

Policy brief

“Strengthening the Civil Society monitoring of CEPA implementation (monitoring of CEPA 52 article (a) and (b) points, 54 (b), (c), (d), (e) and (f) points)”

The Republic of Armenia has undertaken climate commitments within the framework of the Paris Agreement. The measures aimed at fulfilling these commitments are included in the roadmap of the CEPA adopted in 2019. The implementation of these measures has not been comprehensively monitored and evaluated by civil society, which would have contributed to a more holistic assessment and improvement of the actions.

The objective of the study “Strengthening the Civil Society monitoring of CEPA implementation (monitoring of CEPA 52 article (a) and (b) points, 54 (b), (c), (d), (e) and (f) points)” is to monitor the implementation performance of climate change adaptation and mitigation measures outlined in the CEPA roadmap, identify gaps in climate policies of "Forestry," "Agriculture," "Energy," and "Waste" sectors and legislation, examine the challenges of localizing these policies in communities, and propose solutions to address them.

The results of the study may be used in the development of a new CEPA roadmap, as well as in the preparation of Armenia’s NDC 3.0.

The target audience of the study includes the EU, the Government of Armenia, relevant sectoral agencies, and communities.

Key results of the study (conclusion)

1. Legislation

CEPA roadmap 121, 123, and 130 measures were implemented particularly. 122 measure can be considered as initiated. From 2021 to 2024, within the framework of CEPA articles related to CC adaptation and mitigation, 3 laws, the RA Governmental 7 decisions, the RA Prime Minister 1 decision, and 4 normative acts were adopted. Omissions have been identified in 14 acts, and recommendations for addressing these omissions have been developed.

2. Forestry sector

- Data on Armenia's forests from different sources vary and cannot be used to set new climate targets for increasing forest cover.
- Only 1.64% of the 50,000 hectares of new forests planned under the NDC by 2030 were planted between 2021 and 2024.

- Thirty years after the 1993 forest land state inventory, forest lands have been reduced by 126,200 hectares. Only during 2021–2023, it has decreased by 200 hectares. Forested lands have decreased by 45,000 hectares. Only during 2021–2023, it has decreased by 100 hectares.
- Government agencies do not apply uniform indicators to assess the condition of forest systems, which complicates the effectiveness of planned measures, including climate ones.
- According to the report of the National Greenhouse Gas Inventory of Armenia, the CO₂ sequestration volumes from the “Forest Management and Other Land Use” sector have decreased, from -550.1 Gg CO₂ equivalent in 2010 to -373.0 Gg CO₂ equivalent in 2019.

3. Agriculture sector

- Only during 2021–2023 agricultural lands decreased by 1.1 thousand hectares.
- The systems for ensuring climate resilience, such as hail protection, insurance, irrigation, system for forecasting and early warning of hazardous hydro-meteorological events are underdeveloped.
- During 2021-2023, an average of 18.5% of irrigable lands was irrigated by "Jrar" CJSC
- During the reporting period, the key reasons for the non-cultivation of lands including lack of access to irrigation water, insufficient accumulation of water resources in reservoirs, and land fragmentation - remained unresolved.
- During 2021–2024, the gross domestic product share of the agricultural sector (including forestry and fishing) decreased from 11.1% in 2021 to 7.9% in 2024.
- The import figures for large and small ruminants align with the targets set in the Agricultural strategy.

4. Energy sector

- Armenia can achieve the target set by the Nationally determined contributions regarding the doubling of the share of renewable energy, as the share of electricity generated by small hydropower plants and solar power stations in the energy system has increased from 8.57% to 19.4% during 2021-2024.
- According to the Eurostat definition, 58.6% of Armenian households are energy-poor. CEPA does not include specific regulations on energy poverty.

5. Waste sector

- The majority of the requirements in the "Waste Management" section of CEPA Appendix 3 have not been implemented.
- Due to the small volumes of waste sorting and recycling, the majority of municipal solid waste is transported to landfills. The economic mechanisms for waste sorting and recycling are insufficient

to incentivize businesses involved in this sector. In such a situation, achieving the targets set by the Nationally determined contributions is unlikely.

- In Armenia, the majority of water intake does not enter the sewage system. Biogas is not being collected from sewage water treatment plants, which leads to an increase in greenhouse gas emissions.
- The issues related to the installation of sewerage systems in 580 settlements remain unresolved.
- Armenia does not have a development program for the wastewater management sector.

6. Communities

- Communities have not conducted climate risk assessments and do not have a developed climate change adaptation and mitigation local program/strategy.
- Deficiencies in the legislative framework, the lack of tools.
- Contradictions with other legal acts, hinder the achievement of climate targets in communities.
- The lack of the technical resources and specialists.

Recommendations

Recommendations to the EU

- Include clear indicators for measuring "energy poverty" in EU directives and develop a set of tools aimed at overcoming it.
- Guided by Article 52 of the CEPA, assist Armenia in introducing new anti-hail technologies and implementing forest area inventorying.

Recommendations to the RA Government

- Define performance indicators for the implementation of NDC 2.0, evaluate its performance based on these indicators, and ensure its transparency.
- When developing NDC 3.0, set realistic targets considering both the performance of NDC 2.0 and the actual foundations of calculations, as well as the capabilities of Armenia.
- Approve the GoA decision on "Measurement, Continuous Monitoring, Evaluation, and Accountability of Policies and Measures for Mitigating GHG Emissions".



- Include the measures outlined in the sectoral scenarios of the LT-LEDS in the sectoral development strategies for energy, industry, agriculture, waste management, and forestry, which will ensure clear planning for the achievement of CC adaptation and mitigation targets.
- Develop and implement state support mechanisms for the expansion of the community-based autonomous solar power plants, with the aim of gradually reducing the use of liquefied gas in households and GHG emissions.
- Ensure the development of the agricultural land insurance system’s capacities to enhance the sector's climate resilience.
- Encourage the installation of hail protection nets in new areas.

Recommendations to the Ministry of Environment

- Make supplements and amendments to the Law on "Protection of Atmospheric Air" introducing the concept of a unified permit for maximum allowable emissions of GHGs and other pollutants from stationary sources in the point 19 of Article 4. This will allow organizations to obtain a single unified permit for emissions of harmful substances and GHGs into the atmosphere, avoiding duplication.
- Define in the article 9 of the "On Amendments to the Law of the RA on Environmental Impact Assessment and Expertise" Law 30-150-N the authority for authorized body to develop an assessment toolkit for the activities' and concepts' climate factors, as well as measures aimed at CC mitigation and adaptation.
- Make amendment in the RA Water Code to include:
 - “Criteria for water resource reduction caused by CC or anthropogenic impact”, which will enable the implementation of Article 33.1 of the law that defines the cases for reviewing water use permits.
 - Provisions on mechanisms for assessing water use applications from a CC perspective and for mitigating negative climate impacts in the water sector.
 - Provisions to promote and ensure the effective implementation of water reuse, which will contribute to rational water use and conservation.
- Make amendment in the “RA Governmental Decision No. 54-N, dated January 11, 2024, "On Approving the Procedure for Inventory of Greenhouse Gas Emissions" to include:
 - A provision for amending the RA Code on Administrative Offenses to ensure the enforcement of the regulation by establishing liability for failure to submit GHG reports.
 - The establishment of realistic indicators for the volume of municipal solid waste disposed of in "community landfills" and for illegal logging to enhance the accuracy of GHG calculations.



- Make amendments in the RA Laws “On Waste Disposal and Sanitary Cleaning” and “On Waste” to define the concept of "community landfill", ensuring alignment with Decision No. 54-N on the procedure for inventorying GHG emissions and providing a legal basis for reporting GHG emissions from community landfills.
- Make supplements in the GoA decision No. 1692-L, dated November 3, 2022, "On Approving the Climate Change Adaptation Program in the Water Resources Sector and the List of Measures for 2022-2026":
 - Include in the decision the measure "Hydrological and Chemical Forecasting, Base, Best-Case, and Worst-Case Scenario Construction for Water Resources," which will contribute to risk management in the water sector under CC conditions.
 - Insert a provision for cooperation among the state agencies responsible for the sector, ensuring the harmonization of functions of various competent state agencies in the implementation of adaptation measures in the water sector.
 - Include a component of civil society opinions in the indicators for assessing the effectiveness of water sector adaptation measures, which will ensure the inclusiveness of the evaluation process.
 - Set realistic timelines for the implementation of program measures, taking into account
- Make supplements in the draft law “On Climate”:
 - Define the toolkit of guarantee mechanisms for supporting vulnerable communities provided in the draft law, ensuring the targeting of the guarantor and the enforceability of the law in this regard.
 - Add a provision for providing support to communities in reducing GHG emissions and expanding carbon sinks.
 - Make the climate marking requirement for the community budget, as defined in the draft law, mandatory.
 - Provide a mechanism for continuous monitoring of the climate financing, technology transfer, and capacity-building measures received by local governments, with data submission to the authorized body every two years.
 - Include procedures for local governments to participate in the development of legal acts containing components of CC mitigation and adaptation that have direct or indirect effects on the community, as well as procedures for submitting their written positions on these matters.
 - Include in the draft law a provision on amending the "Code on Administrative Offenses" of the RA.

- When developing the environmental strategy, take into account the targets set for the forest sector in the GoA decision No. 2318-L on LT-LEDS, and include provisions for afforestation and reforestation of community-designated forest lands.
- Conduct an inventory of forest areas in the RA to obtain an accurate picture of the real state of forest areas and set realistic targets. To ensure the financing of these activities, apply to the RA Government and international donor organizations.
- Strengthen control over forest areas to exclude anthropogenic sources of forest fires.
- Direct the vector of control over illegal timber transportation towards preventive measures for illegal deforestation in forests.
- After the establishment of new forest areas, ensure the necessary measures for their protection.
- Improve the existing forest monitoring system.
- Develop uniform indicators for assessing the condition of forest systems, including climate indicators.

Recommendation to the Ministry of Economy

- Make amendments in the GoA decision No. 987-N, dated June 17, 2021 "On Defining Cases of Conversion of Agricultural Land to Non-Agricultural Land", to establish the cases excluding the conversion of agricultural lands.
- Make amendments in the GoA decision N 1886-L, dated December 19, 2019 “On the Approval of the Economic Development Directions of the Agricultural Sector of the RA for 2020-2030 and the Program of Activities for the Implementation of Economic Development Directions of the Agricultural Sector of the RA for 2020-2022 and 2023-2026 and the related timeline" to ensure the inclusion of the targets set by the LT-LEDS for the agricultural sector, and to include provisions for supporting, advising, and assisting communities and farm enterprises in the implementation of climate adaptation measures and programs, as well as promoting agricultural cooperatives.
- Study the international experience of anti-hail systems operating with modern technologies, and adapt them for use in Armenia.

Recommendations for the Ministry of TAI

- Make a supplement in the RA law "On Local Self-Government" to define the relevant powers and duties for local self-government bodies regarding the annual reporting of GHG, GHG absorption indicators from the atmosphere, and CC mitigation measures monitoring, in order to ensure compliance with the requirements of the GoA decision No. 54-N, dated January 11, 2024, "On Approving the Procedure for Inventory of Greenhouse Gas Emissions"

- Make amendments in the GoA decision No. 1708-N, dated November 16, 2006, "On Approving the Procedure for Allocating Subsidies from the State Budget to Communities" to establish a lower co-financing share for communities in programs aimed at:
 - CC adaptation and mitigation,
 - Energy conservation and energy efficiency.
- Make amendments in the GoA decision “On Amendments and Additions to the GoA decision No. 143-L of February 13, 2025" regarding the waste management system strategy, to ensure the inclusion of the targets set by the LT-LEDS in that document.
- Prioritize the adoption of a new energy sector development strategy, which will include comprehensive CC adaptation measures and the targets of the LT-LEDS.
- Develop Wastewater disposal Sector Development Program. The document must:
 - Take into account state commitments to reduce GHG emissions from the wastewater sector;
 - Include provisions for implementing GHG mitigation measures outlined in Armenia’s NDC;
 - Introduce measures to expand sewerage systems in the 580 settlements currently lacking such infrastructure.
 - Ensure biogas capture infrastructure integration into existing WWTPs and planned WWTPs.
- Support the process of filling positions with energy and climate specialists in the staff of community municipalities. This will strengthen the community's capacities, aimed at involving local-level climate policy, and will ensure that, with the help of these specialists, a climate component is included in the community's annual work plans, four-year development, and subvention programs.

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