

National Implementation Report of the Aarhus Convention (2021-2024)

Republic of Armenia

1. Process by which the report has been prepared

Provide a brief summary of the process by which this report has been prepared, including information on the type of public authorities that were consulted or contributed to its preparation, how the public was consulted and how the outcome of the public consultation was taken into account, as well as on the material that was used as a basis for preparing the report.

The National Implementation Report (NIR) of Armenia under the Aarhus Convention (hereinafter referred to as the "Convention") was prepared by the National Focal Point with the active participation of the the Ministry of Environment of the Republic of Armenia (RA), other relevant governmental bodies, Yerevan Aarhus Center, Non-Governmental Organizations (NGO), and A. Iskoyan Environmental Law Research Center of the Yerevan State University (YSU) and other interested stakeholders.

In order to organize the report preparation process in a more participatory and transparent manner, and to ensure the inclusion of comprehensive information, the Aarhus Center (hereinafter referred to as the Yerevan Aarhus Center) of the “Hydrometeorology and Monitoring Center” (hereinafter referred as “Armhydromet”) State Non-Commercial Organization (SNCO) of the Ministry of Environment of the RA is implementing the project titled “Strengthening Aarhus Centres in the OSCE area to promote good environmental governance and sustainable development,” with financial support from the Organization for Security and Co-operation in Europe (OSCE). Within the framework of the project, and in cooperation with the National Focal Point of the Convention, relevant professional subdivisions of the Ministry of Environment and non-governmental organizations (hereinafter referred to as NGOs) active in the field of environmental protection were informed about the project and the launch of preparatory work for the Report.

The following state bodies and NGOs participated in the process (with written opinions and proposals):

- Ministry of Environment of the Republic of Armenia (MoE)
- Ministry of Internal Affairs of the Republic of Armenia (MoIA)
- Ministry of Justice of the Republic of Armenia (MoJ)
- Ministry of Territorial Administration and Infrastructure of the Republic of Armenia (MoTAI)
- Ministry of Economy of the Republic of Armenia (MoEc)
- Ministry of Health of the Republic of Armenia (MoH)
- Ministry of Education, Science, Culture and Sport of the Republic of Armenia (MoESCS)
- Statistical Committee of the Republic of Armenia
- Environmental Protection and Mining Inspection Body of the Republic of Armenia
- Urban Development Committee of the Republic of Armenia

Yerevan Aarhus Center

A. Iskoyan Environmental Law Research Center, YSU

Transparency International Anti-corruption Center

“Armenian Women for Health and Healthy Environment” NGO

“Blejan” Environmental, Social and Business Support NGO

“Freedom of Information Center of Armenia” NGO

“Dalma-Sona” Educational, Cultural, Social and Environmental Foundation

Law Development and Protection Foundation

“Consumer Support Center” NGO

“Green Roof” NGO

“Khazer” Ecological and Cultural NGO

“Shoger Union” Social-Educational NGO

“EcoLur” Informational NGO

Media.am website

“Lore EcoClub” NGO

Center for Community Mobilization and Support

Center for Human Rights Research

Through an online questionnaire, NGOs were given the opportunity to join pre-established focus groups related to the three pillars of the Aarhus Convention: access to information, public participation in decision-making, and access to justice (questionnaire link: [here](#))

The Yerevan Aarhus Center, in collaboration with the National Focal Point of the Convention, developed the following questionnaires, which were used during focus group discussions:

a) Focus Group 1: Access to Information

1. Legislative, regulatory, and other measures related to Articles 4 and 5 of the Aarhus Convention
2. Obstacles to the implementation of Articles 4 and 5 of the Aarhus Convention
3. Additional information related to Articles 4 and 5 of the Aarhus Convention
4. Links to official websites and other electronic platforms related to Articles 4 and 5 of the Aarhus Convention.

b) Focus Group 2: Public Participation in Decision-Making

1. Legislative, regulatory, and other measures related to Articles 6, 7, and 8 of the Aarhus Convention
2. Obstacles to the implementation of Articles 6, 7, and 8 of the Aarhus Convention
3. Additional information related to Articles 6, 7, and 8 of the Aarhus Convention
4. Websites and other relevant links related to Articles 6, 7, and 8 of the Aarhus Convention

c) Focus Group 3: Access to Justice

1. Legislative, regulatory, and other measures related to Article 9 of the Aarhus Convention
2. Obstacles to the implementation of Article 9 of the Aarhus Convention
3. Additional information related to Article 9 of the Aarhus Convention
4. Websites and other relevant links related to Article 9 of the Aarhus Convention

On March 14, 2025, a workshop entitled "Synergies between the Aarhus Convention and Other Environmental Conventions in the Context of Access to Information and Public Participation" was organized by "Armhydromet" SNCO. The aim was to discuss and identify synergies between the Aarhus Convention and other environmental conventions, as well as to ensure that information on the processes carried out under all conventions ratified by the RA is adequately reflected in the Report.

All suggestions and comments submitted during the focus groups and public discussions through electronic variants by NGO representatives were taken into account during the preparation of the NIR.

Public hearings were held with the active participation of the MoE, other state bodies, Aarhus Centers, and NGOs.

In the course of preparing the report, the legislative and sub-legislative acts of the RA, draft laws, short-term and long-term programs, as well as other measures aimed at the implementation of the Convention, were used.

2. Particular circumstances relevant for understanding the report

Report any particular circumstances that are relevant for understanding the report, e.g., whether there is a federal and/or decentralized decision-making structure, whether the provisions of the Convention have direct effect upon its entry into force, or whether financial constraints are a significant obstacle to implementation (optional).

Following Armenia's ratification of the Aarhus Convention (01.08.2001), the direction of environmental democracy development was reshaped with the aim of aligning environmental policy with Western standards. Constitutional provisions relating to environmental norms¹ were revised, and national legislation² was also amended.

¹ The RA Constitution was significantly revised in 2015, transitioning the country from a semi-presidential to a parliamentary republic: <https://www.president.am/en/constitution-2015/>

² www.env.am Legislation subsector. <http://env.am/orensdrutyun/orenqner>

The Comprehensive and Enhanced Partnership Agreement (CEPA) was signed between the RA, on one side, and the EU, the European Atomic Energy Community, and their member states, on the other (signed on 24.11.2017, entered into force on 01.06.2018)³.

Within the framework of CEPA, various actions are foreseen in the environmental field, including measures aimed at ensuring public access to environmental information. The provisions of the Agreement (Articles 91.1 to 91.5) directly reflect the requirements⁴ of the Convention.

According to Article 4 of the Constitution, state power in the RA is exercised in accordance with the Constitution and laws, based on the principles of separation and balance of legislative, executive, and judicial powers.

The MoE of the RA is a republican body of executive authority that develops and implements state policy in the fields of environmental protection and the rational use of natural resources. The MoE operates based on its charter, which was approved by the RA Prime Minister's **Decision No. 745-L of June 11, 2018**⁵.

The constitutional provision related to the environment (Article 12 of the RA Constitution) was also amended⁶.

In the 2021, 2022, 2023 state budget of the RA, a special budget line was also allocated for the promotion of the formation of an environmental outlook, ecological upbringing of the population, environmental mindset and awareness through the preservation and exhibition of natural science specimens. Though the budgetary funding of environmental education programs contributes indirectly to the implementation of the Aarhus Convention, no dedicated financial resources have been allocated for the direct implementation of the Aarhus Convention since 2020 state budget. This has inevitably led to certain consequences, particularly a lack of funding for activities such as providing official translations of documents and laws, organizing events, and other necessary processes.

3. Legislative, regulatory and other measures implementing the general provisions in article 3, paragraphs 2, 3, 4, 7 and 8

List legislative, regulatory and other measures that implement the general provisions in article 3, paragraphs 2, 3, 4, 7 and 8, of the Convention.

Explain how these paragraphs have been implemented. In particular, describe:

(a) With respect to paragraph 2, measures taken to ensure that officials and authorities assist and provide

³ CEPA text is available in the following link: https://www.eeas.europa.eu/eeas/eu-and-armenia-comprehensive-and-enhanced-partnership-agreement-enters-force_en (accessed on May 20, 2025)

⁴ <https://www.mfa.am/ru/bilateral-relations/eu>

⁵ <http://env.am/naxararutyun/charter>

⁶ Every citizen is obliged to take care of environmental protection (Article 12 of the RA Constitution). The new wording, based on Articles 10 and 33.2 of the previous version of the Constitution and the principles of constitutional order, establishes that **environmental protection is not only a duty of the state but also a responsibility of every individual.**

the required guidance;

(b) With respect to paragraph 3, measures taken to promote education and environmental awareness;

(c) With respect to paragraph 4, measures taken to ensure that there is appropriate recognition of and support to associations, organizations or groups promoting environmental protection;

(d) With respect to paragraph 7, measures taken to promote the principles of the Convention internationally; including:

(i) Measures taken to coordinate within and between ministries to inform officials involved in other relevant international forums about article 3, paragraph 7, of the Convention and the Almaty Guidelines, indicating whether the coordination measures are ongoing;

(ii) Measures taken to provide access to information at the national level regarding international forums, including the stages at which access to information was provided;

(iii) Measures taken to promote and enable public participation at the national level with respect to international forums (e.g., inviting non-governmental organization (NGO) members to participate in the Party's delegation in international environmental negotiations, or involving NGOs in forming the Party's official position for such negotiations), including the stages at which access to information was provided;

(iv) Measures taken to promote the principles of the Convention in the procedures of other international forums;

(v) Measures taken to promote the principles of the Convention in the work programmes, projects, decisions and other substantive outputs of other international forums;

(e) With respect to paragraph 8, measures taken to ensure that persons exercising their rights under the Convention are not penalized, persecuted or harassed

a) Articles 51 and 53 of the Constitution of the RA establish the prerequisites for the implementation of Article 3, Paragraph 2 of the Aarhus Convention. The procedure for obtaining such information, as well as the grounds for holding officials accountable in cases of concealment or unjustified refusal to provide information, is established by law. The law also regulates the right of individuals - either independently or jointly with others - to submit petitions to state and local self-government bodies and officials and to receive a proper response within a reasonable time.

By Order No. 61-L of the Minister of Environment, an advisory council under the Minister was established, and its individual composition and rules of procedure were approved⁷. On April 23, 2024, by the Order No. 134-L of the Minister, the individual composition of the Public Council was amended⁸.

The Public Council operating under the MoE is an independent advisory body that coordinates public participation in the development of environmental programs, plans, and policies. The council operates on a voluntary basis. The draft Decision of the RA Prime Minister on the "Working procedure and formation of the public council under the RA Ministers" was developed and submitted for discussions. The draft includes targeted solutions to the gaps and issues resulted from monitoring and investigation procedures.

Within the powers of the MoE, a procedure has been established for receiving citizens through

⁷ <http://env.am/storage/files/61-L.pdf> (accessed on May 20, 2025)

⁸ <http://env.am/naxararutyun/the-councils-attached-to-the-minister> (accessed on May 20, 2025)

electronic platforms such as www.e-gov.am and www.e-request.am. These aim to create a unified platform for e-governance tools across the entire territory of Armenia. Additionally, the www.azdarar.am website is used to ensure public notification in cases required by law or normative legal acts.

b) On February 22, 2018, the RA Government adopted Protocol Decision No. 7 on “Approval of the Strategy for the Development of Environmental Education and Upbringing.” The decision was cancelled as of January 1, 2022. The issue related to the development of the new strategy has been discussed with interested parties.

- Adjustments were made to the RA Prime Minister’s Decision No. 745-L of June 11, 2018 on the amendment of the MoE’s Statute⁹,

- According to Government Decision 4 No. 1363-A of August 18, 2021, and Decision No. 1902-L of November 18, 2021, on the approval of the 2021–2026 Government Action Plan¹⁰, a number of measures were set forth including:

- 1) Submit the draft legislative bill on amendments to the Law on Environmental Education and Upbringing (the bill is currently under development) to the staff office of Prime Minister; (the draft was subjected to public discussion at the unified website for publishing legal acts’ drafts in July, 2022¹¹, but it is still in the revision stage),
- 2) Development of an early warning system for disasters,
- 3) Increasing youth participation in decision-making across all areas of public life,
- 4) Establishment of a unified environmental information system, etc.

- On February 22, 2018, the Government of Armenia adopted Decision No. 191-N On the Approval of the Procedure for Submitting Reports on the Implementation of Monitoring Requirements Aimed at Preventing Environmental Impacts and Reducing Environmental Losses Resulting from Subsoil Use (entered into force on March 17, 2018¹²). Within the framework of this decision, the following measures have to be periodically implemented.

- On March 21, 2018, legislative amendments were adopted to the RA Code on Subsoil (HO-186-N Law). Article 69 of the Code was supplemented with a new provision stipulating that the authorized state body shall annually publish comprehensive information on subsoil users on its official website. On May 25, 2022, further amendments were made to the Code (HO-142-N), including the adoption of regulatory provisions related to the classification of mineral reserves and other matters. Based on these amendments, the Minister of Environment approved, by Order No. 369-N of October 25, 2022, the guidelines for the implementation of Environmental Impact Assessment (EIA) provisions in the mining

⁹ <https://www.arlis.am/DocumentView.aspx?docid=188335>

¹⁰ <https://www.arlis.am/hy/acts/172772>

¹¹ <https://www.e-draft.am/projects/4533/about> (accessed on May 20, 2025)

¹² <https://www.arlis.am/documentview.aspx?docID=120135> (accessed on May 20, 2025)

sector. For instance, the “Guideline for the Development of EIA Reports Submitted for Requesting Geological Exploration and Extraction Rights for the Purpose of Mineral Extraction” highlights the importance of data related to the assessment of social impacts resulting from the proposed activity. It also emphasizes the availability of information on the proposed activity and the presence of public awareness materials. The guideline requires that the subsoil user have an atmospheric air quality monitoring plan, that monitoring be conducted with sufficient frequency, and that the results be made accessible to the broader public. According to the guideline, the “Non-Technical Summary” must be concise and provide a comprehensive description of the project, its potential environmental impacts, and proposed mitigation measures. It should also be easily understandable to a wide audience. Currently, a draft order amending the aforementioned ministerial order is under circulation. The draft proposes more detailed regulations that aim to enable the public to objectively understand the actual scale of the environmental and social impacts of the planned activity and to be informed about its effects on the environment.

In addition to the above-mentioned legislative amendments, the following programs have also been initiated to enhance public awareness on environmental education and key environmental issues:

- In 2019, two environmental awareness programs were launched: “**EcoPlatform**” (a televised program broadcast on the *First Channel* – [youtube page](#)) and “**Your Environmentalist**” (a series of 12 radio programs aired on *Public Radio of Armenia*)¹³. The broadcasts were aired throughout the RA and internationally, including for members of the Armenian diaspora. The “Eco-Platform” television program has not been broadcast since 2020.

- The program titled “Generate Global Environmental Benefits through Environmental Education and Raising Awareness of Stakeholders” was implemented with financial support from the Global Environment Facility (GEF) and the United Nations Development Programme (UNDP) in order to ensure continuous ecological education provided for by the Law on Ecological Education and Upbringing. The training topics included biodiversity, specially protected areas, forests, water resources, soil conservation, climate change, subsoil use, renewable energy, energy efficiency, and more. The trained community-level civil servants were involved in local environmental education and awareness activities. Educational materials developed for civil and community servants within the framework of the program are available to trainers/mentors trained under the program and can also be used in the future to conduct similar training courses.

- Educational and awareness-raising programs, including those implemented at the community level, are carried out through the joint efforts of the MoE, the MoESCS, as well as international organizations and NGOs, based on collaboratively developed curricula and methodological guidelines. The “National Center for Education Development and Innovation” Foundation of the MoESCS has developed educational materials and methodological guidelines, including courses and modules for various age

¹³ <https://hy.armradio.am/archives/234811> (accessed on July 15, 2025)

groups. The Foundation's programs ensure broad youth engagement through diverse activities. International cooperation and training opportunities have been established for professionals and teachers involved in the field.

- Through a joint initiative of MoE, MoESCS, the Government has introduced a new specialization, "Refrigeration Economy," into the official list of professions.

A state educational standard (curricula) has been developed for this specialization, and since 2019, admission has been carried out in this specialty in vocational educational institutions (Armavir Regional State College, Ararat Regional State College, and Yerevan Regional State College No. 2). Each year, the state finances an average of 45 places.

- In Autumn, 2019, a regional center for life-long education and certification has been established at the Shirakatsy Lyceum. The center will host capacity-building trainings on refrigeration economy and climate-related issues with the participation of experts from Europe and Central Asia. The program is implemented by the MoE, with financial support from the Government of the Russian Federation within the framework of the membership fee provided for the implementation of the goals of the Montreal Protocol and the United Nations Industrial Development Organization (UNIDO). The Regional Center was certified under the EU REAL Alternatives 4 LIFE program as a training center, and the lecturers were trained within the same program and received teaching certificates. Participants who successfully completed the training received the REAL Alternatives 4 LIFE certificate, which is also recognized within the EU. The Center continues its activities.

- To promote environmental education and awareness-raising in Armenia's regions, the MoE and the German Agency for International Cooperation (GIZ) have implemented several activities. Within the awareness-raising component on energy efficiency and renewable energy under the ECOserve program, the "Public Awareness and Monitoring Center" NGO developed the "Energiapolia" board game for ages 11–100 and organized table talks with rural women from three regions on topics related to energy efficiency. In 2024, under the EU4Sevan program, an educational module on Lake Sevan protection was developed for senior preschool groups, along with teacher manuals on "Lake Sevan Protection" for elementary, middle, and high school levels. The module and manuals were approved by the MoE and the MoESCS and will soon be implemented in educational institutions.

With the aim of developing and promoting ecological thinking and behavior, and combining theoretical and practical knowledge on environmental topics, educational events were also conducted within the framework of the "Ozone Layer Protection" program for schoolchildren, students of vocational education institutions, university students, and other stakeholders¹⁴.

¹⁴ <https://saveozone.am/en/post/chanachoghakan-ayc-amberd-ozonachapakan-kayan>;
<https://saveozone.am/en/post/chanachoghakan-ayc-amberd-ozonachapakan-ditakayan-epth-ovsanoghneri-hamar> ;
<https://saveozone.am/en/post/aeptemberi-16-chanachoghakan-ayc-amberd-ozonachapakan-ditakayan> ;
<https://saveozone.am/en/post/ozonayin-sherti-pahpanovtyan-hamashkharhayin-or-2023t>

- The MoE, jointly with UNDP, and in cooperation with the Ministry of Labor and Social Affairs of the RA, and the Women’s Council of Armenia, annually organizes an event-award ceremony titled "Climate Change and Women in Armenia," aimed at recognizing women's contributions and leadership in climate change mitigation and adaptation actions and solutions. To raise the level of eco-education and awareness, the MoE regularly organizes environmental events for schoolchildren, students, and other beneficiaries through its subordinate structures. In particular, the following events were carried out during 2021–2024:

- In 2022

- An Eco-Club Youth Summit was organized in collaboration with the “ATP” Charitable Foundation.

- At the “Mkhitar Sebastatsi” Educational Complex, the series of meetings titled “Let’s Speak about Nature” was concluded within the framework of the “Institutional Strengthening and Capacity Building” project jointly implemented with the United Nations Industrial Development Organization (UNIDO). As part of the series, Ministry (MoE) representatives visited the Educational Complex to speak about efforts to restore the ozone layer, the protection of soil and subsoil resources, the management of SPNAs and biodiversity, and the Ministry’s policy on promoting the use of electric vehicles.

- Within the framework of the EU4Sevan project, the “Environment and Health” NGO, in cooperation with the MoE, organized the concluding event of the “Friends of Sevan” program. The program aimed to raise youth awareness about the importance of protecting and restoring Lake Sevan’s ecosystem. It covered around 35 communities and 40 schools in the Gegharkunik region and reached more than 4000 schoolchildren and adults. Between April and November 2022, the program conducted 32 webinars, 55 thematic open classes and discussions, training for teachers and program ambassadors from 12 selected schools, and developed five thematic modules. About 1500 people attended the theatrical performance “Sevan’s Plea.”

- Events dedicated to International Youth Day in the village of Drakhtik.

- Awareness campaigns were held in preschools as part of the “Ozone Layer Protection” program.

- An exhibition titled “Nature through the Eyes of Children” was held at the Yerevan Botanical Garden on the occasion of International Children’s Day.

- The "Youth for Change" program was implemented in the Syunik region, in the "Arevik" National Park ("Zangezur" Biosphere Complex" SNCO, MoE).

- A series of events was organized at the State Nature Museum of Armenia as part of the “Museum Night” initiative.

- The Minister of Environment visited Ayb School to get acquainted with the programs implemented in the natural sciences and meet the authors of the RenéMask project, who appeared in the top ten applicant teams among 516 schools from 114 countries around the world for the prestigious The Earth Prize 2022.

- A three-day training titled “Facing Climate Change: From Ideas to Implementation” was held

under the UNDP–GCF “NAP Armenia” project.

- In 2023

- The State Nature Museum of Armenia hosted an eco-educational workshop titled “Second Life for Waste,” environmental open lessons on International Children’s Day, discussions on the Red Book, endangered species, and their conservation, meetings between schoolchildren and ministry staff as part of a student project on the 17 UN Sustainable Development Goals, an eco-educational session on World Water Day, and a presentation of environmental games was organized.

- The State Institution "Environmental Project Implementation Unit" has brought together 40 young people from Armenia's regions at the agro-educational center to deliver lectures on climate change adaptation, develop and present innovative environmental solutions in communities.

- A roundtable discussion titled “The Montreal Protocol in the Context of the UN Sustainable Development Agenda” was held at the UN Office in Armenia with the participation of high school students.

- The second phase of the “Let’s Speak about Nature” environmental discussion series was conducted.

- A meeting-discussion dedicated to World Wetlands Day was held at the Yerevan Aarhus Center.

- The MoE summarized its meeting series with students of the “Mkhitar Sebastatsi” Educational Complex within the framework of the UNIDO project “Institutional Strengthening and Capacity Building”.

- In 2024

- The Day of Specially Protected Nature Areas (SPNAs) was celebrated.

- The State Nature Museum of Armenia celebrated International Mountain Day, held a workshop on "Second Life for Waste" and an educational lesson on "Hazardous Waste", as well as events dedicated to World Animal Protection Day, the preservation of the Lake Sevan ecosystem, and the Red Books of the fauna and flora of Armenia.

- On International Day for Biological Diversity, media representatives visited the “Khor Virap” State Sanctuary to become acquainted with ecosystem restoration results in this wetland of international importance.

- An environmental workshop for schoolchildren was organized to promote the use of reusable fabric bags.

- Every year, numerous eco-educational events are conducted in SPNAs or on the initiative of their staff for various age groups (see Table 1).

Participants of the events organized by Nature protected areas' management organizations

Name of SNCO	Events and participants	2021	2022	2023	2024
"Dilijan" National Park"	Event	12	12	31	26
	Participant	-	500	1257	845
"Sevan" National Park"	Event	35	25	25	23
	Participant	-	1848	1589	1571
"Khosrov Forest" State Reserve"	Event	50	42	50	55
	Participant	-	1100	1825	1600
"Lake Arpi" National Park	Event	15	18	18	20
	Participant	-	500	500	600
"Zangezur" Biosphere Complex"	Event	22	28	35	23
	Participant	-	705	1244	973
"Reserve Park Complex"	Event	29	10	9	14
	Participant	-	200	200	435

- During the reporting period, a roundtable discussion titled “The Montreal Protocol in the Context of the UN 2030 Agenda for Sustainable Development” was held annually in observance of the International Youth Day, as proclaimed by the UN. The event was organized within the framework of the “Institutional Strengthening and Capacity Building” program, jointly implemented by the MoE and the United Nations Industrial Development Organization (UNIDO)¹⁵. In 2024, both the scope of participants and the agenda of the event were expanded to include issues related to the Aarhus Convention and the role of environmental education in the context of the UN SDGs.

- In addition to the aforementioned activities, the National Focal Point of the Convention held regular meetings with high school students and students of the Faculty of Law at YSU, presenting the principles of the Aarhus Convention, Armenia’s commitments under the Convention, and the ongoing work being carried out in this context.

- In 2020, a roadmap for the new Strategy on the Conservation and Sustainable Use of Biodiversity in Armenia was developed. In 2024, the Biodiversity Strategy and Action Plan for 2026–2030 was developed and, as of April 15, 2025, it is in the discussion phase. A separate document on biodiversity awareness-raising has been developed alongside the Strategy, which envisions a clearly defined action plan in this direction.

A draft of a new Law on Specially Protected Nature Areas was developed, reflecting Armenia’s current needs and legislative requirements. It is still in the revision stage. To support biodiversity conservation, sustainable use, and ecotourism development, brochures and other awareness-raising materials are

¹⁵ <https://saveozone.am/post/monreali-ardzanagrovtyovny-mak-i-kayovn-zargacman-npatakneri-2030-tvakani-orakargi-entateqstovm> ; <https://saveozone.am/post/eritasardovtyan-hamashkharhayin-or-2023-t>; <https://saveozone.am/post/eritasardovtyan-hamashkharhayin-or-2024>.

periodically published and disseminated.

Within the EU framework, an Ecoportal dedicated to water resources was developed. The water quality data have been harmonized with the European Water Information System (WISE), making the portal compatible with the European database.

Though the Ecoportal is intended to provide comprehensive environmental information, it currently contains data only on water resources, including sectoral policy, basin management plans, maps, data on indicators, and a separate subsection dedicated to Lake Sevan¹⁶.

Thus, the implementation of environmental education programs is an integral part of the MoE's activities. These programs are conducted both in Yerevan and the regions of Armenia, aiming to ensure balanced access to environmental knowledge across the population.

c) According to Article 45 of the Constitution of the RA, everyone has the right to freely associate with others, including for the protection of their labor rights, and to form or join trade unions. Freedom of associations/unions may be restricted by law only for the purposes of protecting state security, public order, public health and morality, or the rights and freedoms of others.

The Law on Public Organizations (NGOs) defines the procedure for establishing organizations, the grounds for their state registration, their rights, obligations, and responsibilities, as well as other matters related to their operation. To register a public organization, one must visit <https://www.e-register.am/am/docs>.

In 2021-2024, the Aarhus Centre in Yerevan responded to 72 information requests, addressing written and oral inquiries from students, lecturers, NGO representatives, and individual citizens, including those received from abroad.

The MoE regularly publishes announcements on its official website regarding grant programs, seminars, as well as other events for NGO representatives.

d) i) ii) iii) iv) v) If an international organization's invitation provides for the participation of NGOs or other bodies in a global forum, the MoE sends a letter to the relevant entities requesting nominations. This procedure is followed only when the organizers explicitly request candidate nominations from the Ministry. In all other cases, NGO representatives register and participate in international seminars independently.

In 2022, within the framework of the EU Twinning project "Strengthened Protection and Sustainable Use of Biodiversity in Armenia in Line with the European Union Standards," representatives of scientific institutions and NGOs were included in the delegation alongside representatives of the MoE during study visits to the Czech Republic and Estonia to familiarize themselves with biodiversity conservation

¹⁶ <https://ecoportal.am/en/page/home/>.

and protected area management practices¹⁷.

In 2023 and 2024, an NGO representative was also included in the delegation participating in a series of training sessions organized by the Regional Centre for Capacity Building and Technology Transfer of the Stockholm Convention in the Czech Republic. The trainings focused on newly listed Persistent Organic Pollutants (POPs) and tools for submitting national reports.

From October 14 to 18, 2024, a study visit took place in Podgorica (Republic of Montenegro) within the framework of the project “Additional Energy Efficiency Measures in the Refrigeration Sector.” The Armenian delegation included representatives from the MoE, the MoTAI, Armenian engineering Association of Refrigeration, Air Conditioning, and Heating, as well as experts from the “Ozone Layer Protection” program¹⁸.

e) In accordance with the Constitution of the RA, individuals exercising their rights under international conventions shall not be subjected to punishment, persecution, or harassment (Article 26). The National Focal Point of the Convention provided information to the media and NGOs regarding the establishment of a new mechanism under the Convention - the institution of the Special Rapporteur on Environmental Defenders¹⁹.

4. Obstacles encountered in the implementation of article 3

Describe any obstacles encountered in the implementation of any of the paragraphs of article 3 listed above.

Though training programs have been implemented for both public servants, and to raise the population’s awareness of environmental rights, such programs need to be continuous. There are obstacles to the equal involvement of regions and communities, particularly in terms of the limited outreach of non-formal education.

There is a need for the provision of Aarhus convention to be formally and non-formally integrated into the curricula of the secondary schools of Armenia. It is necessary to ensure continuous trainings in ecological education for teachers and pedagogues.

The low activity level of Aarhus Centers is related to the uncertain legal status and insufficient or even entirely lacking funding. With proper funding, these centers could provide significant support in the implementation of the Convention, particularly in relation to Article 3.

There are financial obstacles in the area of promoting public participation in international forums.

5. Further information on the practical application of the general provisions of article 3

¹⁷ <https://www.ecolur.org/en/news/biodiversity/14043/> ; <https://www.ecolur.org/en/news/biodiversity/14444/> ; <https://www.ecolur.org/en/news/biodiversity/14188/>

¹⁸ <https://saveozone.am/en/post/chanachoghakan-ayc-montenegroyi-hanrapetovtyovn>

¹⁹ <https://www.aliqmedia.am/2022/06/30/70604/> ; <https://www.ecolur.org/hy/news/electionspoliticsecology/14169/>

Provide further information on the practical application of the general provisions of article 3.

The functions of the Academy of Justice include the provision of professional training for judges and prosecutors. Efforts continue to raise awareness among judges and prosecutors regarding environmental law and the Aarhus Convention, including an increase in the number of lecture hours. Within the framework of the Academy of Justice, environmental law and the Aarhus Convention are taught every semester in training sessions (9 academic hours) for sitting judges, prosecutors, and candidates included in the judicial and prosecutorial reserve lists.

The environmental law textbook published by the YSU in 2020 serves as a teaching manual for students of both law and non-law faculties, as well as for practicing lawyers, judges, and prosecutors. At the initiative of the Yerevan Aarhus Centre, informational seminars are regularly organized, which contribute to environmental education and public awareness on environmental issues.

From 2021 to 2024, the Aarhus Centre in Yerevan, continuing its activities within the structure of the “Armhydromet” SNCO, disseminated environmental information in various formats for the benefit of the public, particularly aiming to raise the environmental knowledge and awareness of young people. These activities encouraged public participation in environmental decision-making processes.

The Centre organized around 55 events, including public discussions, roundtable meetings, professional consultations, and environmental education activities. Special attention was given to engaging schoolchildren and students by organizing study visits to meteorological and monitoring stations, as well as scientific institutions, where young people acquired practical knowledge in the field of environmental protection.

The Aarhus Centre actively cooperated with NGOs, jointly organizing discussions on relevant topics. A number of online trainings and thematic events were held, including a cleanup campaign along the Yerevan Lake shoreline and debates on greening and the protection of urban ecosystems.

For public awareness purposes, the Centre also continued its active outreach via social media, disseminating information on environmental issues, promoting international cooperation, and facilitating the exchange of professional opinions.

In 2019, at the initiative of Members of the National Assembly, a draft Law on Environmental Information was developed. It was presented for public consultation, during which many proposals were received from civil society²⁰. In 2023, the draft was circulated among relevant ministries, and a working discussion was held at the MoE under the leadership of the Minister, with participation from the MoJ and Members of Parliament. The adoption of the draft was rejected, including based on the opinions expressed by NGOs.

²⁰ Response of the civil society to the draft Law: <https://transparency.am/hy/publication/324>

Each year, on June 5, the MoE, under the leadership of the Minister, celebrates World Environment Day. Representatives of NGOs, academia, and international organizations are invited to participate. Events include environmental film screenings, presentations of programs implemented by the Ministry, and more. Below is the link related to the Ministry's activities for World Environment Day:

<http://env.am/news/environmental-day-06-2024> .

In 2024 three Aarhus centers (Gavar, Gyumri, Yerevan) of Armenia jointly with “Khazer” ecological-cultural NGO held seminar - discussions on the topic “Addressing questions of the future generation on climate change to the present generation”. A final conference was held together with Gyumri Aarhus center where two environmental NGOs have been invited and attended from Georgia (ECOVISION and Green Regions). During the conference the “Innovative Doctrinal Concept on Climate Change” developed within the frame of the program has been approved, which was submitted to the “international Climate Action Network” regional organization (CAN EECCA) for further discussions and dissemination.

6. Website addresses relevant to the implementation of article 3

Give relevant website addresses, if available:

<https://nature.e-gov.am/hy/>, www.nature-ic.am, www.gov.am, www.env.am, www.court.am,
www.armstat.am, www.e-gov.am, www.e-register.am

7. Legislative, regulatory and other measures implementing the provisions on access to environmental information in article 4

List legislative, regulatory and other measures that implement the provisions on access to environmental information in article 4.

Explain how each paragraph of article 4 has been implemented. Describe the transposition of the relevant definitions in article 2 and the non-discrimination requirement in article 3, paragraph 9. Also, and in particular, describe:

- (a) With respect to paragraph 1, measures taken to ensure that:
 - (i) Any person may have access to information without having to state an interest;*
 - (ii) Copies of the actual documentation containing or comprising the requested information are supplied;*
 - (iii) The information is supplied in the form requested;**
- (b) Measures taken to ensure that the time limits provided for in paragraph 2 are respected;*
- (c) With respect to paragraphs 3 and 4, measures taken to:
 - (i) Provide for exemptions from requests;*
 - (ii) Ensure that the public interest test at the end of paragraph 4 is applied;**
- (d) With respect to paragraph 5, measures taken to ensure that a public authority that does not hold the environmental information requested takes the necessary action;*
- (e) With respect to paragraph 6, measures taken to ensure that the requirement to separate out and make*

available information is implemented;

(f) With respect to paragraph 7, measures taken to ensure that refusals meet the time limits and the other requirements with respect to refusals;

(g) With respect to paragraph 8, measures taken to ensure that the requirements on charging are met.

a) Regarding paragraph 1:

At the constitutional level, the legal basis for requesting information from competent public authorities, as well as the liability of officials, is ensured (as mentioned above).

The RA Law "On Freedom of Information" (Article 3) provides the definition of "information". Article 29 of the Constitution states: "Prohibition of Discrimination".

The RA Law "On Environmental Impact Assessment and Expertise" (EIAE) contains a provision. Ensuring the public notification and participation opportunity during the expert examination is within the power of authorized body (Article 9). Meeting the notification requirements on the assessment and expertise procedures for the draft foundational documents impact throughout the EIA, SEA and expert examination process is also within the capacity of territorial administration bodies (Article 10), whereas meeting the notification requirements on the draft founding documents or planned activities, their impact assessment and expert examination falls within the capacity and functions of local self-government bodies (Article 11). The initiator submits notification about the initiator, objective of the intended activities, summary description and venue of the envisaged activity to the head of the community. *"The head of the community shall make notification of the public concerned within five working days after receiving the notification, and shall hold a public hearing in the affected settlement no earlier than on the 21st, not later than on the 25th working day after the notification"* (Article 16.2).

The Law "On Urban Development" (adopted on 5 May 1998, amended on 23 March, 2018) grants the public the right to receive reliable information on urban development activities and planned changes in their living environment (Article 13).

The Law "On Protection of the Population in Emergency Situations" (adopted on 2 December 1998) stipulates: early warning of state authorities and the public in the event of a threat or occurrence of an emergency situation (Article 5).

In 2019, a draft law "On Disaster Risk Management and Protection of the Population" was developed. It was published on the website open to the general public for review, and accepts comments and suggestions. Based on the mentioned comments the draft Law has been revised.²¹

At its session on March 6, 2025, the Government approved the draft laws "On Disaster Risk Management and Civil Protection" and "On Making Amendments to the Code of the RA on Administrative Offenses," considering that the adoption of the law will ensure the establishment of a

²¹ <https://www.e-draft.am/projects/6963> (accessed on May 20, 2025).

sustainable institutional system for disaster risk management, with the proportional and interoperable involvement of all stakeholders²². The law was adopted on April 18, 2025²³. It enshrines the expansion of digital tools, specifically mandating that all disaster risk management and emergency response plans be digitized and made readily accessible.

Among the disaster risk reduction measures, the law also provides for the creation and management of a unified information system on disaster risk and climate change adaptation. Additionally, it mandates the promotion of disaster risk reduction, resilience, and a culture of safety through training, educational programs, and awareness-raising for all segments of the population, with special attention to the needs of vulnerable groups and ensuring feedback mechanisms with the public.

Amendments have been also made to the RA Law "On the Rescue Service" to expand the powers of the Rescue Service, particularly for the purpose of civil and population protection during emergency situations. These include collection, synthesis, and processing of solutions, as well as the organization and implementation of public notification measures.

Article 12 of the RA Law "On the Safe Use of Atomic Energy for Peaceful Purposes" (adopted on 1 February 1999), titled as "Right to Access Information in the Field of Atomic Energy Use", states that legal and natural persons of the RA have the right to obtain information from authorized public bodies on the safety of nuclear facilities that are being designed, constructed, operated, or decommissioned, as well as on the radiological situation in Armenia, provided that such information is not classified as state or official secret.

Public Participation

According to Article 20 of the RA **Water Code** (June 4, 2002), the authorized state body is obliged to inform the public about water policy, basin management plans, and issues related to water use permits, and to ensure public participation in the discussion process of these matters. Article 19 of the RA Water Code states that "the procedure for providing information through the State Water Cadastre information systems shall be defined by the Government." (<https://www.arlis.am/hy/acts/71621>).

The RA Law on Standardization (February 8, 2012) defines among its objectives the improvement of safety levels in production, services, and processes, and the protection of human health, life, and the environment.

According to Article 2 of the RA Law on **Hydrometeorological Activity** (2001), it is required to promptly publish information about hydrometeorological phenomena and processes, i.e., actual and forecasted data on natural phenomena and dangerous levels of environmental pollution, which must be disseminated immediately after receipt and processing in accordance with the established procedure.

²² Government Decision on approving the drafts. <https://www.irtek.am/views/act.aspx?aid=128778>: News on the Government Session: <https://mia.gov.am/2025/03/06/gov-8/>

²³ <http://www.parliament.am/legislation.php?sel=show&ID=9697>

The RA Law on **State Statistics** (April 4, 2000) was repealed, and on April 9, 2018, the RA Law “On Official Statistics” entered into force. According to the new law, the Statistical Committee is the principal producer of official statistics in Armenia and coordinates all activities related to the development, production, and dissemination of official statistics within the national statistical system, except for the Central Bank of Armenia (Article 7). Statistical programs include the statistical information necessary for monitoring the country’s economic, demographic, social, and environmental situation, taking into account the limitations of available resources, the burden on data providers, and cost-effectiveness (Article 14). State and local self-government bodies are obligated to provide official statistics producers with data available at their disposal, free of charge, in the level of detail required for the production of official statistics, as well as metadata that enables the assessment of data quality (Article 20)²⁴.

The RA Law on **Local Self-Government** (07 May, 2002) stipulates that the community council of elders has the right to request documents from state bodies and officials that relate to community matters and do not contain legally classified information. In the field of nature and environmental protection, the mandatory powers of a community leader include the protection of lands, forests, and water areas owned by the community, as well as environmental protection in general. In this sector, the community leader also carries out delegated state powers (Article 45), including the implementation of measures for the use and protection of subsoil, forest, water, and air resources, as well as flora and fauna, and ensures the protection of land from pollution by chemical and radioactive substances and industrial waste.

In the field of urban development, the community leader, in specified cases and procedures, must inform the community population about planned urban development changes affecting the environment (Article 37.1.4).

The RA **Law on Specially Protected Areas of Nature** (November 27, 2006) grants everyone the right to: a) request and receive information on the status, protection, and use of specially protected natural areas; b) apply to the authorized state body and/or the local self-government body within whose administrative boundaries the specially protected area of local significance is located to receive such information. The environmental inspection body is obliged to provide information on environmental law compliance to the public, including NGOs, upon request. The law is currently in the revision stage and must be aligned with the Global Biodiversity Framework adopted in December 2022, which implies the inclusion of more participatory management mechanisms for specially protected areas.

According to Article 37 of the RA **Law on Environmental Control/Oversight** (April 11, 2005, last revised on 15 February, 2024), “At the request of the public, including non-governmental organizations, the Environmental Inspectorate shall provide information on the implementation of environmental legislation in accordance with the legislation of the RA and this Article.” To effectively implement environmental legislation, the inspection body responsible for oversight in the field of environmental protection may inform the public about its activities, while maintaining confidentiality and refraining

²⁴ The Law is available in Armenian: <https://www.arlis.am/DocumentView.aspx?DocID=120755>

from disclosing details of ongoing investigations. It may also involve the public in the decision-making process concerning environmental law violations. Provision of knowingly false information by the public to the relevant territorial subdivisions of the inspection body responsible for oversight in the field of environmental protection regarding violations of the law entails liability as prescribed by the legislation of the RA.

The Environmental Protection and Mining Inspection Body ensures public awareness both through its official website and by regularly organizing awareness-raising events with various groups²⁵. The official website of the Inspection Body is required to publish quarterly reports on conducted observations, as well as annual reports and reports on inspections and studies carried out during the given year²⁶.

To raise public awareness about the impact of the environment on human health, relevant information is published on the official website of the MoH (www.moh.am) and on social media platforms. The population is informed through the media and various broadcasts. To enhance environmental legal awareness, the relevant legal acts have been adopted.

The Government of Armenia has launched the website www.e-gov.am, which provides, among other things, information on Government and Prime Minister decisions. Draft decisions of the Government are also published in advance on the site.

The Statistical Committee of Armenia (www.armstat.am) provides comprehensive and accessible statistical data on the environmental situation of the RA (e.g., the annual statistical publication, Environment and Natural Resources in the RA). These materials are available not only in PDF format but also in Word and Excel formats to improve accessibility and usefulness for users. In 2012 a separate database website of the Statistical Committee (<http://armstatbank.am>) was put into operation which made the access to statistical information even easier.

The RA Law “On Freedom of Information”(Article 4), outlines the key principles for ensuring freedom of information: unified procedures for registering, classifying, and storing information; protection of the freedom to search and receive information; ensuring access and transparency.

The “Armhydromet” SNCO of the MoE is the principal body/tool responsible for collecting and disseminating information on environmental components in Armenia. The Center’s website provides monitoring data on air, water, soil, waste, and forests. It includes a search function, allowing users to select a year, reporting period (weekly/monthly), month, and city to obtain information on atmospheric air, water, and other environmental components²⁷.

According to its charter, the “Armhydromet” SNCO carries out the following types of entrepreneurial activities:

²⁵ <https://www.ecoinspect.am/hy/irazekum>

²⁶ Reports of Environmental Protection and Mining Inspection Body: <https://www.ecoinspect.am/hy/reports>

²⁷ <https://armmonitoring.am/page/5>

- 1) Implementation of laboratory research and analyses,
- 2) Compilation and provision of hydrogeological information (consultations),
- 3) Conducting studies on the quantity and quality of groundwater at observation points within a special monitoring network, specifically in local or small areas of groundwater deposits formed under the influence of limited technogenic factors,
- 4) Provision of hydrometeorological information and delivery of specialized hydrometeorological services,
- 5) Radar observation of atmospheric phenomena and provision of relevant information services, as well as conducting research using geographic information systems (GIS) and remote sensing technologies.

The SNCO website offers information in three languages: <https://armmonitoring.am/#home>.

This information is also disseminated by the Aarhus Center in Yerevan via electronic emails and social media.

The Law “On Freedom of Information” regulates the procedures for submitting and discussing information requests and states that the applicant is not required to justify their inquiry. The Criminal Code and the RA legislation on administrative offences foresee penalties for officials as a safeguard. Specifically, Chapter 39 of the Criminal Code lists crimes against environmental safety, establishing criminal liability for acts such as the illegal circulation of hazardous chemical or biological substances or waste, pollution of atmospheric air, water, and the marine environment, degradation of land, illegal hunting, and violation of the regime of specially protected natural areas.

Article 4, section 2 of the Law “On Freedom of Information” sets shorter deadlines for providing information than those established by the Aarhus Convention.

According to Article 9, section 8 of the law, “Responses to verbal requests shall be given immediately after the hearing or, where possible, within a short timeframe.” The law also provides that if a part of the requested information is not subject to disclosure, the remaining part should still be provided. Exceptions apply to state and official secrets, as defined by the Law “On State and Official Secrets” (dated 03.12.1996), which determines what information may or may not be classified as such (Article 10).

The Law “On EIAE” (dated 21 June, 2014, last revised on 03 May, 2023) also stipulates confidentiality of information containing legally defined secrets during the examination process. However, Armenian legislation does not provide a precise definition of “trade secret.” The Civil Code only provides the following: “Information is considered a service, trade, or banking secret if it has actual or potential commercial value due to being unknown to third parties, there is no legal access to it, and the holder takes measures to preserve its confidentiality.” In practice, this definition is subject to varying interpretations (Article 141).

According to Article 21 of the RA Law "On Hydrometeorological Activities" (dated 07.02.2001), the information is provided free of charge: is defined by the Government of the RA; A fee is charged for the provision, copying, and delivery (by post or other means) of general information regarding hydrometeorological phenomena and processes. Decision No. 349 (amended on 08 May, 2024²⁸) of the Government of the RA, dated March 18, 2004, includes a list of urgent and generally significant hydrometeorological information. The National Statistical Committee publishes and makes accessible to users quarterly, semi-annual, and annual statistical reports, statistical handbooks, and yearbooks, including the annual environmental statistical summary, all of which are available on the website www.armstat.am. According to the Law "On Freedom of Information" if a government agency or organization provides false or incomplete information, it is obliged, upon receiving a written request from the applicant, to provide corrected information free of charge, in accordance with the procedures defined by law. The State Committee of the Real Estate Cadastre adjunct to the Government provides information on real estate, including land plots, on paid basis.

Since 2005, the Legal Information System of Armenia (www.arlis.am) has been operating online as a joint initiative of the World Bank and the MoJ. The system is free of charge and is updated on a weekly basis. In addition to electronic resources, the Official Bulletin and the Bulletin of Interdepartmental Normative Acts are also published, which contain the laws and other regulatory legal acts of the RA. In the Yerevan Municipality and its 12 administrative districts, citizen applications and inquiries are accepted through a "unified service desk" system, the website www.yerevan.am, social media platforms, and a hotline. Responses are provided within the prescribed timeframes.

By the Order No. 17 of the Minister of Environment dated 21.01.2005, the fee rates for the provision of information by the "Republican Geological Fund" SNCO (under the jurisdiction of the MoTAI) were approved. The Order was repealed on 25 September, 2016²⁹. By Order No. 40-L of the MoTAI dated June 15, 2020, the maximum fee for services provided by the "Republican Geological Fund" was established³⁰

8. Obstacles encountered in the implementation of article 4

Describe any obstacles encountered in the implementation of any of the paragraphs of article 4.

The following key issues were identified during the focus group discussions of access to information (environmental information and awareness-raising):

- The information presented during the EIA process is often incomplete, limiting the public's ability to form a well-grounded opinion.
- The uncertainties of the legal status of Aarhus Centers hinders institutional stability and public

²⁸ <https://www.arlis.am/documentview.aspx?docid=192636>

²⁹ <https://www.arlis.am/DocumentView.aspx?docid=23046>

³⁰ <https://api.mtad.am/storage/images/legal-acts/62174f8bc832d-655.pdf>

engagement.

- The level of awareness about the environmental legislation is low, especially in smaller communities.
- Selective approaches to information dissemination undermine the principles of equality and transparency.
- A lack of media literacy contributes to the spread of misinformation.
- Responses from government agencies to inquiries by citizens and NGOs are often incomplete or insufficiently substantiated.
- Official websites contain incomplete information and are often irregularly updated.
- There are no subscription tools available to access updates on environmental news or legislative changes.
- The lack of data protection may jeopardize the integrity of decision-making processes.
- Some communities lack digital rapid response tools (e.g., SMS, Telegram); however, certain communities do have the technical capacity to send alerts via SMS. The Yerevan Municipality uses the Telegram platform on a daily basis to ensure rapid dissemination of messages.
- Local self-government bodies lack sufficient capacity and tools to implement effective public awareness activities.

According to Subpoint 16 of Paragraph 1 of Article 73 of the Law on State Registration of Rights to Property (14.04. 1999), the fee for providing cadastral schemes and maps in vector format is set at 5000 AMD for the information included in each thematic layer (data aggregation) of a given community (in the case of Yerevan – each administrative district), for each real estate unit (plot): 100 AMD.

On March 1, 2023, the National Assembly of the RA adopted the Law on “State Secrets,” which has raised concerns among civil society organizations³¹. Article 9 of the law prohibits the restriction of information related to “environmental protection”; however, the wording does not cover, for example, issues related to the use of natural resources or the impact on historical and cultural monuments resulting from environmental effects. In addition, the law introduces the concept of “official information for limited distribution,” which may allow for the classification of information that does not formally qualify as a state secret under the law, but contains “elements of a state secret” and relates to the activities of state and local self-government bodies, legal entities, and officials. The dissemination of such information may, at the discretion of those in possession of it, be deemed to negatively affect the defense, security, political and economic interests, foreign relations, or public order of the RA. According to some civil society organizations, this creates the risk of restricting access to information and abusing that authority.

9. Further information on the practical application of the provisions of article 4

Provide further information on the practical application of the provisions on access to information in article 4, e.g., are there any statistics available on the number of requests made, the number of refusals and

³¹ <https://transparency.am/hy/media/news/article/5055>

The MoE maintains annual statistics on the number of requests³² submitted by natural and legal persons. All requests received from individuals and legal entities are responded to. In cases requiring further examination of the issue, applicants are notified either of the referral of the matter to the competent authority or of the need for an extension of the legally established timeframe (30 days).

Activities to enhance the exchange and dissemination of environmental information between Aarhus Centres and non-governmental organizations, with the aim of making information more accessible to the public are still ongoing. The primary activities are carried out by the Yerevan Aarhus Centre. Information is disseminated through the Aarhus center's subsection of the Armhydromet official website and an electronic mailing network, which includes environmental NGOs, members of civic initiatives and other interested citizens

Participants in the focus group discussions also noted positive developments. For instance, in 2023, the "Armhydromet" SNCO developed and recently launched the Armhydromet mobile application, now available on both the App Store and Google Play. The application enables users to access reliable and near real-time information on both weather conditions and air quality.

To further enhance access to environmental information, the focus group participants proposed the following:

- Introduce standardized formats for information presentation and streamline the content across government/state websites.
- Establish the legal status of Aarhus Centers.
- Expand public awareness campaigns in local communities.
- Ensure equality for all stakeholders in information dissemination practices.
- Support media literacy development programs, particularly targeting youth.
- Regulate the procedures for responding to information requests with clear deadlines and justifications.
- Introduce subscription tools for the purpose of information dissemination.
- Ensure the implementation of legal and technical measures for data protection.
- Develop programs for the deployment/use of digital tools in communities.
- Conduct digital tools application training in communities.

It should be noted that the official website of the MoE and other official information channels are currently undergoing a transformation process, and some of the aforementioned recommendations have already been considered, with efforts underway toward their implementation.

³² In 2018, a total of 2,080 requests were received from citizens and legal entities, of which 1,565 were submitted electronically and 515 in hard copy.

In 2019, 2,970 requests were received, including 2,365 submitted electronically and 605 in hard copy.

In 2020, 570 requests were received, all of which were submitted electronically due to the pandemic.

In 2024 - 450 requests submitted; 418 satisfied, 8 rejected, 9 partially answered, and 15 redirected:

<http://env.am/storage/files/report-statitics-2025.pdf> (accessed on May 20, 2025)

10. Website addresses relevant to the implementation of article 4

Give relevant website addresses, if available:

www.gov.am, www.env.am, www.armstat.am, ArmStatBank, www.arlis.am, www.laws.am,
www.parliament.am, www.e-gov.am, www.yerevan.am, <http://armmonitoring.am/#monitoring>,
www.meteomonitoring.am, www.mtad.am, www.eiti.am, <https://www.ecoinspect.am/hy>

11. Legislative, regulatory and other measures implementing the provisions on the collection and dissemination of environmental information in article 5

List legislative, regulatory and other measures that implement the provisions on the collection and dissemination of environmental information in article 5.

Explain how each paragraph of article 5 has been implemented. Describe the transposition of the relevant definitions in article 2 and the non-discrimination requirement in article 3, paragraph 9. Also, and in particular, describe:

- (a) With respect to **paragraph 1**, measures taken to ensure that:
 - (i) Public authorities possess and update environmental information;*
 - (ii) There is an adequate flow of information to public authorities;*
 - (iii) In emergencies, appropriate information is disseminated immediately and without delay;**
- b) With respect to **paragraph 2**, measures taken to ensure that the way in which public authorities make environmental information available to the public is transparent and that environmental information is effectively accessible;*
- (c) With respect to **paragraph 3**, measures taken to ensure that environmental information progressively becomes available in electronic databases which are easily accessible to the public through public telecommunications networks;*
- (d) With respect to **paragraph 4**, measures taken to publish and disseminate national reports on the state of the environment;*
- (e) Measures taken to disseminate the information referred to in **paragraph 5**;*
- f) With respect to **paragraph 6**, measures taken to encourage operators whose activities have a significant impact on the environment to inform the public regularly of the environmental impact of their activities and products;*
- (g) Measures taken to publish and provide information as required in **paragraph 7**;*
- (h) With respect to **paragraph 8**, measures taken to develop mechanisms with a view to ensuring that sufficient product information is made available to the public;*
- (i) With respect to **paragraph 9**, measures taken to establish a nationwide system of pollution inventories or registers.*

The provisions of the Aarhus Convention are directly applied in the management of environmental information flow. In particular, these provisions are reflected in the statutes of governing bodies to eliminate obstacles in the processes of collecting and providing information.

The RA Law “On the Protection of the Population in Emergency Situations” (adopted on 02.12.1998) includes, among key population protection measures, the requirement to inform the public about the threat or likelihood of an emergency.

According to Article 20 of the RA Water Code (adopted on 04.06.2002), the state authorized body responsible for public awareness and participation is obligated to inform the public about the drafting of

sectoral regulatory/strategic documents.

The Government of the RA adopted Decision No. 217-N 07 March, 2023 "On Approving the Procedure for Public Notification and Publication of Documents Developed by the Body Responsible for the Management and Protection of Water Resources." On March 6, 2025, an amendment was made to the decision, clarifying that "The official website of the MoE (www.env.am) and the website www.azdarar.am may serve as means of notification³³."

Article 21 of the RA Law "On Hydrometeorological Activities" defines the concept of urgent information on hydrometeorological phenomena and processes — factual and forecasted information about hazardous natural phenomena and pollution levels of the environment which must be transmitted immediately after receipt and processing, in accordance with the established procedure. The law guarantees the right of citizens, NGOs, and other legal entities to receive accurate information on hydrometeorological phenomena, as well as the right of citizens and NGO associations to conduct independent observations of such phenomena, with the obligation to notify the competent state authority of natural disasters, accidents, technologically induced environmental impacts, and pollution (Article 8).

According to Article 7 of the Law "On Freedom of Information" 1) Information holders must publish the procedures for providing information and must immediately publish or otherwise specifically inform the public if the dissemination of information may prevent threats to state and public security, public order, public health and rights, the rights and freedoms of third parties, the environment, or property.

Article 29 of the Law "On Specially Protected Areas of Nature" stipulates that the authorized state body, in accordance with the law, shall provide information on planned activities within specially protected areas, decisions regarding the protection and use, and the ecological status of specially protected areas.

In the context of the implementation of the Aarhus Convention (a continuous process carried out under Articles 4 and 5), environmental information is collected and maintained in the MoE's information databases and provided to the public upon request, as well as via the Ministry's official website (www.env.am). The Ministry's website has been operational since 2001. As of April 15, 2025, the website features 7 main menus with 35 submenus covering areas such as environmental expertise, licenses and permits, international cooperation, collaboration with NGOs, inspections and public procurement. It includes statistical and quarterly reporting forms and their completion guidelines, SPNAs, links, a library, video gallery, videos, news, and announcements, as well as a dedicated section for upcoming public hearings. The website also contains a "Legislation" section, where draft legal acts are published. The website complies with the minimum standards set by Government Decision No. 1521-N of December 26, 2013, "On Approving the Minimum Requirements for Official Websites of State Bodies on the Internet³⁴."

In collaboration with the Information Systems Agency of Armenia, a new version of the MoE's website

³³ <https://www.arlis.am/DocumentView.aspx?docid=203811>

³⁴ <https://www.arlis.am/DocumentView.aspx?DocID=88785>

has been developed, in line with Government Decision No. 884-L dated June 14, 2024 (“On the Development and Implementation of the ‘CLOUD-FIRST’ Policy”). The website is hosted on Amazon’s cloud platform. It is fully compliant with the digitalization principles developed by the Ministry of High-Tech Industry, as well as the WCAG 2.1 AA accessibility standard. Significant efforts have been made to improve the quality and clarity of service-related content. Content is currently being uploaded to the website. The new website will become available within the next month.

Information posted on the MoE’s website is also actively disseminated via the Ministry’s social media pages³⁵ and by the Yerevan Aarhus Center.

Legislative measures

Proper flow and updating of environmental information in the capital is ensured by the Information and Public Relations Department and the Environmental Department of Yerevan Municipality. The editorial staff of the official website of Yerevan Municipality processes the received information and publishes it in the relevant sections of the website and the official news feed.

In Armenia, information on emergencies is disseminated by the MoE, the Ministry of Internal Affairs (which includes the Seismic Protection Territorial Survey), the MoH, MoEc, the MoTAI, the municipalities of Yerevan and other community staffs, and the Water Committee, using all available media. Such information may include, in particular, recommendations on safety measures, forecasts of hazardous phenomena developments, research findings, reports on mitigation or prevention measures of hazardous situations, and other relevant data.

The Statistical Committee and other official statistics producers may establish and maintain statistical registers to be used exclusively for statistical purposes upon the Law on Official Statistics (21 March, 2018, Article 22). To ensure the production of official statistics through periodic sample surveys, the Statistical Committee annually implements a statistical data collection program funded by the state budget.

Additionally, the RA Law on Freedom of Information (23.09.2003, Article 7) stipulates that:

- a) The holder of information shall, in accordance with the procedure established by law, develop and publish the procedure for providing information, and post it at its location in a publicly visible place.
- b) The holder of information shall immediately publish or otherwise make accessible to the public any information under its control that, if disclosed, may prevent threats to state and public security, public order, public health and morals, the rights and freedoms of others, the environment, or property.

The RA Law “On Public and Individual Notification via the Internet.” (19.03.2012) is also important for ensuring proper flow and updating of environmental information. According to Article 3 of this law “1. *In cases defined by law or other normative legal acts where public notification is required through publication in the press, the public notification must also be posted on the website*”.

³⁵ https://www.facebook.com/mnparmenia/?locale=hy_AM ; [MoE youtube](#)

Upon the RA Government Decision No. 1044 of 30.08.2007, the monitoring procedure for specially protected nature areas was approved. In accordance with Clauses 18 and 19 of the procedure: “The authorized state body ensures the input, classification, analysis, periodic updating, and public accessibility of monitoring data. The entered data is analyzed and evaluated within 20 days from the date of entry and is then published on the appropriate website³⁶”.

According to Article 25 of the Law on Normative Legal Acts (21.03.2018):

- 1. The official publication of a normative legal act is carried out through its publication on the Unified Website for the Publication of Normative Legal Acts (hereinafter referred to as the Unified Website³⁷),*
- 2. The date of official publication is the day when the final edited and adopted or signed full text of the act is published for the first time on the Unified Website.*
- 3. The Ministry is obligated to ensure the publication of normative legal acts, submitted in the prescribed manner by the adopting authority, on the Unified Website within two working days, as well as the official incorporation of the normative legal acts.*
- 4. The official publication is made in the exact form in which the acts were submitted for publication. Other persons or bodies are prohibited from making linguistic, editorial, stylistic, or other changes to the normative legal act adopted in its final version by the law-making body, except for correcting spelling or punctuation errors, provided that such corrections do not alter the content of the text.*
- 5. If, after the publication of a normative legal act, typographical or technical errors are discovered that do not change the content of the text upon correction, the Ministry, upon the request of the body that submitted the act for publication, shall make the necessary corrections in the text of the act, indicating that a correction has been made.*

Information on international agreements signed by Armenia is available on the website of the MoJ. According to Article 24 of the Law on International Agreements³⁸:

- 1. The Ministry of Foreign Affairs of the Republic of Armenia shall perform the functions of the depositary of international agreements of the Republic of Armenia.*
- 2. Original international agreements, true copies certified by the depositaries of multilateral international agreements, officially approved translations of international agreements shall be kept in the archive (depositary) of international agreements of the Ministry of Foreign Affairs.*
- 3. The Ministry of Foreign Affairs of the Republic of Armenia shall maintain a uniform register for record-registration of international agreements, which shall contain informational data on the international agreements.*
- 4. An international agreement having entered into force shall, in conformity with the arrangements agreed with the other contracting party, be submitted for registration pursuant to the Charter of the United Nations.*
- 5. The procedure for keeping the international agreements and maintaining the uniform register for*

³⁶ <https://www.arlis.am/DocumentView.aspx?docID=135783>

³⁷ e-draft.am, the website is run by the MoJ

³⁸ https://www.translation-centre.am/pdf/Translat/HH_orenk/HO_213_N_2018/HO-213-N_en.pdf

*record-registration thereof, as well as the functions of the depositary, shall be prescribed by the Minister of Foreign Affairs of the Republic of Armenia*³⁹.

Information on international agreements signed by Armenia is also available on the websites of the National Assembly, the MoE, and other platforms .

On December 7, 2022, a full revision of the Law of the Republic of Armenia “On Atmospheric Air Protection” (HO-121, adopted on October 11, 1994) was adopted (HO-522-N), which includes the following key provisions:

- According to Article 16, Part 3, the data from state monitoring of atmospheric air must be provided to the relevant interested bodies in the prescribed manner. In addition, to ensure public accessibility, ongoing and urgent information on pollution shall be published in accordance with procedures established by the Government.

- In accordance with Article 20, Part 1, natural persons (including those engaged in entrepreneurial activity), legal entities, and public organizations have the right to receive information on the state of atmospheric air and the sources of air pollution; to participate in air protection activities; to fund such initiatives; to participate in discussions at various levels regarding planned economic or other activities that may negatively impact air quality; to take part in the development of air protection programs; and to submit proposals for their improvement.

On January 4, 2024, the Government adopted Decision No. 32-N “On approving the procedure for the development of draft maximum permissible emission (MPE) norms for pollutants (harmful substances) discharged into atmospheric air, and on the issuance, denial, or revocation of emission permits for legal entities and individual entrepreneurs that have submitted such drafts,” and Decision No. 23-N “On approving the procedure for the state registration of emissions of pollutants (harmful substances) into atmospheric air and the provision, analysis, and archiving of relevant information.” These decisions respectively establish provisions on the conditions and requirements for the application of background pollution data, the granting or denial of emission permits, the revocation of previously issued permits (No. 32-N), as well as the powers of the authorized body responsible for state registration, the deadlines for reviewing and approving the list of organizations subject to such registration, the methodology for calculating the quantities and types of atmospheric pollutant emissions, the electronic submission of administrative statistical reports, and the requirement for organizations with new, reconstructed, or expanding stationary sources of pollution to submit emission calculations to the competent authority prior to operation (No. 23-N).

Regarding Article 5, Paragraph 3 of the Aarhus Convention, the Government, by Decision No. 505-

³⁹ <https://translation-centre.am/>

L dated April 8, 2021, approved the Strategic Program for the Establishment of an Integrated Cadaster⁴⁰. The decision identified the challenges related to maintaining cadasters (registers) of facilities, property, and resources under the authority of various state management bodies. It was recorded that certain functions were either not performed or were insufficiently performed, the cadasters operated independently from each other, the data were often duplicated or contradictory, which significantly hindered the process of ensuring that management bodies were equipped with the necessary information and, at times, made it impossible to utilize information available in different databases or information systems for the purposes of effective governance, the development of efficient programs, or the successful implementation of state-level initiatives. The decision also addressed the regulation of spatial data use.

The decision calls for the integration of sectoral cadasters, including thematic cadasters related to the environment, such as:

- 1) The Forest Cadaster, managed by the “Hayantar” SNCO.
- 2) The State Water Resources Cadaster, managed by the Water Resources Management Department of the MoE.
- 3) Cadaster for SPNAs, managed by the relevant subdivision of the MoE.
- 4) Cadaster for flora
- 5) Cadaster for fauna
- 6) The State Waste Cadaster, managed by the relevant subdivision of the MoE.
- 7) The State Cadaster of Mineral Deposits and Occurrences.

Regarding Article 5, Paragraph 6 of the Aarhus Convention: Armenian legislation does not currently provide for any specific measures to encourage businesses with significant environmental impact to regularly inform the public about the environmental effects of their activities and products. According to the Water Code⁴¹, for example, a privilege is envisaged for individuals withdrawing water from a water resource to implement secondary (repeated) use of water after its initial use. This includes creating the necessary infrastructure to enable such secondary use. However, this provision is not yet in force, as the necessary legal regulations to support its implementation are still under development. In particular, the RA Tax Code must include provisions defining privileges in the calculation of natural resource use fees. No natural resource use fee is calculated for water resources allocated for secondary use by a secondary water user (Article 25.1).

Regarding Article 5, Paragraph 7: The MoE publishes information and analytical studies on biodiversity, forest conservation, desertification, and other environmental issues. Information on forests

⁴⁰ <https://www.arlis.am/DocumentView.aspx?docid=151578>

⁴¹ RA Water Code (Armenian) <https://www.arlis.am/documentview.aspx?docid=166600>

is disseminated by the “Hayantar” State Non-Commercial Organization under the MoE of Armenia (www.armforest.am). Government bodies regularly organize roundtable meetings, seminars, press conferences, and public hearings on draft laws, environmental and other ecological issues with NGOs and scientific representatives.

Regarding Article 5, Paragraph 8: Issues related to information in the food industry are addressed by the MoEc, particularly the National Body for Standards and Metrology (<https://www.armstandard.am/>) within its structure. Numerous commercial entities have also obtained international certification rights for their products, including in the pharmaceutical and medical technology fields. The Food Safety Inspection Body, established in 2012, plays an important role in this sector. It was reorganized on April 9, 2018, and renamed the Food Safety Inspection Body of the RA in 2019 (<https://www.snund.am/en>)

On January 17, 2023, the RA Law on Genetically Modified Organisms (GMOs) was adopted and entered into force on August 10, 2023. The Law regulates the use of GMOs and ensures biosafety-related legal relations, aiming to prevent potential adverse effects on the environment, human health, biodiversity, and agricultural lands. Article 9 of the Law governs the provision of information on the use of GMOs and public awareness. The relevant paragraphs of this article are presented below:

“3. The authorized body shall inform the public through mass media about the measures aimed at preventing situations arising from the use of GMOs or their combinations.

4. Legal relations regarding the provision of information on the use of GMOs are governed by the Law on Freedom of Information and by the provisions established under international treaties of the Republic of Armenia.

6. In accordance with the procedure established by law, any person has the right to request and receive from the authorized body, in accordance with the procedures prescribed by the legislation of the Republic of Armenia, non-confidential information on the use of GMOs. The following information related to the use of GMOs and biosafety is not considered confidential:

- 1) Data on the person engaged in the relevant activity (except for information considered confidential under RA law);*
- 2) General characteristics of the GMOs;*
- 3) The purpose and location of their use;*
- 4) Isolation measures applied;*
- 5) Possible adverse environmental impacts and potential threats to human health;*
- 6) Contingency plan to be implemented in case of possible incidents;*
- 7) Action plan/program of measures/ aimed at eliminating potential adverse effects.*

7. *The authorized body shall, in the manner prescribed by the legislation of the Republic of Armenia, provide the public with information about the use of GMOs through mass media, electronic communication tools, public hearings, the official website, and other means not prohibited by law. This information shall include:*

1) *Monitoring results;*

2) *Licensing;*

3) *Emergency situations;*

4) *Other data defined by this Law and the legislation of the Republic of Armenia for the purpose of public awareness.”*

In recent years, several NGOs have been involved in the development and implementation of voluntary eco-labeling systems (e.g., the NGO ECOGLOB for eco-friendly agricultural products labeling). NGOs and scientists are well informed about the draft law, which has been presented during parliamentary hearings. The Government has also approved several decisions⁴², including:

- Technical Regulation on Requirements for Materials in Contact with Food and the Form and Content of Labeling Information in Armenian (25.10.2007, No. 1282),
- Requirements for the Form of Armenian Labeling Information for Imported Food and Food Additives (21.12.2006, No. 1838⁴³),
- Rules for the Labeling and Marking of Organic Agricultural Products and Products in the Transitional Period of Organic Farming (19.03.2009, No. 283),

Rules for the Organization of Organic Farming, Production of Plant and Plant-Based Products, Agricultural Animals and Animal-Based Products (including beekeeping products), Organic Processing, Packaging, Storage, Transportation, Sale, and Labeling (11.06.2009, No. 662). The procedure for the organization of organic agriculture, production of plants and plant-based products, agricultural animals and animal-based products (including beekeeping products), as well as the organic processing, packaging, storage, transportation, marketing, and labeling thereof (11.06.2009, N662).

Regarding Article 5, Paragraph 9: At the 2003 “Environment for Europe” Ministerial Conference in Kyiv, Armenia, along with 36 other countries, was among the first to sign the PRTR Protocol to the Aarhus Convention. During the reporting period, the following activities were carried out to accelerate the ratification of the Protocol in Armenia and to create capacities and methodologies for PRTRs:

1. In cooperation with the Secretariat of the Aarhus Convention and at the request of the Minister of Environment of the Republic of Armenia, the United Nations Economic Commission for Europe

⁴² [List of links related the decisions on Organic Farming](#)

⁴³ [RA Government Decision of 21.12.2006](#)

(UNECE) engaged international experts to assess Armenia’s legislative framework and institutional arrangements. Drawing on international best practices, the experts provided recommendations regarding the necessary legislative amendments and the potential governing body for the Pollutant Release and Transfer Register (PRTR) system.

2. In July 2024, in collaboration with the Secretariat of the Convention and the PRTR Protocol, and with the support of the Environmental Project Implementation Unit (EPIU), a hybrid-format thematic discussion was held at the MoE. The event was attended by staff of the Ministry, international experts, and Christophe Ducoté, the environmental affairs officer from the PRTR Protocol Secretariat.

According to the international experts, Armenia’s legislation provides a sufficiently solid foundation in line with the PRTR Protocol.

12. Obstacles encountered in the implementation of article 5

Describe any obstacles encountered in the implementation of any of the paragraphs of article 5.

Insufficient awareness of state officials about their obligations under the Convention.

13. Further information on the practical application of the provisions of article 5

Provide further information on the practical application of the provisions on the collection and dissemination of environmental information in article 5, e.g., are there any statistics available on the information published?

Recognizing the essential role of the Aarhus Centers in the implementation of the Convention—particularly in terms of collecting and disseminating environmental information—a number of steps have been taken in Armenia to clarify the legal status of the Aarhus Centers and to revitalize their activities⁴⁴. By the Order of the Minister of Environment dated February 6, 2023, a working group was established to develop a proposal regarding the new institutional and legal status of the Aarhus Centers⁴⁵. In 2024, the Council of the Yerevan Aarhus Center was formed. Of its five members, three represent the public sector, and two are the Director of the SNCO and the National Focal Point for the Convention. The Council is chaired by a representative of a non-governmental organization. The Charter of the Armenian “Hydrometeorology and Monitoring Center” SNCO was amended to clearly define the functions of the Aarhus Center, which has now been established as a separate subdivision.

In 2021, a Memorandum of Understanding was signed between the Deputy Minister of Environment of

⁴⁴ <http://env.am/news/orhus-14-10-2022>

⁴⁵ <http://env.am/news/orhus-27-07-2023>

Armenia, the Deputy Chairperson of the State Revenue Committee (SRC), and the Vice-Rector of the Armenian State University of Economics. The memorandum aims to enhance the knowledge of future specialists in the field within the scope of the “Green Customs” course, foster professional interest in the field, promote multifaceted cooperation in education, and increase the effectiveness and engagement of educational processes through collaboration.

In 2024, the SRC “Training Center” SNCO organized an introductory training on the "Green Customs" initiative for customs officers. Coordinators of relevant environmental conventions (including CITES, the Vienna Convention for the Protection of the Ozone Layer and its Montreal Protocol, and the Rotterdam, Stockholm, Basel, and Minamata Conventions) presented Armenia’s commitments under these instruments and outlined the necessary steps for their effective implementation. The training significantly improved the awareness of customs officials regarding environmental conventions. Similar activities are planned for this year as well.

In the 2022–2027 Five-Year Development Program of the Dilijan Community, the presence of the Dilijan Aarhus Environmental Information Center is highlighted among the community’s key public resources. The program emphasizes the Center’s role in promoting environmental education, increasing public access to environmental information, encouraging public participation in environmental decision-making, and fostering a transparent environment on environmental issues within the community.

14. Website addresses relevant to the implementation of article 5

Give relevant website addresses, if available:

www.gov.am, www.env.am, www.laws.am, www.parliament.am, www.mes.am, www.e-gov.am, www.mta.gov.am, www.arlis.am, <https://armforest.am> , www.azdarar.am .

15. Legislative, regulatory and other measures implementing the provisions on public participation in decisions on specific activities in article 6

List legislative, regulatory and other measures that implement the provisions on public participation in decisions on specific activities in article 6.

Explain how each paragraph of article 6 has been implemented. Describe the transposition of the relevant definitions in article 2 and the non-discrimination requirement in article 3, paragraph 9. Also, and in particular, describe:

*(a) With respect to **paragraph 1**, measures taken to ensure that:*

(i) The provisions of article 6 are applied with respect to decisions on whether to permit proposed activities listed in annex I to the Convention;

(ii) The provisions of article 6 are applied to decisions on proposed activities not listed in annex I which may have a significant effect on the environment;

(b) Measures taken to ensure that the public concerned is informed early in any environmental decision-

making procedure, and in an adequate, timely and effective manner, of the matters referred to in **paragraph 2**;

(c) Measures taken to ensure that the time frames of the public participation procedures respect the requirements of **paragraph 3**;

(d) With respect to **paragraph 4**, measures taken to ensure that there is early public participation;

(e) With respect to **paragraph 5**, measures taken to encourage prospective applicants to identify the public concerned, to enter into discussions, and to provide information regarding the objectives of their application before applying for a permit;

(f) With respect to **paragraph 6**, measures taken to ensure that:

(i) The competent public authorities give the public concerned all information relevant to the decision-making referred to in article 6 that is available at the time of the public participation procedure;

(ii) In particular, the competent authorities give to the public concerned the information listed in this paragraph;

(g) With respect to **paragraph 7**, measures taken to ensure that procedures for public participation allow the public to submit comments, information, analyses or opinions that it considers relevant to the proposed activity;

(h) With respect to **paragraph 8**, measures taken to ensure that in a decision due account is taken of the outcome of the public participation;

(i) With respect to **paragraph 9**, measures taken to ensure that the public is promptly informed of a decision in accordance with the appropriate procedures;

(j) With respect to **paragraph 10**, measures taken to ensure that when a public authority reconsiders or updates the operating conditions for an activity referred to in paragraph 1, the provisions of paragraphs 2 to 9 are applied, making the necessary changes, and where appropriate;

(k) With respect to **paragraph 11**, measures taken to apply the provisions of article 6 to decisions on whether to permit the deliberate release of genetically modified organisms into the environment.

In 2023, a draft law amending the Law “On EIAE” was adopted . Within the framework of the legislative amendments, the following aspects were revised:

- definitions/concepts of fundamental importance were reviewed in the context of ratified international legal instruments and law enforcement practice,

- types of proposed activities were revised to ensure compliance with Annex I of the Aarhus Convention,

- the types of proposed activities, classified according to their potential environmental impact and sector, are now divided into two categories—A and B. Under the previous law, there were three categories: A, B, and C. The types of activities subject to EIA have also been revised to align with the Aarhus Convention and relevant EU directives (Directive 2011/92/EU, Directive 2001/42/EC, and Directive 2003/35/EC), taking into account the practical application experience in Armenia (Article 12 of the new EIAE law),

- deadlines for public hearings were adjusted in accordance with the Aarhus Convention; however, detailed procedures were adopted at the sub-legislative level. Particularly, the new law completely revises the procedures for notification and conduct of public hearings:

- ✓ The timeframes have been extended both for organizing public hearings after the initial notification and for submitting public comments, opinions, and suggestions,

- ✓ If under the previous law, public hearings were held uniformly 7 days after notification, under the new law, they are conducted during the preliminary agreement phase, on working days 21 to 25 following the notification, while during the expert review phase no earlier than the 15th working day after the notification.

- the phases of the expertise process were reduced:

- ✓ EIA stage: when the initiator, if licensed accordingly, or through an individual entrepreneur or legal entity holding the appropriate license, assesses the potential environmental impacts of the proposed activity and identifies and justifies the project through relevant draft documentation, etc.
- ✓ The preliminary agreement or disagreement stage,
- ✓ The expert review stage.

According to Article 16 of the EIAE Law, during the preliminary agreement or disagreement stage:

1. The initiator intending to carry out a proposed activity as defined in Article 12 of this Law, within a community where the activity is to be implemented, submits a notification to the head of the respective community. The notification must include:

- 1) The name and address of the initiator;*
- 2) The title of the proposed activity (as per Article 12), its objective, and a brief description;*
- 3) The location where the proposed activity is to be implemented.*

2. Upon receiving the notification, the community leader must, within five working days, notify the affected/interested public and organize a public hearing no earlier than the 21st and no later than the 25th working day following the notification, in the impacted/affected locality.

- the process for developing the EIA report was clarified,

- for the first time, it is proposed that not only the EIA reports but also the draft documentation shall be subject to expert review (The Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (EIA) guidelines were approved by Order No. 438-N of the Minister of Environment dated October 29, 2024⁴⁶),

- for the first time, it is stipulated that the Government will provide guidelines on environmental impact assessment,

- the grounds for invalidating expert conclusions were comprehensively reviewed,

- the rights and responsibilities of entrepreneurs in the process of assessing and researching proposed activities were specified,

⁴⁶ <https://www.arlis.am/documentview.aspx?docid=199014>

- amendments were made to the related Laws.

All expert judgements are published on the official website of the MoE.

According to Part 2 of Article 20 of the “Law on Atmospheric Air Protection”, NGOs, in accordance with the legislation of the RA and their charters, have the right to participate in the implementation of atmospheric air protection measures.

In line with Paragraph 8 of Article 9 of the Law on GMOs, the competent authority is responsible for ensuring public participation in the processes defined by the law through information dissemination and organization of public hearings.

16. Obstacles Encountered in the Implementation of Article 6 of the Aarhus Convention

Describe any obstacles encountered in the implementation of any of the paragraphs of article 6.

Despite the fact that information about public hearings is posted on the official website of the MoE and actively disseminated by Yerevan Aarhus Centers, in some cases this information is accessible only shortly before the date of the public hearing. As a result, in certain instances, the interested public is not informed in a timely manner about announcements of public hearings and the related draft documents. In this regard, the role of NGOs is particularly important, as they help disseminate information about upcoming public hearings on planned activities through their own communication channels.

During a focus group discussion, NGO representatives and experts identified the following issues related to public participation:

- Absence of a clear format for submitting comments following the EIA process.
- Lack of criteria for evaluating public recommendations.
- Failure to Provide Justifications for Rejected Proposals.
- Legal ambiguity between the concepts of “information” and “notification.”
- The law does not provide the opportunity to submit comments after the second hearing.
- Lack of public hearings during the development phase of key policy documents/founding documents.
- Reduction in the number of public hearings.
- Low effectiveness of public councils.
- Limited use of the E-draft platform as a tool for public participation.

According to a group of civil society organizations (CSOs), the amendments made to the RA Law on EIAE adopted on May 3, 2023, have significantly restricted opportunities for public participation in environmental decision-making processes in Armenia and have weakened the already limited existing

mechanisms⁴⁷. In the opinion of the CSOs, the stages of the EIAE process as well as opportunities for public involvement have been reduced, making meaningful and adequate public participation and early-stage engagement in decision-making unattainable. They believe that the new law has complicated the EIAE procedures and their understanding, allowing considerable room for discretionary application. According to them, under the new law, local communities are required to express agreement or disagreement with the proposed activity by decision of the municipal council of elders during the first public hearing. However, during that hearing, the specifics of the proposed activity, including its associated risks, are not presented, preventing communities from making informed decisions. The CSOs have pointed out that the official website of the MoE does not fully ensure access to documents submitted for EIAE, thereby undermining the public's ability to properly prepare for hearings. Often, the documents forming the basis of decisions are published only partially. In some cases, interested members of the public are invited to visit the "EIAE Center" SNCO located in Yerevan, which creates a serious barrier to information access and public participation.

It should be noted that the issue raised by CSOs is also linked to technical limitations, specifically, the large volume of materials submitted for expert review. EIA reports often include large-scale graphical and schematic materials, which cannot technically be uploaded to the website. Therefore, notifications commonly state that additional information can be accessed by visiting the EIAE Center.

The 5 NGOs further argue that the current law does not clearly define the mechanisms through which the MoE's EIAE Center SNCO is to evaluate the position of the affected community when providing expert opinions. Meanwhile, together with the EIA report the SNCO receives the protocol of the first public hearing, with an attached note containing the justifications and explanations for the proposals and comments submitted at that time. In case of their absence or their insufficiency for the implementation of the expert examination, the case is sent to the "EIAE Center" as a remark for further revision with a mandatory note on this in the supplementary note submitted to the initiator.

Under the RA Code on Subsoil, the notion of "force majeure" in the context of mining operations has been expanded alongside fires, floods, earthquakes, etc. to include "civil disobedience." This term refers to protests carried out through public gatherings aimed at expressing opposition to government policies or programs (Article 3, Part 1, Point 56, and Article 55.1). According to the above-mentioned five NGOs, such kind of regulation could be used as grounds to ignore public discontent and, once the protest is neutralized, to extend the validity period of the subsoil use permit.

17. Further information on the practical application of the provisions of article 6

Provide further information on the practical application of the provisions on public participation in decisions on specific activities in article 6, e.g., are there any statistics or other

⁴⁷ According to the opinion submitted to the MoE on June 2, 2025, by the Transparency International Anti-Corruption Center, the Center for Community Mobilization and Support NGO, "EcoLur" Informational NGO, the Foundation for the Development and Protection of Law, and the Human Rights Research Center NGO (hereinafter referred to as the "5 NGOs"), regarding this Report.

information available on public participation in decisions on specific activities or on decisions not to apply the provisions of this article to proposed activities serving national defence purposes.

Currently, the following sub-legislative acts and the EIAE Law adopted in 2023 upon the new revision are in force:

- Government Decree on defining the content of public awareness and public hearing notifications, the procedure for conducting public hearings, the process for submitting opinions, comments, and suggestions by the interested public during the EIA and expert review process, and the procedure and deadlines for preliminary consent or disagreement by local self-government bodies. procedure for public notification and public discussions (No. 1325-N, dated 19.11.2014, upon the updated revision in 2023);
- Government Decision on Approving the Procedure for EIA (25 July 2024, No. 1143-N).
- Government Decision “On Approving the Procedure for Stakeholder Participation in the Environmental Impact Assessment and Expertise Process for the Planned Activity” (No. 643-N, dated May 2, 2024).
- Government Decree on the procedure for assessing and compensating possible economic damage to the environment (No. 764-N, dated 27.05.2015).
- Government Decision “On Approving the Procedure for SEA and the Requirements for the SEA Report” (No. 2294-N, dated December 1, 2023);
- Government Decision “On Approving the Procedure for Determining the Necessity of Environmental Impact Assessment and Expertise for the Reconstruction, Expansion, Technical or Technological Re-equipment, Reprofiting, Conservation, Relocation, Termination, Closure, Demolition, or Design Modification of the Planned Activities” (No. 43-N, dated January 11, 2024);
- Government Decision “On Approving the Types of Activities Subject to Environmental Impact Assessment and Expertise that are not Included in Foundational Documents with a Positive State Expert Conclusion, but Are Planned in Specially Protected Nature Areas, Forest Lands, Green Zones of Settlements, Cultural Heritage Monument Zones, or Ecological Lands” (No. 638-N, dated May 2, 2024);
- Government Decision “On Approving the Characteristics to Be Considered in the Environmental Impact Assessment and Expertise Process of Facilities Important for Nuclear Energy Safety” (No. 326-N, dated March 7, 2024).

It is noteworthy that there is a certain trend of increased participation in public hearings, though this trend is not uniform across all cases and locations.

On July 29, 2020, the Memorandum was signed between the “Hydrometeorology and Monitoring Center” SNCO, the “EIAE Center” SNCO, and the Yerevan Aarhus Center. The purpose of the

Memorandum is to deepen cooperation in the dissemination of environmental information during the EIA and expertise processes.

The Yerevan Aarhus Center has made a significant contribution to promoting public participation by actively engaging in discussions on amendments to the RA Law on EIAE and its subordinate legal acts. During this process, the Center submitted recommendations and carried out extensive awareness-raising activities.

On April 25, 2025, the public discussion (hereinafter referred to as “public hearing”) of the draft of this report took place at the Yerevan Aarhus Center, with participation of experts from the MoE and representatives of civil society organizations. Participants addressed the obstacles to the implementation of the Aarhus Convention, noting the weakness of public leverage in decision-making and the ineffectiveness of appeal mechanisms. It was also mentioned that since 2018, there has been a noticeable decline in public engagement and interest in environmental decision-making processes.

A working group has been established within the frame of the project “Only Participatory Decisions” implemented by the “Community Mobilization and Support” NGO, which also involved representatives from MoE and MoTAI. As a result of a number of working discussions the norms regulating the issues on public participation specifically at community level have been enhanced which need for further improvement in order to promote more active public participation. The results have been discussed also at the Yerevan Aarhus Center. The NGO has presented recommendation package which has become subject for discussion to be considered when making legal reforms in this area.

18. Website addresses relevant to the implementation of article 6

Give relevant website addresses, if available:

www.mta.gov.am, www.env.am, www.nature-ic.am, www.snund.am, www.northsouth.am,
<http://env.am/announcement/public-reviews>

19. Practical and/or other provisions made for the public to participate during the preparation of plans and programmes relating to the environment pursuant to article 7

List the appropriate practical and/or other provisions made for the public to participate during the preparation of plans and programmes relating to the environment, pursuant to article 7. Describe the transposition of the relevant definitions in article 2 and the non-discrimination requirement in article 3, paragraph 9.

According to the new Law on EIAE, the draft fundamental documents related to the fields of social and economic development, energy, urban development, transport, communication, agriculture, tourism, territorial development, subsurface use, industries, recreation, forestry, fish farming, waste use, water economy — which contain grounds for carrying out the activities provided for by Article 12 of this Law or of the projects prescribed by Annexes 1 and 2 of the Protocol on SEA to Convention "On Environmental Impact Assessment in a Trans-boundary Context" — shall be subject to SEA.

Public hearing notifications is published in mass media outlets with a circulation of at least 3,000 copies and through other mass media channels, posted on the information boards of the regional governor's office, the local self-government bodies of the affected community, the administrative head of the affected settlement, or in public buildings of significance (such as cultural, artistic, scientific, educational, or academic institutions). The notification shall also be published on the official websites of the affected community's local self-government bodies and the initiator (where applicable). During the expert review process, the notice is also published on the official website of the competent authority.

The entire process of public hearings is recorded and audio-visually documented by the responsible authority. Public discussions may also be audio-visually recorded by other participants and submitted to the expert review center.

According to Article 9, Point 4 of the Law when drafting the final state expert review conclusion, whether positive or negative, the competent authority shall take into account the suggestions, comments, and opinions submitted by participants in the process as well as the results of public hearings. If the opinions of the participants are not accepted, the competent authority must provide substantiated justification. The final expert opinion is approved by the head of the competent authority or by a person authorized by them.

Article 29 of the Constitution enshrines the principle of the discrimination prohibition.

20. Opportunities for public participation in the preparation of policies relating to the environment provided pursuant to article 7

Explain what opportunities are provided for public participation in the preparation of policies relating to the environment, pursuant to article 7.

Public participation during the preparation of programs and plans is ensured through various means, including public gatherings, opinion polls, and, at times, working discussions involving experts from different stakeholder groups. For the implementation of various programs, different working groups have been established, which include subject-matter experts. Experts from NGOs (as representatives of the interested public), representatives of relevant ministries, and other professionals serve as the primary target groups in this process. For example, to identify challenges in the urban development sector, organize discussions around them, and propose joint solutions, an Urban Development Council has been established under the Chairman of the Urban Development Committee.

21. Obstacles encountered in the implementation of article 7

Describe any obstacles encountered in the implementation of any paragraphs of article 7.

The collaboration between government officials and independent experts requires further improvement. The regular restoration of the activities of the Public Council under the Minister of Environment, would provide a fresh start and a solution to these issues.

As already mentioned in Section 3 of this report, in 2024, a draft Government Decision was developed and circulated for discussion on approving the procedure and rules for the operation of the Public

Councils of RA Ministries. Adoption of this decision will provide targeted solutions to existing issues and gaps. The purpose of the Public Councils of RA Ministries is to foster an open and inclusive decision-making environment, promoting participatory governance, engaging stakeholder groups in policy development and implementation, and ensuring effective and targeted communication with the public. The Council is intended to serve as a platform for participatory and inclusive decision-making and communication between the ministries, civil society organizations, and the public. Its members will take part in addressing a variety of issues during different stages of policy development and/or implementation in the key areas of activity of the ministries as defined by the RA Law “On the Structure and Activities of the Government”.

According to the opinion of the 5 NGOs, the 2024 SEA report on the Yerevan City Master Plan contained several fundamental shortcomings, both in terms of inadequate public participation and incomplete assessment of ecological risks. Even after public discussions, the report failed to address a number of key issues, such as the preservation of green zones, transport overload, and potential impacts on air quality. This indicates that the SEA was applied primarily as a formal requirement rather than as an effective tool for implementing a responsible urban development policy.

22. Further information on the practical application of the provisions of article 7

Provide further information on the practical application of the provisions on public participation in decisions on specific activities in article 7.

Below is a link where the documents related to the operation of the Public Council under the Minister of Environment of the RA are published.

<http://env.am/naxararutyun/the-councils-attached-to-the-minister>

Participants of the focus group discussion also noted certain positive developments, in particular:

- Amendments to the Law on EIA have improved the timeframes for public notification (25 days for Category A projects and 20 days for Category B projects).
- The planned digitalization of the EIAE Center's activities and the introduction of an online platform are expected to enhance transparency.

The website of the “EIAE Center” SNCO is currently under development.

23. Website addresses relevant to the implementation of article 7

Give relevant website addresses, if available:

www.gov.am, www.env.am, www.armstat.am, www.e-gov.am, www.mta.gov.am,
www.meteomonitoring.am, www.e-draft.am , www.azdarar.am

24. Efforts made to promote public participation during the preparation of regulations and

rules that may have a significant effect on the environment pursuant to article 8

Describe what efforts are made to promote effective public participation during the preparation by public authorities of executive regulations and other generally applicable legally binding rules that may have a significant effect on the environment, pursuant to article 8. To the extent appropriate, describe the transposition of the relevant definitions in article 2 and the non-discrimination requirement in article 3, paragraph 9

According to the Law on “EIAE”, the “interested public” is defined as “*shall mean one or more natural or legal persons directly or potentially impacted as a consequence of implementation of the fundamental document or carrying out of the proposed activity, or showing interest in relation to decisions adopted thereon*” (Article 4, Clause 18). Government Decision No. 1325-N of the RA establishes the legal grounds for public participation in the development of normative legal acts that may have a significant impact on the environment. The participation of concerned public in the decision-making processes is ensured through the notification and public hearings during the assessment and expert examination period of draft founding document, SEA report or planned activity and EIA process. These public hearings and discussions are conducted in accordance with the Law and Government Decision No. 1325-N⁴⁸. In cases when the affected settlements are more than one the public hearing is organized in that of where the planned activity is intended to be conducted ensuring participation of the all affected settlements’ representatives. In the mentioned case the public hearings are held in each affected settlement.

The gathering of public opinion on key documents and proposed activities is carried out through public hearings. The public can submit opinions, comments and suggestions both verbally and in written form.

Public notifications are disseminated through the format already introduced in above -mentioned paragraph. Where any activity prescribed by Annex 1 to the Convention on Environmental Impact Assessment in a Transboundary Context or any fundamental document prescribed by Article 21 may have a significant adverse transboundary environmental impact in the territory of the RA, the authorised body shall notify the relevant state authorised body of the affected state thereon as prescribed by this Law and other legal acts. The notification must include information about:

- (1) draft fundamental document and SEA report, information on the proposed activity, including any information on potential transboundary impact thereof;*
- (2) the nature of possible decisions adopted with regard to the draft fundamental document or the proposed activity;*
- (3) the procedures and time limits for expert examination;*
- (4) the time limits for response of the given state with regard to its intention to participate in the process of transboundary impact assessment. The authorised body shall support the process of preparation of notification and inquiry by the initiator.*

⁴⁸ After amendment of EIAE Law this law also was adjusted on 28.12.2023:
<https://www.arlis.am/documentview.aspx?docid=188064>

There is an established practice of holding parliamentary hearings on draft environmental legislation, with the participation of NGO representatives and sectoral ministries. This practice enables active public engagement and the submission of substantiated proposals. Moreover, NGO representatives participate in the early stages of legislative drafting and hearings.

25. Obstacles encountered in the implementation of article 8

Describe any obstacles encountered in the implementation of any of paragraphs of article 8.

Amendments were introduced by Government Decision No. 1325-N concerning more effective public participation, as the grounds for public notification and hearings are now regulated in greater detail. These include the organization of public notification and hearings of developing foundational documents and proposed activities under categories A, B.

In addition, all competent authorities inform the public about draft legal acts through their official websites, as well as via the electronic platform www.e-draft. Its operating legislative base is Government Decision No. 1134-N of September 2, 2016. The current relations concerning the public discussion organization and their implementation are regulated by the Government Decision No 1146-N, October 10, 2018. All state bodies are required to publish their normative legal acts on the above-mentioned website, where individuals and legal entities may submit proposals and comments.

According to the opinion of the 5 NGOs, although the draft guidelines on EIA and SEA were published and discussed with interested members of the public in 2024, their shortcomings were not thoroughly addressed in collaboration with civil society.

The same NGOs believe that the comments and recommendations submitted by civil society organizations regarding both the Law on EIAE and the draft amendments to the Subsoil Code were neither discussed with the broader public nor taken into account. The lack of feedback mechanisms and the exclusion of public voices from the decision-making process have undermined public trust—both in participatory institutions and in the government’s commitment to fulfilling its environmental protection obligations.

26. Further information on the practical application of the provisions of article 8

Provide further information on the practical application of the provisions on public participation in the field covered by article 8.

In Armenia, there is a practice whereby the National Assembly organizes public hearings, involving mass media outlets, non-governmental organizations, officials, and other individuals. The standing committees of the National Assembly have an institution of independent experts, which includes representatives from academic and non-governmental sectors. State bodies encourage the expression of public opinion by publishing draft legislative acts online. Since 2016, a unified website of draft legal acts has been operating, all state bodies have been posting the draft normative legal acts developed under

their jurisdiction on the www.e-draft.am platform, where the public can submit proposals and comments.

The website has a statistics section. According to statistical data, as of May 16, 2025, approximately 159,270 users are registered on the website. As of the same date, the MoE has uploaded over 440 projects to the platform.

It should be noted that despite the concerns raised by several NGOs regarding the public discussions of the draft EIA and SEA guidelines, both the initial and revised versions, updated based on received comments, were not only published on the e-draft platform but also presented and discussed with CSOs at the Aarhus Center in Yerevan. The drafts were disseminated through the Aarhus Center's email network, which includes addresses of more than 55 actively operating NGOs, civic initiatives, and independent experts. Feedback from CSOs was collected and considered in the final versions of the guidelines.

With regard to the issue of participation in the legislative reform process raised by the 5 NGOs in the previous section, it should also be emphasized that the discussions on the draft amendments to the EIAE Law were conducted over several years to ensure that the comments and proposals of all interested stakeholders could be taken into account. Numerous consultations were held, and the final version of the draft aimed to integrate the received input as comprehensively as possible. As for the draft amendments to the Mining Code, they too were subject to extensive and prolonged public discussion. The draft was made publicly available on the official www.e-draft.am platform, where the summary sheet is also accessible, providing detailed explanations on the acceptance or rejection of the submitted comments and proposals⁴⁹.

27. Website addresses relevant to the implementation of article 8

Give relevant website addresses, if available:

www.justice.am, www.env.am, www.facebook.com/mnparmenia, www.gov.am, [www.e-draft](http://www.e-draft.am),
<https://www.e-gov.am/>.

28. Legislative, regulatory and other measures implementing the provisions on access to justice in article 9

List legislative, regulatory and other measures that implement the provisions on access to justice in article 9.

Explain how each paragraph of article 9 has been implemented. Describe the transposition of the relevant definitions in article 2 and the non-discrimination requirement in article 3, paragraph 9. Also, and in particular, describe:

⁴⁹ Summary sheet of the Draft Law "On Making Amendments and Addenda to the RA Subsoil Code": [https://www.e-draft.am/projects/7136/digest](http://www.e-draft.am/projects/7136/digest)

(a) With respect to **paragraph 1**, measures taken to ensure that:

(i) Any person who considers that his or her request for information under article 4 has not been dealt with in accordance with the provisions of that article has access to a review procedure before a court of law or another independent and impartial body established by law;

(ii) Where there is provision for such a review by a court of law, such a person also has access to an expeditious procedure established by law that is free of charge or inexpensive for reconsideration by a public authority or review by an independent and impartial body other than a court of law;

(iii) Final decisions under this paragraph are binding on the public authority holding the information, and that reasons are stated in writing, at least where access to information is refused;

(b) Measures taken to ensure that, within the framework of national legislation, members of the public concerned meeting the criteria set out in **paragraph 2** have access to a review procedure before a court of law and/or another independent and impartial body established by law, to challenge the substantive and procedural legality of any decision, act or omission subject to the provisions of article 6;

(c) With respect to **paragraph 3**, measures taken to ensure that where they meet the criteria, if any, laid down in national law, members of the public have access to administrative or judicial procedures to challenge acts and omissions by private persons and public authorities which contravene provisions of national law relating to the environment;

(d) With respect to **paragraph 4**, measures taken to ensure that:

(i) The procedures referred to in paragraphs 1, 2 and 3 provide adequate and effective remedies;

(ii) Such procedures otherwise meet the requirements of this paragraph;

(e) With respect to **paragraph 5**, measures taken to ensure that information is provided to the public on access to administrative and judicial review.

i) Any person who considers that their request for information, submitted in accordance with Article 4, has not been handled in compliance with the provisions of that article shall have access to a review procedure before a court or another independent and impartial body established by law.

According to Article 50 of the Constitution of the RA:

1. Everyone has the right to an impartial, fair, and timely examination of issues related to them by administrative bodies.
2. In the course of administrative proceedings, everyone has the right to access all documents related to them, except for those classified as confidential by law.
3. State and local self-government bodies and officials are obliged to listen to a person before adopting an individual act intervening for him, except for the cases defined by law.

Article 3 of the RA Law "On the Fundamentals of Administration and Administrative Proceedings" defines the concept of an administrative body, which includes all state administration bodies engaged in administrative activities. This definition generally corresponds to the definition set forth in the Aarhus Convention.

Article 63 of the Constitution guarantees the right to a fair trial, specifically:

1. Everyone has the right to a fair and public hearing/trial of case/ within a reasonable time by an independent and impartial court.

2. *Judicial proceedings, or parts thereof, may be held in closed session by court decision, in cases and according to procedures prescribed by law, for the purpose of protecting the private life of participants, the interests of minors, the administration of justice, as well as state security, public order, or morals.*
3. *The use of evidence obtained in violation of fundamental rights or in a manner that undermines the right to a fair trial is prohibited.*

In the RA, justice is administered solely by courts, in accordance with the Constitution and laws. The judicial system includes the Constitutional Court, the Court of Cassation, courts of appeal, courts of first instance of general jurisdiction, as well as the Administrative Court. Specialized courts may also be established in cases prescribed by law. The establishment of extraordinary courts is prohibited.

The Judicial Code, adopted on February 7, 2018, provides that courts of first instance include: 1) *Courts of general jurisdiction*; 2) *Specialized courts*.

The specialized courts currently functioning are the Administrative Court, the Bankruptcy Court, and Anti-Corruption Court. The courts of appeal include: 1) *Criminal Court of Appeal*; 2) *Civil Court of Appeal*; 3) *Administrative Court of Appeal*; and 4) *Anti-Corruption Appellate Court*. It should be noted that when interpreting the fundamental rights and freedoms enshrined in the Constitution, consideration is given to the practice of international bodies operating on the basis of international treaties on human rights ratified by the RA.

ii)

The Judicial Code establishes the criteria for a reasonable timeframe, particularly stating that, when determining whether the duration of proceedings is reasonable, the following factors must be taken into account:

- 1) *The circumstances of the case, including its legal and factual complexity, the conduct of the participants in the proceedings, and the consequences of the duration of the proceedings for the party involved;*
- 2) *The actions taken by the court and their effectiveness in ensuring that the case is examined and resolved within the shortest possible time;*
- 3) *The overall duration of the case examination;*
- 4) *The indicative average duration of case examination as determined by the Supreme Judicial Council.*

If a specific timeframe for the examination and resolution of a case is prescribed by law, the case must be examined and resolved within that timeframe. Any extension of such timeframe is permitted only in cases and in the manner prescribed by law.

The Law on State Duty defines the objects of state duty collection. In particular, a state duty is charged in the RA for *lawsuits, applications, and complaints submitted to courts, for appeals and cassation appeals against judicial acts, as well as for the issuance of copies (duplicates) of documents by the court.*

According to Article 9 of the Law on State Duty⁵⁰, the law prescribes the rates of state duty for lawsuits/claims, applications, and complaints submitted to courts, for cassation appeals against court decisions, as well as for the provision of copies (duplicates) of documents or audio- records by the court. The state duty for claims, applications, and complaints submitted to the court, for appellate and cassation appeals against judicial acts of the court, and for copies (duplicates) of documents provided by the court shall be charged at the following rates (only the rates relevant to the subject matter are presented below): (See Table 2)

Table 2

- Applications in special proceedings	Triple the base rate of the state duty, for appellate complaints- tenfold the base duty
- Appellate complaints against the courts lawsuit acts	In a property claim case – in the amount of 3 percent of the disputed sum indicated in the appeal. If the claims fully granted or fully rejected by the court of first instance are being disputed, or if the granted or rejected claims are not being disputed, then in the amount of 3 percent of the claim value filed and appealed in the court of first instance
- Cassation appeals against court decisions	in property disputes in the amount of 3 percent of the claim value, but not less than ten times and not more than one thousand times the base duty; for non-property (non-pecuniary) claims – in the amount of twenty times the base duty; for special proceedings – in the amount of ten times the base duty.
- Provision of copies (duplicates) of court judgments, verdicts, and decisions	50% of the base rate of the state duty, plus a 15 percentage of the base rate for each prepared page

Information related to all news concerning the judicial system and functioning of the judiciary may be obtained from the website www.court.am. The websites www.datalex.am, www.armlaw.am (Judicial Acts Search System of the RA).

Through the website www.datalex.am, judicial acts of various court instances may be downloaded without any restrictions and free of charge. The website operates in three languages. The main search criteria include: type of case, case number, name of the court, name of the judge, name of the plaintiff,

⁵⁰ <https://www.arlis.am/hy/acts/74375>

name of the defendant, date of claim submission, subject matter of the case, date of decision, legal article, and so on. The website also allows users to view court hearing schedules, submit applications online (for example through cabinet.armlex.am), access precedent-setting cases, search for legal acts, view cases of the European Court of Human Rights (ECHR), and more.

The decisions of the Court of Cassation and the Constitutional Court are available on www.arlis.am website. The system serves as the official platform for the publication of legal acts in Armenia.

In addition, legal remedies are ensured through the activities of the Prosecutor's Office, as well as by the Human Rights Defender of the RA, who examines citizens' applications concerning actions and decisions of officials and organizations that violate the rights and freedoms guaranteed by the Constitution, legislative acts, and international treaties of the RA. The Law "On the Prosecutor's Office" also defines the powers of this body in the field of protecting state interests, which include issues related to environmental protection.

According to the revised Constitution (Article 191), the Human Rights Defender is an independent official who monitors the observance of human rights and freedoms by state and local self-government bodies and officials, and in cases defined by the Law on the Human Rights Defender—also by organizations. The Defender contributes to the restoration of violated rights and freedoms and to the improvement of normative legal acts related to rights and freedoms.

The Human Rights Defender enjoys the same immunity as that granted to a Member of Parliament.

All of the above-mentioned documents, as well as an online application form for contacting the Defender, are available on the Human Rights Defender's official website (www.ombuds.am). In urgent cases, individuals may also contact the Defender through the hotline. The website is presently undergoing improvement and relaunching activities.

The annual reports of the Human Rights Defender contain information on the state of protection of environmental rights.

As a result of long-standing civil society advocacy, a new provision has been included in the 2023–2025 Action Plan of the National Strategy for the Protection of Human Rights of the RA. According to this provision, NGOs will have the right to file lawsuits in matters of public interest, including administrative and criminal cases, based on the principle of "actio popularis", which allows any person to act in defence of public interests.

Article 13 of the RA Judicial Code establishes the binding force of judicial acts, in particular:

- *The final judicial act is issued by the court on behalf of the Republic of Armenia.*
- *Judicial acts that have entered into legal force are binding for their addressees.*
- *Failure to comply with a judicial act that has entered into legal force results in liability as prescribed by law.*

By Government Decision No. 1133-L of July 21, 2022, the Strategy of Judicial and Legal Reforms for 2022–2026 and the corresponding Action Plan were adopted. Information on the measures undertaken is available on the official website of the MoJ⁵¹.

Amendments to the Criminal Code have introduced new mechanisms for holding individuals accountable for environmental crimes.

From the perspective of both accessibility and efficiency of justice, the introduction of an electronic justice system is considered a strategic priority of the Government. This system will operate as a unified platform while comprising various electronic modules—e.g., for civil, criminal, and other types of cases. The electronic platform for civil proceedings is already operational, while the platform for administrative proceedings is in its final stage of completion.

The existence of such a platform enables document circulation through the system, provide a flexible electronic notification mechanism, and offer effective tools for extracting statistical data, among others. As a result of digitalization and the automation of certain functions, the justice system will become more accessible to citizens, the time required to carry out various procedures will be reduced, and the workload of the courts will decrease, thereby positively impacting the quality of judicial decisions/acts.

By the Decision of the Prime Minister of the RA, the Information Systems Management Board was established to coordinate reforms and programs related to digital transformation, the development of a digital (electronic) society and economy in Armenia, and to enhance cooperation with international partners and dialogue with the private sector in this field (The Board coordinates the digitalization processes not only in the field of justice but also across all other sectors). In addition, under the coordination of the MoJ, an interagency working group has been established to oversee the development of the electronic justice system. This group also facilitates dialogue among stakeholders and contributes to the identification of effective solutions from the standpoint of ensuring access to justice.

29. Obstacles encountered in the implementation of article 9

Describe any obstacles encountered in the implementation of any of the paragraphs of article 9.

According to the results of the focus group discussions with NGOs, several organizations expressed the following view:

- The right of NGOs to file lawsuits under the Administrative Procedure Code is subject to strict limitations, including the requirement of having at least two years of operational experience, participation in public hearings, and alignment with the organization’s statutory objectives.
- In the field of environmental protection, there have been instances of SLAPP (Strategic Lawsuits Against Public Participation) cases, which, in the opinion of five NGOs⁵², are aimed at silencing

⁵¹ <https://moj.am/page/491>

⁵² Transparency International Anti-Corruption Center, the Center for Community Mobilization and Support NGO, “EcoLur” Informational NGO, the Foundation for the Development and Protection of Law, and the Human Rights Research Center NGO.

NGOs and activists. According to their estimates, in recent years, legal entities have filed approximately 30 such lawsuits against representatives of the interested public.

These cases concern demands brought before the court requiring citizens or NGO representatives to publicly retract statements, made via social media or in the press, about a given enterprise, which are alleged to contain defamatory information, and to pay compensation. It should be noted that in some of these cases, the court of first instance with general jurisdiction partially upheld the company's claim by reducing the amount of compensation sought or rejected the claim on the grounds that the statute of limitations for filing the lawsuit had expired. In certain instances, citizens have appealed the court's decision to collect damages for defamation to the Court of Appeal or subsequently to the Court of Cassation. There are examples where the Court of Appeal has decided to annul or amend the lower court's decision and reject the claim for compensation for insult in favor of the citizen. In such cases, the company's appeal to the Court of Cassation was often not admitted for consideration, and the previous decision remained in force⁵³.

It should be noted that amendments were made to the Civil Procedure Code in 2024, introducing the possibility for the court to immediately reject the acceptance of a statement of claim if the claim is manifestly unfounded. In such cases, the claimant also forfeits the amount of the state duty as a penalty. In addition, both the civil and administrative procedure legislation now provide effective mechanisms for the application of judicial sanctions in cases of abuse of rights.

30. Further information on the practical application of the provisions of article 9

Provide further information on the practical application of the provisions on access to justice pursuant to article 9, e.g., are there any statistics available on environmental justice and are there any assistance mechanisms to remove or reduce financial and other barriers to access to justice?

According to data from 2019–2020, it should be noted that efforts were made within the framework of the Supreme Judicial Council to develop statistics on environmental justice.

During the preparation of the previous report representatives of NGOs indicated in the questionnaire that the system for submitting complaints to the court is ineffective; even if judges are professionals, they often lack proper qualifications in handling specialized environmental cases. Among the barriers to access to justice, they also highlighted the protracted nature of judicial proceedings, the difficulty in finding qualified lawyers for environmental cases, and other related issues.

In Armenia, issues related to environmental challenges, ecological law, international environmental agreements, and dispute resolution in environmental law were studied during the 2021–2022 training programs for judges and judicial candidates. These were included under the module “Current Issues of Environmental Law in the RA” within the annual specialization course in administrative law. In 2023–2024, these topics were addressed in the course titled “Specific Features of Examining Special

⁵³ https://datalex.am:443/?app=AppCaseSearch&case_id=45880421203916345;
https://datalex.am:443/?app=AppCaseSearch&case_id=16325548649293283;
https://datalex.am:443/?app=AppCaseSearch&case_id=49258120924416074;
https://datalex.am:443/?app=AppCaseSearch&case_id=45880421204391054

Proceedings.”

Throughout 2021 and 2024, a total of 45 judges and 4 judicial candidates received training on issues related to environmental law and environmental dispute resolution.

According to paragraph 2(c) of Decision VII/8a of the Meeting of the Parties to the Aarhus Convention, it is required to align the national legislative provisions on access to justice for NGOs with Article 9(2) of the Convention. In this context, we kindly inform you that during 2022–2023, on the initiative of the national coordinator of the Aarhus Convention and in cooperation with the A. Iskoyan Environmental Law Research and Educational Center of YSU, discussions were held regarding the necessary amendments to the Law on Public Organizations and the Administrative Procedure Code. Concurrently, Members of Parliament Ms. Zaruhi Batoyan and Ms. Heriknaz Tigranyan initiated the relevant legislative amendments. They developed and circulated a draft law on making amendments and supplements to the Law on Public Organizations. In March 2025, a legislative package comprising the draft law on amendments to the Law on Non-Governmental Organizations and the draft law on making amendments and supplements to the RA Administrative Procedure Code was submitted for legal, financial and economic, and social expert reviews⁵⁴. On March 28, the Expert-Analytical Department of the National Assembly Staff concluded that the proposed regulations do not contain any provisions that are problematic from a constitutional standpoint. The legislative package aims to establish a legal basis for NGOs to represent and protect the interests of their beneficiaries or members within the scope of their statutory goals in court, especially when the matter concerns the prohibition of discrimination or the protection of collective interests. For this purpose, it is proposed to revise Clause 7 of Part 1 of Article 16 of the Law on Public Organizations. Under the new wording, an organization, in line with its statutory objectives, shall have the right, in accordance with the procedure established by law, to represent and defend its own rights and legitimate interests as well as those of its members and beneficiaries—arising from its statutory goals—in other organizations, in courts, and before state and local self-government bodies. It is also proposed to grant NGOs the right to file lawsuits in court for the protection of the collective interests of their beneficiaries in cases and in the manner prescribed by the Administrative Procedure Code of the RA. As a result of these legislative changes:

- The requirement for obtaining beneficiaries’ consent is eliminated;
- The precondition requiring participation in public hearings on environmental issues is removed from the Law on Non-Governmental Organizations;
- The scope of public interest representation rights for NGOs is expanded to include cases related to discrimination not only on the grounds of disability, but also on the basis of sex, race, skin color, origin, language, religion, and other social characteristics. The requirement that the majority of the organization's members be persons with disabilities is maintained only in the case of presenting individual cases of discrimination on the basis of disability.

⁵⁴ http://www.parliament.am/draft_history.php?id=15463&lang=arm

During the public discussion of the draft report, it was noted that Paragraph 1 of Article 9 of the Aarhus Convention is not being fully implemented, as no other independent and impartial body has been established since the ratification of the Convention. According to this provision, any person who considers that their request for access to information under Article 4 has not been handled properly must have access to a review procedure before a court of law or another independent and impartial body established by law.

31. Website addresses relevant to the implementation of article 9

Give relevant website addresses, if available:

www.justice.am, www.gov.am, www.court.am, www.concourt.am, www.arlis.am, www.moj.am, www.datalex.am, www.armlaw.am, www.ombuds.am, cabinet.armlex.am, <https://cassationcourt.am/>.

32. General comments on the Convention's objective

If appropriate, indicate how the implementation of the Convention contributes to the protection of the right of every person of present and future generations to live in an environment adequate to his or her health and well-being.

The Convention contributes to the development and implementation of a more effective, transparent, and accountable decision-making process in the field of environmental policy, through broader and more effective public participation.

33. Legislative, regulatory and other measures implementing the provisions on genetically modified organisms pursuant to article 6 bis and Annex I bis

On January 17, 2023, the RA Law of the on GMOs was adopted and entered into force on August 10, 2023.

On September 15, 2023, the RA Government approved the State Program on Measures Aimed at Preventing Risks and Eliminating Damage to the Environment, Human Life and Health, and Agricultural Lands Arising from the Use of GMOs and Biosafety Issues⁵⁵.

In 2023 the MoE launched the preparatory activities for the ratification of the GMO Amendment to the Aarhus Convention. Working discussion was organized at the MoE. GMO Amendment was translated into Armenian. MoE submitted a request to the line ministries for getting opinions and recommendations thereon.

The RA law on MGOs was translated into English and delivered to the Compliance Committee via the Committee's Secretary. On July 15, 2024, the Party officially applied to the Committee with the request of considering the compliance of the GMO Law to the GMO Amendment.

⁵⁵ RA Government Decision N 1558-N, 14.09.2023: <https://www.arlis.am/DocumentView.aspx?docid=182477>

34. Obstacles encountered in the implementation of article 6 bis and annex I bis

Describe any obstacles encountered in the implementation of any of the paragraphs of article 6 bis and annex I bis.

35. Further information on the practical application of the provisions of article 6 bis and annex I bis

Provide further information on the practical application of the provisions on public participation in decisions on the deliberate release into the environment and placing on the market of genetically modified organisms in article 6 bis, e.g., are there any statistics or other information available on public participation in such decisions or on decisions considered under paragraph 2 of annex I bis to be exceptions to the public participation procedures in that annex?

37. Follow-up on issues of compliance

If, upon consideration of a report and any recommendations of the Compliance Committee, the Meeting of the Parties at its last session has decided upon measures concerning compliance by your country, please indicate (a) what were the measures; and (b) what specific actions your country has undertaken to implement the measures in order to achieve compliance with the Convention.

Please include cross-references to the respective sections, as appropriate.

A plan of action aimed at implementing Decision VII/8a of the Meeting of the Parties to the Convention was developed in June 2022. In accordance with the plan, necessary measures were undertaken, and reports were submitted to the Compliance Committee in line with the established timeline. However, there are still items that have not been implemented within the set deadlines; nevertheless, work in that direction is ongoing.