisions and project disqualification, the government could refine and clarify the eligibility criteria for projects funded through participatory budgeting. The criteria should balance alignment with strategic goals with preserving space for community-driven ideas that address immediate local needs. It is crucial to explicitly allow a broader range of project types, including services, procurement, and social programs, alongside infrastructure projects. To prevent malpractice in the eligibility check, the government and civil society should work with municipalities to develop clear guidelines that prevent excessive restrictions while maintaining accountability. These guidelines could include a requirement of holding open sessions of the local participatory budgeting committees that conduct preliminary selection of proposals and give opportunity for proposal authors to clarify their ideas.²³
- Expand and strengthen public awareness and capacity-building:** Public engagement remains a challenge, particularly in communities where there is a low level of civic activism and lack of CSOs. Local CSOs and municipality staff need training on effective outreach strategies and use of digital platforms. To increase participation, a sustained, multi-channel awareness campaign could be implemented at the national and local levels. This could include education on how participatory budgeting works, its impact, and how residents can participate. Apart from dissemination of information through social media or other digital platforms, municipalities could organize face-to-face discussions in communities to ensure larger involvement, particularly in schools, municipal enterprises, universities, and in outdoor public spaces. These approaches proved effective in the pilot communities.²⁴ Additionally, municipalities should receive continuous support to better facilitate participatory budgeting, engage citizens, and ensure transparency in implementation. Apart from dissemination, providing expert support to citizens during proposals' development can ensure they are high-quality, well-formulated, and responsive to community needs.²⁵ This can be achieved through workshops with youth and other active community members during the proposal submission phase, equipping them with the skills and guidance to develop impactful project ideas. To reduce donor dependency and ensure the long-term sustainability of participatory budgeting, the government could allocate grant funds directly to local CSOs to support awareness-raising, capacity-building, and the dissemination of information.²⁶
- Enhance transparency and accountability in participatory budgeting decision-making:** Public trust in participatory budgeting hinges on transparent decision-making and clear communication. Municipalities could publish detailed information on all project proposals, eligibility decisions, voting results, and project implementation progress as

required by guidelines. Publication of all the proposals, with clear reasoning for those which did not pass eligibility, could make the process more credible. Regular monitoring and reporting on participatory budgeting outcomes would help to demonstrate impact. Additionally, independent monitoring mechanisms, such as civil society oversight committees, could enhance accountability and prevent potential manipulation of the process.

Commitment 7. Registry of gifts for public officials

Lead agencies: Commission for the Prevention of Corruption; Ministry of Justice

Context and objectives

The Law on Public Service prohibits public officials from accepting gifts in relation to their official service, with some exemptions, such as gifts granted during official visits or public events, ceremonial gifts, grants, and fellowships. It requires officials to transfer gifts exceeding a value of AMD 60,000 (about USD 150) to the state or community ownership. Commitment 7 aimed to enforce legal regulations related to gifts, enhance transparency and accountability in public service, and ensure compliance with international anti-corruption recommendations. Key milestones included adopting regulations for registering and transferring gifts and establishing a publicly accessible online registry that allows citizens to monitor and report non-compliant gifts. The Corruption Prevention Commission (CPC) would oversee the registry and initiate proceedings as necessary based on reports of violations submitted by the public. This would include disciplinary and administrative sanctions as provided by the law and/or sending proceedings to law enforcement in case of criminal offense.²⁷

Early results: Moderate results

The most notable achievement of the Commitment is the establishment of a legal framework for tracking gifts that aligns with international anti-corruption standards. However, the electronic public registry remains incomplete. While some public officials have improved compliance with gift declaration requirements, challenges remain, including insufficient understanding of the gift restrictions, limited usability of the current registry, and lack of a legal requirement to register gifts that are treated as not linked with official duties.

For the first milestone, the government established a legal framework governing gift registration and declaration. Amendments adopted in December 2022 to the Law on Public Service require officials and public servants to register permissible gifts if their value exceeds AMD 40,000 (about USD 100); specify the mechanisms for value assessment, reporting and oversight; and set the CPC as the responsible body for gift registration.²⁸ Additional regulations adopted in December 2023 and April 2024 define procedures for registering and handling the gifts and regulate internal whistle-blowing procedures.²⁹ According to the adopted regulations, gifts that exceed the threshold value are transferred to the State Property Management Committee (or to a local self-government body in the case of local officials) and become state (or community) property. Prohibited gifts shall also be transferred to the state if it is not possible to return the gift or pay equivalent compensation within a set period. In June 2024, the government adopted bylaw regulations on the procedures of gift transfers, completing the legal basis for gift registration and transfer. The gift registration and transfer rules entered into force in August 2024. CSOs actively participated in the legislative process, contributing to reforms with research and policy recommendations.³⁰ In the framework of the EU- and OGP-funded

“Multi-Faceted OGP Action: Open Justice & Anti-Corruption Commitments” Program, the Armenian Lawyers’ Association conducted expert discussions and prepared two analyses of best international practices. Many of the recommendations were considered in the new regulations.³¹ The Group of States against Corruption (GRECO) praised the legislative changes and steps taken toward clarification of gift rules, procedures of gift registration, and awareness raising, recognizing Armenia’s progress in addressing respective anti-corruption recommendations.³²

The CPC has developed the technical specification of the gift registry. However, the platform was not complete by the end of the implementation period. The CPC signed an agreement for the software in November 2024, and the contractor began development following the finalization of the system design.³³ The USAID-funded Armenian Integrity Program supported the platform’s creation. However, due to the US foreign aid freeze in January 2025, delays are expected until alternative funding is secured. Until the platform is operational, the CPC provided a template for gift declarations along with a guideline published on its website and has been collecting the submissions from officials through email communication.³⁴ Since September 2024, the gift declarations are published in a Google Drive folder.³⁵

The CPC provided training and consultations to public servants on compliance with gift-related restrictions and requirements. The CPC has received an increasing number of phone inquiries to consult on gift acceptance and registration procedures and plans to cover this topic in the e-learning module on public service integrity (the e-learning platform for civil servants is expected to be operational in May 2025).³⁶ A methodological guide for providing an advisory opinion on gifts was published in June 2024.³⁷ In addition, the CPC plans to create video materials for broader awareness raising of both public servants and the general public.³⁸

The IRM assesses the early results of the commitment as moderate. Before the commitment, there was no system for gift declarations, which restricted oversight of compliance with gift regulations. The commitment introduced clear regulations for the handling of gifts related to official duties, helping improve understanding of gift restrictions and allowing the CPC and the public to better track compliance. These regulations might serve a preventive function, as public servants might be more cautious in accepting gifts that are not permitted. However, the absence of a fully operational digital registry limits the expected increase in transparency and public oversight. Further, enforcement remains weak. Compliance by officials with gift declaration rules largely relies on their ethical responsibility, as the CPC and integrity officers have limited capacity to monitor compliance. The culture of gift-giving as a sign of gratitude continues to hinder enforcement, and whistleblowing mechanisms remain underutilized due to social stigma.³⁹ Another challenge is the limited capacity of integrity officers responsible for providing consultations on gift-related matters. In many cases, integrity officers are overburdened staff from human resource departments and have insufficient expertise in anti-corruption regulations.⁴⁰ As a result, much of the training and consultation burden falls on the CPC, which itself faces staffing shortages.

Civil society stakeholders acknowledge the improvements in the legal framework and transparency, particularly regarding permissible gifts. However, investigative journalists and anti-corruption experts are concerned that high-value gifts may still go undeclared if they are classified as “personal” and thus exempt from registration. Additionally, the current registry only displays permissible gifts, omitting information about prohibited gifts that were returned or transferred to the state, which reduces its oversight potential.⁴¹ Even in the case of permissible gifts, the register does not provide information on their handling after the transfer to the State Property Committee or local government (whether it was kept in the state body, sold, donated,

or otherwise disposed) as this information is beyond the CPC’s powers. A civil society stakeholder also highlighted inconsistencies in the valuation of gifts. Despite procedural changes aimed at standardizing the assessment process, cases of unverified pricing have been reported, raising concerns about the reliability of gift handling and evaluation procedures.⁴² The CPC representative noted that while transparency and accountability are the primary goals of gift registration, conducting costly expert assessments for handmade souvenirs or items without available market prices may not be cost-effective.⁴³

Looking Ahead

Armenia has submitted the gift register as an Open Gov Challenge, proposing the creation of a digital register integrating AI-based evaluation and verification solutions.⁴⁴ Future efforts should focus on full operation of the registry, awareness raising and public oversight, and mechanisms for monitoring compliance with gift restriction requirements. By addressing these issues, Armenia can ensure that the gift registry becomes an effective anti-corruption tool that enhances transparency and public accountability.

The IRM recommends the following steps for future actions:

- **Prioritize full implementation of the digital registry**, including automated data verification and flagging tools, providing digital security, and ensuring its interoperability with existing asset and income declaration systems to allow for automated cross-checks of officials’ declared gifts.
- **Strengthen oversight mechanisms and apply sanctions for non-compliance** to enhance enforcement and deter violations. Integrity officers should receive additional training and resources to fulfill their role more effectively.
- **Improve transparency on gifts transferred to state ownership** by publishing details on prohibited gifts, their disposal, and their location post-transfer.⁴⁵ This would enable public oversight beyond the initial transfer and enhance accountability for state property management.
- **Expand the scope of registered gifts** to include all gifts above a certain threshold, even if classified as “personal” (not linked to the performance of official duties). As an alternative, such gifts that are presented in the asset and income declarations could include details on their donor identity.⁴⁶ This would help track the source of expensive gifts and detect potential conflicts of interest.
- **Increase public awareness to change cultural perceptions** about gift restrictions and declaration requirements through sustained education. While administrative and criminal sanctions are necessary, long-term success depends on changing public officials’ attitudes toward accepting gifts.
- **Develop clear and practical guidelines for assessing types of gifts** to help public servants distinguish between permissible and prohibited gifts. Instead of a blanket prohibition, the code of conduct could provide step-by-step guidance on evaluating gifts’ appropriateness.⁴⁷ Further, simple and accessible educational materials combined with training sessions could strengthen public servants’ understanding of the regulations and their practical application.⁴⁸

- **Enhance whistleblower protections and reporting mechanisms** to encourage officials and the public to report violations. Cultural resistance to whistleblowing could be addressed through legal safeguards and awareness-raising.

¹ Anzhela Kzhdryan (Office of the Prime Minister), electronic communication and interview by IRM researcher, 27 Jan. 2025.

² Kzhdryan, interview.

³ Shushan Doydoyan (Freedom of Information Center of Armenia), interview by IRM researcher, 21 Jan. 2025; Freedom of Information Center of Armenia, “75. USAID Strategic Communications Support Activity” (25 Feb. 2025), <https://foi.am/en/ongoing/36123>.

⁴ Jami J. Rodgers (USAID Senior Procurement Executive and Director, Bureau for Management, Office of Acquisition & Assistance), “USAID’s Implementation of the Funding Pause for Foreign Assistance Programs” (United States Agency for International Development, 28 Jan. 2025), <https://content.govdelivery.com/accounts/USAIDHQ/bulletins/3cf4d94>.

⁵ Sona Ayvazyan (Transparency International Anticorruption Center), interview by IRM researcher, 6 Feb. 2025.

⁶ Prime Minister of the Republic of Armenia, “ՀԱՅԱՍՏԱՆԻ ՀԱՆՐԱՊԵՏՈՒԹՅԱՆ ՎԱՐՉԱՊԵՏ: ՈՐՈՇՈՒՄ N 1204-L ՀԱՅԱՍՏԱՆԻ ՀԱՆՐԱՊԵՏՈՒԹՅԱՆ ՎԱՐՉԱՊԵՏԻ 2018 ԹՎԱԿԱՆԻ ՄԱՅԻՍԻ 25-Ի N 564-L ՈՐՈՇՄԱՆ ՄԵՋ ՓՈՓՈԽՈՒԹՅՈՒՆՆԵՐ ԵՎ ԼՐԱՑՈՒՄՆԵՐ ԿԱՏԱՐԵԼՈՒ ՄԱՍԻՆ” [RA Prime Minister Decision N 1204-L on Amendments and Supplements to the RA Prime Minister’s Decision N 564-L of 25 May 2018], (ARLIS, 26 Dec. 2024), <https://www.arlis.am/DocumentView.aspx?docid=201524>.

⁷ Open Government Partnership, “Armavir, Armenia, Participatory Budgeting Implementation (AMAVR0002)” (accessed Apr. 2025), <https://www.opengovpartnership.org/members/armavir-armenia/commitments/AMAVR0002/>.

⁸ Government of the Republic of Armenia, “ՀԱՅԱՍՏԱՆԻ ՀԱՆՐԱՊԵՏՈՒԹՅԱՆ ԿԱՌԱՎԱՐՈՒԹՅՈՒՆ: Ո Ր Ո Շ ՈՒ Մ: 2 նոյեմբերի 2023 թվականի N 1890-Ն: ՀԱՅԱՍՏԱՆԻ ՀԱՆՐԱՊԵՏՈՒԹՅԱՆ ՀԱՄԱՅՆՔՆԵՐՈՒՄ ՄԱՍՆԱԿՑԱՅԻՆ ԲՅՈՒՋԵՏԱՎՈՐՄԱՍԲ ԶԵՎԱՎՈՐՎԱԾ ԾՐԱԳՐԵՐԻ ԻՐԱԿԱՆԱՑՄԱՆ ՆՊԱՏԱԿՈՎ ՀԱՅԱՍՏԱՆԻ ՀԱՆՐԱՊԵՏՈՒԹՅԱՆ 2024 ԹՎԱԿԱՆԻ ՊԵՏԱԿԱՆ ԲՅՈՒՋԵԻՑ ՀԱՄԱՅՆՔՆԵՐԻՆ ՍՈՒԲՎԵՆՏԻԱՆԵՐԻ ՏՐԱՄԱԴՐՄԱՆ ԿԱՐԳԸ ՀԱՍՏԱՏԵԼՈՒ ՄԱՍԻՆ” [RA Government Decision No. 1890-N ‘On approving the procedure for providing subventions to RA communities from the RA State Budget 2024 for implementing participatory budgeting projects in the communities’] (ARLIS, 2 Nov. 2023), <https://www.arlis.am/DocumentView.aspx?docid=184645>.

⁹ Ashot Giloyan (Ministry of Territorial Administration and Infrastructure), electronic communication with IRM researcher, 26 Feb. 2025.

¹⁰ Government of the Republic of Armenia, “ՀՀ ԿԱՌԱՎԱՐՈՒԹՅԱՆ ՈՐՈՇՈՒՄԸ ՀՀ ԿԱՌԱՎԱՐՈՒԹՅԱՆ 2023 ԹՎԱԿԱՆԻ ՆՈՅԵՄԲԵՐԻ 2-Ի N 1890-Ն ՈՐՈՇՄԱՆ ՄԵՋ ՓՈՓՈԽՈՒԹՅՈՒՆՆԵՐ ԵՎ ԼՐԱՑՈՒՄՆԵՐ ԿԱՏԱՐԵԼՈՒ ՄԱՍԻՆ” [RA Government Decision on Amendments to the RA Government Decision No. 1890-N], [ARLIS, 20 Feb. 2025] <https://www.arlis.am/hy/acts/203408>. Republic of Armenia, “ՀՀ ՕՐԵՆՔԸ ՀՀ 2025 ԹՎԱԿԱՆԻ ՊԵՏԱԿԱՆ ԲՅՈՒՋԵԻ ՄԱՍԻՆ” [Law of the RA on 2025 State Budget Law] [ARLIS, 04.12.2024], <https://www.arlis.am/documentview.aspx?docid=200713>.

¹¹ The project is co-financed by the German Federal Ministry for Economic Cooperation and Development (BMZ) and the Swiss Agency for Development and Cooperation, and implemented in close partnership with the Ministry of Territorial Administration and Infrastructure. See “Good Governance for Local Development South Caucasus (GGLD)” (GIZ, June 2025), <https://www.giz.de/en/downloads/giz2025-en-factsheet-good-governance-for-local-development-in-armenia.pdf>.

¹² GIZ, *ՄԱՍՆԱԿՑԱՅԻՆ ԲՅՈՒՋԵՏԱՎՈՐՈՒՄ ԶԵՆՆԱՐԿ* [Handbook on Participatory Budgeting], (2020), https://api.mtad.am//storage/pages/files/2022/03/pdf/02_9-15-sc319-62e15fda33353.pdf.

¹³ Ministry of Territorial Administration and Infrastructure of the Republic of Armenia, *ՀԱՄԱՅՆՔՆԵՐՈՒՄ ՄԱՍՆԱԿՑԱՅԻՆ ԲՅՈՒՋԵՏԱՎՈՐՄԱՆ ԸՆԹԱՑԱԿԱՐԳԵՐԻ ՎԵՐԱԲԵՐՅԱԼ ՄԵԹՈԴՈԴԱԲԱՆԱԿԱՆ ՈՒՂԵՅՈՒՅՑ* [Methodological Guide on Participatory Budgeting Procedure in Communities] (2024), https://mtad.am/pages/Participatory_budgeting.

¹⁴ Grisha Khachatryan (Information Systems Development and Training Center), interview by IRM researcher, 27 Feb. 2025.

¹⁵ Ashot Giloyan (Ministry of Territorial Administration and Infrastructure), interview by IRM researcher, 26 Feb. 2025.

¹⁶ Ani Tovmasyan and Azganush Mnatsakanyan (Armavir Development Center), interview by IRM researcher, 24 Feb. 2025; Arpine Hakobyan (NGO Center), interview by IRM researcher, 26 Feb. 2025; Lusine Avelyan and Gayane Nalbandyan (GIZ Armenia), interview by IRM researcher, 21 Feb. 2025; Narek Botsinyan (Progress Youth NGO), interview by IRM researcher, 21 Feb. 2025.

¹⁷ Tovmasyan and Mnatsakanyan, interview; Lilya Afrikyan (Office of the Prime Minister), interview by IRM researcher, 22 Jan. 2025; Avelyan and Nalbandyan, interview.

¹⁸ Giloyan, electronic communication.

¹⁹ Arpine Hakobyan, interview.

²⁰ Arpine Hakobyan, interview.

²¹ Ashot Giloyan, interview, Ruzanna Gabrielyan (Ministry of Finance), interview by IRM researcher, 12 Feb. 2025; Government of the Republic of Armenia, “ՀՀ ԿԱՌԱՎԱՐՈՒԹՅԱՆ ՈՐՈՇՈՒՄԸ ՀՀ ՊԵՏԱԿԱՆ ԲՅՈՒՋԵԻՑ ՀԱՄԱՅՆՔՆԵՐԻՆ ՍՈՒԲՎԵՆՅՈՒՆԵՐԻ ՏՐԱՄԱԴՐՄԱՆ ԿԱՐԳԸ ՀԱՍՏԱՏԵԼՈՒ ՄԱՍԻՆ” [Decision Of The Government Of The RA On Approving The Procedure For Providing Subsidies To Communities From The RA State Budget] N1708-N, (16 Nov. 2006, amended 23 May 2024), <https://www.arlis.am/DocumentView.aspx?DocID=193133>.

²² Giloyan, interview; Hakobyan, interview; Avelyan and Nalbandyan, interview.

²³ Hakobyan, interview.

²⁴ Tovmasyan and Mnatsakanyan, interview; Botsinyan, interview.

²⁵ Hakobyan, interview.

²⁶ Tovmasyan and Mnatsakanyan, interview; Avelyan and Nalbandyan, interview.

²⁷ The Corruption Prevention Commission of Armenia is an independent state body responsible for maintaining and analyzing public officials' asset and income declarations and providing recommendations on ethical issues (e.g., integrity, incompatibility requirements, conflicts of interest, examination of cases related to administrative offences) and imposing administrative sanctions within the framework of areas for which they are responsible. See Republic of Armenia, “ՀՀ ՕՐԵՆՔԸ ԿՈՌՈՒՊՑԻՅԱՅԻ ԿԱՆԽԱՐԳԵԼՄԱՆ ՀԱՆՁՆԱԺՈՂՈՎԻ ՄԱՍԻՆ” [Law Of The RA On The Anti-Corruption Commission] (ARLIS, 9 Jun. 2017), <https://www.arlis.am/DocumentView.aspx?DocID=172271>.

²⁸ Republic of Armenia, “ՀՀ ՕՐԵՆՔԸ «ՀԱՆՐԱՅԻՆ ԾԱՌԱՅՈՒԹՅԱՆ ՄԱՍԻՆ» ՕՐԵՆՔՈՒՄ ԼՐԱՅՈՒՄՆԵՐ ԵՎ ՓՈՓՈԽՈՒԹՅՈՒՆՆԵՐ ԿԱՏԱՐԵԼՈՒ ՄԱՍԻՆ” [Law Of The RA On Amendments And Changes To The Law “On Public Service”], (ARLIS, 7 Dec. 2022), <https://www.arlis.am/DocumentView.aspx?docid=172230>.

²⁹ Republic of Armenia, “ՀՀ ՕՐԵՆՔԸ «ՀԱՆՐԱՅԻՆ ԾԱՌԱՅՈՒԹՅԱՆ ՄԱՍԻՆ» ՕՐԵՆՔՈՒՄ ԼՐԱՅՈՒՄՆԵՐ ԵՎ ՓՈՓՈԽՈՒԹՅՈՒՆՆԵՐ ԿԱՏԱՐԵԼՈՒ ՄԱՍԻՆ” [Law of the RA On Amendments And Changes to the Law “On Public Service”] (ARLIS, 11 Apr. 2024), <https://www.arlis.am/DocumentView.aspx?docid=192458>; Republic of Armenia, “ՀՀ ՕՐԵՆՔԸ «ՊԵՏԱԿԱՆ ԳՈՒՅՔԻ ԿԱՌԱՎԱՐՄԱՆ ՄԱՍԻՆ» ՕՐԵՆՔՈՒՄ ԼՐԱՅՈՒՄ ԵՎ ՓՈՓՈԽՈՒԹՅՈՒՆ ԿԱՏԱՐԵԼՈՒ ՄԱՍԻՆ” [Law of the RA On Amendments and Supplementation to the Law “On State Property Management”] (ARLIS, 2 May, 2024), <https://www.arlis.am/DocumentView.aspx?docid=192453>; Republic of Armenia, “ՀՀ ՕՐԵՆՔԸ «ՊԵՏԱԿԱՆ ԱՐԱՐՈՂԱԿԱՐԳԻ ՄԱՍԻՆ» ՕՐԵՆՔՈՒՄ ԼՐԱՅՈՒՄՆԵՐ ԿԱՏԱՐԵԼՈՒ ՄԱՍԻՆ” [Law of the RA On Amendments to the Law “On State Ceremony”], (ARLIS, 11 Apr. 2024), <https://www.arlis.am/DocumentView.aspx?docid=192459>; Anti-Corruption Commission, “ԿՈՌՈՒՊՑԻՅԱՅԻ ԿԱՆԽԱՐԳԵԼՄԱՆ ՀԱՆՁՆԱԺՈՂՈՎԻ ՈՐՈՇՈՒՄԸ ՀԱՆՐԱՅԻՆ ՊԱՇՏՈՆ ԶԲԱՂԵՑՆՈՂ ԱՆՁԱՆՑ ԵՎ ՀԱՆՐԱՅԻՆ ԾԱՌԱՅՈՂՆԵՐԻ ԿՈՂՄԻՑ ՊԱՇՏՈՆԵԱԿԱՆ ՊԱՐՏԱԿԱՆՈՒԹՅՈՒՆՆԵՐԻ ԻՐԱԿԱՆԱՑՄԱՆ ԿԱՊԱԿՑՈՒԹՅԱՄԲ ՍՏԱՅՎԱԾ ՆՎԵՐՆԵՐԻ ՀԱՇՎԱՌՄԱՆ, ՀԱՆՁՆՄԱՆ ԵՎ ԳՆԱՀԱՏՄԱՆ, ՆՎԵՐՆԵՐԻ ՀԱՇՎԱՌՄԱՆ ՌԵԵՍՏՐԻ ՎԱՐՄԱՆ ԵՎ ՆԵՐԿԱՅԱՑՎԱԾ ՏՎՅԱԼՆԵՐՈՒՄ ՓՈՓՈԽՈՒԹՅՈՒՆՆԵՐԻ ԿԱՏԱՐՄԱՆ, ՆՎԵՐՆԵՐԻ ԸՆԴՈՒՆՄԱՆ ՍԱՀՄԱՆԱՓԱԿՈՒՄՆԵՐԻ ԽԱՆՏՄԱՆ ԴԵՊՔԵՐԻ ՎԵՐԱԲԵՐՅԱԼ ՏԵՂԵԿՈՒԹՅՈՒՆՆԵՐԻ ՏՐԱՄԱԴՐՄԱՆ ԿԱՐԳԵՐԸ, ԻՆՉՊԵՆ ՆԱԵՎ ՌԵԵՍՏՐՈՒՄ ԼՐԱՅՄԱՆ ԵՎ ՀՐԱՊԱՐԱԿՄԱՆ ԵՆԹԱԿԱ ՏՎՅԱԼՆԵՐԻ ՑԱՆԿԵՐԸ ՍԱՀՄԱՆԵԼՈՒ ՄԱՍԻՆ” [Decision Of The Commission On The Prevention Of Corruption On The Procedures For The Calculation, Transfer And Evaluation Of Gifts Received By Public Officers And Public Servants In Connection With The Performance Of Official Duties, Maintaining The Gift Calculation Register And Making Changes In The Submitted Data, Providing Information On Cases Of Violation Of Restrictions On The Acceptance Of Gifts, As Well As On Determining The Lists Of Data Subject To Additional Information To The Register And Publication], (ARLIS, 22 Dec. 2023), <https://www.arlis.am/DocumentView.aspx?docid=199926>; Government of the Republic of Armenia, “ՀՀ ԿԱՌԱՎԱՐՈՒԹՅԱՆ ՈՐՈՇՈՒՄԸ ՀԱՆՐԱՅԻՆ ՊԱՇՏՈՆ ԶԲԱՂԵՑՆՈՂ ԱՆՁԱՆՑ ԵՎ ՀԱՆՐԱՅԻՆ ԾԱՌԱՅՈՂՆԵՐԻ ՊԵՏԱԿԱՆ ՄԵՓԱԿԱՆՈՒԹՅՈՒՆ ԴԱՐՁԱԾ ՆՎԵՐՆԵՐԻ ՏՆՕՐԻՆՄԱՆ ԿԱՐԳԸ, ԳՈՒՅՔԻ ՏՆՕՐԻՆՄԱՆ ԵՂԱՆԱԿՆԵՐԻ ԸՆՏՐՈՒԹՅԱՆ ՄԵԹՈԴԱԲԱՆՈՒԹՅՈՒՆԸ, ԱՌԱՆՁԻՆ ՏԵՍԱԿԻ ԳՈՒՅՔԻ ՏՆՕՐԻՆՄԱՆ ԱՌԱՆՁԱՀԱՏՎՈՒԹՅՈՒՆՆԵՐԸ, ՏՆՕՐԻՆՄԱՆ ԵՂԱՆԱԿԻ ՎԵՐԱԲԵՐՅԱԼ «ՊԵՏԱԿԱՆ ԱՐԱՐՈՂԱԿԱՐԳԻ ՄԱՍԻՆ» ՕՐԵՆՔՈՒՄ ՍԱՀՄԱՆՎԱԾ ԵԶՐԱԿԱՑՈՒԹՅԱՆ ՏՐԱՄԱԴՐՄԱՆ ԿԱՐԳԸ, ՇՈՒՏ ՓՉԱՑՈՂ ԵՎ ՊԱՀՊԱՆՄԱՆ ԷԿՎԱՆ ԾԱԽՍԵՐ ՊԱՀԱՆՁՈՂ ԳՈՒՅՔԵՐԻ ՑԱՆԿԸ, ՇՈՒՏ ՓՉԱՑՈՂ ԳՈՒՅՔԻ ՈՉՆՉԱՑՄԱՆ ԴԵՊՔԵՐԸ, ԿԱՐԳԸ ԵՎ ՏՆՕՐԻՆՄԱՆ ԵՂԱՆԱԿՆԵՐԸ ՍԱՀՄԱՆԵԼՈՒ ՄԱՍԻՆ” [Decision Of The Government Of The RA On The Procedure For The Management Of Gifts Of Public Officers And Public Servants That Have Become State Property, The Methodology For Selecting The Periods For The Management Of Property, The Specific Features Of The Management Of A Particular Type Of Property, The Procedure For Providing A Conclusion On The Period Of Management Defined By The Law “On The State Procedure”, The List Of Property That Is Quickly Perishable And Requires Significant Costs For Storage, On Determining The Cases, Procedure And Periods Of Destruction Of Perishable Property], (ARLIS, 20 Jun. 2024), <https://www.arlis.am/DocumentView.aspx?docid=194326>.

³⁰ Suzanna Soghomonyan (Armenian Lawyers' Association), interview by IRM researcher, 14 Feb. 2025.

³¹ Armenian Lawyers' Association, “Expert Analyses on the Improvement of the Institution of Gifts of Persons holding Public Positions and Public Servants” (16 May 2024), <https://armla.am/en/8613.html>.

³² Group of States Against Corruption and Council of Europe, *Fourth Evaluation Round: Addendum to the Second Compliance Report on Armenia* (GRECO Secretariat, 11 Dec. 2024), <https://rm.coe.int/greco4-2024-11-final-eng-add-to-the-2nd-compliance-report-armenia-pu/1680b2bb9f>.

³³ Tigranuhi Khalapyan (Corruption Prevention Commission of Armenia), interview by IRM researcher, 27 Jan. 2025.

³⁴ Corruption Prevention Commission, “Regarding the submission of gift registration forms to the Commission” (4 Oct. 2024), <https://cpcarmenia.am/news/nverneri-hashvarman-dzevatghteri%D5%9D-handznazhoghov-nerkayacman-veraberyal/>.

³⁵ See https://drive.google.com/drive/folders/1SHZ8YoAFdDkT8L-KNFm_g1wjCb1Q9EsW.

³⁶ Khalapyan, interview.

³⁷ Corruption Prevention Commission, “CPC Armenia / Կոռուպցիայի կանխարգելման հանձնաժողով's Post” (Facebook, 25 Jun. 2024), https://www.facebook.com/permalink.php/?story_fbid=774750708153392&id=100068554087037.

³⁸ Khalapyan, interview.

³⁹ Armen Khudaverdyan (Transparency International Anticorruption Center), interview by IRM researcher, 24 Jan. 2025; Khalapyan, interview; Soghomonyan, interview; Transparency International Anticorruption Center, *Compliance of Armenia's Whistleblowing System with International Principles* (2024), <https://transparency.am/en/publication/376>.

⁴⁰ Soghomonyan, interview; Khalapyan, interview; Ministry of Justice of the Republic of Armenia, “Anti-Corruption Strategy of the Republic of Armenia” (accessed Apr. 2025), <https://www.moj.am/en/page/583>.

⁴¹ Khudaverdyan, interview; Grisha Balasanyan (Hetq), interview by IRM researcher, 22 Feb. 2025; Soghomonyan, interview.

⁴² Soghomonyan, interview; Mariam Shahnazaryan, “Ճարմանդ, ժամացույցներ, կտավներ, բաժակների, թեյերի հավաքածու. պաշտոնատար անձանց ԿԿՀ ներկայացրած նվերներն ու դրանց արժեքների գնահատումը” [Bracelets, watches, paintings, a collection of cups and teas: gifts presented to the Central Committee by officials and their valuation], (Iravaban.net, 20 Jan. 2025), <https://iravaban.net/508396.html>.

⁴³ Khalapyan, interview.

⁴⁴ Open Government Partnership, “Armenia: Digital Gift Register for Public Officials” (accessed Apr. 2025), <https://www.opengovpartnership.org/the-open-gov-challenge/armenia-digital-gift-declaration-register-public-officials/>.

⁴⁵ Khudaverdyan, interview; Balasanyan, interview; Soghomonyan, interview.

⁴⁶ *Id.*

⁴⁷ Khudaverdyan, interview.

⁴⁸ Comment provided to the IRM by Armenians’ Lawyers Association during the pre-publication review of this report, 21 April 2025

Section III. Participation and Co-Creation

The fifth action plan’s co-creation process had broad consultations, regional engagement, and diverse outreach methods. Participation during implementation was more limited, with fewer multistakeholder meetings. The establishment of a dedicated open governance unit in the Office of the Prime Minister could improve coordination and sustained engagement in future action plan cycles.

OGP in Armenia

The Office of the Prime Minister (PMO) leads the OGP process in Armenia. The government’s point of contact (PoC) coordinates the process, overseen by the Chief of the Staff of the Prime Minister. Leadership and technical support for the OGP process remained consistent during implementation of the fifth action plan. At the end of the action plan, on 26 December 2024, the Prime Minister issued a decree establishing a Department on Participatory and Open Government within the PMO. This department will be responsible, among other functions, for implementing and coordinating open governance programs.¹ Thus, it will allocate more resources to organizing and coordinating OGP and other open government initiatives of the government.

Unlike previous action plan cycles, no formal working group was established for the development and implementation of the fifth action plan. Instead, an informal multistakeholder forum (MSF) was in place. It includes representatives of the state bodies responsible for the action plan commitments, civil society organizations (CSOs), and representatives from international organizations. Along with seven CSOs engaged in the previous cycle’s working group, more CSOs joined the MSF based on their application or engagement as supporting stakeholders in local or national OGP action plans.² For the first time, the OGP process in Armenia also engaged rural civil society through townhall conversations about co-creating commitments for the national and local action plans, aided by technical support from the OGP Support Unit. The PoC regularly communicated OGP-related updates and MSF meetings to the MSF via a mailing list. Information on engagement opportunities and the application form is published on the government’s OGP website.³ However, during the co-creation and implementation, the MSF did not have any documented membership or governance structure, and there was no publicly available information on the rules of participation, scope of powers, or the composition of the MSF.

The government maintains the official OGP website <https://ogp.gov.am/>. As of February 2025, the news section of the website has not been updated since 2022. However, the PoC posts regular updates about OGP processes, local and global events, and related updates on the OGP Armenia Facebook page, which has over a thousand followers.⁴

Action Plan Co-Creation

Armenia’s fifth action plan co-creation process was marked with a high quality and quantity of consultations with several in-person and online discussions. Overall, engagement and dialogue in the co-creation of the fifth action plan showed some improvements over previous cycles. A good practice was the extensive outreach during co-creation, including broad participation from civil society, regional consultations, and engagement with international partners. Armavir Development Center, the Armenian Lawyers’ Association, and the Freedom of Information

Center organized several events in collaboration with the PoC, under the EU for Integrity Programme for the Eastern Partnership, including online consultations with stakeholders in eight regions, and townhall meetings outside the capital. Commitment proposals were collected through email and, for the first time, via a special form on the government OGP website. The government published a video on YouTube and broadcasted information on the OGP process and opportunities to provide suggestions on the action plan on public television.⁵ The United Nations Development Programme (UNDP) Kolba Lab organized an expert workshop in December 2021 to collect commitment proposals. The Armavir Development Center and the government jointly organized four thematic meetings in March 2022 to discuss the shortlisted commitments.⁶ The Armenian Lawyers' Association organized online discussions as well.⁷

The government reviewed the proposals based on their alignment with OGP values and existing government priorities and, with a consortium of CSOs, organized thematic workshops with stakeholders to draft commitments around the shortlisted options. Thematic meetings helped to initiate dialogue between stakeholders based on shared visions and concerns over existing issues, as well as generate new ideas. After the start of implementation, the government organized a public event in February 2023 to present the action plan and explore collaboration opportunities with stakeholders. Based on the feedback received at the event and recommendations in the IRM Action Plan Review, as well as internal discussions, the government amended the action plan at the end of the first year of implementation.

Both the draft action plan and the revised plan were posted on the legal draft publication (e-draft) platform for public discussion for over two weeks in July–August 2022 and August–September 2023 respectively.⁸ According to stakeholders, the action plan generally addressed the priorities of government and civil society and was more strategic and comprehensive than previous plans.⁹

Participation During Implementation

Compared to the co-creation process, MSF meetings were less frequent during implementation. Two MSF meetings were held online in July 2023 and November 2024 to discuss commitment implementation. During these meetings, government representatives provided updates on implementation progress, while civil society stakeholders had the opportunity to comment, ask questions, and make suggestions. Brief reports on these events were covered on the government's OGP Facebook page, and the first meeting was published on the OGP Armenia YouTube channel.¹⁰

Additional stakeholder meetings occurred around specific commitments, initiated by the PMO, responsible government agencies, CSOs, and/or international partners. As in the previous action plan, donor-funded projects fostered closer collaboration between the government and civil society. For example, the OGP's Eastern Partnership Programme's Open Door Grant enabled the Freedom of Information Center of Armenia (FOICA) to develop a self-assessment toolkit for access to information and conduct workshops for pilot agencies to implement self-assessments (Commitment 3), as well as capacity-building in monitoring beneficial ownership.¹¹ The Armenian Lawyers' Association conducted a study of international experience and legislative analysis to support commitments on the gift register (Commitment 7) and e-court statistics (Commitment 9) and organized discussions and meetings around these commitments.¹² The Armenian Center for Socio-Economic Studies prepared user-friendly information, videos, and visuals and collaborated with the Ministry of Finance to present the 2024 state budget in Citizen Budget format (Commitment 4).¹³ With support from various donor organizations, the government organized consultations with civil society and other stakeholders on the e-

procurement platform (Commitment 8), data policy legislation (Commitment 1), strategic communication (Commitment 2), and labor contracts (Commitment 10). For the implementation of participatory budgeting at the local level (Commitment 5), GIZ provided technical assistance in developing guidelines, creating digital solutions, and funding CSO-led awareness-raising initiatives.

Stakeholders noted that activities related to some commitments were not widely communicated among MSF members. CSOs in the MSF were often aware only of the commitments in which they were directly involved, but updates on action plan implementation were largely limited to infrequent MSF meetings. While the government actively used the OGP Armenia Facebook page to provide updates, this did not reach all MSF members. The government’s OGP website remained outdated, reducing transparency and accountability in the OGP process. For future action plans, direct emails on activities and events related to specific commitments (including projects led by CSOs or donor organizations) from the PoC or responsible agencies, could improve outreach. The government should also proactively publish information on the co-creation process and the implementation of commitments on the OGP website.¹⁴ Additionally, the government could open MSF meetings to all interested participants by announcing them in advance and requiring registration for in-person events. Future outreach could also target civil servants. Finally, the government could strengthen transparency and public engagement through regular (e.g., quarterly) public reporting, such as press conferences or interim implementation reports.

The IRM uses the OGP Participation and Co-Creations Standards to assess countries’ participatory practices throughout the action plan cycle.¹⁵ Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each standard.¹⁶ To ensure compliance with OGP’s Participation and Co-Creation Standards, the IRM recommends the Armenian government publish basic rules for stakeholder participation in the co-creation and implementation processes. Preferably, these rules should clarify the current mandate, composition, and structure of Armenia’s multistakeholder space.

Table 2. Compliance with Minimum Requirements

Minimum requirement	Co-creation	Implementation
1.1 Space for dialogue: There is no formal OGP working group, as in previous action plan cycles. CSOs involved in the previous action plan continued their participation in MSF meetings, and new CSOs joined. The PoC has noted that an informal MSF format has been more productive and flexible, fostering better engagement and participation. The application to join the MSF is available on Armenia’s OGP website. ¹⁷ However, neither the application form, social media posts, nor the OGP website include information on the rules of participation in the MSF or its current membership. OGP’s Participation and Co-creation Standards require the basic rules on participation in the member country’s space for dialogue to be public. MSF meetings occurred in July 2023 and November 2024. ¹⁸ Additionally, a public event was held in February 2023, engaging the MSF and open to wider civil society and international organizations. ¹⁹ In July 2024, the government stakeholders met to discuss progress of the commitments. ²⁰	No	No

2.1 OGP website: The government maintains the official OGP website (https://ogp.gov.am/) where general information on OGP, the previous and current action plans, the working group, and more is available (in English and Armenian). There is no need to register to access the website. The government also maintains an official OGP Armenia Facebook page.	Yes	Yes
2.2 Repository: The official OGP Armenia Facebook page was regularly updated, including with information regarding commitment implementation. The official OGP website presents the current action plan and commitments, with space allocated for information on each commitment's milestones, including the milestone's description and status. ²¹ At the end of the implementation period, the website had information on the implementation of one commitment in the fifth action plan with a link to further information. For the other commitments, only the status was given with no additional details on implementation. ²²	Yes	Yes
3.1 Advanced notice: See the Action Plan Review ²³	Yes	Not applicable
3.2 Outreach: See the Action Plan Review	Yes	Not applicable
3.3 Feedback mechanism: See the Action Plan Review	Yes	Not applicable
4.1 Reasoned response: See the Action Plan Review	Yes	Not applicable
5.1 Open implementation: During the implementation phase, the government met with civil society stakeholders in February 2023 to present the action plan and collect suggestions on better implementation. They met again in July 2023 and November 2024 to present implementation process. ²⁴ Civil society stakeholders could ask questions and provide comments on further steps. Additionally, the government, civil society, and international organizations conducted local and national level events concerning specific commitments to discuss the issues and gaps in the given area, consult on draft documentation, and raise awareness on the results.	Not applicable	Yes

¹ Prime Minister of the Republic of Armenia, “ՀՀ ՎԱՐՉԱՊԵՏԻ ՈՐՈՇՈՒՄԸ ՀՀ ՎԱՐՉԱՊԵՏԻ 2018 ԹՎԱԿԱՆԻ ՄԱՅԻՄԻ 25-Ի Ռ 564-Լ ՈՐՈՇՄԱՆ ՄԵՋ ՓՈՓՈԽՈՒԹՅՈՒՆՆԵՐ ԵՎ ԼՐԱՑՈՒՄՆԵՐ ԿԱՏԱՐԵԼՈՒ ՄԱՍԻՆ” [Decision Of The Prime Minister Of The RA On Amendments And Supplementations To Decision Of The Prime Minister Of The Ra Of May 25, 2018 N 564-L], (ARLIS, 26 Dec. 2024), <https://www.arlis.am/DocumentView.aspx?docid=201524>.

² Lilya Afrikyan (Office of the Prime Minister), interview by IRM researcher, 22 Jan. 2025.

³ Open Government Partnership Armenia, “Join the Group” (accessed Apr. 2025), <https://ogp.gov.am/en/joining-the-group>.

⁴ “Open Government Partnership/Armenia, ԲԿԳ/Հայաստան” [Homepage], (Facebook, accessed Apr. 2025), <https://www.facebook.com/OpenGovernmentPartnershipArmenia/>.

⁵ Arm Gov, “«Բաց կառավարման գործընկերություն-Հայաստան» նախաձեռնությունը հանրությունից առաջարկներ է սպասում» [The “Open Government Partnership-Armenia” Initiative Is Waiting for Proposals from the Public] (YouTube, 6 Dec. 2021), <https://www.youtube.com/watch?v=RpWBU7E5gM0&t=18s>.

⁶ For Facebook posts about the meetings, see Kolba Lab, “Kolba Lab’s Post” (Facebook, 6 Dec. 2021), <https://www.facebook.com/KolbaLab/posts/pfbid02dKwubHcHpGV9eoGK1twjcAXQoY8a5f9Rku3EJRsdDY0y9ySK8EXZvDeDdN26Vo8I>; Armavir Development Center, “Արմավիրի զարգացման կենտրոն / Armavir Development Center’s Post” (Facebook, 8 Mar. 2022), <https://www.facebook.com/armavirdc/posts/pfbid0zr1bKSqLrRWxrKC5q6etA9KZQVU1haTgugm5yTVJ4XLafPXUUA1msdUZrYG55BzYI>; Open Government Partnership/Armenia, ԲԿԳ/Հայաստան, “Open Government Partnership/Armenia, ԲԿԳ/Հայաստան’s Post” (Facebook, 9 Mar. 2022), <https://www.facebook.com/OpenGovernmentPartnershipArmenia/posts/pfbid02JEuQ7fHXZ3274gtM1VnAfaVeR8CTdx7DwMvj>

[o7umkx2aLviJvGwNy3msc79WxEx7l](https://www.facebook.com/OpenGovernmentPartnershipArmenia/posts/pfbid0kfedEWTx2sYyNtUXCjo8GA3vFPBxHttydsbuBvzZFCrd5tyDNajyM5trTGJijYdXl); Open Government Partnership/Armenia, ԲԿԳ/Հայաստան, “Open Government Partnership/Armenia, ԲԿԳ/Հայաստան's Post” (Facebook, 11 Mar. 2022), <https://www.facebook.com/OpenGovernmentPartnershipArmenia/posts/pfbid0kfedEWTx2sYyNtUXCjo8GA3vFPBxHttydsbuBvzZFCrd5tyDNajyM5trTGJijYdXl>; Open Government Partnership/Armenia, ԲԿԳ/Հայաստան, “Open Government Partnership/Armenia, ԲԿԳ/Հայաստան's Post” (Facebook, 17 Mar. 2022), <https://www.facebook.com/OpenGovernmentPartnershipArmenia/posts/pfbid0vmnckE8NbGwK96xMfUjt2eRVPtau5tGh5UrgCyyviGTvsq1kjGU9YrWamXP9nvlfl>.

⁷ Armenian Lawyers' Association, “Online Discussion in the Format of Public-Private Dialogue within the Framework of the Development of the 5th Open Government Partnership (OGP) National Action Plan: Public Integrity, Public Procurement” (11 May 2022), <https://armla.am/en/7352.html>; Armenian Lawyers' Association, “Public-Private Dialogue on Public Communication Strategy and Introduction of e-Justice Tools” (17 May 2022), <https://armla.am/en/7355.html>; Armenian Lawyers' Association, “Digital Signing of Employment Contracts and Implementation of “Barev Balik” (Hello Child) Information Platform: Online Discussion in the Format of Public-Private Dialogue” (24 May 2022), <https://armla.am/en/7358.html>; Armenian Lawyers' Association, “Development of Participatory Mechanisms in the Budgeting Process and Interoperability of Existing and Planned Registers with Regard to Beneficial Owners: Online Discussion in the Format of Public-Private Dialogue” (30 May 2022), <https://armla.am/en/7361.html>.

⁸ Office of the Prime Minister, “On the Approval of the Action Plan of the Republic of Armenia for 2022–2024 within the ‘Open Management Partnership’ Initiative” (Unified Website for Publication of Draft Legal Acts, 18 May 2022), <https://www.e-draft.am/en/projects/4581/>; Office of the Prime Minister, “ՀԱՅԱՍՏԱՆԻ ՀԱՆՐԱՊԵՏՈՒԹՅԱՆ ԿԱՌԱՎԱՐՈՒԹՅԱՆ 2022 ԹՎԱԿԱՆԻ ՀՈՎՏԵՄԲԵՐԻ 6-Ի N 1568-Լ ՈՐՈՇՄԱՆ ՄԵՋ ՓՈՓՈԽՈՒԹՅՈՒՆ ԿԱՏԱՐԵԼՈՒ ՄԱՍԻՆ” [On Amendments to Decision N 1568-L of the Government of the Republic of Armenia of October 6, 2022], (Unified Website for Publication of Draft Legal Acts, 15 Sep. 2023), <https://www.e-draft.am/projects/6189>.

⁹ Tatevik Margaryan, *Armenia Action Plan Review 2022-2024* (Open Government Partnership, 15 Jun. 2023), <https://www.opengovpartnership.org/documents/armenia-action-plan-review-2022-2024/>.

¹⁰ Open Government Partnership/Armenia, ԲԿԳ/Հայաստան, “Open Government Partnership/Armenia, ԲԿԳ/Հայաստան's Post's Post” (Facebook, 8 Feb. 2023), <https://www.facebook.com/OpenGovernmentPartnershipArmenia/posts/pfbid0cMpmnHMM2Jz8A6SHnaoVEhbJEttAjtUz38bcJGxvCdymzTKXTigLQVBxBdLqMJnl>; Open Government Partnership/Armenia, ԲԿԳ/Հայաստան, “Open Government Partnership/Armenia, ԲԿԳ/Հայաստան's Post's Post” (Facebook, 25 Jul. 2023), <https://www.facebook.com/OpenGovernmentPartnershipArmenia/posts/pfbid0yhpBhni77nRn5JFZyZT31XZ7zMRv1acaCffPhxqf8SPkmtWNmSz8TWu7xBcLovYl>; Open Government Partnership/Armenia, ԲԿԳ/Հայաստան, “Open Government Partnership/Armenia, ԲԿԳ/Հայաստան's Post's Post” (Facebook, 8 Nov. 2024), <https://www.facebook.com/OpenGovernmentPartnershipArmenia/posts/pfbid02JyMiTop4QifCtZQ7vyq2MZwesaPbe8vPVB4rQPmrESE8yWAYY5RjwG7yHqN98r17l>; OGP Armenia, “OGP MSF meeting 21.07.2023” (YouTube, 25 Jul. 2023), https://www.youtube.com/watch?v=HEeagg_puZs.

¹¹ Freedom of Information Center of Armenia, “69. Advanced Access to Information and Beneficial Ownership Transparency in Armenia” (30 Nov. 2023), <https://foi.am/en/completed-foica-projects/4703>.

¹² Armenian Lawyers' Association, “Multi-Faceted OGP Action: Open Justice & Anti-Corruption Commitments on E- Courts & Gift Registry” (13 Dec. 2023), <https://armla.am/en/8022.html>.

¹³ Armenian Center for Socio-Economic Studies, “Citizen's Budget 2024 (EU OGP)” (accessed Apr. 2025), <https://www.acses.am/citizens-budget-2024-eu-ogp/>.

¹⁴ Naira Arakelyan (Armavir Development Center), interview by IRM researcher, 24 February 2025; Sona Ayyazyan (Transparency International Anticorruption Center), interview by IRM researcher, 6 Feb. 2025; Arpine Hakobyan (NGO Center), interview by IRM researcher, 26 Feb. 2025.

¹⁵ Open Government Partnership, “OGP Participation and Co-Creation Standards” (24 Nov. 2021), <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>.

¹⁶ Open Government Partnership, “IRM Guidelines for the Assessment of Minimum Requirements” (31 May 2022), https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf.

¹⁷ Open Government Partnership Armenia, “Join the Group.”

¹⁸ Open Government Partnership/Armenia, ԲԿԳ/Հայաստան, “Open Government Partnership/Armenia, ԲԿԳ/Հայաստան's Post's Post” (Facebook, 25 Jul. 2023); Open Government Partnership/Armenia, ԲԿԳ/Հայաստան, “Open Government Partnership/Armenia, ԲԿԳ/Հայաստան's Post's Post” (Facebook, 8 Nov. 2024).

¹⁹ Open Government Partnership/Armenia, ԲԿԳ/Հայաստան, “Open Government Partnership/Armenia, ԲԿԳ/Հայաստան's Post's Post” (Facebook, 8 Feb. 2023).

²⁰ The Government of the Republic of Armenia, “Պաշտոնական լրահոս: Կայացել է «Բաց կառավարման գործընկերություն» նախաձեռնության պետական համակարգի մարմինների մասնակցությամբ նիստը” [Official

News Feed: A meeting of the "Open Governance Partnership" initiative with the participation of state bodies was held], (31 Jul. 2024), <https://www.gov.am/am/news/item/15935>.

²¹ Open Government Partnership Armenia, "OGP-Armenia National Action Plan 2022-2024" (18 May 2022), <https://ogp.gov.am/en/ongoing-action-plan/«բաց-կառավարման-գործընկերություն»-նախաձեռնության-շրջանակներում-հայաստանի-հանրապետության-2022-2024-թ.>

²² Open Government Partnership Armenia, "Action Plans, 1. Formation of legislative framework defining Data policy" (Jan. 2024), <https://ogp.gov.am/en/commitments/27>.

²³ Margaryan, *Armenia Action Plan Review 2022-2024*.

²⁴ Open Government Partnership/Armenia, ԲԿԳ/Հայաստան, "Open Government Partnership/Armenia, ԲԿԳ/Հայաստան's Post's Post" (Facebook, 8 Feb. 2023); Open Government Partnership/Armenia, ԲԿԳ/Հայաստան, "Open Government Partnership/Armenia, ԲԿԳ/Հայաստան's Post's Post" (Facebook, 25 Jul. 2023); Open Government Partnership/Armenia, ԲԿԳ/Հայաստան, "Open Government Partnership/Armenia, ԲԿԳ/Հայաստան's Post's Post" (Facebook, 8 Nov. 2024).

Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.¹

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.² The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objectives, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The Early Results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
 - improving practices, policies, or institutions governing a policy area or within the public sector; or
 - enhancing the enabling environment to build trust between citizens and the state.

- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
 - improving practices, policies, or institutions governing a policy area or within the public sector; or
 - enhancing the enabling environment to build trust between citizens and the state.
- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
 - improving practices, policies, or institutions governing a policy area or within the public sector; or
 - enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show that clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Tatevik Margaryan and was reviewed by Thomas Kalinowski, IRM external expert. The IRM methodology, quality of IRM products, and review process is overseen by the IRM's International Experts Panel (IEP).³ For more information, refer to IRM webpage⁴ or the glossary of IRM and OGP terms.⁵

¹ For definitions of OGP terms, such as co-creation and promising commitments, see "OGP Glossary," <https://www.opengovpartnership.org/glossary/>.

² The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses "Potential for Results" and "Early Results" at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.

³ Open Government Partnership, Independent Reporting Mechanism, "International Experts Panel" (accessed Apr. 2025), <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/>.

⁴ Open Government Partnership, "IRM Overview" (accessed Apr. 2025), <https://www.opengovpartnership.org/irm-guidance-overview/>.

⁵ Open Government Partnership, "OGP Glossary" (accessed Apr. 2025), <https://www.opengovpartnership.org/glossary/>.

Annex I. Commitment Data¹

Commitment 1: Legislative framework on Data Policy

- | | |
|---|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Substantial | <ul style="list-style-type: none"> • Completion: Substantial • Early results: No Notable Results |
|---|--|

Under this commitment, the government planned to adopt a unified data management policy to govern all state-held information and define an open data policy. According to the amended action plan, the government planned to develop two legal acts on data policy: the Law on Freedom of Information and Public Information (regulating main aspects of data management and access to data) and the Law on Cyber Security (creating a cyber-safe environment for information systems). The commitment aimed to set clear regulations for publishing state-held information and ensure government compliance with open data principles.

The government studied international practices and developed draft laws and amendments to relevant legislation. The draft package was discussed with CSOs, media organizations, and experts, and published on the e-draft platform for public consultation.² The draft Law on Freedom of Information and Public Information, which aimed to replace the current Law on Freedom of Information, was published for consultation in December 2023.³ Civil society criticized the draft as potentially limiting freedom of information.⁴ Following these concerns, the Office of the Prime Minister, in collaboration with the Ministry of High-Tech Industry, organized public consultations in January–February 2024.⁵ The CSOs concerns were taken into account in a revised draft Law on Public Information, which covers only the legal relations related to information management. The draft regulates the collection, processing, and use of public information through an open data policy, the creation, management, and accessibility of databases, as well as respective oversight mechanisms. It provides the concept of a unified state information system, where the information holders input information and use it exclusively in the scope of their functions. The draft law also sets an authorized body that will be coordinating the maintenance and oversight of the system.⁶

The Ministry of High-Tech Industry also developed a draft Law on Cybersecurity and amendments for relevant legislation. The draft defines the procedure for detection, notification, prevention, and resolution of cyber incidents in information systems and key information infrastructure providing vital services. It also identifies the state administration bodies responsible for cybersecurity and the scope of their powers, including control over compliance with the law and cybersecurity audits. The draft was published for public consultation in March 2024.⁷

Neither draft was adopted by the end of the implementation period. Thus, the last milestone of the commitment remains incomplete. The main reason for the delay, according to a government representative, is ongoing internal discussion on the status of the authorized body in public information and cybersecurity, as establishing an independent body will require subsequent major changes in legislation.⁸

At the time of writing this report, this commitment has not yet achieved major results, pending the approval and implementation of the legislation. According to the representative of the responsible agency, once adopted, the law will play a key role in data digitalization, and introduce a major shift in transparency of state-held information, as any information that is not classified will be proactively published in open-data format for public use.⁹ However, civil society stakeholders argue that such a reform will take years to implement, given that state administration bodies have yet to fully comply with the disclosure requirements of the current law, covering specific categories of information. Some stakeholders also raised concerns about the lack of active communication and discussions with civil society regarding the open-data legislation following the publication of the draft in March 2024.¹⁰ Though the draft received over 20 comments on the e-draft platform and the government indicated that some of these suggestions were accepted, no public information has yet been provided on the revised version. In November 2024, several media organizations issued a statement highlighting their concerns about the draft.¹¹ An area expert involved in drafting the statement noted that while the government was open to discussions and suggestions, certain issues remained unresolved—particularly those related to potential restrictions on access to information and risks of violating personal data protection principles.¹² At the same time, CSOs emphasize the importance of introducing data legislation, recognizing its potential to enhance transparency, improve the quality of government-held data, and facilitate more effective access to information and monitoring efforts.¹³

The IRM recommends maintaining an open dialogue with civil society and the media while finalizing the legislative process. Given the critical role of the data legislation in enhancing transparency and access to public information, authorities could address outstanding concerns regarding potential restrictions on information access and personal data protection. In parallel, the government could focus on improving the implementation capacity of public institutions, including standardizing government websites, fully disclosing the data required by the Law on Access to Information, and ensuring compliance with open data principles.

Commitment 2: State strategic communication architecture

- | | |
|--|--|
| <ul style="list-style-type: none">• Verifiable: Yes• Does it have an open government lens? Yes• Potential for results: Modest | <ul style="list-style-type: none">• Completion: Substantial• Early results: Significant Results |
|--|--|

This commitment is assessed in Section II above.

Commitment 3: Self-assessment system in the freedom of information

- | | |
|--|---|
| <ul style="list-style-type: none">• Verifiable: Yes• Does it have an open government lens? Yes• Potential for results: Modest | <ul style="list-style-type: none">• Completion: Substantial• Early results: Moderate Results |
|--|---|

The commitment introduced and piloted a system for self-assessment in the field of freedom of information. Three state administration bodies were selected for the pilot: the Office of the Prime Minister, the Ministry of Economy, and the Ministry of Labor and Social Affairs (MLSA).

The Freedom of Information Center of Armenia (FOICA), a CSO specializing in access to information, developed a self-assessment guide and toolkit. This resource includes a methodology for self-assessment and a set of indicators based on legal requirements related to freedom of information.¹⁴ FOICA introduced the guide to the pilot agencies and facilitated their self-assessment through dedicated workshops.¹⁵ These activities were supported by the EU-funded “EU for Integrity” Program for the Eastern Partnership. The pilot agencies published annual statistics on information requests using a standard template from FOICA.¹⁶

According to a representative of a pilot agency, the self-assessment facilitated internal discussions on access to information, enabled agencies to compile an inventory of available data, and helped identify systemic gaps that require broader solutions.¹⁷ However, the results of the self-assessments have not been made public. Stakeholders noted that this decision was based on the view that the process serves as an internal self-reflection tool rather than a mechanism for external accountability.¹⁸ The government plans to recommend the self-assessment guide and the publishing of freedom of information statistics in a single format to all public administration bodies.¹⁹

The commitment achieved moderate early results by piloting self-assessment and fostering discussions on improving access to information. However, tangible outcomes in freedom of information have yet to materialize. To ensure meaningful progress, the government could actively engage civil society in improving access to information. Moving forward, stakeholders could continue assisting government agencies in scaling up the self-assessment practices and address systemic issues identified during the pilot.

Commitment 4: Participatory mechanisms in the budgeting process

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| <ul style="list-style-type: none">• Verifiable: Yes• Does it have an open government lens? Yes• Potential for results: Modest | <ul style="list-style-type: none">• Completion: Limited• Early results: Moderate Results |
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The commitment aimed to address the low level of public participation in the national budgeting process. It aimed to create a unified platform of draft budgets from state administration bodies, enabling citizens to provide input during budget drafting.

Before the commitment, government agencies posted their draft budget proposals on their websites and invited public input before submitting them to the government. This practice continued through the implementation period. As part of the commitment, the Ministry of Finance established a page on its website dedicated to participative budgeting. The page provides the opportunity to download draft budgets from all government agencies, including ministries, committees, commissions, the Human Rights Defender’s Office, and regional governance bodies, as well as links to announcements of public consultation on draft budgets published by respective agencies. If the agencies collected proposals from the public, the page provides summaries of those proposals and feedback on their inclusion.²⁰ The Ministry of Finance collects and posts this information based on the data from government agencies. As of February 2025, the page included information on budget drafts for 27 out of 32 government agencies and all 10 regional governments. However, only five agencies published collected proposals, while the remaining agencies reported receiving none.²¹

As the commitment envisioned an interactive platform for budget consultations, the Ministry of Finance developed a terms of reference (ToR) and engaged donors to get support.²² Due to a lack of funding, the platform was not developed within the implementation period.

The IRM assesses the early results of the commitment as moderate. The current webpage serves as a centralized repository of budget-related information, increasing transparency but not significantly enhancing public participation. A key limitation of the existing system is that information on budget discussions is published post-fact. As a result, stakeholders must still visit individual agency websites to track discussions and submit timely feedback. A civil society representative working on budgeting noted that the platform should include interactive features, such as direct commenting, subscription options, and simplified summaries of draft budgets to encourage broader public engagement.²³

The Ministry of Finance provided a manual on organizing discussions (developed before the action plan) and maintains communication with agencies to remind them about budget consultation requirements and offer support. In the framework of the Open Door Grant under OGP's EU For Integrity Programme, the Armenian Center for Socio-Economic studies (ACSES) implemented the "Citizen's Budget 2024: A More Informed and Active Citizen" project. ACSES produced infographics, videos, and TV reports on the state budget of 2024 and together with the Ministry of Finance of Armenia prepared the 2024 Citizen's Budget. ACSES reported that about 1.5 million people have seen at least one of their publications and the infographics on the MoF and ACSES Facebook pages reached 2.6 million cumulative impressions.²⁴ Other donor-funded initiatives have also improved public awareness on and engagement in budgeting, such as the USAID Public Finance Management Project, supporting the Ministry of Labor and Social Affairs in enhancing budget transparency and accountability to the public,²⁵ and the EU-funded Budgets 4 Citizens (B4C) program aimed at providing publicly accessible budgetary information.²⁶

As a next step, the government is exploring options for establishing a more interactive and user-friendly public participation platform. Apart from this platform, civil society and government stakeholders emphasize the need to strengthen CSOs' capacity and motivation to engage more proactively and effectively in budgetary discussions.²⁷

Commitment 5: Participatory budgeting at the local level

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| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Complete • Early results: Significant Results |
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This commitment is assessed in Section II above.

Commitment 6: Access to cartographic spatial data and metadata

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| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Limited • Early results: Moderate Results |
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The commitment aimed to create a national geodesy portal, which would allow the public to search and analyze cartographic spatial data and metadata from various state bodies.²⁸ The portal would cover immovable property, surface waters, forests, protected areas, agriculture, climate, infrastructure, and historical and cultural monuments, among other elements, and provide free-of-charge access to data with some exceptions.

The Law “On Spatial Data” was adopted in January 2023, regulating the collection, management, and processing of spatial data (information about the location, appearance, size, and other properties of spatial objects). The law requires spatial data be made available to interested parties and outlines a fee structure with exemptions for certain users like research and higher educational institutions. At the same time, the law mentions that the geoportal of spatial data shall be freely accessible to the public with the possibility for search, view, and download. It shall include information about the main characteristics of spatial objects, possibility to process data for registered users, as well as metadata (details about the content, quality, and conditions of spatial data).²⁹ At the time of writing this IRM Results Report, the geoportal provides a country map that allows users to view the outlines and satellite images of spatial objects, along with their cadastral numbers where available.³⁰ Users can also measure the size of objects. However, the most recent map update is from 2014.

While stakeholders acknowledge that the geoportal's functionality has improved, they highlight significant limitations. The platform does not provide key details such as property addresses, coordinates, or other essential information needed for investigations or monitoring. As a result, users still must pay to access detailed property information on the e-cadastre website.³¹ The IRM recommends making at least basic information on land, water, property, and other data publicly available and free.

Commitment 7: Registry of gifts for public officials

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| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Substantial • Early results: Moderate Results |
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This commitment is assessed in Section II above.

Commitment 8: Comprehensive system of electronic procurement

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| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Limited • Early results: No Notable Results |
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This commitment aimed to merge all public procurement-related systems into a single platform where procurement information will be published free of charge and automatically, thereby complying with open-data standards.

The commitment saw limited completion and no notable results, as the procurement platform was not ready by the end of the implementation period. The primary cause of the delay was the postponed Government Finance Management Information System (GFMIS), originally

intended to include the e-procurement platform.³² Due to this delay, the procurement platform was separated from the GFMIS, and a tender for the platform was announced on the public procurement website in April 2024.³³ Four applicants passed the pre-selection stage, followed by negotiations with each candidate in the second half of 2024. The remaining milestones, including contractor selection and contract execution, are expected to be completed by April 2025.³⁴

In 2023, the Ministry of Finance consulted with stakeholders—including public administration and local government bodies, media, CSOs, and businesses—on the platform's ToR.³⁵ The Ministry communicated the revised ToR and invited stakeholders to participate in negotiations with potential contractors.³⁶ CSO representatives praised the Ministry's attention to each suggestion and willingness consider them during the ToR development, as well as its communication throughout the process.³⁷ Although beyond the commitment's initial scope, the Ministry initiated a government decision to allow CSOs and media representatives to oversee implementation of public procurement contracts, provided they obtained certification from the Ministry of Finance.³⁸ As of November 2024, 10 CSOs and one media outlet had received certification for this oversight role.³⁹ Enlarging the possibilities of public oversight over procurement contracts might help build civil society's expertise and encourage greater use of the e-procurement platform.

Moving forward, the government should ensure the timely and smooth development of the platform once a contractor is selected. The government could also continue to involve civil society in both the platform's design and contract oversight to enhance public trust and accountability. Adhering to open-data standards and ensuring the platform is user-friendly would maximize its impact on procurement transparency. Raising awareness and building the capacity of civil servants and other stakeholders will be critical to ensure effective use of the platform.

Commitment 9: “e-Court-statistics” statistical analytical tool

<ul style="list-style-type: none">• Verifiable: Yes• Does it have an open government lens? Yes• Potential for results: Modest	<ul style="list-style-type: none">• Completion: Limited• Early results: No Notable Results
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The commitment aimed to publish judicial proceeding statistics via the Electronic Justice (e-justice) system, enabling users to conduct statistical analyses on judicial processes starting from the pretrial stage. This initiative was expected to enhance public oversight and support the government in evidence-based judicial reforms.

The commitment's implementation was limited. USAID/Armenia Justice Sector Support Project supported a study on best practices of judicial statistical tools in comparable countries.⁴⁰ The Armenian Lawyers' Association (ALA) organized focus group discussions in partnership with the CSO Anti-Corruption Coalition of Armenia under the EU-funded “Multi-Faceted OGP Action: Open Justice & Anti-Corruption Commitments” Program to identify current problems and recommendations.⁴¹ Additionally, ALA analyzed the capabilities of existing digital business processes and statistical tools, in line with the second milestone of the commitment.⁴²

Subsequent milestones, such as developing the necessary legislation and software, were not

achieved due to the absence of the e-justice system, which would serve as the foundation for the statistical module. The EU-funded TA project, “Development and Introduction of E-justice Solutions in Armenia” (2021–2023),⁴³ contracted a developer for the system, but it was not completed by the project’s end. According to a representative of the donor organization, the lack of coordination both from the contractor and the government, as well as frequent management changes in public institutions limited the completion.⁴⁴ Technical challenges remain, including deficiencies in existing court electronic systems, interoperability between digital platforms, and the need for manual data entry in parts of the justice system.⁴⁵

Currently, the Ministry of Justice, in collaboration with the Information Systems Agency, is assessing system needs to determine the next steps.⁴⁶ Civil society stakeholders recommend starting with a roadmap for modernizing judicial performance measurement and evaluation, incorporating statistical tools as a key mechanism for assessing judicial efficiency, planning, and management, drawing on Estonia’s experience.⁴⁷

Commitment 10: Electronic system of employment contracts

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| <ul style="list-style-type: none">• Verifiable: Yes• Does it have an open government lens? No• Potential for results: Modest | <ul style="list-style-type: none">• Completion: Limited• Early results: No Notable Results |
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The commitment aimed to introduce electronic labor contracts for public and private sector employees. The contracts will be accessible on a single platform to employers and employees, to the Health and Labor Inspection Body, and to the State Revenue Committee, which will help protect employee rights, reduce shadow employment, and enable the Health and Labor Inspection Body proactively to identify possible violations of labor rights.

The Ministry of Labor and Social Affairs developed draft amendments to the Labor Code and the Law on Audiovisual Media, which provided for the introduction of a digital system for employment contracts. Several public consultations and awareness-raising activities on the draft package were carried out (including media publications, videos on YouTube, community townhalls, and expert discussions).⁴⁸ The amendments to the Labor Code were adopted in December 2024 and will take effect in July 2025. Under these amendments, beginning in January 2026, employers will be required to sign employment contracts—including commencement, amendment, and termination—through a digital system, with voluntary use starting in July 2025.⁴⁹ In 2025, after the implementation period, the Ministry of Labor and Social Affairs published a draft resolution that establishes the requirements for the digital system of employment contracts, the procedures for providing access to the data and concluding employment contracts through the system, and the authorized body managing the system.⁵⁰ Civil society stakeholders emphasize the need for an independent body to manage the system, ensuring that oversight authorities access only necessary information within their legal mandates. They mention potential risks of unauthorized access, data leaks, or misuse, and the lack of clear safeguards and responsibilities for protecting personal and confidential information.⁵¹ The responsible Deputy Minister mentioned that these risks were mitigated to the extent possible, including by limiting and tracking access of state servants to the contracts database.⁵²

The commitment does not have clear open government lens because it does not advance one

of the OGP values of transparency, public accountability, or civic participation. However, in the long term, the digital platform will allow more effective and timely collection and publication of statistical information on labor-related data by the State Committee of Statistics and relevant state agencies (Ministry of Labor and Social Affairs—MLSA, Ministry of Economy, and Health and Labor Inspection Body). As next steps, the MLSA is considering revising the statistical fields on labor-related data and discussing automated risk assessment mechanisms to facilitate the work of the Health and Labor Inspection. If completed, these steps would increase the scope of statistical information and enhance the accountability of the Inspection Body.

¹ Editorial notes:

1. For commitments that are clustered, the assessment of potential for results and early results is conducted at the cluster level, rather than the individual commitment level.
2. Commitments' short titles may have been edited for brevity. For the complete text of commitments, *please see* The Government of the Republic of Armenia,, *Action Plan of Open Government Partnership Initiative of the Republic of Armenia for 2022–2024*, Annex to the Decision of the Government of the Republic of Armenia N 1958-L of November 9th 2023, (Open Government Partnership, 9 Nov. 2023), https://www.opengovpartnership.org/wp-content/uploads/2022/10/Armenia_Action-Plan_2022-2024_Dec_Amended_EN.pdf. For more information on the assessment of the commitments' design, see Independent Reporting Mechanism, *Armenia Action Plan Review 2022-2024* (Open Government Partnership, 15 Jun. 2023), <https://www.opengovpartnership.org/documents/armenia-action-plan-review-2022-2024/>.

² Artyom Mesropyan (Ministry of High-Tech Industry), interview by IRM researcher, 31 Jan. 2025.

³ Ministry of High-Tech Industry, “ՏԵՂԵԿԱՏՎՈՒԹՅԱՆ ԱԶՏԱՌԻԹՅԱՆ ԵՎ ՀԱՆՐԱՅԻՆ ՏԵՂԵԿՈՒԹՅՈՒՆՆԵՐԻ ՄԱՍԻՆ” [On Freedom of Information and Public Information], (Unified Website for Publication of Draft Legal Acts, 4 Jan. 2024), <https://www.e-draft.am/projects/6657>.

⁴ CSO Meter, “Armenia: Draft law on access to information criticised by CSOs” (European Center for Not-for-Profit Law Stichting, 30 Jan. 2024), <https://csometer.info/updates/armenia-draft-law-access-information-criticised-csos>.

⁵ ՀՀ կառավարություն, “ՀՀ կառավարություն’s Post” (Facebook, 19 Jan. 2024), <https://www.facebook.com/armgovernment/posts/pfbid0285afrVrklzJCM28K3ncZYDYDKzvYVxbZCNrjoGFFjuwz7zMEuzhxXVS AhUfJPVwki>; The Ministry Of High-Tech Industry Of The Republic Of Armenia, “The second working meeting was held on the amendments to the draft laws” (12 Feb. 2024), <https://hightech.gov.am/en/tegekatvakan-kentron/ayl/norutyunner/draft-law-on-information>.

⁶ Unified Website for Publication of Draft Legal Acts, “«ՀԱՆՐԱՅԻՆ ՏԵՂԵԿՈՒԹՅՈՒՆՆԵՐԻ ՄԱՍԻՆ» ՀԱՅԱՍՏԱՆԻ ՀԱՆՐԱՊԵՏՈՒԹՅԱՆ ՕՐԵՆՔԻ ԵՎ ՀԱՐԱԿԻՑ ՕՐԵՆՔՆԵՐՈՒՄ ՓՈՓՈԽՈՒԹՅՈՒՆՆԵՐ ԵՎ ԼՐԱՅՈՒՄՆԵՐ ԿԱՏԱՐԵԼՈՒ ՄԱՍԻՆ» [On the Law of the Republic of Armenia on Public Information and Amendments and Additions to the Related Laws], (12 Mar. 2024), <https://www.e-draft.am/projects/6936/about>.

7 Unified Website for Publication of Draft Legal Acts, “«ԿիբեռնԱնվճԱՆԳՈՒԹՅԱՆ ՄԱՍԻՆ», «ԱՆՁՆԱԿԱՆ ՏՎՅԱԼՆԵՐԻ ՊԱՇՏՊԱՆՈՒԹՅԱՆ ՄԱՍԻՆ» ՕՐԵՆՔՈՒՄ ՓՈՓՈԽՈՒԹՅՈՒՆ ԿԱՍԱՐԵԼՈՒ ՄԱՍԻՆ», «ԷԼԵԿՏՐՈՆԱՅԻՆ ՓԱՍՏԱԹՂԹԻ ԵՎ ԷԼԵԿՏՐՈՆԱՅԻՆ ԹՎԱՅԻՆ ՍՏՈՐԱԳՐՈՒԹՅԱՆ ՄԱՍԻՆ» ՕՐԵՆՔՈՒՄ ՓՈՓՈԽՈՒԹՅՈՒՆ ԿԱՍԱՐԵԼՈՒ ՄԱՍԻՆ», «ԱԶԳԱՅԻՆ ԱՆՎՃԱՆԳՈՒԹՅԱՆ ՄԱՐՄԻՆՆԵՐԻ ՄԱՍԻՆ» ՕՐԵՆՔՈՒՄ ՓՈՓՈԽՈՒԹՅՈՒՆՆԵՐ ԵՎ ԼՐԱՅՈՒՄՆԵՐ ԿԱՍԱՐԵԼՈՒ ՄԱՍԻՆ, ԶԿԱՐԶԱԿԱՆ ԻՐԱՎԱՄԱԽՏՈՒՄՆԵՐԻ ՎԵՐԱԲԵՐՅԱԼ ՀԱՅԱՍՏԱՆԻ ՀԱՆՐԱՊԵՏՈՒԹՅԱՆ ՕՐԵՆՍԳՐՔՈՒՄ ԼՐԱՅՈՒՄՆԵՐ ԿԱՍԱՐԵԼՈՒ ՄԱՍԻՆ” [On Amendments To The Law "On Cybersecurity", "On Personal Data Protection", "On Amendments To The Law "On Electronic Document And Electronic Digital Signature", "On Amendments And Additions To The Law "On National Security Bodies", "On Amendments To The Code Of The Republic Of Armenia On Administrative Offences"], (23 Mar. 2024), <https://www.e-draft.am/projects/6970/about>.

⁸ Mesropyan, interview.

⁹ *Id.*

¹⁰ Sona Ayvazyan (Transparency International Anticorruption Center), interview by IRM researcher, 6 Feb. 2025; Shushan Doydoyan (Freedom of Information Center of Armenia), interview by IRM researcher, 21 Jan. 2025; Seda Muradyan (Public Journalism Club NGO), interview by IRM researcher, 7 Feb 2025.

- ¹¹ MediaLab, “Լրագրողական կազմակերպությունների հայտարարությունը «Հանրային տեղեկությունների մասին» օրենքի լրամշակված նախագծի վերաբերյալ” [Statement of media organisations on the revised draft Law on Public Information], (4 Nov. 2024), <https://medialab.am/290409/>.
- ¹² Gevorg Hayrapetyan (CyberHUB, dpHUB), interview by IRM researcher, 21 Feb. 2025.
- ¹³ Muradyan, interview; Ayvazyan, interview; Hayrapetyan, interview.
- ¹⁴ Freedom of Information Center of Armenia, “ATI Self-Assessment Toolkit” (9 Jul. 2023), <https://foi.am/en/books/32929>.
- ¹⁵ Freedom of Information Center of Armenia, “ATI self-assessment mechanisms: workshop with FOI officials took place” (1 Sep. 2023), <https://foi.am/en/news-events/12773>; Freedom of Information Center of Armenia, “The Implementation Phase of the ATI Self-Assessment system” (22 Nov. 2023), <https://foi.am/en/news-events/31960>; Freedom of Information Center of Armenia, “FOICA supported the Ministry of Labor and Social Affairs with the practical implementation of the FOI self-assessment mechanism” (15 Dec. 2023), <https://foi.am/en/news-events/33104>.
- ¹⁶ The Government of the Republic of Armenia, “Վիճակագրություն հարցումների վերաբերյալ” [Statistics on Inquiries], (accessed Apr. 2025), <https://www.gov.am/am/Statistics/>; Ministry of Labour and Social Affairs of the Republic of Armenia, “Տեղեկատվություն ստանալու հարցումների վիճակագրություն” [Statistics of information requests], (accessed Apr. 2025), <https://www.mlsa.am/statistic-information-requests>; Ministry of Economy, “ԱՄՓՈՓ ՏԵՂԵԿԱՏՎՈՒԹՅՈՒՆ ՀՀ ԷԿՈՆՈՄԻԿԱՅԻ ՆԱԽԱՐԱՐՈՒՅՈՒՅՈՒՆԻ ԿՈՂՄԻՑ 2023 ԹՎԱԿԱՆԻ ԸՆԹԱՑՔՐՈՄ ՍՈՒՑԱԾ ՏԵՂԵԿՈՒԹՅՈՒՆ ՍՈՒՆԱԼՈՒ ՀԱՐԳՈՒՄՆԵՐԻ ՎԵՐԱԲԵՐՅԱԼ” [Summary Information on information requests received by the RA Ministry of Economy in 2023] (accessed Apr. 2025), <https://mineconomy.am/media/27701/Ardir-harcum.pdf>.
- ¹⁷ Zaruhi Manucharyan (Ministry of Labor and Social Affairs), interview by IRM researcher, 13 Feb. 2025.
- ¹⁸ Lilya Afrikyan (Office of the Prime Minister), interview by IRM researcher, 22 Jan. 2025; Doydoyan, interview.
- ¹⁹ Afrikyan, interview.
- ²⁰ Ministry of Finance of the Republic of Armenia, “Բյուջետային տեղեկատվության հանրայնացում” [Public disclosure of budget information], (accessed Apr. 2025), https://minfin.am/hy/page/hy_government_list_1.
- ²¹ *Id.*
- ²² Ruzanna Gabrielyan (Ministry of Finance), interview by IRM researcher, 12 Feb. 2025.
- ²³ Haykaz Fanyan (Armenian Center for Socio-Economic Studies), interview by IRM researcher, 14 Feb. 2025.
- ²⁴ Armine Petrosyan (Armenian Center for Socio-Economic Studies), electronic communication with IRM researcher, 30 Apr. 2025.
- ²⁵ USAID Armenia, “USAID Armenia’s post”, (Facebook, 14 Nov. 2022), (accessed Jan. 2025), <https://www.facebook.com/USAIDArmenia/posts/495486675944310>.
- ²⁶ Budgets for Citizens, “‘Budget Knowledge-Sharing’ platform” (accessed Apr. 2025), <https://budgets.am/en/about-platform>.
- ²⁷ Afrikyan, interview; Gabrielyan, interview; Fanyan, interview.
- ²⁸ This initiative started before the action plan’s adoption and currently functions in pilot mode, with the possibility of viewing the map and catalog of metadata. See Geoportal.am, “ԱԶԳԱՅԻՆ ԳԵՈՊՈՐՏԱԼ” [National Geoportal], <https://geoportal.am/>.
- ²⁹ Republic of Armenia, “ՀՀ ՕՐԵՆՔԸ ՏԱՐԱԾԱԿԱՆ ՏՎՅԱԼՆԵՐԻ ՄԱՍԻՆ” [RA Law on Spatial Data], (ARLIS, 17 Jan. 2023), <https://www.arlis.am/DocumentView.aspx?DocID=174026>.
- ³⁰ The map view is available at: <https://maparmenia.am/>.
- ³¹ Gevorg Tosunyan (CivilNet), interview by IRM researcher, 6 Feb. 2025.
- ³² Ministry of Finance of the Republic of Armenia, “Digital Agenda, GFMIS project” (9 Jan. 2024), <https://minfin.am/en/page/gfmis/>.
- ³³ Ministry of Finance of the Republic of Armenia: Procurement System, “Գնումների հայտարարություններ” [Procurement Announcements], (16 Apr. 2024), https://gnumner.minfin.am/hy/page/erkpul_mrcuyti_nakhaorakavorman_haytararutyun/.
- ³⁴ Sergey Shahnazaryan (Ministry of Finance), interview by IRM researcher, 4 Feb. 2025.
- ³⁵ Ministry of Finance of the Republic of Armenia, “A public discussion of the technical task draft of the e-procurement system was held” (19 May 2023), https://minfin.am/en/content/a_public_discussion_of_the_technical_task_draft_of_the_e_procurement_system_was_held/; Ministry of Finance of the Republic of Armenia, “The technical task draft of the electronic procurement system was discussed with the representatives of the state departments” (22 May 2023), https://minfin.am/en/content/the_technical_task_draft_of_the_electronic_procurement_system_was_discussed_with_the_representatives_of_the_state_depart/; Ministry of Finance of the Republic of Armenia, “Public discussions of the technical task draft of the electronic procurement system last” (23 May 2023), https://minfin.am/en/content/public_discussions_of_the_technical_task_draft_of_the_electronic_procurement_system_last/.
- ³⁶ Shahnazaryan, interview; Ayvazyan, interview.
- ³⁷ Ayvazyan, interview; Arpine Hakobyan (NGO Center), interview by IRM researcher, 26 Feb. 2025.
- ³⁸ Government of the Republic of Armenia, “ՀՀ ԿԱՌԱՎԱՐՈՒԹՅԱՆ ՈՐՈՇՈՒՄԸ ՀՀ ԿԱՌԱՎԱՐՈՒԹՅԱՆ 2017 ԹՎԱԿԱՆԻ ՄԱՅԻՍԻ 4-Ի N 526-Ն ՈՐՈՇՄԱՆ ՄԵՋ ՓՈՓՈԽՈՒԹՅՈՒՆՆԵՐ ԵՎ ԼՐԱՅՈՒՄՆԵՐ ԿԱՏԱՐԵԼՈՒ

ՄԱՍԻՆ” [Decision of The Government of the RA on Amendments and Supplementations To Decision of The Government of the RA of May 4, 2017 N 526-N], (ARLIS, 23 May 2024), <https://www.arlis.am/DocumentView.aspx?docid=193122>.

³⁹ For a list of CSOs and media organizations exercising public oversight over the implementation of contracts, see <https://gnumner.minfin.am/website/images/original/13.11.2024.rtf>.

⁴⁰ Rubina Mkhitarian (Ministry of Justice), electronic communication with IRM researcher, 24 Jan. 2025.

⁴¹ Armenian Lawyers’ Association, “Focus Group Discussion on the Commitment ‘eCourt-statistics statistical analytical tool’ with the Participation of Representatives of State and Private Institutions, and CSOs” (24 Jan. 2024), <https://armla.am/en/8112.html>; Armenian Lawyers’ Association, “Transparency and Accountability with the Launch of the ‘eCourt-statistics’ Statistical Analytical Tool: Focus Group Discussion” (29 Jan. 2024), <https://armla.am/en/8150.html>; Armenian Lawyers’ Association, “3rd Focus Group Discussion on Commitment ‘eCourt-statistics’ Statistical Analysis Tool” (2 Apr. 2024), <https://armla.am/en/8330.html>; Armenian Lawyers’ Association, “The 4th Focus Group Discussion on the Commitment ‘eCourt-Statistics Statistical Analysis Tool’ was held” (8 Apr. 2024), <https://armla.am/en/8347.html>.

⁴² Armenian Lawyers’ Association, “‘Improvement of Legal Mechanisms for Judicial Statistics’ study” (16 Jul. 2024), <https://armla.am/en/9247.html>.

⁴³ The European Union For Armenia, “Development and Introduction of E-justice Solutions in Armenia” (14 Nov. 2023), <https://eu4armenia.eu/projects/eu-project-page/?id=1645>.

⁴⁴ Irina Movsesyan (EU Delegation to Armenia), electronic communication with IRM, 5 Mar. 2025.

⁴⁵ Mariam Zadoyan (Armenian Lawyers’ Association), interview by IRM researcher, 5 Feb. 2025; Rubina Mkhitarian (Ministry of Justice), electronic communication with IRM researcher, 24 Jan. 2025.

⁴⁶ Mkhitarian, interview.

⁴⁷ Armenian Lawyers’ Association, “‘Improvement of Legal Mechanisms for Judicial Statistics’ study.”

⁴⁸ Ruben Sargsyan (Ministry of Labor and Social Affairs), interview by IRM researcher, 28 Feb. 2025; Naira Arakelyan (Armavir Development Center), interview by IRM researcher, 24 Feb. 2025; Lurer, “Աշխատանքային պայմանագրերը կկնքվեն էլեկտրոնային եղանակով” [Employment contracts will be signed electronically], (YouTube, 12 Sep. 2024), <https://www.youtube.com/watch?v=nXJIAU221s>; Yerevan Today, “Բոլոր աշխատանքային պայմանագրերը կնքվելու են միայն թվային համակարգի միջոցով. Ռուբեն Սարգսյան” [All employment contracts will be conducted only through the digital system Ruban Sargsyan] (YouTube, 12 Sep. 2024), <https://www.youtube.com/watch?v=iCE8Y-4xzBY>; National Assembly of the Republic of Armenia, “Work discussion on employment contracts and charitable programs”, (11 Dec. 2023), http://www.parliament.am/news.php?do=view&cat_id=2&day=11&month=12&year=2023&NewsID=19823&lang=eng; National Assembly of the Republic of Armenia, “Քննարկվել են աշխատանքային պայմանագրերի էլեկտրոնային կնքման հարթակի ներդրմանը վերաբերող հարցեր” [Issues regarding implementation of platform for electronic signature of labor contracts debated] (21 Dec. 2023), http://www.parliament.am/news.php?do=view&cat_id=2&day=21&month=12&year=2023&NewsID=19870&lang=eng.

⁴⁹ Republic of Armenia, “ՀՀ ՕՐԵՆՔԸ ՀՀ ԱՇԽԱՏԱՆՔԱՅԻՆ ՕՐԵՆՍԳՐՔՈՒՄ ՓՈՓՈԽՈՒԹՅՈՒՆՆԵՐ ԵՎ ԼՐԱՑՈՒՄՆԵՐ ԿԱՏԱՐԵԼՈՒ ՄԱՍԻՆ” [RA Law on Amendments and Supplements to the RA Labor Code] (4 Dec. 2024), <https://www.arlis.am/DocumentView.aspx?docid=201313>.

⁵⁰ Unified Website for Publication of Draft Legal Acts, “ԱՇԽԱՏԱՆՔԱՅԻՆ ՊԱՅՄԱՆԱԳՐԵՐԻ ԿՆՔՄԱՆ ԹՎԱՅԻՆ ՀԱՄԱԿԱՐԳԻ ՆԵՐԿԱՅԱՑՎՈՂ ՊԱՀԱՆՁՆԵՐԸ, ԹՎԱՅԻՆ ՀԱՄԱԿԱՐԳԻ ՏՎՅԱԼՆԵՐԻՆ ՀԱՍԱՆԵԼԻՈՒԹՅՈՒՆ ՏՐԱՄԱԴՐԵԼՈՒ, ԹՎԱՅԻՆ ՀԱՄԱԿԱՐԳՈՎ ԱՇԽԱՏԱՆՔԱՅԻՆ ՊԱՅՄԱՆԱԳՐԵՐԻ ԿՆՔՄԱՆ ԿԱՐԳԵՐԸ ԵՎ ԹՎԱՅԻՆ ՀԱՄԱԿԱՐԳԻ ԿԱՌԱՎԱՐՈՒՄՆ ԻՐԱԿԱՆԱՑՆՈՂ ԼԻԱԶՈՐ ՄԱՐՄԻՆԸ ՍԱՀՄԱՆԵԼՈՒ ՄԱՍԻՆ ՀՀ ԿԱՌԱՎԱՐՈՒԹՅԱՆ ՈՐՈՇՄԱՆ ՆԱԽԱԳԻԾ” [Draft Decision of RA Government “On the requirements for the digital system for concluding employment contracts, providing access to the data of the digital system, establishing the procedures for concluding employment contracts through the digital system and the authorized body implementing the management of the digital system], (20 Feb. 2025), <https://www.e-draft.am/projects/8279>.

⁵¹ Unified Website for Publication of Draft Legal Acts, “ԱՇԽԱՏԱՆՔԱՅԻՆ ՊԱՅՄԱՆԱԳՐԵՐԻ ԿՆՔՄԱՆ ԹՎԱՅԻՆ ՀԱՄԱԿԱՐԳԻ ՆԵՐԿԱՅԱՑՎՈՂ ՊԱՀԱՆՁՆԵՐԸ, ԹՎԱՅԻՆ ՀԱՄԱԿԱՐԳԻ ՏՎՅԱԼՆԵՐԻՆ ՀԱՍԱՆԵԼԻՈՒԹՅՈՒՆ ՏՐԱՄԱԴՐԵԼՈՒ, ԹՎԱՅԻՆ ՀԱՄԱԿԱՐԳՈՎ ԱՇԽԱՏԱՆՔԱՅԻՆ ՊԱՅՄԱՆԱԳՐԵՐԻ ԿՆՔՄԱՆ ԿԱՐԳԵՐԸ ԵՎ ԹՎԱՅԻՆ ՀԱՄԱԿԱՐԳԻ ԿԱՌԱՎԱՐՈՒՄՆ ԻՐԱԿԱՆԱՑՆՈՂ ԼԻԱԶՈՐ ՄԱՐՄԻՆԸ ՍԱՀՄԱՆԵԼՈՒ ՄԱՍԻՆ ՀՀ ԿԱՌԱՎԱՐՈՒԹՅԱՆ ՈՐՈՇՄԱՆ ՆԱԽԱԳԻԾ” [Draft Decision of RA Government “On the requirements for the digital system for concluding employment contracts, providing access to the data of the digital system, establishing the procedures for concluding employment contracts through the digital system and the authorized body implementing the management of the digital system], (20 Feb. 2025), <https://www.e-draft.am/projects/8279/digest>.

⁵² Sargsyan, interview.