



Policy brief

Advancing Anti-corruption reforms in Armenia under CEPA

ISSUE AT STAKE

The Comprehensive and Enhanced Partnership Agreement (CEPA) between Armenia and the European Union (EU) is a cornerstone of Armenia’s reform agenda, setting a framework for strengthening democracy, the rule of law, and good governance - including anti-corruption efforts. While Armenia has made notable progress in implementing CEPA reforms in the fight against corruption, as outlined in its roadmap, serious challenges remain. Gaps in enforcement, weak institutional capacities, and limited transparency still have an impact on reform efforts.

This policy brief assesses Armenia’s progress in implementing CEPA-mandated anti-corruption reforms as part of a civil society monitoring program. It identifies how Armenia’s 2023-2026 Anti-Corruption Strategy aligns with the commitments set forth under CEPA Articles 4 and 12, assesses the progress achieved and provides recommendations to support more effective implementation moving forward.

KEY FINDINGS

Moderate Progress in Anti-CEPA-Aligned Anti-Corruption Reforms

Out of the 11 activities planned for 2024 under the 2023–2026 Anti-Corruption Strategy, only 7 have been fully implemented, with 4 partially completed. The implementation pace is slow, focusing on formal outputs rather than strategic anti-corruption goals.

1. Corruption Prevention Commission (CPC)

In November 2024, a draft law proposing changes to the Corruption Prevention Commission (CPC) was released for public consultation. The amendments aim to improve the selection process for CPC members by including civil society representative in a selection procedure, and introducing structured disciplinary measures for CPC members with four levels of penalties.

The law also grants CPC members the right to publish dissenting opinions on majority rulings, addressing a gap in the current legal framework. However, as of now, these amendments have not been approved by the government, resulting in a partial implementation.



Draft amendments to clarify the CPC’s role and procedures - particularly those related to initiating proceedings and verifying asset declarations - have been developed but are not scheduled for adoption under the current Anti-Corruption Strategy Action Plan. In the meantime, the CPC lacks formal, well-defined and standardized procedures for verifying and analyzing asset declarations.

2. Reforms in the field of corruption prevention

2.1 Improving the declaration system

While legislation is being updated to expand the list of public officials required to submit asset declarations, compliance remains a major issue. In 2024, thousands of declarations were either late or unsubmitted, with enforcement measures proving largely ineffective. Verification and institutional capacity gaps within the CPC continue to affect the system’s credibility.

2.2 Incompatibility requirements of persons holding public positions and civil servants

Although the CPC provides case-specific guidance and monitors compliance, tools for identifying and managing incompatibility violations remain underdeveloped. Proceedings initiated by the CPC related to incompatibility requirements rarely lead to meaningful consequences.

2.3 Conflict of Interest

Draft amendments to improve the legal framework on conflict of interest have been developed and approved by the government. However, practical enforcement is lacking. Most investigations are triggered by media reports and often result only in fines, which are not always proportionate to the severity of the violation. There is no proactive mechanism for detecting or managing conflicts of interest.

3. Effective investigation of corruption crimes

3.1 Anti-Corruption Committee (ACC)

Recent reforms now require the ACC Chair to report annually to Parliament, thus increasing accountability. However, the selection process of ACC Chairman and deputies remains controlled by the Government, lacking legally defined selection criteria and transparency.

Staffing of the ACC reached about 75% in 2024, indicating progress toward the 2026 goal. However, concerns remain about the professional capacity of the staff. Multiple targeted trainings were conducted in



2024 for ACC investigators, prosecutors, and judicial staff. While training participation rates were relatively high, they should be complemented by systemic reforms to ensure institutional impact.

Although training programs and some guidelines have been introduced, key methodological tools such as the methodology on the corruption crime detection and investigation still remains under review, with the delay attributed to difficulties in engaging a suitable expert

3.2 Specialized Anti-Corruption Courts

Most judges handling corruption cases received targeted training. Yet, court backlogs persist - 237 cases were carried over from 2023, and only 46 verdicts were issued in 2024. This suggests the need for deeper institutional assessments beyond training alone.

A new electronic system for corruption-related data is in its final development phase, but interoperability across institutions is lacking. Current measures do not fully meet the 2024 target. A truly unified system remains essential for accountability and oversight.

RECOMMENDATIONS

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

General (Strategy-level)

- Align the CEPA roadmap with Anti-Corruption Strategy objectives to better assess government commitment to CEPA reforms in the field.
- Distinctly separate indicators that measure delivered outputs and outcomes from operational-level indicators that track the implementation of specific activities.
- Optimize and streamline the Anti-Corruption Strategy to ensure feasibility within the available timeframe.
- Develop sector-specific anti-corruption action plans for ‘high-risk’ areas.
- Make monitoring reports more results-driven, including analytical insights and causes for underperformance.
- Develop a financial report on the Anti-Corruption Strategy implementation, in addition to the existing budget estimate.

Addressing the conflict of interest



- Amend the Law “On Public Service” or draft a separate act covering all related provisions, including incompatibility requirements, restrictions, and gift prohibitions.
- Strengthen enforcement mechanisms by going beyond fines – such as reclaiming profits, and/or invalidating the contracts/deals made under a conflict of interest.

Improving the declaration system

- Introduce a robust verification and analysis procedure based on risk-based criteria, incorporated with a regulation that specifies the verification concept and methodology.
- Consolidate asset declarations of public officials and their family members into a single, unified form and simultaneously upgrade the CPC website to display both officials’ and their family members’ declarations in a single window.

Institutional strengthening of anti-corruption bodies

- Strengthen institutional capacities of the CPC by filling key positions in structural divisions, to enhance monitoring, verification, and enforcement efforts.
- Identify CPC staff skill gaps and develop a targeted training program, especially in handling administrative proceedings and financial disclosures.
- Establish clear criteria for the appointment of ACC leadership, or introduce legislative amendments mandating parliamentary approval for these positions to limit political influence.
- Reconsider physical fitness requirements under Government Decision N 1708-N for ACC’s operational-intelligence roles with consideration for either relaxing the physical fitness criteria or removing it entirely to widen the talent pool.

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