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Monitoring Report

Monitoring Armenia’s Commitments under CEPA for Disability Inclusion



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3. Executive Summary

This report presents the findings of an independent monitoring assessment of Armenia’s implementation of Articles 84 to 88 of the Comprehensive and Enhanced Partnership Agreement (CEPA) with the European Union, with a specific focus on disability inclusion. The analysis is organized around four thematic areas: poverty reduction and social cohesion, employment and inclusive labor markets, social dialogue and civil society engagement, and corporate social responsibility.

While Armenia has undertaken reforms in social protection and employment, these efforts remain insufficiently inclusive of persons with disabilities. Disability-related considerations are largely absent from key strategic documents, benefit levels fall below subsistence thresholds, and systemic barriers continue to restrict access to employment, public services, and decision-making spaces.

Although anti-discrimination provisions exist in national labor legislation, enforcement remains weak. Employment quotas for persons with disabilities are not operationalized, and support programs often lack accessibility or adaptability. Participation mechanisms are underused, and organizations of persons with disabilities are frequently excluded from meaningful engagement in policymaking. A coordinated approach to corporate social responsibility is lacking, with disability inclusion largely absent from private sector practices.

The report concludes that Armenia’s efforts, while notable in some areas, fall short of the commitments outlined in CEPA and the CRPD. Strengthening legal implementation, institutional coordination, and inclusive policymaking is essential. Priority recommendations include enhancing disability data systems, ensuring the meaningful participation of OPDs in all stages of policy development, and establishing a national CSR framework with a focus on social inclusion.



4. Introduction and Background

The Comprehensive and Enhanced Partnership Agreement between the European Union (EU) and the Republic of Armenia¹ represents a significant framework for political, economic, and social cooperation. Signed in November 2017 and provisionally applied since June 2018, CEPA replaced the 1999 Partnership and Cooperation Agreement (PCA)², marking a new phase in EU-Armenia relations. The agreement provides for broad sectoral cooperation while respecting Armenia’s commitments within the Eurasian Economic Union (EAEU). Unlike a full Association Agreement or a Deep and Comprehensive Free Trade Area (DCFTA)³, which some Eastern Partnership (EaP) countries have pursued, CEPA was designed to enable closer alignment with EU policies and standards while accommodating Armenia’s existing trade commitments.

In terms of governance and policy alignment, the implementation of CEPA has been guided by a roadmap⁴, adopted through the Prime Minister’s Decision of June 1, 2019 (N 666-L). This roadmap serves as a structured action plan for legal harmonization and institutional reforms, outlining Armenia’s commitments in various sectors covered by CEPA. However, while it facilitates broader governance and economic reforms, it does not directly address CEPA’s social provisions, including those related to employment, social protection, non-discrimination, and stakeholder engagement. This has contributed to gaps in the implementation of disability-inclusive policies, labor market accessibility, and civil society participation.

¹ *Comprehensive and Enhanced Partnership Agreement between the European Union and the European Atomic Energy Community and their Member States, of the one part, and the Republic of Armenia, of the other part*, Official Journal of the European Union, L 23, January 26, 2018, 4–466, https://eur-lex.europa.eu/eli/agree_internation/2018/104/oj.

² *Partnership and Cooperation Agreement between the European Communities and their Member States, of the one part, and the Republic of Armenia, of the other part*, Official Journal of the European Communities, L 239, September 9, 1999, 3–50, <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A21999A0909%2801%29>.

³ European Commission, *Deep and Comprehensive Free Trade Agreements*, Access2Markets, accessed April 16, 2025, <https://trade.ec.europa.eu/access-to-markets/en/content/deep-and-comprehensive-free-trade-agreements>.

⁴ Government of the Republic of Armenia, *Decision No. 666-L of the Prime Minister of the Republic of Armenia on Approving the Roadmap for the Implementation of the Comprehensive and Enhanced Partnership Agreement between the Republic of Armenia and the European Union, the European Atomic Energy Community and their Member States*, June 1, 2019, available in Armenian, <https://www.arlis.am/DocumentView.aspx?docid=153164>.



Despite progress in legislative reforms, challenges remain in translating legal commitments into systemic change. Armenia has introduced laws on the rights of persons with disabilities⁵, employment⁶, and social protection⁷, but enforcement remains uneven. While certain provisions establish employment quotas, anti-discrimination measures, and social benefits, these have not been fully integrated into Armenia’s economic and labor market policies. The government’s engagement with civil society organizations, particularly organizations of persons with disabilities, remains inconsistent, with limited opportunities for structured participation in policymaking and legislative processes.

As Armenia deepens its cooperation with the EU, CEPA remains the primary mechanism for policy alignment and institutional reforms. The ongoing evolution of EU-Armenia relations, shaped by geopolitical shifts, economic considerations, and governance priorities, presents both opportunities and challenges in ensuring full implementation of CEPA’s commitments. Strengthening social policies, improving labor market accessibility, and enhancing civil society participation are essential to ensuring that CEPA’s provisions translate into meaningful reforms that align with EU standards and Armenia’s international obligations.

Against this backdrop, the **objective of this study** is to evaluate the extent to which Armenia’s implementation of CEPA Articles 84 to 88 advances disability inclusion in practice. The assessment focuses on four interrelated areas: poverty reduction and social cohesion, inclusive labor markets, stakeholder participation, and corporate social responsibility. It aims to analyze whether existing policies and institutional practices align with the principles of CEPA and the CRPD, identify barriers to inclusion, and offer evidence-based recommendations to support Armenia’s compliance with its international commitments and its efforts to build a more inclusive society.

5. Methodology

This report is grounded in a rights-based, policy monitoring approach designed to assess the Republic of Armenia’s implementation of its commitments under Articles 84 to 88 of the

⁵ National Assembly of the Republic of Armenia, *Law of the Republic of Armenia on the Rights of Persons with Disabilities*, adopted May 5, 2021, available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=196661>.

⁶ National Assembly of the Republic of Armenia, *Law of the Republic of Armenia on Employment*, adopted December 11, 2013, available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=199715>.

⁷ National Assembly of the Republic of Armenia, *Law of the Republic of Armenia on Social Assistance*, adopted October 24, 2024, available in Armenian, <https://www.arlis.am/DocumentView.aspx?docid=199657>.



Comprehensive and Enhanced Partnership Agreement, with a specific focus on disability inclusion. The methodology aligns with international human rights standards, including the United Nations Convention on the Rights of Persons with Disabilities, and reflects best practices in inclusive monitoring frameworks.

The analysis is structured around four interrelated thematic areas drawn directly from CEPA: poverty reduction and social cohesion, employment and inclusive labor markets, social dialogue and civil society engagement, and corporate social responsibility. These areas correspond to Articles 84 through 88 and are supported by a twin-track monitoring approach, examining both mainstream policies and disability-specific measures to ensure a comprehensive evaluation.

The methodology combines legal and policy analysis with an evidence-based assessment of implementation. A detailed monitoring matrix, presented in Annex 2, guided the process by outlining the indicators, judgment criteria, and thematic monitoring questions applied across the four areas of assessment. This matrix formed the analytical foundation for data collection and evaluation, enabling a structured examination of both the formal legal alignment and the practical impact of policies on the rights and inclusion of persons with disabilities.

Data collection was conducted from January to April 2025 and included three primary methods. First, a comprehensive desk review was carried out, involving an analysis of national legislation, CEPA provisions, government decisions, and policy strategies. Key documents reviewed included the CEPA agreement and its 2019 implementation roadmap, the 2025–2031 Strategic Employment Plan, relevant decrees on social protection, and legal frameworks on disability rights and anti-discrimination. This review was supplemented by the analysis of reports produced by Armenian civil society organizations, international agencies, and treaty bodies.

Second, formal information requests were submitted to state institutions, including the Ministry of Economy and Ministry of Labor and Social Affairs. These requests aimed to obtain official data and internal documents relevant to the implementation of disability-related policies under CEPA. Where responses were received, the information was used to verify findings and fill gaps in public data availability.

Third, consultations were held with a range of stakeholders, including representatives of government agencies, National Assembly, organizations of persons with disabilities (OPDs), and experts. These semi-structured interviews provided context to policy implementation and helped validate the desk research findings with lived experience perspectives. In addition, a validation workshop was organized with the participation of diverse stakeholders, where preliminary findings were presented and discussed. Feedback received during this session informed the final analysis, and relevant additions were made to strengthen the accuracy and completeness of the report.

Analytically, the report draws on thematic synthesis, gap analysis, and policy impact evaluation. Thematic synthesis was used to identify recurring challenges and opportunities across the four CEPA thematic areas. Gap analysis enabled a comparison between Armenia’s current policy landscape and



its legal obligations under CEPA and the CRPD. The assessment of policy impact focused on the degree to which national systems promote inclusion, financial security, equal employment opportunities, and participation for persons with disabilities.

Limitations

The monitoring process encountered several limitations that, while not significantly affecting the overall analysis, shaped the depth and scope of certain components. These limitations stemmed from both structural and practical factors.

One methodological consideration was the broad and sometimes open-ended nature of the CEPA articles under review. Articles 84 to 88 establish important areas for cooperation, but they do not always specify measurable benchmarks or expected outputs. As a result, assessing compliance and implementation required a degree of interpretative analysis. To address this, a tailored monitoring framework was developed based on CEPA provisions and international standards, particularly the UN Convention on the Rights of Persons with Disabilities, in order to evaluate alignment and practical impact.

Another challenge was related to the availability and consistency of administrative data on persons with disabilities. While some relevant data were accessible, they were often fragmented across institutions or lacked the level of disaggregation needed for in-depth analysis, particularly in areas such as poverty, employment, and service access. In some instances, discrepancies were noted across official sources without the possibility of independent verification. Additionally, data disaggregated by age, gender, region, or type of disability remain limited, which constrained the ability to explore intersectional patterns of exclusion.

Institutional factors also presented certain constraints. For example, corporate social responsibility remains a policy area without clear institutional ownership. The Ministry of Economy has, at times, referenced CSR in the context of social policy, but no body has a formal mandate to develop or oversee CSR-related frameworks. The Ministry of Labor and Social Affairs, despite its leading role in inclusion policies, does not carry responsibilities for CSR under its statute. This lack of clarity made it more difficult to assess coordinated state efforts in promoting responsible business practices aligned with CEPA commitments.

Despite these challenges, the combination of documentary analysis, institutional correspondence, and stakeholder input provided a robust basis for the findings presented in this report. The methodology ensures that the assessment is grounded in evidence, informed by international standards, and attentive to both systemic policy issues and the lived experiences of persons with disabilities in Armenia.



6. Monitoring Results and Key Insights

Poverty Reduction and Social Cohesion

Relevant Provisions under CEPA

Article 84 of CEPA states:

“The Parties shall strengthen their dialogue and cooperation on promoting the International Labour Organisation (“ILO”) Decent Work Agenda, employment policy, health and safety at work, social dialogue, social protection, social inclusion, gender equality and anti-discrimination, and thereby contribute to the promotion of more and better jobs, poverty reduction, enhanced social cohesion, sustainable development and improved quality of life.”

Article 85a of CEPA states:

“Cooperation, based on exchange of information and best practices, may cover a selected number of issues to be identified among the following areas: (a) poverty reduction and the enhancement of social cohesion.”

Findings

Armenia has undertaken reforms in its poverty reduction strategies and social protection mechanisms in an effort to align with its CEPA commitments to enhance social cohesion. The government has introduced a new methodology for evaluating social assistance, moving toward a needs-based approach.⁸ However, as described below, these reforms remain inadequate in addressing the specific barriers faced by persons with disabilities, failing to incorporate a structured, inclusive framework that ensures economic security and access to essential services.

While Armenia’s national poverty rate stood at 26.5% in 2021⁹, persons with disabilities experience significantly higher levels of poverty and social exclusion¹⁰. High inflationary pressures, lack of

⁸ National Assembly of the Republic of Armenia, *Law on Making Amendments and Addenda to the Law of the Republic of Armenia on State Allowances*, adopted October 24, 2024, available in Armenian, <https://www.arlis.am/DocumentView.aspx?docid=199679>.

⁹ World Bank. *Poverty & Equity Brief: Armenia*. Europe & Central Asia. April 2023. Accessed April 16, 2025. https://databankfiles.worldbank.org/public/ddpext_download/poverty/987B9C90-CB9F-4D93-AE8C-750588BF00QA/current/Global_POVEQ_ARM.pdf.

¹⁰ World Bank. *Disability Inclusion*. Updated April 9, 2025. Accessed April 16, 2025. <https://www.worldbank.org/en/topic/disability>.



access to formal employment, and an underdeveloped social safety net continue to exacerbate financial insecurity among persons with disabilities. Despite these concerns, no disability-specific poverty impact assessment has been conducted, nor has the government developed a data collection system to assess the poverty rates among children and adults with disabilities. The lack of disaggregated data¹¹ and the absence of periodic reports on disability and poverty hinder the government’s ability to design effective, targeted policies.

The 2024 amendments to the Law on State Allowances¹² introduced a new methodology (piloting in 2 regions) for determining social assistance eligibility, based on family income and household composition. However, these reforms fail to take into account the unique financial burdens associated with disability and continue to apply outdated categorizations that reinforce economic exclusion:

- Only persons with severe or complete functional limitations are considered dependent family members for assistance eligibility, while those with moderate disabilities are excluded from additional support. This misconception assumes that individuals with moderate disabilities face no employment barriers, despite clear evidence to the contrary (art. 15.3).
- The law imputes income to unemployed individuals, meaning that if a person with disabilities is not employed, the government assumes they earn a set amount, regardless of their actual income. This artificially inflates household earnings, often disqualifying individuals from essential financial assistance (art. 15.3).
- Disability benefits are counted as family income, reducing eligibility for additional support, despite the fact that these benefits do not sufficiently cover disability-related expenses (annex 1, 32).¹³

Additionally, poverty reduction in Armenia largely focus on income levels alone and do not account for the multidimensional nature of poverty, such as discrimination, lack of access to services, and systemic exclusion from education and employment. Social assistance programs are not individualized and fail to consider a person’s unique circumstances based on social work assessments. This lack of a personalized approach results in many persons with disabilities falling through the cracks, unable to receive the support they need.

¹¹ Statistical Committee of the Republic of Armenia (Armstat). *Social Snapshot and Poverty in Armenia*. Yerevan: Armstat, 2024. Accessed April 16, 2025.
https://armstat.am/file/article/poverty_2024_en_00.pdf.

¹² National Assembly of Armenia, *Amendments to the Law on State Allowances*, 2024.

¹³ Government of the Republic of Armenia, *Decision No. 27-N of January 9, 2025*, available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=205191>.



The government’s public communication on poverty also lacks a human rights-based approach.¹⁴ Official discourse often uses stigmatizing and blaming language toward unemployed individuals¹⁵, including those with invisible disabilities, reinforcing negative stereotypes about persons with disabilities and their economic participation. This further alienates persons with disabilities from engaging with social programs and employment initiatives¹⁶.

Persons with disabilities in Armenia receive disability benefits based on the degree of “functional limitation”, yet these payments are insufficient to ensure financial security. In 2024, the disability benefit amounts¹⁷ were:

- Complete functional limitation: 39,000 AMD (~\$100 USD)
- Severe functional limitation: 37,500 AMD (~\$96 USD)
- Moderate functional limitation: 36,000 AMD (~\$92 USD)
- Children with disabilities: 39,000 AMD (~\$100 USD)

These benefits fall significantly below the minimum consumer basket cost of 67,875 AMD (~\$174 USD), which includes basic food and non-food essentials. While the food basket cost alone (36,875 AMD or ~\$95 USD)¹⁸ is covered by the lowest disability benefit, this calculation does not account

¹⁴ Socioscope NGO, *Participatory Study on Poverty, Employment, and Labor Rights: The Case of Gegharkunik and Shirak Regions*, Yerevan, 2024, available in Armenian, https://socioscope.am/wp-content/uploads/2024/01/Research_31.12_web-1.pdf.

¹⁵ Government of the Republic of Armenia. *The Launch of the New Insecurity Assessment System Will Begin in Kotayk and Syunik Regions from March 17, 2025*. January 9, 2025. Accessed April 16, 2025. <https://www.primeminister.am/en/press-release/item/2025/01/09/Cabinet-meeting/>.

¹⁶ Whittle, H. J., K. Palar, N. A. Ranadive, J. M. Turan, M. Kushel, and S. D. Weiser. “The Land of the Sick and the Land of the Healthy: Disability, Bureaucracy, and Stigma among People Living with Poverty and Chronic Illness in the United States.” *Social Science & Medicine* 190 (October 2017): 181–89. <https://doi.org/10.1016/j.socscimed.2017.08.031>.

¹⁷ Government of the Republic of Armenia, *Decision No. 1489-N of December 26, 2013, on Defining the Amounts of Benefits in Cases of Old Age, Disability, Loss of Breadwinner, and Funeral Assistance*, available in Armenian, <https://www.arlis.am/DocumentView.aspx?docid=179721>.

¹⁸ Statistical Committee of the Republic of Armenia (Armstat), *Value of the Minimum Consumer Basket*, in *Socio-Economic Situation of the Republic of Armenia, January–December 2024*, Yerevan, February 5, 2025, available in Armenian, https://armstat.am/file/article/sv_12_24a_6200.pdf.



for the additional financial burdens associated with disability, such as healthcare costs, assistive devices, mobility support, and accessibility-related expenses.¹⁹

Furthermore, persons with disabilities must choose between receiving either old-age pensions or disability pensions upon reaching retirement age²⁰. This forces individuals to forgo one essential source of financial support, often leaving them in a worse economic position in old age.

Additionally, persons with disabilities residing in state-run care institutions are excluded from receiving disability or old-age benefits, apart from a small additional amount based on their previous work experience. This policy further diminishes financial independence and places institutionalized individuals in complete dependence on state-provided resources.²¹

Despite the government’s acknowledgment of the economic challenges faced by persons with disabilities, there has been no official publication of a comprehensive study on poverty.

Although a study on disability-related extra costs was conducted with UNICEF support, it has only been introduced to a group of stakeholders and has not been made publicly available.²² The absence of transparent data and official reporting on disability-related costs limits the ability of policymakers, OPDs, and civil society organizations to advocate for improved financial support.

Conclusions and Recommendations

Armenia’s efforts to reform its poverty reduction and social protection systems remain limited in scope when it comes to the needs of persons with disabilities. Current policies focus narrowly on income, apply restrictive and outdated definitions of dependency, and fail to reflect the multidimensional and intersectional realities of poverty experienced by persons with disabilities. As a result, many individuals continue to fall outside the scope of adequate financial support and social inclusion measures.

¹⁹ Daniel Mont, Alex Cote, Jill Hanass-Hancock, Lena Morgon Banks, Vlad Grigorus, Ludovico Carraro, Zachary Morris, and Monica Pinilla-Roncancio, *Estimating the Extra Costs for Disability for Social Protection Programs*, International Labour Organization, 2022, <https://www.social-protection.org/gimi/ShowRessource.action?id=57850>.

²⁰ National Assembly of the Republic of Armenia, *Law of the Republic of Armenia on State Allowances*, adopted December 12, 2013, available in Armenian, <https://www.arlis.am/DocumentView.aspx?docid=199737>.

²¹ National Assembly of Armenia, *Law on State Allowances*, 2013.

²² Ministry of Labor and Social Affairs of the Republic of Armenia, *Presentation of Analysis Results on Expenditures for Children with Disabilities*, October 18, 2024, available in Armenian, <https://mlsa.am/news/795>.



To advance toward a more inclusive and rights-based approach, the following recommendations are proposed:

To the Government of Armenia (under the leadership of the Ministry of Labor and Social Affairs)

Level: Legal, Policy, and Institutional

- Introduce automatic annual indexation of disability benefits to adjust for inflation and ensure that the real value of support does not decline over time.
- Recalculate the minimum disability benefit amounts to reflect actual living costs. A combination of cash and in-kind benefits should be used to address the diversity of disability-related expenses and to move toward benefit adequacy.
- Incorporate non-income dimensions of poverty, such as access to health care, education, assistive devices, and transportation, into the eligibility and assessment criteria of social protection programs. This would allow for a more individualized and comprehensive understanding of need.
- Institutionalize the practice of conducting disability impact assessments, both ex ante and ex post, for any major reform in social protection or poverty policy. These assessments should be conducted in partnership with OPDs and include both quantitative and qualitative methods to ensure full rights compliance.
- Amend regulations that exclude persons with disabilities living in state-run institutions from receiving full disability or old-age benefits. Such policies should be revised to protect personal financial autonomy regardless of living arrangements.
- Eliminate the requirement for older adults with disabilities to choose between old-age and disability benefits.
- Remove the provision of income imputation for persons with disabilities who are unemployed. This practice penalizes individuals who face systemic labor market exclusion by assigning fictional income, resulting in unfair disqualification from essential support.
- Exclude disability benefits from household income calculations used to determine eligibility for social assistance. These benefits are designed to address disability-related costs and should not be treated as general disposable income.

To the Ministry of Labor and Social Affairs

Level: Programmatic and Communications

- Ensure that all pilot programs in social protection and poverty reduction comply with existing legal standards, including the CRPD and the Law on the Rights of Persons with Disabilities. Pilot initiatives should not bypass core principles of equality and non-discrimination, accessibility, and participation.



- Develop and implement a public communications strategy on poverty and social protection that avoids stigmatizing narratives, adopts a human rights-based approach, and emphasizes the structural causes of exclusion.
- Engage organizations of persons with disabilities in co-designing information campaigns, training materials, and awareness-raising activities that challenge harmful stereotypes and promote inclusive public discourse.

To the Statistical Committee of Armenia (in cooperation with Ministry of Labor and Social Affairs)

Level: Data and Monitoring

- Establish a national disability-inclusive poverty monitoring system, with regular collection and publication of disaggregated data by type of disability, gender, age, region, and socio-economic status.
- Align data collection practices with international tools such as the EU-SILC and the Washington Group Short Set of Questions on Disability, to allow for comparability and evidence-based policy design.



Employment and Inclusive Labor Markets

Relevant Provisions under CEPA

Article 84 of CEPA states:

“The Parties shall strengthen their dialogue and cooperation on promoting the International Labour Organisation (“ILO”) Decent Work Agenda, employment policy, health and safety at work, social dialogue, social protection, social inclusion, gender equality and anti-discrimination, and thereby contribute to the promotion of more and better jobs, poverty reduction, enhanced social cohesion, sustainable development and improved quality of life.”

Article 85 (b), (c) and (d) of CEPA states:

“Cooperation, based on exchange of information and best practices, may cover a selected number of issues to be identified among the following areas: (b) employment policy, aiming at more and better jobs with decent working conditions, including with a view to reducing the informal economy and informal employment; (c) promoting active labour market measures and efficient employment services to modernise the labour markets and to adapt to labour market needs; (d) fostering more inclusive labour markets and social safety systems that integrate disadvantaged people, including people with disabilities and people from minority groups.”

Findings

After a long gap, Armenia adopted a new Strategic Employment Plan for 2025-2031 through Government Decision No. 2083-L of December 27, 2024²³, replacing the previous Employment Strategy for 2013-2018²⁴. This marks a significant shift in employment policy planning after nearly a decade without a comprehensive framework. However, despite Armenia’s commitments to inclusive labor markets under CEPA, the CRPD, and national disability legislation, the new strategy fails to meaningfully incorporate disability inclusion measures.

A word search comparison between the two strategies highlights a sharp decline in references to disability. The 2013-2018 strategy mentioned persons with disabilities 62 times, reflecting a more explicit focus on employment barriers, targeted policies, and inclusive labor market programs. In

²³ Government of the Republic of Armenia, *Decision No. 2083-L of December 27, 2024, on Approving the 2025–2031 Employment Strategy*, available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=201615>.

²⁴ Government of the Republic of Armenia, *Excerpt from Government Session Protocol No. 45 of November 8, 2012, on Approving the Report on the 2013–2018 Employment and Social Inclusion Strategy*, available in Armenian, <https://www.irtek.am/views/act.aspx?aid=68183>.



contrast, the 2025-2031 strategy mentions disability only seven times, and exclusively in the situation analysis section, without integrating disability-specific measures into strategic goals, priority programs, or expected results.

Armenia’s Labor Code²⁵ explicitly prohibits discrimination in recruitment, hiring, and workplace practices. Article 3.1 of the Labor Code prohibits direct and indirect discrimination based on disability, among other factors, ensuring that individuals cannot be treated less favorably in employment relations. The law also prohibits discriminatory job advertisements and hiring criteria beyond practical and professional qualifications.

Despite this strong legal framework, the problem lies in enforcement. There is no systematic monitoring or reporting mechanism to track workplace discrimination²⁶ and no cases of employment discrimination based on disability have been effectively prosecuted. Employers frequently fail to implement workplace adjustments, and persons with disabilities face significant difficulties proving discrimination due to a lack of formal complaints mechanisms and legal support.

While the Law “On Employment”²⁷ mandates a 3% employment quota for persons with disabilities in state institutions and a 1% quota for private companies with 100 or more employees, the government has not issued a necessary decree to operationalize these quotas, rendering the law ineffective. This lack of implementation means there are no binding requirements for employers to hire persons with disabilities, and no penalties or incentives are in place to encourage compliance.²⁸

Additionally, the requirement for reasonable accommodations in the workplace is legally recognized²⁹ but not adequately facilitated by the state agencies. The August 11, 2022, decree on

²⁵ National Assembly of the Republic of Armenia, *Labor Code of the Republic of Armenia*, adopted November 9, 2004, available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=199957>.

²⁶ Socioscope NGO, *Policy Document on Improving the Protection of Labor Rights: Recommendations from Civil Society Organizations*, “Decent Work Now!” program, Yerevan, 2023, available in Armenian, <https://socioscope.am/wp-content/uploads/2023/02/Քաղաքականության-փաստաթուղթ-Աշխատանքային-իրավունքներ.pdf>.

²⁷ National Assembly of Armenia, *Law on Employment*, 2013.

²⁸ Government of the Republic of Armenia, *Decision No. 1308-N of November 19, 2014, on Approving the Procedure for Making and Using Alternative Contributions by Organizations in Case of Non-fulfillment of the Employment Quota*, available in Armenian, <https://www.arlis.am/documentview.aspx?docid=102803>.

²⁹ National Assembly of Armenia, *Law on the Rights of Persons with Disabilities*, 2021.



reasonable accommodations³⁰ for employees and students with disabilities introduced provisions for workplace adjustments, yet the decree fails to define "reasonability" in alignment with the CRPD³¹. Instead, it establishes a fixed 5% threshold of total expenditures for defining "undue burden", which in some cases can be unrealistically high and discourage employers from providing accommodations.

Moreover, there is no structured enforcement mechanism to ensure that employers provide reasonable accommodations, nor any state-led financial support to make workplace adjustments more affordable. The 2023 government program aimed at reimbursing employers for accommodation costs failed to attract any applicants in its first six months.³²

Article 85(d) of CEPA mandates the promotion of inclusive labor markets and social safety systems that integrate disadvantaged groups, including persons with disabilities. However, Armenia's employment policies are not aligned with this commitment, as they fail to provide structured programs or incentives for disability-inclusive employment.

There is still no official, comprehensive system for monitoring the employment rates of persons with disabilities in Armenia. However, recent data from 2022 indicate that 68.2% of persons with disabilities aged 15–74 were outside the labor force, compared to 38.9% of persons without disabilities. Despite slight improvements in employment participation, only 26.8% of persons with disabilities were employed, and 15.9% of those in the labor force were unemployed. Regional disparities persist: rural areas see slightly higher labor force participation among persons with disabilities (39.6%) than urban areas (27.9%).³³

Armenia's state-run employment programs have largely failed to provide effective support for persons with disabilities. Between 2020 and mid-2023, a total of 3,096 individuals were employed through government employment programs, yet only 222 were persons with disabilities, accounting

³⁰ Government of the Republic of Armenia, *Decision No. 1265-N of August 11, 2022, on Defining the Procedure for Providing Reasonable Accommodations*, available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=167278>.

³¹ UN Committee on the Rights of Persons with Disabilities, *General Comment No. 6 on Equality and Non-Discrimination*, CRPD/C/GC/6, April 26, 2018, <https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no6-equality-and-non-discrimination>.

³² Government of the Republic of Armenia, *Decision No. 242-L of February 23, 2023, on Approving a Measure to Promote Employment*, available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=174467>.

³³ Statistical Committee of the Republic of Armenia, *Labour Market in Armenia, 2023: Population with Disability*, Yerevan, 2023, available in Armenian, https://armstat.am/file/article/lab_market_2023_10.pdf.



for just 7% of all program beneficiaries.³⁴ It remains unclear whether these job placements were long-term contracts or temporary arrangements, raising concerns about the sustainability and inclusivity of these programs.

Between 2021 and 2022, the government halted all state employment programs to evaluate their effectiveness.³⁵ This breach of the state’s obligation under the CRPD significantly impacted persons with disabilities, who were left without active labor market support measures.

In 2021, the government launched a tax deduction program³⁶ for employers hiring persons with disabilities acquired due to military operations, offering income tax reductions of up to 100,000 drams per quarter and a one-time accommodation grant of up to 500,000 drams. Despite these incentives, only one employer participated, demonstrating the program’s failure to create real employment opportunities. Similarly, the 2023 reasonable accommodation reimbursement program received no applicants in its first six months, raising questions about its design, accessibility, and effectiveness.³⁷

One of the key factors contributing to the limited effectiveness of these employment support programs has been their restrictive eligibility criteria. Employers were required to post job openings through the Unified Social Service (USS)³⁸ platform, and persons with disabilities had to be registered in the system to qualify for support. This design excluded employers hiring through independent channels and reduced incentives for businesses to participate in state-led initiatives. The Ministry of Labor and Social Affairs has since acknowledged the program’s shortcomings, as reflected in the decision not to extend or renew it.³⁹

³⁴ Ministry of Labor and Social Affairs of the Republic of Armenia, *Official Response to the Disability Rights Agenda NGO*, July 21, 2023.

³⁵ *Zhoghovurd Daily*, “Several Employment Assistance Programs Are No Longer in Operation,” verified by Disability Rights Agenda NGO, available in Armenian, <https://armlur.am/1221256>.

³⁶ Government of the Republic of Armenia, *Decision No. 460-L of April 1, 2021, on Approving the Measure of Providing State Compensation to the Employer in the Case of Employment of Ex-Servicemen (or Those Considered Equal) Who Have Received an Injury as a Result of Military Operations and Are Recognized as Persons with Disabilities*, available in Armenian, <https://www.arlis.am/DocumentView.aspx?DocID=151281>.

³⁷ Government of Armenia, *Decision No. 242-L*, 2023.

³⁸ Unified Social Service of the Republic of Armenia, *Official Website*, <https://socservice.am>.

³⁹ Ministry of Labor and Social Affairs, *Official Response*, 2023.



Employment support programs in Armenia are not fully accessible to persons with disabilities. The launch of the job search engines^{40 41} were intended to improve labor market integration, yet the platforms do not comply with Web Content Accessibility Guidelines⁴². It also requires physical visits to Unified Social Service centers to complete employment procedures, creating significant barriers for job seekers with disabilities.

Additionally, there is no systematic vocational training or mentorship program specifically designed for persons with disabilities. While general employment training programs exist, they do not include accessibility adaptations, assistive technology, or tailored job placement services.

Despite CEPA’s emphasis on civil society engagement in employment and social policy, there is no evidence that OPDs were consulted in drafting the Strategic Employment Plan for 2025-2031⁴³, nor have they been systematically included in labor market policy discussions.

Conclusions and Recommendations

Despite a renewed effort to update Armenia’s employment policy through the 2025–2031 Strategic Employment Plan, significant gaps persist in aligning employment systems with CEPA Article 85(d) and CRPD Article 27. The failure to integrate disability inclusion into core strategic objectives, the absence of meaningful implementation mechanisms, and the poor design of support programs continue to exclude persons with disabilities from labor market participation.

To ensure a more inclusive and rights-compliant employment policy framework, the following recommendations are proposed:

To the Government of Armenia (under the leadership of the Ministry of Labor and Social Affairs)

Level: Legal, Policy, and Institutional

⁴⁰ Ministry of Labor and Social Affairs, *e-work.am: Official Employment Platform*, launched May 3, 2024, <https://e-work.am>.

⁴¹ Ministry of Labor and Social Affairs of the Republic of Armenia, *Work Without Borders: Official Employment Platform*, <https://rbg.workforall.am>.

⁴² World Wide Web Consortium (W3C), *Web Content Accessibility Guidelines (WCAG) 2.1*, W3C Recommendation, June 5, 2018, <https://www.w3.org/TR/WCAG21/>.

⁴³ Government of the Republic of Armenia, *Draft Employment Strategy for 2025–2031*, available in Armenian, <https://www.e-draft.am/projects/8070>.



- Revise the Strategic Employment Plan 2025–2031 to include disability-specific objectives, measurable indicators, and implementation benchmarks. The strategy should explicitly recognize persons with disabilities, including refugees with disabilities, as active contributors to the labor force with untapped potential, rather than passive recipients of support.
- Mandate regular disability impact reviews of employment strategy, with mechanisms to adjust policies based on lessons learned and evolving labor market conditions. These reviews should be participatory and grounded in disaggregated data.
- Operationalize the employment quota system outlined in the Law “On Employment” by issuing a dedicated government decree. This decree should include enforcement mechanisms, regular monitoring, and meaningful sanctions for non-compliance.
- Introduce employer incentives, including tax benefits, wage subsidies, and public recognition schemes, for companies that meet or exceed the employment quota. These mechanisms should prioritize inclusive hiring and retention practices.
- Amend the 2022 decree on reasonable accommodations by removing the rigid 5% financial threshold and replacing it with a flexible, case-by-case standard in line with CRPD principles. The amendment should reflect the concept of “undue burden” as interpreted by the CRPD Committee.
- Develop inclusive vocational training programs specifically for persons with disabilities, co-designed with OPDs, incorporating assistive technologies, accessible materials, and adaptable training formats.
- Re-launch the 2023 reimbursement program for accommodations with revised eligibility rules, simplified applications, and full accessibility for both employers and employees with disabilities.
- Remove the restriction that limits program eligibility to those using the Unified Social Service platform. Employers who hire persons with disabilities through alternative channels should also be eligible for support programs, thereby expanding opportunities for inclusive hiring.
- Provide public funding and technical support to SMEs for implementing workplace accommodations. Procedures should be simplified, and accompanied by awareness-raising campaigns to increase uptake.

To the Ministry of Labor and Social Affairs

Level: Programmatic, Policy, and Service Design

- Ensure the meaningful involvement of organizations of persons with disabilities, including those representing marginalized groups such as refugees with disabilities, in the design, implementation, and monitoring of employment-related policies and programs. Their participation must be structured, consistent, and accessible.



- Enable remote access to all employment-related services provided through the Unified Social Service, eliminating the need for in-person visits for registration, interviews, or documentation submission.
- Apply universal design principles in employment program planning and ensure meaningful OPD consultation at every stage of program design, implementation, and revision.
- Introduce structured mentorship and peer-supported job coaching programs, drawing from successful practices in EU Member States that have been positively referenced by the CRPD Committee.

To the Labor Inspectorate and the Human Rights Defender’s Office

Level: Monitoring and Redress

- Establish a dedicated oversight mechanism to monitor cases of workplace discrimination and violations of reasonable accommodation obligations.
- Create a confidential and accessible complaints mechanism for persons with disabilities experiencing discrimination in employment.

To the Ministry of Labor and Social Affairs and the Statistical Committee (in cooperation with the State Revenue Committee)

Level: Data Systems and Monitoring

- Establish a centralized employment data system, developed in cooperation with the Statistical Committee, State Revenue Committee, and Ministry of Labor and Social Affairs, to collect and publish disaggregated data by disability type, gender, age, region, and employment sector.

To the Ministry of High-Tech Industry and the Ministry of Labor and Social Affairs

Level: Digital Accessibility and Inclusion

- Ensure that job-matching platforms, including “Jobs without Borders,” meet Web Content Accessibility Guidelines (WCAG 2.1) and are fully usable by persons with diverse disabilities.



Social Dialogue and Civil Society Engagement

Relevant Provisions under CEPA

Article 85g of CEPA states:

"Cooperation, based on exchange of information and best practices, may cover a selected number of issues to be identified among the following areas: (g) enhancing the participation of social partners and promoting social dialogue, including through strengthening the capacity of all relevant stakeholders."

Article 86 of CEPA states:

"The Parties shall encourage the involvement of all relevant stakeholders, including civil-society organisations and in particular social partners, in the policy development and reforms of the Republic of Armenia and in the cooperation between the Parties under this Agreement."

Article 87 of CEPA States:

"The Parties shall aim to enhance cooperation on employment and social policy matters in all relevant regional, multilateral and international fora and organisations."

Article 89 of CEPA states:

"A regular dialogue shall take place on the issues covered by this Chapter."

Findings

Armenia has recently taken steps to institutionalize civil society engagement through the creation of the Participatory and Open Government Department within the Office of the Prime Minister.⁴⁴ Established by a decree on December 26, 2024⁴⁵, this department is responsible for developing participatory governance mechanisms, monitoring public engagement processes, implementing open governance programs, and addressing issues related to CSOs. The department was introduced as part

⁴⁴ CSO Meter, "Armenia: Government Establishes New Department to Boost Public Participation and Principles of Open Government," January 29, 2025, <https://csometer.info/updates/armenia-government-establishes-new-department-boost-public-participation-and-principles>.

⁴⁵ Prime Minister of the Republic of Armenia, *Decision No. 1204-L on Making Amendments and Addenda to Decision No. 564-L of May 25, 2018*, adopted December 26, 2024, available in Armenian, <https://www.arlis.am/DocumentView.aspx?docid=201524>.



of the Public Administration Reform Strategy for 2023-2025⁴⁶, which identifies participatory governance as a key pillar of reform. However, despite these commitments to fostering open governance and improved state-CSO cooperation, the department was created without consultations with disability rights organizations.

While Armenia’s legal framework mandates public consultations⁴⁷ on legislation and policy reforms, barriers to meaningful participation persist. The government primarily relies on e-draft.am⁴⁸, an online platform for publishing draft policies, as the main consultation tool. However, short consultation periods, complex legal language, and a lack of accessibility features prevent many organizations from effectively engaging in policy discussions. Many draft policies are not published in accessible formats, and OPDs face additional challenges in navigating bureaucratic procedures, making it difficult for them to contribute to legislative reforms that directly impact their rights.⁴⁹

Armenia has formally established mechanisms for consultation with organizations working in the disability sector, but these structures are largely ineffective in practice. The National Commission Dealing with Issues of Persons with Disabilities, created under Prime Minister Decision No. 98 of February 25, 2008⁵⁰, was intended to provide equal representation of government institutions and NGOs to discuss disability-related issues and adopt consultative recommendations. However, this commission does not meet regularly as required by its mandate and remains underutilized as a platform for meaningful engagement.

Despite its formal role, the commission has never addressed CEPA-related discussions or social policy reforms linked to economic inclusion and employment strategies. No platform has been

⁴⁶ Government of the Republic of Armenia, *Decision No. 691-L of May 13, 2022, on Approving the Public Administration Reform Strategy, the 2022–2024 Roadmap and Results Framework, and the List of Persons Ensuring Oversight and Coordination of the Strategy's Implementation*, available in Armenian, <https://www.arlis.am/DocumentView.aspx?docID=162791>.

⁴⁷ National Assembly of the Republic of Armenia, *Law of the Republic of Armenia on Normative Legal Acts*, adopted March 21, 2018, Chapter 2, available in Armenian, <https://www.arlis.am/documentview.aspx?docid=187324>.

⁴⁸ Ministry of Justice of the Republic of Armenia, *Unified Website for Publication of Legal Acts' Drafts*, <https://www.e-draft.am/en>.

⁴⁹ United Nations Special Rapporteurs and Working Group, *Joint Communication OL ARM 1/2022*, December 22, 2022. “The publication of the draft Decree for consultation on a public website without any accessibility measures and opportunities for involvement throughout the drafting process therefore would fall short of the State’s obligations under the CRPD.”

⁵⁰ Prime Minister of the Republic of Armenia, *Decision No. 98 of February 25, 2008, on Approving the Procedures of the National Commission Dealing with Issues of Persons with Disabilities*, available in Armenian, <https://www.arlis.am/documentview.aspx?docid=197606>.



established for OPDs to engage in CEPA implementation discussions, nor are they invited to participate in broader civil society consultations on CEPA-related reforms.

Even when disability-related consultations for other reform agendas occur, they remain largely inaccessible and ineffective. OPDs report that they are frequently excluded from decision-making processes, and when they do participate, their recommendations are rarely incorporated into final policies. In some cases, draft decrees appear on the government’s agenda⁵¹ without prior public discussion, preventing OPDs from providing meaningful input. The 2022 decrees on personal assistance services, for example, were formally consulted with the disability community, yet many of their recommendations were ignored, and the final decrees failed to align with European good practices⁵².

The exclusion of specific disability groups further limits the representativeness of social dialogue in Armenia. Refugees with disabilities, children with disabilities, and individuals with psychosocial disabilities are frequently overlooked in policymaking processes, and their specific needs are not adequately reflected in legislative reforms⁵³. Public discussions, when they occur, are often held in inaccessible venues, lack sign language interpretation, and do not provide materials in accessible formats, restricting the ability of persons with disabilities to participate effectively.⁵⁴

Beyond disability-specific forums, broader social dialogue mechanisms in Armenia remain weak, with limited engagement of trade unions, employer organizations, and independent CSOs in labor market policymaking. While formal tripartite structures exist, such as the Republican Tripartite Commission⁵⁵, which includes representatives from the government, employers, and trade unions, its influence over inclusive employment policy decisions remains minimal.

Organizations of persons with disabilities involved in this research are not aware of or included in discussions within these broader social dialogue frameworks. There is no systematic consultation

⁵¹ Government of the Republic of Armenia, *Cabinet Meeting Agendas*, e-Governance Platform, <https://e-gov.am/sessions/>.

⁵² Government of the Republic of Armenia, *Draft Decision: On Defining the Procedure and Conditions for Providing Personal Assistant Services*, discussion summary, available in Armenian, <https://www.e-draft.am/projects/4043/digest?page=1>.

⁵³ Coalition for Inclusive Legal Reforms, *Alternative Report on the Implementation of the UN Convention on the Rights of Persons with Disabilities: Republic of Armenia*, 2025.

⁵⁴ Disability Rights Agenda NGO, *Shadow Report on the Implementation of the United Nations Convention on the Rights of Persons with Disabilities in Armenia*, submitted January 20, 2025.

⁵⁵ Confederation of Trade Unions of Armenia, *Republican Collective Agreement*, signed December 13, 2024, <https://hamk.am/knqvets-hanrapetakan-nor-kolektiv-paymanagir>.



with OPDs by either the government, employer associations, or trade unions, despite the significant barriers persons with disabilities face in the labor market.

No information was identified on capacity-building programs for civil society organizations, including OPDs, that systematically strengthened the ability of OPDs to monitor CEPA implementation or engage in broader policymaking processes. Training programs on EU mechanisms, advocacy strategies, and CEPA monitoring have been conducted with international support, yet OPDs report that such programs often missed them and lacked follow-up support. Furthermore, there is no state-led initiative to provide financial or structural support to disability organizations to strengthen their technical or organizational capacity, leaving many OPDs reliant on international donors for resources.

Conclusions and Recommendations

Although Armenia has made formal commitments to participatory governance, these efforts have not translated into meaningful or inclusive engagement for persons with disabilities and organizations of persons with disabilities, particularly in the context of CEPA implementation. Existing structures remain underutilized, and participation mechanisms lack accessibility, transparency, and responsiveness. The absence of targeted capacity-building and sustained consultation has left OPDs excluded from both general civil society dialogues and sector-specific reforms that directly affect the disability community.

To align with CEPA Articles 85(g), 86, and 89, as well as CRPD Article 4(3), the following actions are recommended:

To the Government of Armenia (with coordination by the Office of the Deputy Prime Minister and the Ministry of Labor and Social Affairs)

Level: Institutional, Legal, and Participatory Governance

- Ensure the full inclusion of OPDs, including underrepresented groups such as refugees with disabilities, children with disabilities, and persons with psychosocial disabilities, in all CEPA-related consultation processes. This participation should extend to both general civil society dialogues and sector-specific discussions on employment, social protection, and economic inclusion.
- Strengthen the National Commission on the Issues of Persons with Disabilities by ensuring it meets regularly, operates with structured agendas, and has mechanisms for follow-up and feedback. The Commission’s mandate should be updated to include CEPA-related matters and cross-sectoral reforms impacting persons with disabilities.
- Establish a dedicated CEPA civil society working group, coordinated with the Office of the Deputy Prime Minister or the Ministry of Labor and Social Affairs, which includes OPDs and meets regularly to monitor and contribute to CEPA implementation on social and employment policy matters.



- Mandate the early-stage involvement of OPDs in all legal and policy drafting processes relevant to disability rights, employment, and social protection. Consultations should not be limited to reviewing finalized drafts but should begin during concept development and continue throughout the drafting process.
- Institutionalize cooperation between state institutions and OPDs through memoranda of understanding, annual engagement plans, and joint initiatives. Government ministries should maintain formal contact lists and dialogue calendars to ensure regular and inclusive participation.
- Ensure that all public consultations meet accessibility standards, including the provision of Armenian sign language interpretation, accessible venues or online formats, and the availability of easy-to-read and screen-reader-compatible materials. Notices should be disseminated well in advance and in multiple formats.
- Create a dedicated budget line and support mechanism for OPD capacity-building, either within the Ministry of Labor and Social Affairs or through the Participatory and Open Government Department. This should include training on CEPA monitoring, EU policy mechanisms, legal literacy, and public engagement strategies.
- Ensure the inclusion of OPDs in broader social dialogue mechanisms, such as the Republican Tripartite Commission. OPDs should receive formal invitations and have the opportunity to contribute to discussions on inclusive employment, working conditions, and social protection reforms.
- Facilitate structured peer learning and exchange programs between Armenian OPDs and their counterparts in EU Member States and Eastern Partnership countries. These exchanges should focus on best practices in CEPA monitoring, policy dialogue, and the implementation of disability-inclusive development.

To the Ministry of Justice

Level: Institutional

- Improve the functionality and accessibility of the e-draft.am platform to meet universal design standards. This includes providing materials in plain language and accessible formats, and extending consultation periods to ensure meaningful participation from OPDs and individuals with disabilities.

Corporate Social Responsibility

Relevant Provisions under CEPA

Article 85i of CEPA states:



"Cooperation, based on exchange of information and best practices, may cover a selected number of issues to be identified among the following areas: (i) promoting corporate social responsibility."

Article 88 of CEPA states:

"The Parties shall promote corporate social responsibility and accountability and encourage responsible business practices, such as those promoted by the OECD Guidelines for Multinational Enterprises, the UN Global Compact, the ILO tripartite declaration of principles concerning multinational enterprises and social policy, and ISO 26000."

Findings

Armenia does not have a dedicated law on CSR, and corporate engagement in social responsibility remains largely voluntary. The government has not established a systematic policy framework to incentivize businesses to adopt responsible practices, nor has it integrated CSR principles into corporate governance requirements. While some multinational enterprises operating in Armenia adhere to international CSR frameworks, domestic companies (particularly small and medium-sized enterprises) lack structured incentives to engage in long-term social responsibility initiatives. As a result, CSR remains an ad hoc practice, primarily driven by philanthropic donations rather than embedded into corporate strategies.

Corporate philanthropy remains one of the most visible forms of CSR in Armenia, but several barriers limit its impact. Businesses engaging in charitable activities do not benefit from significant tax incentives, and corporate donations are not deductible from taxable income. This discourages companies from sustaining long-term social initiatives, particularly in areas such as disability rights and inclusive employment. The taxation of in-kind donations further limits the willingness of businesses to contribute goods and services to social causes.⁵⁶

Although the Law on Charity⁵⁷ provides a legal foundation for corporate giving, it does not explicitly connect charitable donations to broader corporate social responsibility commitments, nor does it

⁵⁶ NGO Center, *Policy Paper on Charitable Sector Reforms in Armenia: Conclusions and Recommendations*, October 2024, <https://ngoc.am/wp-content/uploads/2024/10/12.07-%D4%B2%D5%A1%D6%80%D5%A5%D5%A3%D5%B8%D6%80%D5%AE%D5%B8%D6%82%D5%A9%D5%B5%D5%A1%D5%B6-%D5%B8%D5%AC%D5%B8%D6%80%D5%BF%D5%AB-%D6%84%D5%A1%D5%B2%D5%A1%D6%84%D5%A1%D5%AF%D5%A1%D5%B6%D5%B8%D6%82%D5%A9%D5%B5%D5%A1%D5%B6-%D6%83%D5%A1%D5%BD%D5%BF%D5%A1%D5%A9%D5%B8%D6%82%D5%B2%D5%A9.pdf>.

⁵⁷ National Assembly of the Republic of Armenia, *Law of the Republic of Armenia on Charity*, adopted October 8, 2002, available in Armenian, <https://www.arlis.am/documentview.aspx?docid=43682>.



establish a structured policy framework or monitoring mechanisms to assess the impact of corporate contributions on vulnerable groups.

No information was identified on government efforts to systematically encourage CSR initiatives that specifically promote the rights of persons with disabilities.⁵⁸ While some businesses support disability-related initiatives, there is no structured policy that incentivizes the private sector to adopt disability-inclusive practices in employment, service provision, or supply chain management.

Public awareness of CSR remains limited, and businesses engaging in responsible practices receive little recognition. There are no state-led awards, rankings, or promotional programs to encourage businesses to integrate CSR into their operations. No mandatory reporting requirements exist for businesses to disclose their social and environmental impact, and supply chain transparency remains a challenge. Although CEPA explicitly references the OECD Guidelines for Multinational Enterprises⁵⁹, the UN Global Compact⁶⁰, the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy⁶¹, and ISO 26000⁶², these frameworks are not readily available or widely implemented in Armenia. There is no official translation⁶³ or systematic dissemination of these standards, limiting their accessibility to businesses, policymakers, and civil society organizations.

In the absence of a structured national CSR strategy, corporate social engagement remains fragmented, with little connection to broader government policies on social cohesion and sustainable economic development.

⁵⁸ Ministry of Labor and Social Affairs, *Official Letter No. ՁՄ/ՁՄ-2/7113-2025*, 2025.

⁵⁹ Organisation for Economic Co-operation and Development (OECD), *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*, 2023, <https://www.oecd.org/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct-81f92357-en.htm>.

⁶⁰ United Nations Global Compact, *About the UN Global Compact*, accessed April 17, 2025, <https://unglobalcompact.org/about>.

⁶¹ International Labour Organization (ILO), *Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy*, 5th ed., March 24, 2023, <https://www.ilo.org/publications/tripartite-declaration-principles-concerning-multinational-enterprises-and-3>.

⁶² International Organization for Standardization (ISO), *ISO 26000:2010 – Guidance on Social Responsibility*, November 2010, <https://www.iso.org/standard/42546.html>.

⁶³ National Body for Standards and Metrology, Ministry of Economy of the Republic of Armenia, *Catalog of Standards*, accessed April 17, 2025, <https://www.armstandard.am/en/standarts>.



Conclusions and Recommendations

Despite Armenia’s commitments under CEPA to promote corporate social responsibility and align with international standards, the current approach to CSR remains fragmented, unregulated, and primarily philanthropic. There is no national legal or strategic framework guiding CSR efforts, and no government body is tasked with coordinating or monitoring the private sector’s role in advancing social inclusion, including for persons with disabilities. This lack of structure limits the development of responsible business practices and hinders the integration of CSR into Armenia’s broader efforts to promote inclusive and sustainable economic development.

To operationalize CEPA’s provisions on CSR and encourage disability-inclusive corporate engagement, the following recommendations are proposed:

To the Government of Armenia (under the leadership of the Ministry of Economy, involving Ministry of Labor and Social Affairs and private sector actors)

Level: Legal, Policy, and Institutional Coordination

- Designate a government body to coordinate CSR policy development and implementation, ensuring inter-ministerial cooperation. The Ministry of Economy could be assigned this function, with a dedicated unit or focal point responsible for CSR and business and human rights.
- Develop and adopt a national CSR strategy that clearly defines the government’s expectations of the private sector, outlines priority areas for CSR engagement (including disability inclusion), and sets out mechanisms for monitoring, evaluation, and reporting.
- Amend the Law on Charity or develop standalone CSR legislation to establish a legal framework that goes beyond voluntary giving and links corporate responsibility to broader social development goals.
- Launch national awards or ranking systems to recognize inclusive businesses and CSR leaders.
- Engage organizations of persons with disabilities and civil society in shaping the CSR agenda, advising companies on inclusive practices, and monitoring the social impact of corporate activities. OPDs should be considered key stakeholders in the national CSR strategy development process.

To the Ministry of Economy (in coordination with the Ministry of Labor and Social Affairs)

Level: Knowledge Dissemination and CSR Integration

- Translate and disseminate international CSR frameworks referenced in CEPA, including the OECD Guidelines for Multinational Enterprises, UN Global Compact principles, the ILO Tripartite Declaration, and ISO 26000. These should be made available in Armenian and



tailored for practical use by domestic businesses, particularly small and medium-sized enterprises (SMEs).

- Encourage disability-inclusive CSR through targeted guidance and engagement. The national CSR strategy should include specific objectives related to disability rights, such as inclusive employment, accessibility of services, universal design in product development, and support for organizations of persons with disabilities or social enterprises.
- Establish voluntary CSR reporting mechanisms, with a long-term goal of introducing mandatory reporting for large companies on their social and environmental impacts.
- Foster public-private partnerships that align corporate resources with national development goals, including CEPA implementation and CRPD obligations. These partnerships could support employment programs for persons with disabilities, accessible infrastructure development, or innovation in assistive technologies.

To the Ministry of Finance (in coordination with the Ministry of Economy)

Level: Financial Incentives

- Introduce tax incentives and recognition mechanisms for businesses that engage in meaningful, long-term CSR initiatives. These could include tax deductions for inclusive hiring practices, provision of reasonable accommodations, and donations of goods and services to social causes.



7. Final Conclusions

This monitoring report finds that, although Armenia has undertaken reforms in social protection, employment, stakeholder engagement, and corporate responsibility, the inclusion of persons with disabilities remains fragmented and inconsistent with the commitments outlined in CEPA Articles 84 to 88 and the Convention on the Rights of Persons with Disabilities. Disability continues to be addressed largely in general terms or through isolated provisions, rather than being structurally embedded in national policies, implementation frameworks, or monitoring systems.

Across the different areas assessed, several recurring gaps and systemic barriers emerged. These include the persistent lack of reliable and disaggregated disability-related data, the limited involvement of organizations of persons with disabilities in shaping policies, the gap between formal legal commitments and their practical enforcement, and a lack of coordination between government institutions, civil society, and the private sector. Despite the transformative potential of CEPA, its mechanisms are not yet fully used as tools for advancing disability rights in a coherent and sustained manner.

What becomes clear through this analysis is the need for a unified approach that cuts across policy areas and fosters long-term institutional change. Disability inclusion should be mainstreamed throughout CEPA implementation, not as a secondary consideration but as a guiding principle applied from the earliest stages of policy development through to implementation and evaluation. Legal reforms that result from CEPA should be coherent with both the CRPD and Armenia’s national law “On the Rights of Persons with Disabilities”. This coherence should be ensured through policy review processes that identify inconsistencies and provide timely harmonization.

A strong and reliable system for collecting and using disability-disaggregated data is also essential. Such a system should be coordinated across relevant institutions, follow internationally recognized tools, and be capable of capturing intersectional factors such as age, gender, type of disability, and geographic location. Without this data infrastructure, inclusive policymaking will continue to rely on assumptions rather than evidence.

Equally important is the need to institutionalize the meaningful participation of persons with disabilities in all aspects of policy development. This participation should include early and sustained involvement, adequate resources, and accessible consultation processes. Organizations of persons with disabilities should be recognized not only as stakeholders but as full partners in the design, implementation, and monitoring of reforms. This includes ensuring participation reflects the diversity within the disability community, including groups that are often overlooked such as refugees with disabilities, children with disabilities, and persons with psychosocial or intellectual disabilities.

In summary, shifting from fragmented efforts to truly inclusive CEPA implementation requires a transformation in both mindset and institutional practice. Such a shift must be grounded in the principles of human rights, equality, and dignity, ensuring that no one is left behind as Armenia continues its path toward deeper cooperation with the European Union.



9. Annexes

Annex 1: List of National Legislation

Government of the Republic of Armenia. *Decision No. 1265-N of August 11, 2022, on Defining the Procedure for Providing Reasonable Accommodations*. Available in Armenian.

<https://www.arlis.am/DocumentView.aspx?DocID=167278>.

Government of the Republic of Armenia. *Decision No. 1308-N of November 19, 2014, on Approving the Procedure for Making and Using Alternative Contributions by Organizations in Case of Non-fulfillment of the Employment Quota*. Available in Armenian.

<https://www.arlis.am/documentview.aspx?docid=102803>.

Government of the Republic of Armenia. *Decision No. 1489-N of December 26, 2013, on Defining the Amounts of Benefits in Cases of Old Age, Disability, Loss of Breadwinner, and Funeral Assistance*. Available in Armenian. <https://www.arlis.am/DocumentView.aspx?docid=179721>.

Government of the Republic of Armenia. *Decision No. 2083-L of December 27, 2024, on Approving the 2025–2031 Employment Strategy*. Available in Armenian.

<https://www.arlis.am/DocumentView.aspx?DocID=201615>.

Government of the Republic of Armenia. *Decision No. 242-L of February 23, 2023, on Approving a Measure to Promote Employment*. Available in Armenian.

<https://www.arlis.am/DocumentView.aspx?DocID=174467>.

Government of the Republic of Armenia. *Decision No. 27-N of January 9, 2025*. Available in Armenian. <https://www.arlis.am/DocumentView.aspx?DocID=205191>.

Government of the Republic of Armenia. *Decision No. 460-L of April 1, 2021, on Approving the Measure of Providing State Compensation to the Employer in the Case of Employment of Ex-Servicemen (or Those Considered Equal) Who Have Received an Injury as a Result of Military Operations and Are Recognized as Persons with Disabilities*. Available in Armenian.

<https://www.arlis.am/DocumentView.aspx?DocID=151281>.

Government of the Republic of Armenia. *Excerpt from Government Session Protocol No. 45 of November 8, 2012, on Approving the 2013–2018 Employment Strategy and the Report on Social Inclusion*. Available in Armenian. <https://www.irtek.am/views/act.aspx?aid=68183>.

Government of the Republic of Armenia. *Public Administration Reform Strategy, 2022–2024 Roadmap and Results Framework*. Decision No. 691-L of May 13, 2022. Available in Armenian.

<https://www.arlis.am/DocumentView.aspx?docID=162791>.



Government of the Republic of Armenia. *Roadmap for the Implementation of the Comprehensive and Enhanced Partnership Agreement*. Decision No. 666-L of the Prime Minister. June 1, 2019. Available in Armenian. <https://www.arlis.am/DocumentView.aspx?docid=153164>.

National Assembly of the Republic of Armenia. *Labor Code of the Republic of Armenia*. Adopted November 9, 2004. Available in Armenian. <https://www.arlis.am/DocumentView.aspx?DocID=199957>.

National Assembly of the Republic of Armenia. *Law of the Republic of Armenia on Charity*. Adopted October 8, 2002. Available in Armenian. <https://www.arlis.am/documentview.aspx?docid=43682>.

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Annex 2: Monitoring Matrix

Monitoring Question	Judgment Criteria	Indicator	Information Sources
1. Poverty Reduction and Social Cohesion (Article 85a)			
1.1. Are poverty reduction policies inclusive of persons with disabilities and disadvantaged groups?	1.1. Policies explicitly address barriers for persons with disabilities and foster social cohesion.	<ul style="list-style-type: none"> The extent to which policies explicitly identify and address barriers faced by persons with disabilities in key areas such as education, employment, and healthcare. The degree to which policies reflect the principles of the CRPD and commitments outlined in Article 85a of CEPA. 	<ul style="list-style-type: none"> Government documents Social protection program data Local and International reports Interviews
1.2. Are social safety systems designed to include persons with disabilities?	1.2. Social safety systems account for unique challenges of persons with disabilities and ensure adequate coverage.	<ul style="list-style-type: none"> Social safety systems explicitly include provisions to address the unique challenges faced by persons with disabilities (e.g., accessibility, eligibility criteria, and targeted benefits). The degree to which social safety systems align with CEPA (Article 85a) and CRPD requirements, ensuring non-discrimination, accessibility, and inclusion. 	<ul style="list-style-type: none"> Government documents Social protection program data Local and International reports Interviews
2. Employment and Inclusive Labor Markets (Article 85d)			
2.1. Are labor market reforms fostering inclusion for persons with disabilities?	2.1. Employment policies explicitly promote non-discrimination and provide reasonable accommodations.	<ul style="list-style-type: none"> Employment policies explicitly include non-discrimination clauses protecting persons with disabilities in recruitment, hiring, and workplace practices. Policies require and facilitate the implementation of reasonable accommodations for employees with disabilities, such as assistive devices, flexible work arrangements, or accessible workplaces. 	<ul style="list-style-type: none"> Government documents Employment program data Local and International reports Interviews



		<ul style="list-style-type: none"> • Employment policies are aligned with CEPA (Article 85d) and CRPD obligations, ensuring equal access to employment opportunities and inclusive labor market practices. 	
2.2. Are persons with disabilities supported in entering and retaining employment?	2.2. Targeted support programs (e.g., training, subsidies) exist for persons with disabilities.	<ul style="list-style-type: none"> • Evidence of government programs (e.g., vocational training, mentorship, or subsidies) specifically designed to support persons with disabilities in entering and retaining employment. • Employment support programs are accessible to persons with disabilities, including physical, informational, and procedural accessibility. 	<ul style="list-style-type: none"> • Government documents • Employment program data • Local and International reports • Interviews
3. Social Dialogue and Stakeholder Engagement (Article 85g)			
3.1. Are disability rights organizations, including organizations of persons with disabilities actively participating in policymaking?	3.1. Disability rights organizations, including OPDs are regularly consulted, and their input is reflected in reforms.	<ul style="list-style-type: none"> • Evidence of regular consultation meetings or forums involving OPDs in policymaking processes, including the development, implementation, and evaluation of reforms. • The extent to which feedback or recommendations from OPDs are incorporated into policy drafts and final reforms, with documented changes or acknowledgments. • Evidence that policymaking processes are accessible to OPDs, including the provision of reasonable accommodations (e.g., sign language interpretation, accessible documents, and venues). 	<ul style="list-style-type: none"> • Government documents • News Media Reports • Local and International reports • Interviews
3.2. Are the capacities of organizations of persons with disabilities	3.2. Capacity-building initiatives are implemented to empower disability rights	<ul style="list-style-type: none"> • Evidence of government initiatives aimed at strengthening the technical, organizational, or advocacy capacities of OPDs (e.g., training, funding, mentorship). 	<ul style="list-style-type: none"> • Government documents • News Media Reports • Local and International reports



strengthened to enhance participation?	organizations, including OPDs.	<ul style="list-style-type: none">• Feedback from OPDs on the effectiveness of capacity-building programs in enhancing their ability to participate in policymaking and advocacy.	<ul style="list-style-type: none">• Interviews
4. Corporate Social Responsibility (CSR) (Article 85i)			
4.1 Are companies encouraged to adopt CSR initiatives to promote inclusion and accessibility?	4.1. Government actively promotes and incentivizes CSR practices related to inclusion and accessibility.	<ul style="list-style-type: none">• Evidence of policies or programs, government-led campaigns, guidelines, or initiatives that encourage companies to adopt CSR practices focused on inclusion and accessibility.• Existence of financial or non-financial incentives (e.g., tax breaks, public recognition) provided by the government to encourage businesses to implement CSR initiatives benefiting persons with disabilities.	<ul style="list-style-type: none">• Government documents• News Media Reports• Local and International reports• Interviews