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Monitoring report

On conducting civil society monitoring of the Comprehensive and Enhanced Partnership Agreement (CEPA) implementation

In the field of Anti-corruption reforms

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ABBREVIATIONS

ACC	Anti-Corruption Committee
CEPA	Comprehensive and Enhanced Partnership Agreement
CPC	Corruption Prevention Commission
CSO	Civil Society Organization
EU	European Union
NGO	Non-Governmental Organization
RA	Republic of Armenia



TABLE OF CONTENTS

ABBREVIATIONS	2
EXECUTIVE SUMMARY	4
1.INTRODUCTION	6
1.1 Objectives and scope	6
1.2 Monitoring methodology	7
2.MONITORING FINDINGS	8
2.1Corruption Prevention Commission (CPC)	8
2.1.1 Enhancing the capacities of CPC	8
2.1.2 Expanding the functions of CPC	8
2.2 Reforms in the field of corruption prevention	10
2.2.1 Improving the declaration system	10
2.2.2 Clarifying requirements regarding the incompatibility of persons holding public positions and civil servants	11
2.2.3 Conflict of interest	11
2.3Effective Investigation of Corruption Crimes	12
2.3.1 Anti-Corruption Committee (ACC)	12
2.3.2ACC activities on implementing the laws	15
2.3.3Specialized Anti-Corruption Courts	15
3.GENERAL DISCUSSION AND CONCLUSIONS	17
4.RECOMMENDATIONS	19
REFERENCES	21
APPENDIX 1. Monitoring Matrix	24
APPENDIX 2. List of Topics for Information Requestsand Stakeholders Interviewed	28



EXECUTIVE SUMMARY

This report presents the findings of an independent civil society expert monitoring on the implementation of the Comprehensive and Enhanced Partnership Agreement (CEPA) between Armenia and the European Union (EU), focusing on anti-corruption reforms. The monitoring was done as part of the EU-funded project “Support to CEPA Monitoring, Implementation, and Communication” and the aim to assess progress under CEPA Articles 4 and 12, with reference to Armenia’s 2023-2026 Anti-Corruption Strategy.

The monitoring report reveals moderate progress in implementing the 2023–2026 Anti-Corruption Strategy under CEPA-aligned measures. Of the outlined 11 activities, only 7 have been fully implemented, with 4 partially completed. Despite progress in legislative reforms, training, and methodological development, the overall pace of implementation remains slow and insufficiently outcome-driven.

Key issues include the government’s focus on formal outputs without effectively linking them to strategic anti-corruption goals, due in part to the lack of impact indicators and weak application of the logical framework. Many activities remain procedural or legislative in nature, lacking mechanisms for enforcement and long-term impact.

Anti-Corruption Strategy doesn’t adequately address high-risk sectors and high-level corruption. Implementation gaps exist in the conflict of interest system, which remains largely restricted to legislative amendments around its new definition without viable enforcement tools. Similarly, reforms to the asset declaration system focus on expanding the scope of declarant public officials, without improving the system’s functionality or verification capacity.

Institutional challenges persist within the Corruption Prevention Commission and Anti-Corruption Committee, particularly in terms of staffing, expertise, and operational efficiency. The Corruption Prevention Commission struggles to process and verify asset declarations, with many violations resulting in warnings rather than formal proceedings. The Anti-Corruption Committee faces recruitment barriers due to rigid selection criteria, while its leadership appointment process raises concerns about political influence and institutional independence.

Judicial inefficiencies and delays in the Anti-Corruption Court cases risk further reducing public



trust in the effectiveness and impartiality of anti-corruption institutions.

To address the identified gaps, the monitoring report outlines several key recommendations.

At a Strategy level, it is essential to align the CEPA Roadmap more closely with the goals of the Anti-Corruption Strategy. To better track progress, the Strategy itself should be revised to differentiate clearly between outputs, outcomes, and operational indicators. Streamlining activities to fit within the available time and resources would help ensure that reform efforts are more focused and manageable. Additionally, the government should introduce sector-specific anti-corruption plans targeting high-risk areas, and improve the quality of monitoring reports by making them more analytical and results-focused. Regular publication of financial reports on Strategy’s implementation would further enhance accountability and transparency.

To address the conflicts of interest, the report recommends comprehensive legal reform. This could involve either updating the existing Law “On Public Service” or drafting a separate law dedicated to regulating the conflicts of interest covering all related provisions, including incompatibility requirements, restrictions, and gift bans. Beyond legislative changes, enforcement mechanisms must be strengthened - such as the ability to confiscate profits gained or nullify deals made under conflict of interest.

The asset declaration system requires serious improvement. Currently focused on expanding the number of declarants, it lacks the tools necessary for effective verification. The introduction of clear rules and procedures for checking asset declarations - including risk-based criteria - would allow better identify and act on suspicious disclosures.

Also, institutional reforms are essential to strengthen the anti-corruption bodies. The Corruption Prevention Commission needs to be adequately staffed and equipped, with training programs tailored to improve its capacity to initiate administrative proceedings and analyze financial disclosures. A more independent selection mechanism is needed for the Anti-Corruption Committee’s leadership appointment procedure to protect the integrity of what is meant to be a competitive selection process and the institution itself.



1. INTRODUCTION

1.1 Objectives and scope

The report has been developed as part of the civil society monitoring of the implementation of the CEPA within the framework of the EU-funded project “**Support to CEPA Monitoring, Implementation, and Communication.**” The primary objective of this initiative is to engage civil society actors in the monitoring process, ensuring their active participation in the implementation and oversight of CEPA across ten key sectors: human rights, judicial reform, police reform, anti-corruption reform, education, healthcare, social and labor rights, environment, energy, equitable development, and local government reform.

The present report focuses on the monitoring findings related to CEPA’s implementation in the area of anti-corruption reforms. The foundational framework upon which the monitoring activities are built are the CEPA, CEPA Roadmap, Anti-corruption Strategy for 2023-2026, and 2023-2026 Action Plan Deriving from the Anti-corruption Strategy of Armenia.

Key milestones envisaged under the CEPA Roadmap¹ such as adopting the National Anti-Corruption Strategy for 2019–2022 and establishing an Independent Anti-Corruption Body have been implemented, as documented in the Evaluation and Monitoring Report on the Anti-Corruption Strategy and Its Implementation Measures². In the absence of an updated roadmap with specific activities, the current monitoring efforts will prioritize the implementation of measures under *CEPA Articles 4 and 12*³, with reference to Armenia’s 2023–2026 Anti-Corruption Strategy. This focus is intended to identify how Armenia’s latest anti-corruption strategy aligns with the commitments set forth under CEPA and assess the progress achieved.

In this context, the primary objective of the monitoring activity is as follows:

- *To assess the implementation and progress of anti-corruption reforms under CEPA Articles 4 and 12, focusing on compliance with Armenia’s 2023–2026 Anti-Corruption Strategy.*

¹ Annex to the Decision of the Prime Minister of the Republic of Armenia No. 666-L. 1 June 2019. Roadmap for the Implementation of the Comprehensive and Enhanced Partnership Agreement between the European Union and the European Atomic Energy Community and Their Member States.

² Ministry of Justice, Final Evaluation and Monitoring Report on the Anti-Corruption Strategy and Its Implementation Measures for 2019–2022.

³ 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. 2018. Article 4, Article 12.



1.2 Monitoring methodology

The monitoring was principally guided by the Terms of Reference and the Monitoring Matrix (Appendix 1).

The research followed a structured approach, first analyzing the relevant CEPA agreement articles, then the corresponding section of the CEPA Roadmap, and finally the field strategies. The monitoring focused on CEPA-aligned activities in the Anti-Corruption Strategy Action Plan for 2024, due to the limited coverage of activities in the 2023 Action Plan.

The methodology incorporated the following key approaches:

- a. **Review of documents and reports** that describe progress on outputs according to specified indicators.
- b. **Key informant interview with relevant stakeholder** to validate the data and identify issues related to implementing reforms in targeted areas.
- c. **Formal requests to state agencies** to obtain additional qualitative and quantitative data on reforms.
- d. **Triangulation and validation of comments** by all the stakeholders and project team to produce a comprehensive final monitoring report.
- e. **Evidence-based policy recommendations** and discussions with interested parties/stakeholders based on the findings.

The initial phase of the evaluation focused on collecting detailed information on the indicators specified in the Monitoring Matrix (Appendix 1). In addition, the monitoring process involved five official requests to public agencies (Appendix 2), an interview with a public administration expert in a semi-structured format, and a thorough review of relevant documents, reports, and legislative frameworks. Five official requests were submitted to the relevant state agencies. Three agencies provided timely responses, two delayed their replies. The Anti-Corruption Court responded within the legally prescribed timeframe, though its response primarily included links to relevant reports on its website. The Prosecutor General’s Office was the last to respond, stating that the 2024 report on the Prosecutor General’s activities is still being prepared and will be published on the official website as required by law.



2. MONITORING FINDINGS

2.1 Corruption Prevention Commission (CPC)

2.1.1 Enhancing the capacities of CPC

Review the procedures for selection and liability of the Commission members

The Draft Law “On Amendments and Supplements to the Law on the Corruption Prevention Commission” was published for public consultation on the Unified Website for the Publication of Legal Draft Acts in November 2024.⁴The proposed amendments aim to reform the CPC’s operations by introducing a more inclusive selection mechanism for its members, enhancing their individual accountability, and clarifying the grounds and procedures for disciplinary liability.

Key amendments include the engagement of a civil society representative to the Competition Council formed by the National Assembly for a more balanced appointment procedure. The law also grants CPC members the right to publish dissenting opinions on majority rulings, addressing a gap in the current legal framework. It also introduces structured disciplinary measures for CPC members with four levels of penalties.

These amendments have not yet been approved by the government, leaving the implementation incomplete.⁵⁶

2.1.2 Expanding the functions of CPC

Improve the regulations on the proceedings conducted by the CPC, define their features, and clarify the functions of the CPC as an administrative body

The 2024 Monitoring and Evaluation Report on the 2023-2026 Strategy Action Plan states that draft amendments to the Law “On the Corruption Prevention Commission” and related laws have been developed. The drafts define the specifics of CPC-initiated proceedings and provide greater clarity on the verification process, including its definition, grounds, and timelines. Stakeholder

⁴Draft Law “On Amendments and Supplements to the Law On the Corruption Prevention Commission”.
<https://www.e-draft.am/en/projects/7873/about>

⁵Ministry of Justice, 2023-2026 Action Plan Deriving from the Anti-corruption Strategy of Armenia. Activity 1.1.
<https://www.moj.am/en/page/583>

⁶Ministry of Justice, Monitoring and Evaluation Report on 2024 Activities under the 2023-2026 Anti-Corruption Strategy, 2025
<https://www.moj.am/page/583>



engagement and public discussion on these drafts are scheduled only for 2025, and their adoption is not envisioned within the current Strategy Action Plan’s timeframe.

Notably, there are currently no formal regulations governing the verification and analysis of asset declarations. In practice, the process relies on steps such as sending information requests, issuing written inquiries for clarification, and holding consultations with CPC members. However, these are not well-defined or standardized. The lack of well-defined criteria creates the need for a robust verification and analysis methodology.

2.1.3 CPC activities on implementing the laws

As a result of a media monitoring conducted by the CPC, 46 media publications identified during the reporting period prompted a review of 275 declarations submitted by 94 officials and 38 family members to verify apparent inconsistencies.

Based on the CPC decision No. N 02-L (October 19, 2022) on “Establishing risk criteria for the analysis of declarations and approving the list of relevant public positions” and Decision No. N 01-L (May 29, 2023) on “Updating risk criteria and defining the scope of public positions subject to analysis”, 125 declaration analyses were completed in 2024, resulting in administrative offense proceedings initiated against four declarants. Case materials from 4 investigations were forwarded to the Prosecutor General’s Office.

During the reporting period, the CPC initiated a total of 778 proceedings - more than in 2023⁷ - categorized as follows:

- Proceedings related to declarations– 699 cases
- Proceedings on incompatibility requirements– 10 cases
- Proceedings related to conflict of interest – 1 case
- Disciplinary proceedings against judges – 0
- Consultancies provided on reviewed applications – 119 studies, 58 of which were based on written requests.
- Integrity checks conducted – 336 cases, resulting in 35 negative conclusions.

⁷Corruption Prevention Commission, Annual Activity Report, 2023, <https://cpcarmenia.am/information-files/kkh-tarekan-hashvetvutyun>



Six proceedings were initiated for violations of the law due to the failure to submit a written statement to the CPC regarding conflict of interest circumstances by individuals who do not have a superior or immediate supervisor or hold a political position.

2.2 Reforms in the field of corruption prevention

2.2.1 Improving the declaration system

Extend the scope of declarant public officials

The 2023–2026 Anti-Corruption Strategy Action Plan includes legislative amendments to expand the list of declarant officials, covering leadership positions in state and community bodies, as well as other positions with high-risk exposure. These amendments were set to be drafted by the end of 2024. According to the 2024 Monitoring and Evaluation Report, the Ministry of Justice developed a draft law “On amendments to the Law on Public Service”. The proposed changes aim to broaden the scope of declarant public officials and mandate all declarant officials to submit a declaration of interests. The draft laws are scheduled for stakeholder reviews and public discussion in 2025.

While the Armenian legislation defines the key element of ‘coverage’ for the declaration system, the consistently high rate of non-compliance underscores the need to prioritize improving verification, enforcement, and compliance mechanisms within the declaration system. The semi-annual activity report of the CPC⁸ indicates that a total of 2,754 declarants either failed to submit a declaration in the first half of 2024 or had not done so before 2024. However, the report does not clearly differentiate how many of these unsubmitted declarations specifically belong to the first half of 2024. In the second semi-annual activity report,⁹ the CPC notes that 231 declarations, which were required to be submitted in 2024, were not submitted within the specified period. Notably, despite sending 2,754 written notifications to non-compliant declarants, only 60.38 percent of the unfiled declarations were ultimately submitted. Also, efforts to collect unfiled declarations from previous years remained ongoing throughout 2024. Despite the lack of disaggregated data, the consistently high rate of non-compliance underscores challenges in the declaration system, which

⁸Corruption Prevention Commission, First Semi-Annual Activity Report of CPC, 2024.
<https://cpcarmenia.am/information-files/kkh-kisamyakayin-hashvetvutyun/>

⁹Corruption Prevention Commission, Second Semi-Annual Activity Report of CPC, 2024,
<https://cpcarmenia.am/information-files/kkh-kisamyakayin-hashvetvutyun/>



suggests that improving the verification, enforcement and compliance mechanisms should be prioritized over simply expanding the scope of declarant officials. Additionally, the institutional capacity of the CPC remains a key concern, as its ability to effectively process, analyze, and enforce declaration requirements is limited.

2.2.2 Clarifying requirements regarding the incompatibility of persons holding public positions and civil servants

Enhance the tools for identifying and monitoring incompatibility requirements

As part of its 2023 annual report on the state of the integrity system, the CPC reviewed existing mechanisms regulating the engagement of public officeholders in additional activities. In an official response, the CPC stated that it continues to clarify incompatibility requirements, offering case-specific guidance on the permissibility of engaging in other paid work.

Despite regular monitoring efforts of the CPC to assess compliance among individuals in leadership positions,¹⁰ the progress in enhancing the tools for identifying and monitoring incompatibility requirements remains limited. The CPC is studying international practices regarding the transfer of property to trust management by public officials and civil servants. While the 2024 target under the Anti-Corruption Strategy aimed to clarify the scope of scientific, educational, and creative activities, the CPC has raised concerns that defining these categories may constitute corruption risks, and has therefore proposed revising the target. As a result, the regulation of other permitted paid activities is being addressed through a legislative draft prepared by the Civil Service Office.¹¹

So, certain sub-activities have not yet been carried out within the designated timeline, leaving the implementation partial. In practice, the CPC initiated proceedings in certain cases of incompatibility violations based on declarations¹². However, the impact remains limited as the outcomes of these proceedings generally did not lead to any significant consequences.

¹⁰See the link: <http://cpcarmenia.am/hy/news/item/2024/06/05/1/>

¹¹Ministry of Justice, Monitoring and Evaluation Report on 2023-2026 Anti-Corruption Strategy, 2025, <https://www.moj.am/page/583>

¹²Corruption Prevention Commission, Semi-Annual Activity Reports of CPC, 2024, <https://cpcarmenia.am/information-files/kkh-kisamyakayin-hashvetvutyun/>



2.2.3 Conflict of interest

Ensure the implementation of the new definition of conflict of interest

The Ministry of Justice developed draft amendments¹³ to revise and enhance the existing mechanisms for addressing conflicts of interest in legal acts governing specific types of public services, ensuring alignment with Article 33 of the Law “On Public Service”. The amendments also introduce an obligation to adhere to the behavioral standards established by Article 33 of the Law “On Public Service” and propose that non-compliance with these standards be recognized as ground for a disciplinary liability.

These drafts were submitted for review by relevant stakeholders in May 2024 and were later made available for public discussion.¹⁴ According to the 2024 Monitoring and Evaluation Report of the 2023-2026 Strategy Action Plan, the RA Government approved the drafts and submitted them for parliamentary adoption.

However, even if adopted, a uniform definition of conflict of interest in sectoral laws alone is not enough to ensure effective prevention. Notably, most conflict-of-interest cases investigated by the CPC¹⁵ during the reporting period were based on media reports, primarily concerning community procurement processes. These cases often involved the participation of commercial organizations affiliated with community leaders or decision-making related to affiliated individuals. In the majority of instances, investigations led to administrative fines, while in some cases, no proceedings were initiated due to the expiration of the deadline for imposing an administrative penalty. Fines for failing to notify the CPC of a conflict of interest within the required period maybe a disproportionate measure, particularly in procurement deals involving substantial sums of money. This highlights a more pressing issue – the absence of robust mechanisms for detecting and addressing conflicts of interest or related violations which will be addressed through targeted policy recommendations in the concluding section of this report.

¹³Draft Laws “On Making Amendments to the Constitutional Law on the Judicial Code of the Republic of Armenia” and Related Legislation.
<https://www.e-draft.am/projects/7186/about>

¹⁴Ministry of Justice, Monitoring Report on the Implementation of the Anti-Corruption Strategy and the 2023-2026 Action Plan for January-June 2024, Activity 1.19

¹⁵Corruption Prevention Commission, Semi-Annual Activity Reports of CPC, 2024,
<https://cpcarmenia.am/information-files/kkh-kisamyakayin-hashvetvutyun/>



2.3 Effective Investigation of Corruption Crimes

2.3.1 Anti-Corruption Committee (ACC)

Review the procedure for the Anti-Corruption Committee formation

The Ministry of Justice reported that a study was conducted to assess the ACC’s independence, focusing on potential changes to the appointment and dismissal procedures for its Chairman and Deputies, including the role of the National Assembly. As part of this assessment, international best practices on the independence of anti-corruption bodies, particularly their appointment processes, were reviewed. The study examined anti-corruption law enforcement structures in Moldova, Latvia, Lithuania, and Croatia, analyzed key international standards, and gathered input from relevant stakeholders on the current appointment procedure.

A draft law initiated by the National Assembly was adopted on December 4, 2024 which introduces a requirement for the ACC Chairman to submit an annual report to the National Assembly by April 1 each year. While this amendment strengthens transparency and accountability to the National Assembly, the selection process for the ACC Chairman and Deputies remains deficient in terms of impartiality and effectiveness. The ACC Chairman is appointed by the Government, and the Prime Minister appoints the deputies. So, the procedure for appointing the ACC leadership has yet to be revised, with relevant amendments planned for approval in 2026 under the current Anti-Corruption Strategy. Reviewing this process is particularly important in light of the recent ACC Chairmanship competition,¹⁶ where only five candidates met the eligibility criteria, albeit some with minor concerns regarding questionable ties to former law enforcement officials. The competition committee shortlisted three finalists for the Government’s selection. However, there are no legally defined criteria to guide the Government’s decision, giving it broad discretionary power and creating the potential for arbitrary selection. This lack of transparency may weaken trust in both the integrity of the selection process and the institution itself, while also discouraging diverse and qualified candidates from applying, ultimately limiting inclusivity.

Ensure the institutional strengthening of the Anti-Corruption Committee

¹⁶Interviews of candidates for the Chairman of the Anti-Corruption Committee. March 10, 2025.
<https://www.youtube.com/watch?v=og6XNAKtSI0>



In 2024, competitions for filling positions in the Anti-Corruption Committee were organized and conducted in accordance with the Law “On the Anti-Corruption Committee”, following the legal procedures and timelines.

As a result of these competitions, 26 candidates were appointed to investigative and operational intelligence service positions, while 25 to autonomous positions within the Anti-Corruption Committee. As of December 31, 2024, 77 out of 120 investigative and operational intelligence service positions and 71 out of 80 autonomous positions in the Anti-Corruption Committee had been filled.

Considering that the RA Prime Minister’s Decision No. 1159-A¹⁷ set the maximum number of Anti-Corruption Committee employees at 170 staff units, and the 2023-2026 Anti-Corruption Strategy Action Plan aims for at least 80 percent staffing by 2026, the current data indicating a nearly 75 percent fill rate reflects progress. However, concerns regarding capacity deficits among the staff were highlighted by a CSO representative during an interview.

Conduct professional anti-corruption educational courses and trainings for target groups

In 2024, various training programs were conducted to enhance the professional capacities of personnel within the Anti-Corruption Committee:

- 11 selected candidates for investigative and operational intelligence service positions successfully completed the training at the Educational Complex of the Ministry of Internal Affairs. Additionally, 35 employees from the investigative and operational intelligence services department participated in specialized training at the same institution.
- 7 candidates for autonomous positions underwent professional training at the Academy of Justice, while 19 individuals already in autonomous positions participated in mandatory training at the Academy, achieving a 30% participation rate.
- A total of 5 international training courses on anti-corruption measures, including the detection and investigation of corruption crimes, were organized, with 9 ACC investigators participating.

¹⁷ RA Prime Minister’s Decision N 1159-A of 14.10.2021 “On Amendments and supplements to the decision of the Prime Minister of the Republic of Armenia N 706-A of June 11, 2018.



- Within Armenia, ten training courses were held, attended by 29 investigators, ensuring an overall participation rate of approximately 65%.

In 2024, specialized professional training courses were conducted for a total of 133 prosecutors, focusing on key areas related to corruption and organized crime.¹⁸¹⁹

Develop a comprehensive methodology and guidelines for detecting and investigating corruption crimes

By Order No. 60-L of the RA Chairman of the Anti-Corruption Committee, issued on December 19, 2023, training and education program for individuals holding autonomous positions within the ACC was approved. This program encompasses key aspects of anti-corruption efforts, including methodologies and investigative techniques for detecting and prosecuting corruption-related offenses.

In 2023, the Interdepartmental Commission on Combating Money Laundering, Terrorism Financing, and the Financing of the Proliferation of Weapons of Mass Destruction in Armenia prepared guidelines for investigating money laundering cases, which were officially adopted during its 2024 session. Meanwhile, the “Methodological Guidelines on the Peculiarities of the Investigation of Corruption Crimes, Including Illicit Enrichment,” endorsed by Prosecutor General’s Order No. 35 on March 22, 2021, still remain under review, with the delay attributed to difficulties in engaging a suitable expert.²⁰

2.3.2 ACC activities on implementing the laws

In 2024, investigators of the Anti-Corruption Committee examined a total of 2,289 criminal proceedings,²¹ of which 849 were completed. Among the completed cases, 167 were forwarded to court with indictments against 374 individuals, while 682 proceedings were dismissed.

In 2024, the number of proceedings examined increased by 465 cases compared to 2023’s total of 1,824 proceedings. Additionally, the number of completed proceedings rose by 313 cases, from

¹⁸Ministry of Justice, Monitoring Report on the Implementation of the Anti-Corruption Strategy and the 2023-2026 Action Plan for January-June 2024, Activity 2.4

¹⁹Ministry of Justice, Monitoring and Evaluation Report on 2024 Activities under the 2023-2026 Anti-Corruption Strategy, 2025, <https://www.moj.am/page/583>

²⁰Ministry of Justice, Monitoring and Evaluation Report on 2024 Activities under the 2023-2026 Anti-Corruption Strategy, 2025

²¹Anti-Corruption Committee, Annual Activity Report, 2024, <https://www.anticorruption.am/hy/pages/show/report>



536 in 2023 to 849 in 2024. Compared to 2023, the number of proceedings examined in 2024 increased by 25.5%, while the number of completed proceedings rose by 58.4%.

In 2024, the number of public servants, including officials, prosecuted in criminal proceedings and sent to court with an indictment was 175²² (142 in 2023).

2.3.3 Specialized Anti-Corruption Courts

Conduct trainings for judges of anti-corruption courts

As part of the implementation of the Anti-Corruption Strategy Action Plan, the Governing Council of the Academy of Justice approved the Annual Training Program for Judges and Judge Candidates.²³ This program includes specialized courses and modules tailored for judges at all levels who specialize in anti-corruption cases. As stated in the response to the official request from the Ministry of Justice, the training program was developed in accordance with international standards and requirements, while also incorporating the needs and priorities identified by beneficiaries.

The 2024 curriculum for judges and judicial candidates featured a course on “State Measures against Corruption in Armenia’s Public Service,” developed with the CPC. Delivered by CPC experts, the course covered topics like the declaration system, data verification, conflict of interest, and gift acceptance prohibitions. This course is part of a broader training module for all judges and candidates.

Regarding the percentage of trained judges as outlined in the relevant activity of the Anti-Corruption Strategy Action Plan (performance target for the second half of 2024), the Academy of Justice conducted training on key anti-corruption topics for 14 judges from the Anti-Corruption Court (94%), 12 judges from the Anti-Corruption Court of Appeal (100%), and 10 judges from the Anti-Corruption Chamber of the Court of Cassation (100%), achieving a higher training completion rate.

²² Ibid.

²³ Academy of Justice, Governing Council Decision N012/23/3 on Initial training program for judicial candidates of the Anti-Corruption Court, 2024



While this progress aligns with the anti-corruption commitments outlined in the Strategy’s Action Plan, the training component alone is insufficient to achieve the key objective of comprehensive institutional strengthening of the courts. According to the 2024 Anti-Corruption Court activity report,²⁴ 237 cases were carried over from the previous period, 48 new cases were received, 46 verdicts were rendered, and 23 cases were dismissed. A total of 205 cases remain unfinished and have been carried over to 2025.

To ensure that judicial training contributes to overall efficiency, a separate assessment is required to determine the contributing factors to those case backlogs. While it hasn’t been the focus of this monitoring activity, delays in corruption-related cases are particularly concerning, as they may affect public trust in the courts’ impartiality and effectiveness. Prolonged proceedings may potentially raise concerns about the influence of political and economic actors on legal outcomes. In this context, the procedure for appointing judges also warrants close attention.

Establish a unified corruption crime statistics system and upgrade current mechanisms

According to the official response from the Ministry of Justice, an electronic statistics system, developed with the support of the Ministry of High-Technological Industry, is in its final stage of implementation. This system is designed to track data on the work of prosecutors and will include statistical records of corruption-related crimes, among other features.

Additionally, the Ministry reported that the mechanisms for statistical reporting within the Department for Supervision of the Legality of Pre-Trial Proceedings in the ACC have been modernized. The updated system now records criminal proceedings, their progress, and outcomes, along with detailed data on the accused’s personal information, official positions, legal assessments of prosecutions, and applied preventive measures.

However, the steps taken so far are not sufficient to meet the 2024 performance target. Establishing a unified corruption crime statistics system still requires interoperable pre-trial and trial data management by the General Prosecutor’s Office and the Ministry of Justice.

²⁴Anti-Corruption Court, Annual Activity Report, 2024, <https://court.am/hy/statistic-inner/247>



3. GENERAL DISCUSSION AND CONCLUSIONS

Based on the monitoring results, the measures under CEPA Articles 4 and 12, aligned with the 2023-2026 Anti-Corruption Strategy have shown some progress, but overall implementation remains slow. Out of the 11 CEPA-aligned measures outlined in the Action Plan, 7 have been completed, 4 have been partially implemented.

A major observation is that the Government’s focus within the observed timeframe has primarily been on the formal implementation of Anti-Corruption Strategy’s Action Plan measures, including legislative amendments, training programs, methodologies, statistical system enhancements and the review of international best practices. As a result, it remains challenging to directly link the implementation of these activities to achieving the broader strategic goals, particularly in the absence of valid impact indicators. So, the logical framework is poorly applied, weakening the causal relationship between implementation and results. Many activities are designed as outputs, while others remain mere activities without a clear path to achieving tangible anti-corruption impact. Most of the anticipated results are limited to legislative amendments - an important step, but insufficient to drive effective implementation.

The Anti-corruption Strategy and Action Plan lack a specific focus on “high-risk”²⁵ sectors. While there is some explicit emphasis on combating high-level corruption, the enforcement and oversight mechanisms remain underdeveloped.

In terms of corruption prevention, key activities, such as - ensuring the implementation of the new definition of conflict of interest - are narrowly framed, with performance targets under the current Anti-corruption Strategy limited to legislative amendments, without follow-up measures for enforcement beyond this point. Similarly, the strategic goal of corruption prevention and integrity system strengthening lacks a comprehensive approach. This suggests, reforms in the declaration system are limited to expanding the list of declarant public officials. This mechanical expansion does not inherently improve the effectiveness of the system as envisioned by CEPA.

Significant challenges still persist within the institutional framework for combating corruption. In

²⁵The recent in-depth [study](#) by the EU Commission identifies and maps common high-risk areas for corruption across the broader EU. These include, but are not limited to: Public procurement, Healthcare, Finance, Construction and Infrastructure, Licences and Permits, Law enforcement, Defence and Security. This needs to be adapted to local context by anti-corruption practitioners and experts.



practice, the CPC struggles not only to process declarations throughout the year but also to conduct thorough analyses and verify their accuracy. Key risks lie in limited number of staff in structural divisions, as well as a lack of skills and experience in initiating administrative proceedings and analyzing declarations. Several hundred declarants who fail to submit declarations receive only warnings without formal proceedings, and after an additional 30 days, the collection process begins for non-submitters. However, many cases are ultimately closed due to minor justifications or a perceived lack of significant consequences. This raises concerns about the rigidity of submission deadlines and the effectiveness of penalties for non-compliance.

Within the ACC, despite the ongoing need for capacity building and staffing, minor challenges persist in recruiting for operational and intelligence service positions. The limitations stem from a shortage of qualified applicants as well as barriers created by the physical fitness exam requirement in the selection process. The appointment of the ACC Chairman and Deputies by the Government and Prime Minister poses significant risks of political influence, allowing the government to gain control over the Committee’s activities. This, in turn, threatens the integrity and independence of anti-corruption efforts and may lower public trust in anti-corruption institutions.

An issue commonly observed, despite our limited monitoring, is inefficiency and delays in the proceedings within the Anti-Corruption Court. This has the potential to further weaken public trust in the judiciary’s ability to operate impartially and effectively.

4. RECOMMENDATIONS

The deficiencies observed indicate a slow pace of implementation with regards to broader anti-corruption reform objectives, leading to the following recommendations.

Anti-Corruption Strategy-Level*(Ministry of Justice, Anti-Corruption Bodies, NGOs)*

- Align the CEPA roadmap with Anti-Corruption Strategy’s objectives to create a clear framework for evaluating the government’s commitment to implementing CEPA-mandated reforms in the field.
- Revise the approach for developing the Anti-Corruption Strategy document by distinctly



separating indicators that measure delivered outputs and outcomes from operational-level indicators that track the implementation of specific activities, in line with existing international benchmarks²⁶²⁷.

- Optimize and streamline the Anti-Corruption Strategy to ensure feasibility within the available timeframe to improve effectiveness and implementation outcomes.
- Develop sector-specific anti-corruption action plans for ‘high-risk’ areas²⁸, incorporating targeted preventive and enforcement measures in collaboration with non-governmental stakeholders.
- Ensure that the monitoring and evaluation reports of the Anti-Corruption Strategy and its Action plan are not merely descriptive in manner, but results-focused. Reports should include analytical insights and analysis of the causes of underperformance.
- Develop a financial report on the implementation of the Anti-Corruption Strategy, in addition to the existing budget estimate. This would provide clear accountability and confirm the government’s assurance that lack of funding was not a factor in the poor implementation of the Strategy.

Addressing the conflict of interest system(*Ministry of Justice, CPC*)

- Address conflict of interest regulation by either incorporating a dedicated chapter to the Law “On Public Service” or developing a separate legal act covering all related provisions, including incompatibility requirements, restrictions, and gift prohibitions.
- Strengthen enforcement measures to effectively address conflict of interest violations in practice, going beyond mere fines. This may include measures, such as confiscating profits or a portion thereof gained from contracts awarded under a conflict of interest, and/or,
- Establish a legal and procedural mechanism to invalidate and nullify the deals (tenders, procurement contracts, etc.) made under a conflict of interest.

²⁶OECD, Public Integrity Handbook, OECD Publishing, Paris, 2020, <https://doi.org/10.1787/ac8ed8e8-en>

²⁷U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute, Jenkins, M.; Camacho, G., Core principles for the development of anti-corruption strategies. Practices from around the world, Bergen, 2022.

²⁸The recent [study](#) by the EU Commission could serve as an analytical framework for identifying high-risk corruption areas. Anti-corruption practitioners and experts should adapt it to the local context using frequency-based and/or consequence-based approaches.



Improving the declaration system (*Ministry of Justice, CPC*)

- Finalize the draft amendment to the Law “On the Corruption Prevention Commission and related legislation” to specify the verification concept and methodology, and incorporate a verification procedure based on a risk-based approach to identify and prioritize cases for review when inherent risks are detected in the disclosure forms.
- Consolidate asset declarations of public officials and their family members into a single, unified form.
- Upgrade the CPC website to display both officials’ and their family members’ declarations in a single window, improving accessibility and transparency.

Institutional strengthening of anti-corruption bodies (*Ministry of Justice, CPC, ACC, NGOs*)

- Strengthen institutional capacities of the CPC by filling key positions in structural divisions, to enhance monitoring, verification, and enforcement efforts.
- Assess the needs of CPC staff to develop a targeted capacity development program, especially in handling administrative proceedings and financial disclosures.
- Establish clear criteria for the Government’s appointment of the Chairman and Deputies of the ACC, or introduce legislative amendments mandating parliamentary approval for these positions to limit political influence.
- Review the restrictions set by Government Decision N1708-N “On Determining the Requirements Related to Physical Fitness and Health” for ACC’s operational-intelligence service positions, with consideration for either relaxing the physical fitness criteria or removing it entirely.

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APPENDIX1. Monitoring Matrix

FOCUS AREA/ACTIVITY ²⁹	OUTPUT INDICATORS	METHOD(S)	SOURCES
CORRUPTION PREVENTION COMMISSION (CPC)			
Enhancing the capacities of CPC			
Review the procedures for selection and liability of the Commission members. ³⁰	<ul style="list-style-type: none"> ● Drafted legislative amendments in the requirements and selection procedures for Commission member candidates ● Drafted regulations regarding members’ liability and termination of powers. 	Document review / Desk research Information request	Law on Corruption Prevention Commission and other related legal acts Data from the official request
Expanding the functions of CPC			
Improve the regulations on the proceedings conducted by the CPC, define their features, and clarify the functions of the CPC as an administrative body. ³¹	<ul style="list-style-type: none"> ● Drafted legislative amendments defining the features of proceedings initiated by the CPC, such as verification and analysis of declarations, clarifying the terms used, and setting timelines. 	Desk research Information request	Law on Corruption Prevention Commission, the Code on Administrative Offenses, and other related legal acts Data from the official request

²⁹ Appendix No 2 to the Decision of the Government of the Republic of Armenia. 2023-2026 Action Plan Deriving from the Anti-corruption Strategy of Armenia. <https://www.moj.am/page/583>

³⁰ 2023-2026 Action Plan Deriving from the Anti-corruption Strategy of Armenia. <https://www.moj.am/page/583> . Activity 1.1

³¹Ibid. Activity 1.2



CPC activities on implementing the laws	<ul style="list-style-type: none"> ● Number of checked and analyzed declarations ● Number of overall proceedings ● Number of proceedings related to declarations ● Number of proceedings on non-compliance requirements & conflict of interest ● Number of disciplinary proceedings against judges ● Number of consultancies provided on reviewed applications ● Number of integrity checks conducted 	<p>Desk research</p> <p>Interview/ Information request</p>	<p>CPC Annual Activity Reports</p> <p>Data from the official request</p>
Improving declaration system			
Extend the scope of declarant public officials. ³²	<ul style="list-style-type: none"> ● Legislative amendments on extending the scope of declarant officials ● Legislative amendments on a mandatory requirement for all public officials to submit a declaration of interest. 	<p>Document review / Desk research</p> <p>Interview / Information request</p>	<p>Law on Public Service and other related legal acts</p> <p>Data from the official request</p>
Clarifying requirements regarding the incompatibility of persons holding public positions and civil servants			
Enhance the tools for identifying and monitoring incompatibility requirements. ³³	<ul style="list-style-type: none"> ● Drafted legislative amendments to restrict public position holders (particularly political officials) and those in top and high leadership positions in non-profits or full-time paid positions in 	<p>Document review / Desk research</p>	<p>Semi-annual Monitoring Reports on the Implementation of the Anti-Corruption Strategy and the</p>

³² Ibid. Activity 1.10

³³ Ibid. Activity 1.21

	<p>scientific, educational, and creative activities.</p> <ul style="list-style-type: none"> ● Drafted amendments to define the scope of scientific, educational, and creative activities. ● Drafted provisions to regulate the participation of public officials and servants in other paid work or off-hour jobs in healthcare, sports, journalism, and other humanitarian fields. 		2023-2026 Action Plan
Conflict of interest			
Ensure the implementation of the new definition of conflict of interest. ³⁴	<ul style="list-style-type: none"> ● Drafted legislative amendments aligned with the updated definition of conflict of interest. (provisions for judges, parliamentarians, members of community councils, and sector-specific regulations for various areas of public service) 	<p>Desk research</p> <p>Interview</p>	Semi-annual Monitoring Reports on the Implementation of the RA Anti-Corruption Strategy and the 2023-2026 Action Plan
EFFECTIVE INVESTIGATION OF CORRUPTION CRIMES			
Anti-Corruption Committee (ACC)			
Review the procedure for the Anti-Corruption Committee formation. ³⁵	<ul style="list-style-type: none"> ● Drafted legislative amendments in the procedure for the appointment of the Chairman and his/her deputies ● Legislative amendments regarding a full 	<p>Desk research</p> <p>Information request</p>	<p>Reports on the annual and semi-annual activities of the ACC</p> <p>Data from the official request</p>

³⁴ Ibid. Activity 1.19

³⁵ Ibid. Activity 2.1

	accountability to the National Assembly		
Ensure the institutional strengthening of the Anti-Corruption Committee. ³⁶	<ul style="list-style-type: none"> ● Number of newly recruited staff for operational intelligence services ● Number of newly recruited staff for investigative services 	<p>Desk research</p> <p>Information request</p>	<p>Semi-annual Monitoring Reports on the Implementation of the Anti-Corruption Strategy and the 2023-2026 Action Plan</p> <p>Data from the official request</p>
Conduct professional anti-corruption educational courses and trainings for target groups. ³⁷	<ul style="list-style-type: none"> ● Number of anti-corruption educational courses and trainings for the investigators ● Number of anti-corruption educational courses and trainings for the prosecutors of the Department for the Control over the Legality of Pre-Trial Proceedings and Department for the Confiscation of Property of Illicit Origin 	<p>Desk research</p> <p>Information request</p>	<p>Semi-Annual Monitoring Reports on the Implementation of the Anti-Corruption Strategy and the 2023-2026 Action Plan</p> <p>Data from the official request</p>
Develop a comprehensive methodology and guidelines for detecting and investigating corruption crimes. ³⁸	<ul style="list-style-type: none"> ● Methodology and guidelines for detecting and investigating corruption crimes ● Developed training materials based on methodology and guidelines 	<p>Desk research</p>	<p>Available methodologies and guidelines</p> <p>Reports on the annual and semi-annual activities of the ACC</p>
ACC activities on implementing the laws	<ul style="list-style-type: none"> ● Number of criminal proceedings by the nature of crime ● Number of public servants prosecuted 	<p>Desk research</p>	<p>Reports on the annual and semi-annual activities of the</p>

³⁶ Ibid, Activity 2.2

³⁷ Ibid, Activity 2.4

³⁸ Ibid, Activity 2.6



	and brought to trial		ACC
Specialized Anti-Corruption Courts			
Conduct trainings for judges of anti-corruption courts. ³⁹	<ul style="list-style-type: none"> Revised training programs for judges of the Specialized Anti-Corruption Court, Court of Appeals, Anti-Corruption Chamber of the Court of Cassation, and candidate judges Percentage of anti-corruption courts’ judges passed trainings 	<p>Desk research</p> <p>Information request</p>	<p>Semi-annual Monitoring Reports on the Implementation of the Anti-Corruption Strategy and the 2023-2026 Action Plan</p> <p>Data from the official request</p>
Establish a unified corruption crime statistics system and upgrade current mechanisms. ⁴⁰	<ul style="list-style-type: none"> Developed standardized procedure to keep corruption crime statistics 	<p>Desk research</p> <p>Information request</p>	<p>Semi-annual Monitoring Reports on the Implementation of the Anti-Corruption Strategy and the 2023-2026 Action Plan</p>

³⁹ Ibid, Activity 2.8

⁴⁰Ibid, Activity 2.11



APPENDIX 2. List of Topics for Information Requests and Stakeholders Interviewed

a) Corruption Prevention Commission

Statistics on the number and type of declarations analyzed, integrity checks and proceedings conducted within the monitoring period.

b) Anti-Corruption Committee

Statistics on the newly recruited staff and conducted training.

c) Anti-Corruption Court

Statistics on the number of judges and proceedings.

d) Ministry of Justice

Availability of training programs for judges and candidate judges.

Data on anti-corruption courts' judges passed training.

e) Prosecutor General's Office

Number of anti-corruption educational courses and trainings for the prosecutors of the Department for the Control over the Legality of Pre-Trial Proceedings and Department for the Confiscation of Property of Illicit Origin.

f) Public administration expert

Observations on gaps and challenges on the anti-corruption measures implemented under the CEPA.