



## CLARIFICATION

### **Regarding certain statistical data presented in the monitoring report of Articles 52 (a, b) and 54 (b–f) of the Law on Environmental Impact Assessment and Expertise (EIAEE)**

Within the framework of the “Support to CEPA Monitoring, Implementation, and Communication” Project, a monitoring process was conducted, focusing on Articles 52 (a, b) and 54 (b, c, d, e, f) of the law. The monitoring report and the related policy and advocacy briefs are available in Armenian and English at [www.cepacso.am](http://www.cepacso.am).

On July 4, 2025, the report was discussed at the Ministry of Environment of Armenia. The main topic of discussion was the forestry sector. Specifically, the report stated:

“Thirty years after the 1993 inventory of the state forest fund, forest lands have decreased by 126,200 hectares. Between 2021 and 2023 alone, they declined by 200 hectares. Forest-covered areas have decreased by 45,000 hectares over the same 30-year period.”

These figures were cited from Armenia’s Statistical Yearbooks and the official website of the Ministry of Environment, which includes baseline data from the National Forest Program. Ministry staff and some other experts found these conclusions controversial.

In follow-up correspondence, the Ministry requested a revision of the data, stating:

*“Please ensure corrections to the above-mentioned documents (meaning the figures in the report), considering that the analysis was conducted using non-comparable data. Below are references to internationally accepted methodologies. The OECD Data and Metadata Reporting and Presentation Handbook clearly states that time series data should come from a single source, using consistent definitions and measurement methods.”*

The expert who conducted the monitoring and prepared the report responded:

*“Even using your suggested methodology and relying solely on Statistical Committee data, the 1993–1994 yearbook mentions the forest-covered areas as 334.1 thousand hectares, while the 2024 yearbook lists 289.1 thousand hectares—a difference of 45,000 hectares, which matches the figure in the report.”*

The same expert also addressed the applicability of the Ministry’s reference methodology:

*“The Eurostat Methodological Manuals you cited apply only from 2011 onward, meaning the 1993 baseline data for forest lands and coverage were not calculated using this methodology.”*



To avoid further disagreement, the Ministry was asked to provide official figures for forest land and forest-covered areas for 1993, 2023, and preferably 2024. This would help to justify any corrections to the report.

Deputy Minister Mr. Ara Mkrtchyan provided a letter with the following data:

*“Forest-covered areas in 1993 totaled to 334,100 hectares, according to the Government Decision No. 1232-N of July 21, 2005. According to ‘Hayantar’ SNCO, forest coverage in 2023 was 282,633.50 hectares, and in 2024 it was 286,474.90 hectares.”*

At the same time, it was proposed to *“remove the analysis on forest lands from the report, considering that there is no comparable information in this regard, and that the Government Decisions on “On Approving the Long-Term Strategy for Low Greenhouse Gas Emission Development of the Republic of Armenia (until 2050),” and “On Approving the Nationally Determined Contributions of the Republic of Armenia for 2021-2030 under the Paris Agreement” stipulate obligations concerning the increase of the forest-covered areas of the Republic.”*

Due to experts, the Ministry’s refusal to provide forest land data was unjustified, as the Statistical Committee publishes such figures in its yearbooks.

The documents cited by the Ministry, titled *“On Approving the Long-Term Strategy for Low Greenhouse Gas Emission Development of the Republic of Armenia (until 2050),”* present the absolute values of forest-covered areas, while baseline data on forest lands and forest-covered areas are missing, data that should serve as the basis for increasing forest-covered land areas by 2050.

The NDC document (Government Decision No. 610-L, April 22, 2021) states:

*“With the adoption of a new national forest program, forest coverage is expected to increase to 12.9% of Armenia’s territory by 2030.”*

However, this document also lacks baseline data on forest lands and their coverage.

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## CONCLUSIONS

- Even using the proposed methodology and relying solely on Statistical Committee data, the difference between 1993 and 2024 forest-covered areas is 45,000 hectares, which is consistent with the report.
- Data on forest-covered lands vary across official documents, hindering reliable analysis.



- Forest coverage should be added to the forest lands, making their inclusion in the report justified.
- A comprehensive forest inventory is needed, including protected areas, forest lands, and forest funds, along with a centralized database to understand the real state of forests and set appropriate targets.
- Publicly accessible, standardized, and methodologically sound data are needed to determine whether protected areas were included in the 1993 forest indicators, which serve as the basis for all subsequent climate documents.