Independent Reporting Mechanism

Action Plan Review: Armenia 2025-2027

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Section I. Overview

Armenia's sixth OGP action plan primarily focuses on advancing and completing commitments from the previous cycle, including participatory governance, electronic procurement, public participation at the local level, and transparency of officials' gift declarations. Civil society's engagement in the co-creation process was more limited compared to previous cycles, largely due to the decision to base new commitments on previous reform advances. During implementation it will be important to ensure uptake of new systems, sustained public engagement, and adequate technical and institutional support for public officials and civil society. Consistent dialogue with civil society during implementation will help strengthen accountability around the commitments.

At a Glance

MEMBERSHIP

2011 **Joined OGP**

COMMITMENTS

6/6 **Open government lens**

2/6 **Substantial potential for results**

PROMISING COMMITMENTS

- Enhancement and Introduction of Participatory Governance
- E-procurement system with automated transfer of UBO data
- Mechanisms for public participation at the local level
- Electronic gift register and an automated system for corruption risks analysis

Met the minimum requirements during co-creation: No

Armenia's sixth action plan (2025–2027) includes six commitments. The plan largely builds on commitments from the fifth action plan (2022-2024). The commitments aim to enforce legislation on cybersecurity and open data, strengthen public participation at both the local and national levels, complete the development of the gift register for officials with the addition of automated corruption risk analysis tools, and establishing a new e-procurement system to be linked to beneficial ownership data, as well as improve the transparency of court data.

The government adopted the action plan in December 2025.[1] All commitments are aligned with national policy frameworks (such as the 2021–2026 Action Plan of the Government of the Republic of Armenia and the Public Administration Reform Strategy) and with the Sustainable Development Goals. Some of the commitments address IRM recommendations issued during the previous action plan cycle. Several commitments also address recommendations from the Organization for Economic Co-operation and Development and the Group of States against Corruption.

There were fewer opportunities for civil society to engage in the co-creation process for the sixth action plan compared to previous cycles. This was primarily due to the government's suggestion, accepted by civil society, to carry forward reforms from the previous plan and to avoid introducing new initiatives ahead of the parliamentary elections scheduled for June 2026. Civil society stakeholders generally accepted

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this rationale and believe the action plan broadly reflects current governance priorities.[2] The government also noted that most of the commitments in the 2025-2027 action plan were originally proposed by civil society organizations (CSOs) during the previous plan and therefore civil society has played an important role not only in shaping these commitments but also in their continued development and implementation.

The Department on Participatory and Open Governance Issues, established in 2024 under the Office of the Prime Minister (PMO), assumed the lead role of coordinating OGP processes, under the oversight of the Chief of Staff of the PMO. Since 2020, the multistakeholder working group has operated on an informal basis, without a prime ministerial decision regulating its composition. The working group remains open to representatives from government, international organizations, and civil society that express interest in participating in OGP processes. Most civil society organizations engaged in earlier cycles have continued their involvement. In 2025, only one meeting of the wider OGP working group was convened. Civil society stakeholders highlighted a need for more frequent group meetings and for more intensive communication and discussions around the action plan, both in the development and implementation stages.[3]

The IRM has assessed four commitments as promising which address long-standing priorities in Armenia's open government agenda according to the government, civil society, and international partners. For Commitment 2, the Department on Participatory and Open Governance Issues aims to strengthen participatory governance by developing methodologies and institutional capacities across the government. While this commitment already has the potential to improve the consistency of engagement practices, it could be enhanced by introducing clear standards or incentives to support its implementation. For Commitment 3, the Ministry of Finance will introduce a unified e-procurement platform with automated publication of data and integration with the beneficial ownership registry. This platform could significantly improve procurement transparency, enable real-time oversight, and reduce risks of non-disclosure in public procurement. For Commitment 4, the Ministry of Territorial Administration and Infrastructure will institutionalize participatory budgeting and introduce additional mechanisms for citizen engagement at the local level, including monitoring and feedback tools. If implemented, this commitment could strengthen citizen influence over local decision-making. For Commitment 5, the Corruption Prevention Commission will establish an electronic gift register and introduce automated corruption risk analysis tools. The fully functional gift register and the automated tools could improve detection of irregularities.

As in previous cycles, the sixth action plan focuses primarily on developing digital platforms and procedural frameworks, while activities directly targeting accountability, enforcement and behavioral change are underdeveloped. For example, commitments on enforcing implementation of legislation on information systems and cybersecurity (Commitment 1) and on judicial statistics platform (Commitment 6) are largely technical and preparatory, with impact dependent on broader reforms and practical implementation. In addition, it will be important to ensure that reforms—particularly at the local level—involving pilot initiatives or relying on external support are sustained through long-term institutional ownership. Capacity constraints in public administration could also limit the impact of the action plan. At the same time, the action plan benefits from continuity with previous reforms and alignment with international standards, particularly in areas such as open contracting and participatory governance. Beyond the two-year action plan cycle, it will be important for the government to ensure wide uptake of

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new systems, sustained public engagement, and adequate technical and institutional support for public officials and civil society. Consistent and open dialogue with civil society during implementation could strengthen the impact of the commitments.

[1] «Բաց կառավարման գործընկերություն» նախաձեռնության շրջանակներում Հայաստանի Հանրապետության 2025-2027 թվականների գործողությունների ծրագիրը հաստատելու մասին [Approving the Action Plan of the Republic of Armenia for 2025–2027 within the Framework of the 'Open Government Partnership' Initiative], N 1903-L, 18 December 2025, ARLIS, https://www.arlis.am/hy/acts/218429/latest.

[2] Arpine Hakobyan (NGO Center), interview by the IRM, 24 March 2026; Sona Ayvazyan (Transparency International Anticorruption Center), interview by the IRM, 5 February 2026; Gayane Nalbandyan (Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH), interview by the IRM, 13 March 2026.

[3] Liana Doydoyan (Freedom of Information Center of Armenia), interview by the IRM, 20 March 2026; Grisha Khachatryan (Information Systems Development and Training Center), interview by the IRM, 8 April 2026; Ayvazyan, interview.

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Section II. Promising Commitments

The following review looks at the four commitments that the IRM identified as having the potential to realize the most promising results. Promising commitments address a policy area that is important to stakeholders or the national context. They must be verifiable, have a relevant open government lens, and have modest or substantial potential for results. This review also provides an analysis of challenges, opportunities, and recommendations to contribute to the learning and implementation process of this action plan.

Table 1. Promising Commitments

Commitment 2 aims to strengthen participatory governance by developing methodologies and institutional capacities across government.
Commitment 3 will introduce a unified e-procurement platform with automated publication of data and integration with the beneficial ownership registry.
Commitment 4 aims to institutionalize participatory budgeting and introduce additional mechanisms for citizen engagement at the local level, including monitoring and feedback tools.
Commitment 5 will establish an electronic gift register and introduce automated corruption risk analysis tools.

Commitment 2: Enhancement and introduction of participatory governance

Implementers: Office of the Prime Minister
For a complete description, see Commitment 2 of the action plan.

Context and objectives

This commitment builds on the establishment of the Department on Participatory and Open Governance in the Office of the Prime Minister (PMO) in December 2024 which is a result of the fifth action plan. Previous OGP action plans and governance reforms had introduced participatory tools and platforms such as public councils adjacent to ministries, e-petitions, the e-draft.am platform, and ad-hoc working groups. However, a 2024 OECD review found that participatory policymaking in Armenia remained fragmented and insufficiently embedded across government institutions, limiting their effectiveness.[1] Additionally, Armenia's Public Administration Reform Strategy 2023-2030 identified a need for stronger institutional frameworks for participation and cited OGP as a viable platform to build on. Civil society and government representatives as well as independent studies note that participation is often inconsistent, with limited feedback and weak integration into decision-making processes. In many cases, participatory practices have depended on the individual initiative of ministries and government agencies rather than institutional obligation, and some public bodies perceive participation as a formal requirement rather than a tool for better policymaking.[2] The creation of the Department on Participatory and Open Governance Issues was an important institutional development to address these gaps. Among other functions, this department is now responsible for developing participatory governance mechanisms, monitoring and evaluating participatory processes, and addressing issues related to the development and advancement of civil society organizations (CSOs).[3]

Under this commitment, the department will develop methodological guidance for participatory processes, create databases of civil society stakeholders for engagement in consultations, improve digital participation tools such as e-draft.am, and strengthen the institutional capacities of public officials at the national and local levels.[4]

Potential for results: Modest

If implemented successfully, this commitment could improve the consistency and quality of participatory practices across government institutions. Methodological guidance and capacity-building programs could support more systematic engagement with stakeholders and the public in decision-making processes. For example, the Department on Participatory and Open Governance Issues plans to introduce a methodology for mainstreaming open government (incorporating adherence to the principles of transparency, public participation, accountability and integrity) in the guidelines on the development of strategic planning documents.[5] The commitment could also make policymaking processes more open and transparent. For example, the guideline on strategic management (adopted in April 2026) includes requirements on the contents and format of draft strategies published for public consultation. These guidelines also outline a regular reporting requirement for the implementation of strategies, and open government mainstreaming of the strategies (with transparency as one criteria). Moreover, CSOs will have the option of registering on e-draft.am. Databases of CSOs working in specific thematic areas created through this registration feature could help government agencies to reach a larger number of CSOs when initiating consultations or seeking engagement in policy development.[6]

While the commitment lays important groundwork for institutionalization, its ultimate impact will depend on sustained political support and enforcement, and cultural change within the public administration. The commitment does not introduce binding requirements or incentives for the uniform implementation of the methodological guidelines across government institutions. Civil society stakeholders noted that without adequate enforcement of the guidelines, the new participation mechanisms might become a formality, given the limited recognition of the value of participation among many officials and high turnover of staff. For these reasons, the IRM assesses the potential for results as modest.

Opportunities, challenges, and recommendations during implementation

The success of this commitment will require clear standards and incentives for public institutions to organize participatory processes as well as effective oversight over these processes.[7] According to the PMO representative, contextual factors such as high staff turnover in public institutions, and the shift in governmental focus during the June 2026 electoral period might reduce the speed of implementation.[8] Other key challenges include limited administrative capacity, uneven compliance across institutions, and a need to ensure wide uptake of the new tools. In addition, limited outreach may default participation to stakeholders that are already active in policy-making processes.

To address these challenges and strengthen implementation, the IRM recommends the following steps:

- **Adopt binding government-wide standards for public participation in all stages of policy-making.** The Department on Participatory and Open Governance Issues could ensure that the produced unified participation guidelines and methodologies are enforced through a government decision for better uptake. A government-wide framework could help standardize consultation practices and clarify

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responsibilities of public institutions through by-laws clearly defining when, how, and at which stages participation must occur, including requirements for early-stage engagement. International experience shows that to mainstream participation requires clear rules. For example, under the Romanian Law on transparency of decision-making in public administration (Article 7(9), the public authority is obliged to decide to organize a meeting for public debate on a draft normative act if a legally constituted association or another public authority makes a written request.[9] In Latvia, for each new project the state institutions shall designate a person responsible for ensuring opportunities for public participation, and the responsible person shall involve target groups of society, selecting the most appropriate form of public participation to ensure effective, open, inclusive, and timely public engagement in the process.[10]

- **Improve feedback and transparency in consultations.** To strengthen public trust and participation, the Department on Participatory and Open Governance Issues could incorporate mechanisms that improve the transparency of how stakeholder input influenced policy decisions on participatory governance related methodologies. When overhauling e-draft.am, the PMO and the Ministry of Justice could improve usability, its integration with offline processes, and transparency on how stakeholder feedback influenced the legislation under discussion. Improvements to e-draft.am, enforced by additional government regulations as necessary, could ensure that state institutions publish information on and summaries of in-person consultations, statistics of received and accepted proposals by each agency, revised drafts of policy documents with indication of the changes based on public feedback, as well as new formats of publishing information (e.g. infographics) for better accessibility. For example, Brazil's participation platform consolidates all relevant information on participation opportunities, including public hearings and conferences, digital consultations, councils and boards.[11] The Republic of Moldova's platform provides statistics of the comments received and accepted by decision-makers.[12] Also, Italy's platform consolidates the information and opportunities for public consultations on national, regional and local level, and provides relevant news updates.[13]
- **Strengthen oversight of participatory processes.** Countries that mainstream participation successfully often combine guidance with oversight and performance tracking. In Armenia, the Department on Participatory and Open Governance Issues could work with civil society and independent experts to monitor compliance with the guidance, collect data on participatory practices, and report publicly on performance across institutions.
- **Invest in capacity building and professionalization of participation practices.** Training programs and communities of practice for state servants can help institutionalize participatory governance as well as promote a culture of citizen engagement within public administration. While the commitment already includes capacity building activities, the PMO could also work with the Civil Service Office to incorporate the topic of public participation in civil servants' examination and training programs. This could improve impact and sustainability, considering frequent staff turnover. Countries that mainstream participation successfully combine central guidance with structured coordination and peer-learning. For example, Finland operates multi-level networks of civil servants and stakeholders (including a Civil Servants Network and Local Democracy Network of Municipalities), which are engaged in their OGP process and provide guidance and peer learning.[14] Similarly, Canada has a government-wide

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Public Engagement Community of Practice that exchanges good practices and supports the professionalization of participatory approaches across the civil service.[15]

- **Link participation to incentives and performance evaluation.** To overcome resistance, the Department on Participatory and Open Governance Issues could integrate participation indicators into performance frameworks or civil servant evaluations, encouraging meaningful implementation rather than just formal compliance.
- **Engage civil society actors in the design, implementation and monitoring of the new participation tools, guidelines, and mechanisms.** It is essential that the choice and design of new tools are fit for the context and needs of citizens and CSOs so that these tools can be applied effectively to meet the goals. Therefore, civil society stakeholders should be involved in the process of selecting and developing these tools from the start and throughout to ensure their buy-in and to inspire trust and engagement. Further, the government could encourage civil society monitoring of the implementation of adopted guidelines and tools and engage in continuous dialogue for enhancement and improvement based on the monitoring results.

To improve the broader participation environment in Armenia beyond the scope of this commitment, the government can consider the following IRM recommendations:

- **Institutionalize participation at early stages of decision making.** Participation should begin at the earliest stages of the policy cycle, rather than being limited to commenting on draft legislation, and expanding on the initial formulation of policy ideas. The Department on Participatory and Open Governance Issues could build on existing tools and practices (e.g. public councils, joint working groups) to incorporate participatory mechanisms into the full cycle of institutional and legislative frameworks. Sweden's "Sakråd" model offers a useful example of structured, early-stage dialogue between government and civil society to inform decision-making and improve policy coherence.[16] Additionally, the Council of Europe's Code of Good Practice for Civil Participation in the Decision-Making Process offers guidance on the complete cycle of policy making, including the responsibilities and tools that can be used in each step.[17]
- **Expand outreach and inclusiveness in participatory processes.** While digital tools can enhance accessibility and scale, they should complement in-person and deliberative mechanisms to avoid excluding groups with limited digital access or skills. The Department on Participatory and Open Governance Issues could tailor awareness-raising and support capacity-building, particularly outside Yerevan, to encourage more CSOs to engage in policy development and implementation processes.
- **Encourage innovation and pilot deliberative models.** The Department on Participatory and Open Governance Issues could pilot and integrate into guidelines innovative tools and mechanisms such as citizens' assemblies, public debates, or policy labs. This can deepen engagement and demonstrate the value of participation. Many countries have used citizens' assemblies or other deliberative methods to address complex policy issues, which have proven their effectiveness.[18] The Open Gov Guide provides resources on mainstreaming participation and ideas on various innovative models of participation.[19]

Commitment 3: E-procurement system with automated transfer of UBO data

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Implementers: Ministry of Finance
For a complete description, see Commitment 3 of the action plan.

Context and objectives

This commitment aims to introduce a unified e-procurement platform and make it interoperable with the beneficial ownership registry. Currently, procurement information in Armenia is distributed across several systems. One is armeps.am,[20] launched in 2011, for online organization of the procurement tenders, price quotation, and single sourcing procedures.[21] A module on armeps.am, Procurement Plan and Contracts Management, publishes procurement plans, contracts, and related documentation. All data is searchable by type and subject of contract, contractor, vendor, time, as well as downloadable in CSV and Excel format.[22] The procurement.am[23] platform serves as a bulletin on procurement invitations and notices on contracts. It provides beneficial ownership declarations of tender participants.[24] There is also a separate system eauction.armeps.am[25] for vendors to participate in electronic auctions.[26]

Armenia already publishes significant amounts of procurement information through these platforms. However, information is often fragmented, incomplete, or published in non-machine-readable formats such as scanned PDFs.[27] This makes it time and resource-intensive for journalists and CSOs to monitor procurement spending and analyze the data for potential corruption risks. Furthermore, some procurement processes remain paper-based or are not systematically uploaded to existing platforms, particularly at the local government level.

This commitment builds on a commitment from the previous action plan and aligns with broader government efforts to digitize public administration and increase fiscal transparency. It also responds to concerns raised in international assessments, including OECD anti-corruption monitoring reports, around limited oversight in procurement processes, incomplete digitization, and weak data accessibility.[28] During the previous action plan, the Terms of Reference (ToR) of the e-procurement system were developed and, according to government stakeholders, incorporated the Open Contracting Data Standard (OCDS). A two-stage competition was held for designing and delivering the e-procurement system and pre-qualified participants were allowed to proceed in the tendering process. The Ministry of Finance selected the winning participant and signed a contract in February 2026 for the developing, testing, rollout, and maintenance of the new system. In October 2025, the government amended its decision on electronic procurement to require all communities to implement procurements electronically (in addition to state administration bodies and most state-affiliated entities), as the need for a state-of-the-art system is even more acute.[29]

The commitment advances transparency by enabling access to comprehensive machine-readable data on procurement contracts and post-contract documentation for easier monitoring and public oversight of procurement decisions and contract implementation.

Potential for results: Substantial

If fully implemented, the new e-procurement system could significantly improve the accessibility, quality, and usability of procurement data by publishing information across all stages of the procurement cycle—from tender announcement to contract implementation—in machine-readable and interoperable formats. The commitment addresses several recommendations in the IRM Action Plan Review for 2022-2024, including the incorporation of OCDS and providing features for user reports on specific contracts or contract parties. A user-friendly platform could motivate civil society and the media to monitor procurement processes, improving public oversight. Linking procurement data with other datasets, such as beneficial

ownership information, could enhance transparency and support more effective detection of conflicts of interest and procurement integrity risks. A 2024 government decision allowing certified CSOs and media representatives to oversee the implementation of public procurement contracts may further support these efforts.[30] It could encourage greater use of the e-procurement platform while helping to build civil society expertise in public procurement.

The new platform is expected to automate processes that currently rely on manual input, including the publication of procurement contracts and supporting documentation. According to the Ministry of Finance, automation will reduce administrative workloads for procurement officers, improve the accuracy and timeliness of data publication (by excluding any possibility for omissions or gaps), and provide opportunity for tracking contract management in real time.[31] Furthermore, following the launch of the platform, the government plans to mandate e-procurement for all public bodies, including state and community enterprises, which would significantly expand transparency across all procurement funded by public resources.[32] The inclusion of all communities in the decision is important as it mandates them to implement procurements electronically, ensuring better transparency and accountability for local level procurements. The new platform will support the full implementation and monitoring of this requirement.

The potential impact of the commitment will be reinforced by ongoing anti-corruption reforms. Proposed amendments to the Law on Procurement aim to introduce additional safeguards against corruption risks by restricting companies affiliated with high-ranking officials and their families from participating in public tenders.[33] The e-procurement platform will be a key tool for verifying compliance with the law once it is adopted. CSOs, journalists, and researchers would be able to cross-check bidders' information with the databases of the State Register of Legal Entities and the Corruption Prevention Commission to check if any affiliated person is engaged in the tenders as a head or beneficial owner of the bidder or winner company.

A full transition to electronic procurement and access to automated, comprehensive procurement data covering the full procurement cycle, would be a significant step forward in transparency and would reduce opportunities for non-disclosure. However, the impact will depend on effective enforcement, institutional capacity to analyze and act on data, and the platform's use by civil society and oversight bodies. Broader issues, such as nepotism, manipulation of competition, extensive use of non-competitive procedures, and limited enforcement for procurement-related violations, will likely need to be addressed after the system is in place.[34]

Opportunities, challenges, and recommendations during implementation

Improved transparency in procurement will depend on strong enforcement mechanisms, better public oversight practices, and adequate capacities to use the platform. For effective oversight by civil society, journalists, and other stakeholders, the platform should have a user-friendly design, supported by targeted efforts to strengthen analytical capacity among non-state actors.

Implementation may face practical and institutional challenges. The lack of capacity of state bodies and local administrations to fully switch to e-procurement could undermine its full implementation. Furthermore, the integration of beneficial ownership data may be limited in relation to non-resident companies participating in public tenders. As Armenia's beneficial ownership registry does not currently interoperate with foreign registries, the system may rely on self-reported data for foreign bidders. This could lead to incomplete or unverifiable ownership information and limit the ability to detect conflicts of interest.

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To strengthen implementation, the IRM recommends the following to the Ministry of Finance:

- **Prioritize user-friendly design and advanced search functionality**, including flexible filters and search options by supplier, contracting authority, time-period, and procurement object. Explanatory materials, visual guides, and public dashboards will support broader use of the system. For example, Finland publishes comprehensive procurement data for public use with user-friendly dashboards and easy-to-use search and filter features,[35] while the United Kingdom is developing dashboards for the public to track procurement risks and contract performance.[36]
- **Strengthen beneficial ownership verification mechanisms,** including through international data-exchange cooperation to verify data of non-resident companies. This would help mitigate risks of inaccurate ownership declarations and improve detection of conflicts of interest.
- **Provide regular training and technical guidance for civil society and journalists on analyzing procurement data and monitoring contract performance**. This could be done in collaboration with international organizations and CSOs with relevant expertise. Several countries have combined open data with training and collaboration with watchdog organizations. For instance, Indonesia developed an online procurement monitoring tool together with CSOs and trained journalists and auditors to detect corruption risks using procurement data.[37]
- **Provide continuous training and technical support for procurement officers**, particularly in local governments and state-owned enterprises, to ensure consistent and effective use of the new system.
- **Ensure timely feedback to reports submitted by the public within the platform**, so that irregularities or issues reported by users are addressed.
- **Conduct regular reviews and evaluations of the platform** to assess whether it is meeting the objectives set and refine it to do so where there are shortfalls. The Ministry of Finance could also monitor the results in terms of procurement data, such as single-source bidding, or whether contracts are being awarded to new entrants or existing supplier and bidder groups continue to dominate.

Commitment 4: Mechanisms for public participation at the local level

Implementers: Ministry of Territorial Administration and Infrastructure
For a complete description, see Commitment 4 of the action plan.

Context and objectives

During the previous action plan, Armenia introduced participatory budgeting practices to most communities in Armenia and secured allocation from the state budget for local level participatory budgeting projects. The current commitment aims to further institutionalize participatory budgeting by incorporating it in the Law on Local Self-Governance and the Law on the Budget System of the Republic of Armenia. It also plans to introduce new tools for citizen engagement, including civic monitoring of participatory budgeting processes, enhanced feedback channels, and piloting co-creation methodologies for designing community services. As in previous OGP commitments on local governance, the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH is supporting several milestones with funding from

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the German and Swiss governments,[38] while the development of digital tools for service assessment is supported by a United Nations Development Programme (UNDP) project funded by the Government of Serbia.[39] Most outputs of this commitment will be integrated into the Municipal Management Information System.[40]

Local governments in Armenia typically treat public participation as a procedural requirement rather than a means of genuine engagement. Public hearings are often formalistic, and participation largely depends on the discretion and capacity of community leaders as well as the resources and engagement of local CSOs.[41] This results in low levels of engagement and lack of government feedback to public input, local services not responding to citizen needs, and low levels of trust in local self-governments.

The primary open government value addressed by the commitment is civic participation, complemented by public accountability through monitoring and feedback mechanisms, and elements of transparency through the publication of monitoring, reporting, and assessment outcomes.

Potential for results: Substantial

Most communities and Armenia have already taken up participatory budgeting introduced in the previous action plan, largely due to the government funding allocation as well as awareness raising and methodological support by international and civil society partners. However, this process remains voluntary and not fully institutionalized. The engagement of citizens in the participatory budgeting typically ends at the project selection stage, with limited follow up, monitoring, and accountability.[42] Further, existing tools for citizens to leave feedback, to engage citizens in the design of municipal services, and report issues in the delivery of local services are underutilized, resulting in services that do not adequately respond to public needs.

From the first milestone, this commitment would institutionalize participatory budgeting in the mandatory functions of local governments and would also pilot civic monitoring of participatory budgeting in six communities. Before the adoption of the action plan, the Ministry of Territorial Administration and Infrastructure (MTAI) introduced provisions in the draft amendments to the Law on Local Self-Governance to formalize participatory budgeting.[43] With support from GIZ and in collaboration with the MTAI and the CSO Armavir Development Center are drafting a methodology for civic monitoring of participatory budgeting to be piloted in six municipalities, including the selection and training of citizen monitors (as part of the Good Governance for Local Development South Caucasus (GGLD) project funded by the German and Swiss governments). The implementing organizations emphasize that civic monitoring in participatory budgeting is intended to enhance public awareness, extend engagement beyond the project selection stage, and strengthen trust in the process, rather than serve as a formal oversight or control mechanism.[44] In early 2026 (during the action plan implementation period), the Information Systems Development and Training Center (ISDTC) through the support of German and Swiss governments, responsible for the maintenance of community information systems, integrated monitoring sections on the websites of the pilot communities, allowing monitors to input information electronically and the public to see the outputs of the monitoring checklist.

For the second milestone, since September 2025 (before the official adoption of the action plan) the mobile application Teselem has been operational across all communities. The application provides access and expanded use of the reporting feature on community websites. Before the application, citizens could report issues through a letter or email to the municipal administration, as well as through the special section of the website "Report on an Issue". According to stakeholders, this feature of the website was underutilized, while the mobile

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application provides a more accessible way to report issues.[45] Local government staff receive the report through the system and, following a review of the issue, provides response to the reporting citizens, resolving them, if possible. The MTAI will continue monitoring the usage of the application and feedback provided by municipalities during the action plan implementation.

For the third milestone, the action plan envisaged citizen-centered service codesign in six pilot communities aimed at aligning the design of services with the needs and expectations of citizens. The introduction of co-designed services is supported by GIZ with funding from the German and Swiss governments in the pilot stage. This experience will help build capacities of local governments in applying participatory approaches for community services design and implementation. The experience of the pilots will be disseminated across other communities through exchanges and a methodological toolkit for citizen-focused service design.[46]

Finally, the fourth milestone includes piloting community service surveys through a special section on community websites where citizens can provide a detailed assessment of service quality. This activity is being implemented by UNDP in collaboration with the MTAI and ISDTC. Currently, there is no systematic collection of citizen feedback on municipal services. The survey data will provide local governments with aggregated information on the quality of specific aspects of their work. The assessment questions are being co-designed with community residents and local administrations, allowing for the inclusion of criteria that are relevant to each community, with the aim of incorporating the results into service improvement processes.[47]

The sustainability and depth of these steps is uncertain. The legislative change would establish the legal basis for institutionalizing participatory budgeting across all local communities with a standardized process compliant with the guidelines on participatory budgeting procedure by the MTAI.[48] However, other activities of the commitment are pilots which rely on external support without clear plans for long-term institutionalization or resourcing. The civic monitors currently work as volunteers and do not have any contractual relations or formal commitment from local governments. Stakeholders plan to incorporate the guideline on civic monitoring as a component of the existing participatory budgeting procedure,[49] which communities are required to adhere to if they decide to engage in participatory budgeting process with state co-funding.[50] However, without proper capacity building, transparent and independent selection processes, and incentives for the volunteer monitoring groups, there is a risk that monitoring mechanisms will not be maintained or will function only on paper. Similarly, the continuation and scale up of service evaluation and co-design initiatives will depend on whether municipalities assume ownership and allocate resources for their implementation.[51] Moreover, the commitment does not provide guarantees for the government to act on the reporting through the dedicated platform, nor sanctions if action is not taken.

Given the institutionalization of participatory budgeting through legal amendments, the IRM assesses the commitment's potential for results as substantial. However, for the other activities of the commitment achievement of meaningful and sustained impact will depend on the extent to which pilot initiatives will be scaled, institutionalized, and effectively integrated into local practices.

Opportunities, challenges, and recommendations during implementation

If all the milestones are implemented and institutionalized, this commitment could improve transparency, responsiveness, and citizen engagement at the local level. Expected outcomes include increased use of digital participation tools, improved feedback loops between citizens and municipalities, and gradual cultural shifts toward more participatory governance. However,

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transformative results would require stronger legal anchoring through additional regulations that will build upon the pilot monitoring and service evaluation initiatives, dedicated resources (especially for awareness-raising and capacity building), and clearer accountability mechanisms linking citizen input to decision-making. Several components are donor-driven, with no clear long-term financing or institutional ownership. If monitoring is integrated into participatory budgeting guidelines, the government should take steps to ensure that the outcomes are not affected by low participation, limited capacity, and potential bias in the selection of monitors. Safeguarding the credibility of civic monitoring will also be important in case municipalities control the selection of monitors or if local dynamics discourage critical engagement. Moreover, digital tools such as the Teselem application should be developed to support wide uptake by being made easily accessible, anonymous to use, and ensure feedback leads to visible change. The piloted service co-design and assessment mechanisms also need to be institutionalized, resourced, and actively used by citizens in further stages.

The success of the reform will ultimately depend on sustained engagement beyond pilot phases and the extent to which citizen input leads to visible policy or service improvements. To strengthen implementation and ambition, the IRM recommends the following:

- **The MTAI could institutionalize and properly resource participatory mechanisms**, establishing relevant regulatory provisions and encouraging communities to allocate dedicated budgets for capacity building and awareness-raising. The MTAI could initiate embedding minimum budget allocations for supporting activities and monitoring requirements in legislation, which, alongside dedicated funding in the national or local budgets for outreach and capacity building, would strengthen sustainability.
- **The MTAI, local governments, and international and local partner organizations could ensure the independence and credibility of civic monitoring** through transparent selection processes, with clear guidelines on roles and safeguards. To ensure capacity and committed involvement, CSO representatives, experienced professionals and respected community leaders could be encouraged to engage in monitoring groups. To mitigate risks of bias, Armenia could consider models such as Mexico City's citizen observatories, where civil society plays a formal role in selecting or co-managing monitoring processes.[52]
- **The MTAI, local governments, and international and local partner organizations could invest in inclusive outreach and diversify participation channels**, using targeted campaigns and CSO networks to broaden participation and increase usage of Teselem and service assessment platforms. International experience shows that participation increases when governments combine digital tools with targeted, offline engagement. For example, the Decide Madrid platform is complemented by active outreach campaigns and community-level engagement.[53] Local governments could adopt similar approaches by partnering with CSOs, schools, and community groups, and by using town halls, deliberative workshops, and mobile outreach to engage underrepresented groups. The IRM also recommends mainstreaming school participatory budgeting to inculcate students and youth at an early age. For example, a number of Ukrainian communities have been implementing participatory budgeting in schools with the support of international and local civil society organizations, including through local OGP action plans.[54] Following this experience, the Armenian CSO NGO Center has developed a school participatory budgeting program

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approved by the Ministry of Education, Science, Youth and Sport, which can serve as a basis for institutionalizing this initiative by the government.[55]

- **The MTAI and local governments could close the feedback loop** by ensuring that citizen feedback collected from platforms is systematically reviewed, responded to, and reflected in municipal decisions. A critical success factor observed in OGP reforms is the obligation for public authorities to respond to citizen inputs within defined timeframes. The MTAI could introduce clear standards for responding to issues raised via Teselem and for publishing follow-up actions on service evaluations, recommending them to be adopted by the communities through local level regulations. Public dashboards showing how citizen input influenced decisions would further strengthen accountability.
- **The MTAI, local governments, and international and local partner organizations could design user-friendly and incentive-based digital tools,** ensuring accessibility, and anonymous feedback options. These tools could be integrated into other platforms, such as a mobile application with a service assessment feature. This could be done with the support of donor organizations. At the same time, the municipalities will need to further demonstrate tangible outcomes (e.g. resolved issues, improved services) to sustain user engagement and foster participation culture in the communities.
- **The MTAI, together with the Staff of the Prime Minister and international and local partner organizations could establish a working group or enlarge the existing working group to engage more local civil society actors.** This working group could jointly develop ideas to improve awareness raising and monitoring, set monitoring and evaluation standards, exchange best practices, and ensure local buy-in.

Commitment 5: Electronic gift register and an automated system for corruption risks analysis

Implementers: Corruption Prevention Commission
For a complete description, see Commitment 5 of the action plan.

Context and objectives

This commitment aims to establish a digital register of gifts received by public officials and public servants and introduce automated data analysis tools for declarations and political party reports. This commitment builds on Armenia's recent reforms to regulate gifts received by public officials and public servants and strengthen integrity oversight mechanisms. In the framework of the previous action plan, Armenia adopted legislative regulations to clarify restrictions related to gift acceptance, set procedures for registering, transferring, and evaluating gifts received in connection with official duties and establish administrative liability for violations of gift regulations.[56] Gifts that exceed the threshold value of AMD 60,000 (about USD 150) 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. During the implementation of the previous action plan, the Corruption Prevention Commission of Armenia (CPC) provided a template and guidelines for gift declarations and has been collecting submissions from officials and publishing them in a Google Drive folder since September 2024.[57] Currently, gifts are reported through electronic Excel-based forms and published by the CPC in PDF formats that do not allow structured analysis or systematic public oversight.

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Though the ToR of the gift register was ready in 2024, the platform was not developed by the conclusion of the previous action plan in December 2025, mainly due to the termination of US foreign aid, as the platform development process in the framework of the last action plan cycle had been supported a USAID-funded Armenian Integrity Program. Thus, this commitment builds on earlier efforts to create a digital gift register where the CPC intends to publish in open data format information on the gifts accepted by public officials and public servants in relation to their official duties and considered permissible by law.

The commitment also proposes introducing automated checking for CPC registers, including declarations register, gift register, and political party reports. The CPC currently carries out manual verification of annual reports of political parties, as well as the declarations of property, income, interests, and expenditures (hereinafter: asset and income declarations), using risk-based assessments and reports from citizens and media, which limits the scope of verification.[58] The system of asset and income declaration has been fully digitalized since 2023 and allows data export and analysis, but is not connected to the current database of gifts, political party reports, and other government databases such as those of the State Cadaster Committee, the State Revenue Committee, and the State Register of Legal Entities (the data from these databases is used for verifying the income, property, owned shares, and donations of officials). The CPC processes over 15,000 declarations annually with limited human resources and limited analytical capacity. Under this commitment, the CPC will introduce comprehensive automated tools for analyzing corruption risks using data collected by the CPC from official declarations and political party reports, which will allow automated 'red flags' to be raised for in-depth review by the CPC. The CPC also submitted the development of the gift register as an Open Government Challenge in 2024.[59]

Potential for results: Modest

A digital register and automated analytical tools could significantly improve the efficiency and transparency of integrity oversight. Civil society stakeholders noted that the requirement to report gifts in a digital register has a preventive effect by encouraging public officials to exercise greater caution in accepting gifts.[60] If made interoperable with other CPC registers and government databases, the register could enable data cross-checking and support risk-based oversight. It may also facilitate public scrutiny and analysis of patterns in gift-giving practices.[61]

However, several limitations constrain the potential impact of the commitment. First, the register will cover only gifts received in connection with official duties, while high-value gifts may be transferred through personal channels or declared as personal gifts. Although high-value property and money donations above AMD 200,000 must be reported in annual declarations, the identity of donors is not disclosed due to privacy considerations. Moreover, while declarations apply only to a limited number of officials, the gift register covers all public servants, many of whom are not required to submit asset and income declarations. As a result, there is no publicly available information on personal gifts in their case, despite civil society stakeholders emphasizing that transparency of all types of gifts is important for addressing corruption and integrity risks.[62] Second, the effectiveness of the system will depend heavily on self-reporting and the strength of internal oversight mechanisms. A civil society stakeholder highlighted that limited awareness and misunderstanding of gift reporting requirements among public servants—particularly regarding what constitutes a gift and applicable thresholds—remain significant challenges.[63] The CPC's capacity for oversight is limited and relies largely on media reporting and complaints to identify violations. Although approximately only 30 gifts were registered in 2024, no sanctions were imposed for non-declaring, suggesting weak

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enforcement.[64] At the same time, the CPC notes that its advisory role and disclosure requirements have a preventive effect, and reporting has increased significantly in 2025.[65] In particular, the CPC's advisory opinion provided to public officials and public servants upon request helped to prevent violations related to gift restrictions, avoiding the need for sanctions. However, the system still risks underreporting. Third, the CPC expects to publish only information on accepted gifts, without covering subsequent handling or disposal (e.g. transfer to the state, sale, or donation), as this falls outside the CPC's mandate. This limits transparency over the full process of transferring gifts to state or community ownership.

The effectiveness of automated monitoring tools will require a robust risk assessment methodology. A civil society stakeholder highlighted the need for built-in data validation and cross-checking functions within declaration forms to prevent inconsistent or incorrect entries.[66] In addition, asset and income declaration data prior to 2021 has not been converted into open data format, limiting the ability to conduct longitudinal analysis. The system of automated tools is primarily designed for internal use by the CPC, with red-flag indicators not publicly accessible according to the current planned setting.[67] While automation could expand the scope of verification and improve detection of irregularities, its impact on public accountability will depend on how findings are disclosed and acted upon.

Due to the reliance on self-reporting, limited enforcement mechanisms, partial transparency of the gift lifecycle, and constraints in data accessibility and interoperability, the IRM assesses the commitment's potential for results as modest.

Opportunities, challenges, and recommendations during implementation

If effectively implemented, the register could improve transparency and public oversight of gifts received in relation to official duties. Additionally, the automated verification could support the CPC in systematic oversight of declaration data accuracy, facilitate data cross-checking and identifying irregularities and possible corruption risks. The success of the commitment will depend on the level of interoperability and analytical capacity of the CPC's systems, and the quality and completeness of the data provided by officials. The impact of the commitment on corruption prevention will also depend on the effectiveness of the risk assessment methodology underpinning automated data analysis and red-flag systems, as well as on the transparency of identified violations and the sanctions applied in response.

Stakeholders highlighted the limited capacity of integrity officers[68] and ethics commissions[69] in state bodies to provide support and oversight in the gift registration process, as well as constrained resources of the CPC for verification and follow up on flagged cases.[70] In addition, the digital register might potentially increase the volume of reported gifts, thereby expanding the CPC's oversight workload and straining its already limited capacity (currently only one staff member deals with the gift registration).[71]

To strengthen implementation, the IRM recommends that the CPC consider the following steps:

- **Strengthen enforcement and verification mechanisms to complement self-reporting**, including clearer procedures for identifying and sanctioning violations of gift-related rules. Integrity officers should receive adequate training and resources to fulfill their advisory and oversight role more effectively. It is also important to provide additional guidance, training, and awareness-raising for public officials on reporting obligations and use of the system.
- **Develop clear and practical guidelines for assessing types of gifts** to help public servants distinguish between permissible and prohibited gifts. This could include step-

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by-step guidance within codes of conduct to support consistent interpretation and application. Although the CPC has published guidelines for providing advisory opinions on gift permissibility, futher guidance could include practical explanations and examples beyond the legal provisions to help public officials and public servants better understand permissibility before there is a need to turn for an advisory opinion.[72]

- **Ensure the development of robust risk-based methodologies for automated monitoring**, including clear criteria for red-flag identification and prioritization of cases for review. The CPC could engage CSOs and media actors with experience in analyzing declaration data to support the design and testing of these tools. To ensure that these tools contribute not only to internal administration but also to public oversight, it is important to **enhance the transparency of analytical outputs**, including publishing information on identified red flags and risk patterns.
- **Improve data quality and interoperability** across the gift register, asset declaration system, and other relevant government databases by introducing automated validation and cross-checking functions. This could entail converting declaration data from 2021 and earlier into machine-readable formats to enable longitudinal analysis.

The government can take further steps to improve transparency of gifts and to prevent and/or identify corruption risks and conflict of interest through the following:

- **Improve transparency on gifts transferred to state ownership** by publishing details on permissible or prohibited gifts handed over to the state, including their subsequent management, disposal, and current location. As this is outside the CPC's mandate, the relevant register of the State Property Committee could be digitized and made interoperable with the gift register. This would enable public oversight beyond the initial transfer and enhance accountability for state property management. The CPC notes that it has reached an agreement with the technical organization and the State Property Management Committee to include a separate field in the system indicating whether the gift has been transferred to the state and, if so, how it was subsequently disposed of.[73]
- **In the long-term, expand the scope of disclosure on gifts** through relevant legislative amendments**,** considering inclusion of all high-value gifts regardless of whether they are classified as "personal" or linked to official duties. Alternatively, asset and income declarations could include information on donor identity for such gifts to help track the source of expensive gifts and identify potential conflicts of interest.

Other commitments

Other commitments that the IRM did not identify as promising commitments are discussed below.

Commitment 1 aims to enforce implementation of recent legislation on information systems and cybersecurity through the adoption of by-laws. Within the previous action plan, the government developed three laws, together with amendments to other legislation, which the National Assembly adopted on 4 December 2025. The legal framework for data governance includes the Law on Public Information, which regulates public information, the state information system, databases, the data-exchange layer and access in digital, including machine-readable, form (Article 6); the Law on Cybersecurity, which sets rules for protecting information systems and responding to cyber threats; and the Law on the Regulatory Body of

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Information Systems, which establishes and defines the powers of the independent oversight authority. In addition, related amendments were adopted to several laws, including the laws on personal data protection and on freedom of information. The by-laws will complete the application of the laws already adopted, including the rights and responsibilities of information holders, the criteria for identifying critical information infrastructure, and the procedure for coordinating digital transformation programs and their financing (Law on Public Information, Article 4). The full list of planned regulations is set by Prime Minister Decision No. 117-A of 13 February 2026.[74]

According to a representative of the Ministry of High-Tech Industry, progress on publishing data in open and machine-readable formats is conditioned by ongoing reforms of the digital architecture, legal framework, and data management systems.[75] The Law on Public Information requires proactive disclosure in open data formats and it will be important to account for the limited digital capacity across state institutions, as well as inconsistent implementation of existing information disclosure requirements.[76] In this context, the IRM recommends the following steps:

- Defining, in the Government decision required by Article 7(5) of the Law on Public Information, the procedure and minimum scope of proactive disclosure, including information to be published in machine-readable form under Article 6.
- Strengthening institutional capacities through targeted training of public officials and engaging data providers and users in the development and implementation of data policy by-laws to ensure their usability and effectiveness. A civil society stakeholder further recommends that government bodies conduct a comprehensive self-assessment and inventory of available datasets to classify which data can be made open and ensure the necessary technical conditions for their publication.[77]
- Clarifying institutional responsibilities for monitoring compliance with data disclosure requirements, including whether this role will be fully assigned to the new regulatory body or supplemented by additional oversight mechanisms, such as the proposed independent personal data protection authority, which may also be entrusted with protecting the right to information. The government could also consider drawing on international good practices of open data platforms when establishing the unified platform for data entry envisioned by the Law on Public Information.[78]

Commitment 6 aims to address gaps in the collection and publication of judicial statistics in Armenia. Although several electronic platforms are used within the judicial system, they do not provide a unified environment for managing proceedings and generating comprehensive, automated statistical data. Existing public sources, including the DataLex portal and judicial statistics published by the Judicial Department in Excel format, offer limited and fragmented information.[79] In addition, the OECD Anti-Corruption Network has identified the absence of disaggregated statistics on high-level corruption cases as a shortcoming.[80] The 2022–2026 Strategy for Judicial and Legal Reforms foresees the digitization of proceedings and the establishment of mechanisms for publishing court statistics in an accessible online format.[81]

The commitment would introduce a unified statistical database that will consolidate data from pre-trial and judicial proceedings, enable filtering by specific indicators, and provide open access. As a result, the unified statistical tool will provide improved transparency over the court activities and allow civil society to exercise public oversight over the administration of justice.

Within the commitment timeline, the Ministry of Justice plans to integrate manually collected Excel-based data into the new statistical platform: a user-friendly and searchable dashboard on

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the judiciary's website. For systems that have already been modernized (e.g. civil and administrative courts), data will also be automatically transferred to the platform. For other areas still operating on outdated systems, judges will continue to upload data through the electronic system of document exchange (Mulberry system) until full interoperability is achieved.[82] The Ministry of Justice has identified this phased approach as an interim solution to interoperability challenges that hindered implementation in the previous action plan cycle.[83] In parallel, the Ministry of Justice plans to improve existing statistical classifications by prioritizing key indicators defined by the Supreme Judicial Council. This is expected to ensure both the feasibility of data publication and the relevance of the information for evidence-based policymaking.[84]

The effectiveness of the reform will depend on successful system integration, adequate technical capacities, and the ability to address potential resistance among judges, their assistants, and the relevant staff of courts in adopting new digital tools. Building on civil society recommendations mentioned in the 2022–2024 Action Plan Review,[85] the IRM recommends that the Ministry of Justice:

- Prioritize the publication of statistics on the duration of court cases and enable search and analysis of case statistics by individual judges.
- Expand statistical classifications to include relevant demographic or professional categories (e.g. public officials, civil servants), which could strengthen the analytical value of the data.
- Following the launch of the platform, collaborate with the Prime Minister's Office and civil society on capacity building for judges, their assistants, and the relevant staff of courts, ensuring timely and high-quality data input. Targeted awareness-raising and user engagement could also promote the uptake and use of the statistical data.

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[48] Ministry of Territorial Administration and Infrastructure, «Համայնքներում մասնակցային բյուջետավորման ընթացակարգերի վերաբերյալ» մեթոդական ուղեցույց» [Methodological Guide on Participatory Budgeting Procedures in Communities], https://api.mtad.am/storage/pages/files/2025/12/zip/24_16-18-sc796-694bda12a2421.zip.
[49] Ibid.
[50] Giloyan, interview; Nalbandyan, interview; Tovmasyan, interview.
[51] Grisha Khachatryan (Information Systems Development and Training Center), interview by the IRM, 8 April 2026.
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[55] "Innovation and International Experience for Armenian Schools (Participatory budgeting)," NGO Center, 19 May 2026, https://ngoc.am/en/school-pb/; "The Ministry of Education, Science and Technology of the Republic of Armenia has approved the NGO Center's "School Participatory Budgeting" educational program," NGO Center, 14 August 2026, https://ngoc.am/en/escs-spb-ngoc/.
[56] «Հանրային ծառայության մասին» օրենքում լրացումներ և փոփոխություններ կատարելու մասին [Amendments and Changes to the Law "On Public Service"], HO-540-N, adopted 7 December 2022, ARLIS, https://www.arlis.am/hy/acts/172230; «Հանրային ծառայության մասին» օրենքում լրացումներ և փոփոխություններ կատարելու մասին [Amendments and Changes to the Law "On Public Service"], Law HO-149-N, adopted 11 April 2024, ARLIS, https://www.arlis.am/hy/acts/192458; «Պետական գույքի կառավարման մասին» օրենքում լրացում և փոփոխություն կատարելու մասին [Amendments and Supplement to the Law "On State Property Management"] HO-148-N, adopted 11 April 2024, ARLIS, https://www.arlis.am/hy/acts/192453; «Պետական արարողակարգի մասին» օրենքում լրացումներ կատարելու մասին [Amendments to the Law "on State Ceremony"], HO-150-N, adopted 11 April 2024, ARLIS, https://www.arlis.am/hy/acts/192459; Հանրային պաշտոն զբաղեցնող անձանց և հանրային ծառայողների կողմից պաշտոնեական պարտականությունների իրականացման կապակցությամբ ստացված նվերների հաշվառման, հանձնման և գնահատման, նվերների հաշվառման ռեեստրի վարման և ներկայացված տվյալներում փոփոխությունների կատարման, նվերների ընդունման սահմանափակումների խախտման դեպքերի վերաբերյալ տեղեկությունների տրամադրման կարգերը, ինչպես նաև ռեեստրում լրացման և հրապարակման ենթակա տվյալների ցանկերը սահմանելու մասին [Establishing the Procedures for the Registration, Handover, and Valuation of Gifts Received by

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Persons Holding Public Office and Public Servants in Connection with the Performance of Official Duties; the Maintenance of the Gift Registration Registry and the Making of Amendments to Submitted Data; the Provision of Information Regarding Violations of Restrictions on Accepting Gifts; and the Lists of Data Subject to Entry into the Registry and Publication], N 01-N, 22 December 2023, ARLIS, https://www.arlis.am/hy/acts/203012; Հանրային պաշտոն զբաղեցնող անձանց և հանրային ծառայողների՝ պետական սեփականություն դարձած նվերների տնօրինման կարգը, գույքի տնօրինման եղանակների ընտրության մեթոդաբանությունը, առանձին տեսակի գույքի տնօրինման առանձնահատկությունները, տնօրինման եղանակի վերաբերյալ «Պետական արարողակարգի մասին» օրենքով սահմանված եզրակացության տրամադրման կարգը, շուտ փչացող և պահպանման էական ծախսեր պահանջող գույքերի ցանկը, շուտ փչացող գույքի ոչնչացման դեպքերը, կարգը և տնօրինման եղանակները սահմանելու մասին [Establishing the Procedure for Disposing of Gifts Received by Persons Holding Public Office and Public Servants that Have Become State Property; the Methodology for Selecting Methods of Property Disposal; the Specifics of Disposing of Certain Types of Property; the Procedure for Issuing the Conclusion Regarding the Method of Disposal as Prescribed by the Law "On State Protocol"; the List of Perishable Property and Property Requiring Significant Storage Costs; and the Cases, Procedure, and Disposal Methods for Perishable Property], N 956-N, 20 June 2024, ARLIS, https://www.arlis.am/hy/acts/213580.

[57] See: https://drive.google.com/drive/folders/1SHZ8YoAFdDkT8L-KNFm_g1wjCb1Q9EsW.

[58] According to the data from CPC annual report, 646 declarations of 74 officials and their 121 family members were analyzed in 2024, source: Corruption Prevention Commission, Report on 2024 activities, 2025, https://cpcarmenia.am/api/assets/7881511e-db19-45c0-94c5-40452ff88db0.

[59] “Open Gov Challenge Armenia: Digital Gift Declaration Register for Public Officials”, Open Government Partnership, 26 November 2024, https://www.opengovpartnership.org/stories/open-gov-challenge-armenia/.

[60] Syuzanna Soghomonyan (Armenian Lawyers’ Association), interview by the IRM, 20 January 2026; Hasmik Tigranyan (IFES), interview by the IRM, 4 February 2026.

[61] Mamyan, interview.

[62] Armen Khudaverdyan (Transparency International Anticorruption Center), interview by the IRM, 19 February 2026.

[63] Soghomonyan, interview.

[64] OECD, 2025, *Armenia Fifth Round of Anti-Corruption Monitoring Follow-Up Report*.

[65] Tigranuhi Khalafyan (Corruption Prevention Commission), interview by the IRM, 3 March 2026.

[66]Mamyan, interview.

[67] Tigran Tsaturyan (Corruption Prevention Commission), interview by the IRM, 5 February 2026.

[68] This function is carried out by designated public servants of state and local self-government bodies to advise public servants on rules of conduct and gift restrictions, identify professional risks, and handle local conflict-of-interest prevention (RA Law on Public Service, article 46).

[69] Ethics commissions established by laws on specific types of public service and community service oversee the compliance of public servants with the code of conduct in the respective state body, examine and resolve identified violations, and submit proposals to relevant bodies or officials on the prevention and elimination of incompatibility requirements, violations of the rules of conduct, and situations of conflict of interest of public servants. (RA Law on Public Service, articles 44-45).

[70] Khalafyan, interview; Tsaturyan, interview; Tigranyan, interview.

[71] Khalafyan, interview.

[72] Նվերների թույլատրելիության վերաբերյալ խորհրդատվական կարծիքի տրամադրման մեթոդական ուղեցույց [Methodological guide for providing advisory opinions on the permissibility of gifts], Corruption Prevention Commission, 25 June 2024, https://shorturl.at/TkQmV.

[73] Information provided to the IRM by the Corruption Prevention Commission during the pre-publication review of this report, 17 October 2026.

[74] «Կիբեռանվտանգության մասին», «Հանրային տեղեկությունների մասին», «Տեղեկատվական համակարգերի կարգավորման մարմնի մասին», «Անձնական տվյալների պաշտպանության մասին» օրենքում փոփոխություններ և լրացումներ կատարելու մասին», «Պետական գաղտնիքի մասին» օրենքում փոփոխություն կատարելու մասին», «Տեղեկատվության ազատության մասին» օրենքում փոփոխություններ կատարելու մասին», «Կառավարության կառուցվածքի և գործունեության մասին» օրենքում լրացում կատարելու մասին», «Ազգային անվտանգության մարմինների մասին» օրենքում փոփոխություններ և լրացումներ կատարելու մասին» օրենքների կիրարկումն ապահովող միջոցառումների ցանկը հաստատելու մասին ["On Cybersecurity," "On Public Information," "On the Information Systems Regulatory Body," "On Making Amendments and Additions to the Law 'On Personal Data Protection'," "On Making an Amendment to the Law 'On State Secrets'," "On Making Amendments to the Law 'On Freedom of Information'," "On Making an Addition to the Law 'On the Structure and Activities of the Government'," "On the Law 'On National Security Bodies'" On Approving the List of Measures to Ensure the Implementation of the Laws "On Making Amendments and Additions..."], N 117-A, 13 February 2026, ARLIS, https://www.arlis.am/hy/acts/220963.

[75] Artyom Mesropyan (Ministry of High-Tech Industry), interview by the IRM, 19 Mar. ch 2026.

[76] Doydoyan, interview; Mesropyan, interview; ECNL Stitching and TIAC, *Armenia 2025 Country report*.

[77] Doydoyan, interview.

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[78] See, for example, open data portals of: Canada, "Using and Publishing Open Data and Information," Government of Canada, accessed 23 September 2026, https://open.canada.ca/en/open-data; Estonia, "Andmete teabevärav," [Estonian Data Portal], accessed 23 September 2026, https://avaandmed.eesti.ee/; Finland, "All Finnish Open Data from One Place," Avoin data, accessed 23 September 2026, https://www.avoindata.fi/en; Ukraine, "Open Data Portal," Ministry of Digital Transformation of Ukraine, accessed 23 September 2026, https://data.gov.ua/. More open data portals can be found at "Data Portals: A Comprehensive List of Open Data Portals from around the World," Open Knowledge Foundation, accessed 23 September 2026, https://dataportals.org/.

[79] Statistics, Supreme Judicial Council, checked on 30 March 2026, https://old.court.am/index.php/hy/statistic. The updated in the updated website with statistical data is now presented by court type under https://www.court.am/մշտադիտարկում-և-վիճակագրություն. https://court.am/hy/statistic.

[80] OECD, 2025, *Armenia Fifth Round of Anti-Corruption Monitoring Follow-Up Report*.

[81] Ռազմավարություն Հայաստանի Հանրապետության դատական և իրավական բարեփոխումների 2022-2026 թվականների [2022-2026 strategy for judicial and legal reforms of the Republic of Armenia], Ministry of Justice of the Republic of Armenia https://moj.gov.am/api/assets/4cf3657a-b06a-4dea-b566-bbd9cb68ac45.

[82] Oksanna Abrahamyan (Ministry of Justice), interview by the IRM, 11 March 2026.

[83] See: "Armenia Results Report 2022-2024," Open Government Partnership, 30 June 2024, https://www.opengovpartnership.org/documents/armenia-results-report-2022-2024/.

[84] Հայաստանի Հանրապետության դատարաններում՝ ըստ դատական գործերի վիճակագրական դասակարգիչները և Հայաստանի Հանրապետության դատարանների և դատավորների գործունեության վերաբերյալ հրապարակվող վիճակագրական հաշվետվությունների օրինակելի ձևանմուշները սահմանելու մասին [Establishing Statistical Classifiers for Judicial Cases in the Courts of the Republic of Armenia and Standard Templates for Statistical Reports Published Regarding the Activities of the Courts and Judges of the Republic of Armenia], Bdkh-122-O-408, 30 December 2022, Supreme Judicial Council, https://court.am/articles/բդխ-որոշումներ/1654.

[85] "Armenia Action Plan Review 2022-2024," Open Government Partnership, 15 June 2023, https://www.opengovpartnership.org/documents/armenia-action-plan-review-2022-2024/.

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Section III. Methodology

This product is a concise, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, represent a high priority for country stakeholders, acknowledged as a priority in the national open government context, or a combination of these factors.

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.
- **Midpoint 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 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 the Action Plan Review, the IRM reviews commitments using three indicators:

1. Verifiability: The IRM determines whether a commitment is verifiable as written in the action plan. The indicator is assessed as:

- **Yes/No:** Are the stated objectives and proposed actions sufficiently clear and include objectively verifiable activities to assess implementation?
- Commitments that are not verifiable are considered not reviewable, and no further assessment is carried out.

2. Open Government Lens: The IRM determines if the commitment relates to the open government values of transparency, civic participation, and/or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance. Based on a close reading of the commitment text, the indicator is assessed as:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform, influence or co-create policies, laws and/or decisions? Will the government create, enable, or improve participatory mechanisms for minorities, marginalized or underrepresented groups?

  Will the government improve the enabling environment for civil society (which may include NGO laws, funding mechanisms, taxation, reporting requirements, et cetera)?

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Will the government improve legal, policy, institutional or practical conditions related to civic space such as freedom of expression, association and peaceful assembly that would facilitate participation in the public sphere? Will the government take measures which counter mis- and disinformation, especially online, to ensure people have access to reliable and factual information (which may include digital and media literacy campaigns, fact-checking or fostering an independent news media ecosystem)?

- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

3. Potential for Results: The IRM analyzes the expected results and potential that would be verified in the IRM Results Report after implementation. Potential for results is an early indication of the commitment's possibility to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area. The indicator is assessed as:

- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training, or pilot projects.
- **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review focuses its analysis on promising commitments. Promising commitments are verifiable, have an open government lens, and at least a modest potential for results. Promising commitments may also be a priority for national stakeholders or for the particular context. The IRM may cluster commitments with a common policy objective or that contribute to the same reform or policy issue. The potential for results of clustered commitments is reviewed as a whole.

This review was prepared by the IRM in collaboration with Tatevik Margaryan as researcher and Jeff Lovitt as external expert reviewer. This report was prepared in accordance with IRM Procedures Manual and guidance on artificial intelligence (AI). During the internal review process of this product, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM's International Experts Panel (IEP).[1] The IRM methodology, product quality, and review process are overseen by the IEP.[2]

[1] "International Experts Panel," Open Government Partnership, accessed 15 July 2024, https://www.opengovpartnership.org/about/who-we-are/international-experts-panel.

[2] For more information, see: "Overview – Independent Reporting Mechanism," Open Government Partnership, accessed 15 July 2024, https://www.opengovpartnership.org/irm-guidance-overview.

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Annex I. Commitment Data[1]

Commitment 1: Ensuring the implementation of data policy legislation

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 2: Enhancement and introduction of participatory governance

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 3: A comprehensive e-procurement system: Automated transfer of data of beneficial owners

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Substantial

Commitment 4: Mechanisms for public participation at the local level

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Substantial

Commitment 5: Electronic gift register and an automated system for corruption risks analysis

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 6: "e-Court-statistics" statistical analysis tool

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

[1] Editorial note: For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, not individual commitments. Commitment short titles may have been edited for brevity. For the complete text of commitments, please see: https://www.opengovpartnership.org/documents/armenia-action-plan-2025-2027-december/.

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Annex II. Action Plan Co-Creation

The OGP Participation and Co-Creation Standards are guidelines to support OGP members in undertaking collaborative OGP processes.[1] The Standards include minimum requirements that set a baseline for participatory and transparent OGP processes. In the Action Plan Review, the IRM assesses compliance with the minimum requirements applicable during co-creation of the action plan.[2] Members that have not met all minimum requirements are considered acting contrary to OGP process.

Armenia is not acting according to OGP process, as they did not meet all the minimum requirements applicable during development of the action plan. The IRM will assess Armenia's compliance with OGP process again in two years. Members that are currently not acting according to OGP process can rectify their status by meeting the minimum requirements relevant at the next moment of assessment.[3]

Table 2. Compliance with Minimum Requirements

Minimum requirement	Met?
1.1 Space for dialogue: Armenia's OGP working group is open to stakeholders from state, international organizations and CSOs that indicated interest in the OGP processes (most were engaged in the co-creation and implementation of previous action plans). The working group has operated informally since 2020, as the last prime ministerial decree regulating its composition referred to the 2018-2020 action plan. In 2025, the working group met once on 2 June 2025, to discuss latest updates and new initiatives as possible commitments in the sixth action plan.[4] As of this writing, the working group had not met since June 2025, including after the adoption of the action plan in December 2025, thus not meeting the minimum requirement under Standard 1 to meet at least every six months. Basic rules of participation in the working group were not published during the action plan development but information on the meeting was disseminated through the OGP Armenia Facebook page and sent via email to stakeholders by the government point of contact. Information on the possibility of joining the working group along with the items to be included in the application is published on the government OGP website.[5] However, there is no public information on the mandate and responsibilities of the working group, or basic rules on participation in the OGP process.	No
2.1 OGP website: The Prime Minister's Office (PMO) has maintained an OGP website since 2021.[6] The website is publicly accessible with no access restrictions. The website contains general information on OGP, the previous action plans, news, and other information. However, this information on the website is outdated, and the sixth action plan is not published on it at the time of IRM research. The PMO also maintains an official OGP Armenia Facebook page.[7] The OGP Armenia Facebook page does not contain a link to the sixth action plan, only a shared post by the OGP Facebook page from 13 February 2026 announcing the launch of the plan.[8] The IRM considers an OGP website or social media page "maintained" if it contains at least the country's latest action plan. As neither the PMO's OGP website nor the OGP Armenia Facebook contain the sixth action plan, the IRM assesses minimum requirement 2.1 as not met.	No
2.2 Repository: The official OGP website has not been updated since 2022 and does not contain information on the sixth action plan. The official OGP Armenia Facebook page is regularly updated, including with information on the sixth action plan's co-creation process and the commitments. Therefore, the IRM assesses that minimum requirement 2.2 was met during the co-creation period of the sixth action plan.	Yes

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3.1 Advanced notice: The PMO sent the draft timeline and priorities for the sixth action plan to stakeholders by email on 31 January 2025. The timeline was not published online. On 2 April 2025, the OGP Point of Contact sent an email to stakeholders on the start of the co-creation of the action plan, including the priority directions and opportunities for providing input, and published announcements on the government's official website and on the OGP Facebook page.[9] The deadline for submitting proposals was 30 May 2025.	Yes
3.2 Outreach: Information on OGP processes was disseminated via the government's social media networks and during events organized by the government and civil society stakeholders, such as OpenGovWeek.[10]	Yes
3.3 Feedback mechanism: An announcement on the action plan's development was published on the government's official website and OGP Facebook page with the possibility to make suggestions via a Google Form.[11] There is no documented evidence on the submitted proposals. The government posted the draft action plan on the Unified Website for Legal Drafts (e-draft.am) for public comments in November 2025, providing 16 days for comment submission.[12] No comments have been presented on the platform.	Yes
4.1 Reasoned response: There is no published information on the contributions from stakeholders to the development of the sixth action plan. According to the point of contact at the PMO, proposals were received from three organizations which were already included in the ongoing reforms or irrelevant to the themes proposed by the government for the sixth action plan.[13] The PMO did not provide written feedback to the proposals but provided verbal feedback to one of the three organizations that submitted proposals during one of the consultations for the sixth action plan.	No

The government point of contact at the PMO disseminated information through the mailing list of the OGP working group. Several civil society stakeholders expressed a preference for a formal multi-stakeholder forum (MSF) with clear roles and responsibilities in order to strengthen accountability, better consistency of engagement, and foster a stronger sense of ownership among both government and civil society participants.[14] This would not necessarily require a prime ministerial decree but at a minimum would benefit from publicly available information on members' composition and the role of the MSF. In addition, the MSF did not meet regularly, as required by the minimum standards. Civil society stakeholders noted that, beyond regular meetings, organizing thematic discussions focused on specific commitments, policy areas, digital platforms, or open government topics, could improve the quality of dialogue and create more opportunities for meaningful collaboration between government and CSO actors.[15]

Furthermore, the government's official OGP website has not been updated with the new action plan. Although the government's official OGP Armenia Facebook page is regularly updated and provides news and information on open government issues, an up-to-date official website remains important to ensure accessible, easily retrievable information for the public.

As the government decided to carry over commitments from the previous action plan, it conducted limited outreach and consultations, and commitments were largely shaped by responsible government bodies. At the same time, the PMO provided a platform for submitting comments and proposals on predefined priorities, which was a positive step. However, to strengthen transparency in the co-creation process, it is important that all submissions are documented and that individual feedback is provided to contributors, including justification where proposals are not accepted.

For future action plan processes, the IRM recommends that the PMO:

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- Publish clear and accessible rules for stakeholder participation in co-creation and implementation processes, including the mandate, composition, and structure of Armenia's working group.
- Ensure regular meetings of the multi-stakeholder forum, held at least once every six months, in line with OGP minimum requirements.
- Update and maintain the official government OGP website, at a minimum by publishing the current action plan, participation rules, and providing updates on implementation progress at least twice per year. This could also be a landing page within other government website structures.
- Publish all submitted suggestions and provide tailored responses to contributors, including justification where proposals are not incorporated.

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[1] "OGP Participation and Co-Creation Standards," Open Government Partnership, 24 November 2021, www.opengovpartnership.org/ogp-participation-co-creation-standards.

[2] "IRM Guidelines for the Assessment of Minimum Requirements," Open Government Partnership, 31 May 2022, www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements.

[3] Editorial note: For two-year action plans, the IRM will assess compliance with minimum requirements applicable to implementation in the Results Report. For four-year action plans, the IRM will do so in the Midterm Review. For all action plans, the IRM will provide a comprehensive analysis of participation and co-creation practices throughout the action plan cycle in the Results Report. See: "OGP National Handbook – Rules and Guidance for Participants (2024)," Open Government Partnership, 11 April 2024, www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2024.

[4] Open Government Partnership/Armenia, "Armenia's digital reform! On June 2, more than 40 participants from public authorities, civil society, and the media discussed Armenia's digital reform agenda," Facebook, 5 June 2025, https://www.facebook.com/OpenGovernmentPartnershipArmenia/posts/pfbid0qdXSbkY354M4bWw1Y5P7aWaCrfYxVHZ2GDmpghtmwK9W7YkaBda8XmF5Uq1cLfGml.

[5] Join the Group, Open Government Partnership Armenia https://ogp.gov.am/en/joining-the-group. Last accessed 31 March 2026.

[6] Open Government Partnership Armenia, https://ogp.gov.am/en. Last accessed 31 March 2026.

[7] "Open Government Partnership/Armenia," Facebook, https://www.facebook.com/OpenGovernmentPartnershipArmenia/.

[8] See https://www.facebook.com/OpenGovernmentPartnership/posts/-armenia-launches-its-new-ogp-action-plan-for-20252027the-government-has-committ/1364213545740665/.

[9] https://www.gov.am/am/announcements/item/1594/; Open Government Partnership/Armenia, ««Բաց կառավարման գործընկերություն-Հայաստան» նախաձեռնության նոր գործողությունների ծրագրի մեկնարկ» [Launch of the new action plan for the "Open Government Partnership-Armenia" initiative], Facebook, 2 April 2025, https://www.facebook.com/OpenGovernmentPartnershipArmenia/posts/pfbid0nssUpL73nQzdSQdjZ47vhPHKLQ9ubsQgj15cGDHBRjfoCtvyoj3wW6ESbuy5SnEvl.

[10] The government and IFES organized a joint event during the OpenGovWeek: Open Government Partnership/Armenia, «Հարգելի' գործընկերներ, մայիսի 20-ին «Բաց կառավարման շաբաթ»-ի շրջանակներում Վարչապետի աշխատակազմը և IFES Հայաստան կազմակերպությունը նախատեսել են «Թվային ժողովրդավարություն և թափանցիկ կառավարում»» [Dear colleagues, On May 20, within the framework of "Open Government Week," the Prime Minister's Office and IFES Armenia have planned an event titled "Digital Democracy and Transparent Governance."], Facebook, 16 May 2025, https://www.facebook.com/OpenGovernmentPartnershipArmenia/posts/pfbid0tqrA79Ty29L2FzDSeemYzU6SqsWUAZK6p9Ujn5kw86pHfdusuuY5UY18ur2uCyjnl; Open Government Partnership/Armenia, "On May 20, Open Government Partnership (OGP) Armenia and IFES organized a panel discussion dedicated to the role of digital tools in promoting transparency and accountability in Armenia," Facebook, 21 May 2025, https://www.facebook.com/OpenGovernmentPartnershipArmenia/posts/pfbid09J9TRHMGTKNzxdYLbXvhGAommz5HKkZt5Faguxkxi7qH1qnLVtqxXhNfsMu58wR4l.

[11] https://www.gov.am/am/announcements/item/1594/ (last accessed 31 March 2026); Open Government Partnership/Armenia, Նոր գործողությունների ծրագրի մեկնարկը» [Launch of the new action plan]. https://www.facebook.com/OpenGovernmentPartnershipArmenia/posts/pfbid0nssUpL73nQzdSQdjZ47vhPHKLQ9ubsQgj15cGDHBRjfoCtvyoj3wW6ESbuy5SnEvl.

[12] ««Բաց կառավարման գործընկերություն-Հայաստան» նախաձեռնության շրջանակներում Հայաստանի Հանրապետության 2025-2027 թվականների գործողությունների ծրագիրը» [The Action Plan of the Republic of Armenia

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for 2025-2027 within the framework of the "Open Governance Partnership-Armenia" initiative], Unified Website on Publication of Legal Drafts, accessed 23 September 2026, https://www.e-draft.am/projects/9336.

[13] Lilya Afrikyan (Office of the Prime Minister of the Republic of Armenia), interview by the IRM, 4 March 2026.

[14] Arpine Hakobyan (NGO Center), interview by the IRM, 24 March 2026; Liana Doydoyan (Freedom of Information Center of Armenia), interview by the IRM, 20 March 2026; Naira Arakelyan (Armavir Development Center), interview by the IRM, 23 March 2026.

[15] Sona Ayvazyan (Transparency International Anticorruption Center), interview by the IRM, 5 February 2026; Grisha Khachatryan (Information Systems Development and Training Center), interview by the IRM, 8 April 2026.

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