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**REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND  
THE COUNCIL**

**First Progress Report on the implementation by Armenia of the Action Plan on Visa  
Liberalisation**

## 1. Executive Summary

The EU-Armenia visa liberalisation dialogue was launched in September 2024. A visa liberalisation action plan (VLAP) was subsequently prepared by the Commission with the support of Member States' experts during two scoping visits in Armenia in February and April 2025. The VLAP was then handed over by the Commission to the Armenian authorities in November 2025.

This action plan entails detailed reforms in the areas of i) security of travel documents; ii) border, migration and asylum management; iii) public order and security issues; and iv) fundamental rights issues related to the freedom of movement. The visa liberalisation dialogue lasts as long as it is necessary to meet all benchmarks that have been set.

A first EU evaluation mission was held in Yerevan in December 2025 with Member States's experts, Commission services, the European External Action Service, Frontex and the EU Delegation to Armenia to assess the progress made by Armenia in fulfilling the benchmarks of the VLAP. The focus was on the first set of benchmarks (phase 1), covering the legislative and policy framework in all the policy areas covered by the VLAP.

The first Commission Progress Report builds on the findings of this EU evaluation mission and on the information provided by the Armenian authorities. It focuses on the first set of benchmarks contained in the VLAP as described above. Overall, this first Commission Progress Report concludes that the Armenian authorities have shown a strong political commitment to deliver on the reforms expected under the VLAP. Despite the fact that the VLAP was presented to Armenia only recently, many of the necessary reforms have been initiated or planned by the Armenian authorities.

The Commission will present the findings of this report to the European Parliament and the Council. These findings will also be presented and discussed by the Commission with the Armenian authorities in the next Senior Officials meeting. The Commission will continue to monitor the fulfilment of all benchmarks under the four blocks of the VLAP, with the support of EU Member States's experts. Additional EU evaluation missions will be organised in Armenia in the coming period for this purpose. Regular Progress Reports will be published by the Commission. Progress in the fulfilment of the first set of benchmarks will be closely examined by the Commission and the Council, with a view to reaching agreement to initiate the assessment of the second set of benchmarks (phase 2). This second set of benchmarks will look at the implementation of the reforms.

The Commission will continue to support Armenia in the implementation of the VLAP including through dedicated technical and financial assistance from the Resilience and Growth Plan for Armenia being rolled out.

## 2. Background

Relations between the EU and Armenia are based on the Comprehensive and Enhanced Partnership Agreement (CEPA) which entered into force on 1 March 2021. On 2 December 2025, the EU-Armenia Partnership Council under the CEPA framework adopted a new strategic agenda for the EU-Armenia partnership setting out ambitious priorities and providing a clear mutually agreed framework for cooperation on mobility and people-to-people contacts.

Following endorsement by the Council in July 2024, a visa liberalisation dialogue between the EU and Armenia was launched in Yerevan on 9 September 2024. In October 2025, the Council endorsed the visa liberalisation action plan (VLAP) for Armenia presented by the Commission, setting out the key benchmarks to be met by Armenia before visa-free travel to the EU could be granted to Armenian citizens. The VLAP was handed over to the Armenian authorities on 5 November 2025. Reforms related to the visa liberalisation dialogue are supported by the EU through the Resilience and Growth Plan for Armenia, announced by President von der Leyen in April 2024.

The VLAP is structured around four blocks, namely (1) document security, including biometrics; (2) integrated border management, migration management and asylum; (3) public order and security; and (4) external relations and fundamental rights. It also contains two tiers of benchmarks: in the first phase, a set of benchmarks concerns the legislative and policy framework. This first set of benchmarks will pave the way for meeting more specific benchmarks, which will examine effective and sustainable implementation of relevant measures, in a second phase.

Since 1 January 2014, EU citizens have been exempted from the need to have a visa to travel to Armenia.

As a first gradual step towards the future visa-free travel of Armenian citizens to the EU, the EU-Armenia Visa Facilitation Agreement entered into force on 1 January 2014. On the same date, the EU-Armenia Readmission Agreement also became applicable. Both these agreements, the effective implementation of which is monitored by two dedicated joint committees, are being implemented in a continuously satisfactory manner. The number of Schengen visas issued to Armenian citizens, as well as the percentage of these visas that are multiple-entry visas, has been steadily increasing in recent years. 51,000 Schengen visas were issued to Armenian citizens in 2019 (34.8% of which were multiple-entry visas), while 86,300 Schengen visas were issued to them in 2024 (43.5% of which were multiple-entry visas). This shows the growing interest among Armenians in travelling to the EU. The visa refusal rate has remained stable, at 13.2% in 2019 and 12.4% in 2024, although additional efforts are expected to further reduce visa refusal rate in the future. There continues to be very good cooperation on readmission and returns between the EU and Armenia, as confirmed by the last meeting of the Joint Readmission Committee that took place on 9 October 2025. In 2024, 3,105 return decisions were issued by EU Member States towards Armenian citizens and 925 effective returns took place. In 2025<sup>1</sup>, 3,200 return decisions were issued by EU Member States to Armenian citizens and 1,310 effective returns of Armenians to Armenia took place. The number of Armenian citizens apprehended irregularly staying in the EU has been relatively stable, at 2,155 in 2019 and 2,465 in 2024. However, the significant number of unfounded asylum applications from Armenian nationals in some EU countries, in particular by those seeking medical treatments, represents a challenge that the Armenian authorities should address. In 2024, 5,130 Armenians applied for asylum in the EU (compared with 5,240 in 2022). However, this trend of Armenians applying for asylum has been decreasing significantly in 2025<sup>2</sup>, with 3,535 applications lodged by Armenian citizens in the EU. The Armenian authorities expect that Armenia's new universal healthcare insurance system, which entered into force in 2026 will contribute to a further decrease in asylum applications.

### 3. Methodology

In line with the methodology outlined in the VLAP, the Commission must communicate to the European Parliament and to the Council on the implementation of the VLAP by Armenia. This report is the first such communication.

This report is also published after the adoption by the Commission of its first-ever EU Visa Strategy<sup>3</sup> on 29 January 2026, which seek to strengthen the security and integrity of the Schengen area, while facilitating bona fide travel and enhancing the EU's global attractiveness. This report is in line with the principles of the EU Visa Strategy.

At the meeting of senior officials overseeing the visa liberalisation dialogue which took place in November 2025, the Armenian authorities presented the measures that they had already undertaken to implement the VLAP and explained their planned next steps. On 30 November 2025, Armenia submitted its first progress report on the implementation of the VLAP, which was further updated on 27 February 2026. From 8 to 12 December 2025, an EU evaluation mission involving experts from EU Member States, the European Commission services, the European External Action Service, Frontex and the EU

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<sup>1</sup> Provisional Eurostat data

<sup>2</sup> Provisional Eurostat data

<sup>3</sup> [COM \(2026\) 43 final](#)

Delegation to Armenia took place in Yerevan. The evaluation mission focused on the implementation of the first set of benchmarks across the four blocks of the VLAP. This evaluation mission also built on two scoping missions held in February and April 2025 in Armenia with the participation of experts from EU Member States, the European Commission services, the European External Action Service, Frontex and the EU Delegation to Armenia and whose aim was to inform the drafting of the VLAP. The factual information included in this report is based on these sources.

This first report follows the VLAP structure. Under the four blocks of the VLAP, the report assesses progress in the first set of benchmarks, focusing on the legislative and policy framework and giving recommendations to the Armenian authorities where relevant. The concluding section of the report presents an overall assessment and outlines next steps.

While assessing the implementation of the VLAP, the Commission will also continuously monitor the visa refusal rate in Armenia, the number of Armenian citizens refused entry at the EU's external border or apprehended illegally staying in the EU, the number of return decisions and the number of returns to Armenia, the number of asylum applications in the EU from Armenian citizens, as well as other relevant performance indicators. The Commission will also provide an assessment of possible migratory and security impacts on the EU of future visa liberalisation for Armenia, before passing to the assessment of the second set of benchmarks, focusing on implementation. Identified potential impacts will need to be addressed by the Armenian authorities during the implementation of the VLAP.

Progress will be assessed on a performance-based approach and conditioned on the effective and consistent implementation by Armenia of all benchmarks set by the VLAP. There will be no automaticity in this process and progress in the fulfilment of the first set of benchmarks will be closely examined by the Commission and the Council, with a view to reaching agreement to initiate the assessment of the second set of benchmarks.

When deciding on whether to present a proposal to the European Parliament and the Council for the lifting of the obligation for Armenian citizens travelling to the Schengen area to obtain a short-stay visa, through an amendment of Regulation EU 2018/1806, the Commission will take also into account the overall relations between the EU and Armenia and any possible impacts of visa liberalisation on the basis of trends in the performance indicators mentioned above.

Following the ordinary legislative procedure laid down in the Treaty on the Functioning of the European Union for these matters, on the basis of the Commission's proposal, the European Parliament and the Council will take a decision.

#### 4. Block 1: Document security, including biometrics

- **Consolidation of the legal and institutional framework ensuring the integrity and security of the civil status and civil registration process, including registration of all Armenian citizens in a unified and secure electronic population registry ensuring the highest data protection standards.**

In July 2025, Armenia adopted a new Law on the State Population Registry which lays down the legal basis for the creation of a unified State population registry (SPR) as the single national source of personal identification and demographic data in Armenia. The SPR is intended to ensure the integrity, consistency and reliability of civil status and population data, thereby strengthening identity management, public administration and service delivery in line with international standards. Technical upgrades to improve the efficiency and interoperability of Armenia's SPR with other relevant databases are ongoing.

The Armenian SPR is scheduled to become fully operational on 1 January 2027. It will encompass the entire population of Armenia including non-Armenian nationals and will be based on comprehensive life-event registration, such as births, deaths, marriages and divorces. Furthermore, the SPR will function

as an integrated platform for registration by place of residence, the issuance of public services numbers, and the recording of an individual's legal status, including citizens of Armenia, foreign residents, asylum seekers, and refugees. The SPR – once operational - is expected to meet relevant standards and to serve as a core backbone for secure identity management, greater document security, and evidence-based population and migration governance.

- **Consolidation of the legal and institutional framework for the issuing of machine- readable biometric passports, in full compliance with highest ICAO standards and recommended practices based on secure identity management (civil registry and breeder documents) according to the “one person one document” principle, including as regards diplomatic and service passports.**

In 2023, the government of Armenia launched a public tender for the introduction of a nationwide biometric identification system, with the objective of modernising identity management and aligning document security in the country with international standards. Following the completion of the tender procedure, the Ministry of Internal Affairs of Armenia concluded a public–private partnership agreement with the company *HayPass CJSC* to develop and implement the new nationwide biometric identification system. This system constitutes a cornerstone of Armenia's broader reform of its passport and identity document system.

Under the requirements of the new system, all identity documents issued by Armenia - including identity cards, passports, residence cards, travel documents, and diplomatic and service passports - will incorporate biometric identifiers and be compliant with the standards and recommended practices set out in ICAO Doc 9303. The reform under this new system is designed to ensure a high level of document security, interoperability and international recognition.

A comprehensive review of the legal framework governing identity documents and related procedures is underway. The ‘one person – one document’ principle is expected to be explicitly defined and codified in law, thereby strengthening legal certainty and operational consistency.

To solve the issue of country certificate management, Armenia is joining the ICAO PKI/PKD (Public Key Infrastructure/Public Key Directory) system, which enables the uploading and downloading of the necessary digital certificates and their distribution to other countries. Once the necessary system integrations have been made, the Armenian authorities will be able to verify the authenticity and validity of the chips of all passports issued by countries that are members of the ICAO PKD during border checks. Integrating the same public key infrastructure for chip-based national ID cards and passports into existing systems will increase document security and internal and external security.

- **Adoption of a clear timeframe for the complete roll-out of biometric ICAO-compliant passports (including at Armenia's consulates abroad) and of travel documents (including travel documents for all non-nationals that are distinct from ordinary national travel documents), in accordance with international standards, and for the complete phasing out of old passports.**

The new biometric identification system is scheduled to be launched in the second half of 2026, and so are the first biometric ID cards and passports. The reform will also extend to travel documents issued by Armenian diplomatic missions abroad.

No deadline has been set yet for the completion of the phase-out of non-ICAO-compliant passports.

- **Adoption of a code of ethics, training programmes on anticorruption as well as sanctions in case of non-compliance, secure management of personal documents and data protection for officials of public authorities that deal with passports, identity cards and other breeder documents.**

The staff of Armenia's Civil Status Acts Registration Agency fall under the scope of the Civil Service Law and the integrity-related regulations deriving from the Law. Although this Law also sets out a clear legal basis for integrity and accountability, and the Ministry of Justice introduced regular integrity trainings, less evidence is available regarding the existence of dedicated operational procedures for investigating integrity breaches, the systematic documentation of enforcement outcomes, or the implementation of concrete preventive measures to mitigate integrity and corruption risks inherent in civil status registration and document issuance functions.

To support the sustainable operation of the new digital platforms and to introduce best practices in data governance, Armenia's Migration and Citizenship Service has recruited specialised staff tasked with developing and implementing comprehensive data management policies. In parallel, and in cooperation with international partners, the Migration and Citizenship Service is implementing targeted capacity-building initiatives and training programmes in the field of data management for relevant personnel.

In addition, the Migration and Citizenship Service has also introduced a mandatory series of training courses relevant to document security and identity management. These training materials are being developed with partner units of the National Security Service and aim at ensuring alignment with European best practices and local operational requirements.

*On the basis of the above findings, it is recommended that in relation to block 1 benchmarks related to document security, including biometrics (first phase), the Armenian authorities:*

- *ensure that the future State Population Registry will meet international standards of data integrity and security;*
- *phase out all passports which do not comply with ICAO standards;*
- *provide dedicated, continuous and role-specific training on ID document chip authentication for all relevant staff to correctly interpret the results generated by document reader application;*
- *proceed with the accession to the ICAO Public Key Infrastructure / Public Key Directory (PKI/PKD) system, thereby enabling the secure upload, validation and distribution of Country Signing Certification Authority and Document Signer Certificates necessary for the reliable verification of electronic travel documents;*
- *set-up a centralised certificate management infrastructure to ensure the secure, consistent and timely distribution of digital certificates to all competent authorities involved in document verification and border control, including migration services, border authorities, the customs service and the police;*
- *conduct regular integrity risk assessments covering all stages of breeder document processes, including issuance, verification, storage and IT access;*
- *develop mandatory anticorruption and integrity training for all officials involved in breeder document processes, with regular refresher cycles and structured follow-up;*
- *put in place standard operating procedures for the reporting, detection and investigation of misconduct and integrity breaches involving officials responsible for handling passports, identity cards and other breeder documents, ensuring effective accountability.*

## 5. Block 2: Integrated border management, migration management, asylum

### 5.1 Integrated border management and visa policy

- **Consolidation of the legal and institutional framework for border management according to EU and international standards, including as regards security of data as well as comprehensive control over borders, guaranteeing also efficient inter-agency cooperation between all the agencies involved in border management.**

Over the last two years, additional responsibility for border control in Armenia has been progressively assumed by Armenia's National Security Service (NSS) and its Border Guard Troops (BGT). Following on this ongoing transfer, the Armenian Border Guard Troops are fully responsible for border checks at all existing border crossing points, with Georgia, Iran and at the country's international airports. The state borders with Azerbaijan and Türkiye remain closed. Armenian green borders with Iran and Türkiye have been jointly patrolled alongside Russian border guards since January 2025.

Armenia should consider preparing specific legislation to strengthen inter-agency cooperation and information exchange since these will be essential for the successful implementation of the integrated border management (IBM) concept. At present, border management and related law enforcement activities remain largely separate in the country. Operational intelligence is not systematically exchanged between national authorities working in this area, and each authority tends to intervene independently in offences detected within its own area of responsibility.

To address these shortcomings, Armenia needs to strengthen inter-agency information exchange and analytical capacities, including through the development of (i) joint risk analyses; (ii) risk profiles and (iii) improved monitoring. In this context, a strategic shift from reactive responses towards an intelligence-led policing model would significantly increase the effectiveness of border management and internal security.

- **Adoption of a national strategy for integrated border management (IBM) and action plan in accordance with international standards, containing a clear timeframe, strategic and specific objectives as well as implementation measures, detailed milestones, performance indicators and control mechanisms for the further development of legislation, organisation, infrastructure, equipment, sufficient human and financial resources in the area of border and return management, as well as international cooperation.**

The evolving role and responsibilities of the Armenian Border Guards will require a corresponding reform of its training system. Such a reform is essential to ensure that professional standards in border control and border checks are fully met and sustainably maintained, particularly in light of the future introduction of the Integrated Border Management (IBM) model. This model requires intensive operational cooperation among the various authorities involved in border management, including the Border Guard, the police, migration authorities and the customs service.

The Armenian authorities have drawn up a concept paper on the future IBM, which was endorsed by the Prime Minister. Based on this concept paper, the draft IBM strategy and action plan for 2026-2029 are being developed, drawing on EU assistance.

International cooperation of the Border Guard Troops is still at an early stage. A working arrangement between the National Security Council and Frontex has been in place since 2012. The adoption of a new working arrangement between Frontex and the relevant Armenian authorities is underway.

- **Adoption of a code of ethics and training programmes on anticorruption and fight against organised crime, respect for fundamental rights, referral and asylum procedures relevant for border management and the fight against migrant smuggling and trafficking in human beings specifically covering all the national authorities involved in IBM.**

The Rules of Conduct for the Personnel of the National Security Bodies of Armenia adopted in May 2025 lay down a legal framework which also applies to Border Guard Troops personnel and covers both on-duty conduct and a broad range of off-duty situations. In addition, a separate and new code of conduct for the Border Guard Troops - based on EU guidelines - was adopted by the National Security Service in February 2026.

These texts articulate coherent and consistent principles relating to the primacy of the public interest and legality, impartiality and objectivity, non-discrimination, respect for vulnerable persons,

anticorruption standards, and appropriate professional appearance and conduct. Provisions in these texts addressing the respectful treatment of vulnerable persons, complaint handling procedures, and limitations on searches are detailed and well suited to the specific context of border control. In addition, the Rules of Conduct contain robust anticorruption provisions, including restrictions on gifts and conflict-of-interest requirements, which are aligned with the broader national integrity framework.

The Scientific Educational Centre of Armenia's National Security Service provides regular professional training and retraining for Border Guard Troops officers. Training is delivered through short-term courses as well as longer programmes of up to one month, often conducted on site. According to the Armenian authorities, there are plans for additional modules to be integrated into Border Guard Troops training programmes from mid-2026 onwards, covering issues such as corruption prevention, and the fight against illicit drug trafficking, smuggling, and organised crime.

In parallel, the Rules of Conduct and Ethics for Customs Officers, adopted on 12 August 2025, lay down behavioural standards for customs personnel, including provisions on conflicts of interest, gift limits and registers, confidentiality obligations, and conduct in dealings with the public. These standards are consistent with international integrity frameworks applicable to customs authorities.

The draft concept paper 2026-2029, entitled 'Developing the capabilities of the Border Guard Troops within the framework of the Integrated Border Management system', reflects the intention of the Border Guard Troops to pursue integrity-related reforms, increase transparency and accountability, introduce anticorruption measures, apply integrity and corruption risk-assessment tools, and audit mechanisms.

Finally, Armenia's Migration and Citizenship Service conducts regular trainings and coordination meetings with Border Guard Troops personnel and plans to extend similar training activities to relevant police officers. The aim of these trainings is to ensure the uniform and consistent application of asylum and referral procedures across all authorities involved in border management, thereby strengthening compliance with international protection standards. CEPOL is providing support to national authorities in their efforts to develop capacities of law enforcement services in line with EU standards and practices in the areas such as human rights and fighting migrant smuggling and trafficking in human being. The Border Guard Troops also receive trainings on international and national standards in refugee protection by the UNHCR. The UN Agency engages in regular protection monitoring at border crossing points in coordination with the Migration and Citizenship Service and the Human Rights Defender's Office.

## 5.2 Migration management

- **Consolidation of the legal and institutional framework for migration policy, in line with EU and international standards, including in the field of legal/labour migration, measures supporting the integration of foreigners and the re-integration of Armenian citizens (returning voluntarily or not) and the fight against irregular migration (including continued efforts to conclude readmission agreements with the main countries of origin and/or transit and inland detection of irregular migrants).**

In recent years, Armenia has undertaken substantial legal, institutional, and operational reforms to modernise its migration governance framework, in line with the Armenian government programme for 2021-2026, supported also by several EU-funded projects. These reforms aim to strengthen institutional capacity, ensure more effective management of migration flows, and strengthen the processes for integration, asylum, and readmission. The central element has been the establishment of the Migration and Citizenship Service under the Ministry of Internal Affairs, which became operational in February 2024 and is supported by several EU-funded projects implemented by the International Organization for Migration (IOM) and the International Centre for Migration Policy Development (ICMPD).

Part of Armenia's ongoing reform efforts on migration have focused on the digitalisation of the population and migration management systems such as the provisions included in the Law on the State

Population Registry adopted on 3 July 2025 and scheduled to enter into force on 1 January 2027. In addition to data on Armenian citizens, the new registry will include data on all foreigners legally residing in Armenia. The law provides the legal basis for the creation of a unified population registry consolidating all personal, demographic and civil acts data into a single information system.

In parallel, Armenia has advanced reforms to digitalise administrative services related to citizenship and legal residence. On 22 January 2025, amendments to the Law on Citizenship were adopted, introducing electronic procedures for applications to acquire or terminate Armenian citizenship. The Electronic Citizenship Case Management System was officially launched on 1 January 2026. It enables digital case management, reduces administrative burdens, and improves efficiency. The digitalisation of work permits and residence permit procedures for foreign nationals is also included in the amendments to the Law on Foreigners adopted in January 2026, which will enter into force in November 2026.

A government decree granted temporary protection status to Karabakh Armenians (in total 115,000) in October 2023. In December 2025, the Government extended this temporary protection until 31 December 2026. The Migration and Citizenship Service is conducting public awareness campaigns on this issue and has facilitated expedited citizenship procedures for displaced persons. Between 2023 and mid-March 2026, a total of 34,567 individuals holding temporary protection status acquired Armenian citizenship. All applicants under this programme received Armenian citizenship to date.

Armenia is implementing measures to support the reintegration of returning citizens. Reintegration support is delivered through a combination of state-led programmes, donor-funded initiatives and civil society involvement.

The Repatriation and Integration Centre, established in 2023 by the Office of the Armenian High Commissioner for Diaspora Affairs, continued to operate as a central entry point for repatriation and reintegration support. The Centre provides individualised case management and assistance covering legal status, access to public services, employment, education, business establishment and broader socio-economic integration, complemented by language training, integration seminars and multilingual guidance materials.

Armenia continues to strengthen its cooperation on readmission with the European Union, EU Member States, and non-EU countries. On 21 July 2025, Armenia signed a bilateral Readmission Agreement with Georgia which was ratified by the Armenian Parliament on 19 January 2026. Additional agreements are being drafted with Ukraine, Kazakhstan, Kyrgyzstan, Iceland, Montenegro, and Albania, while the agreement with Moldova is ready for signature. Armenia has also proposed readmission agreements to Iraq and India.

In 2025, EU Member States submitted 775 readmission requests to Armenia, which issued 479 emergency travel documents in response. As a result, 119 Armenians were returned via Frontex-supported charter flights in 2025. Since July 2022, Armenia has been covered under the Frontex-led EU Reintegration Programme (EURP).

Inland detection of irregular migrants in Armenia is carried out through a multi-agency framework. Identified cases are referred to the Migration and Citizenship Service for assessment of legal status, initiation of international protection procedures where applicable, or the adoption of return decisions according to national legislation and readmission agreements. While a basic legal and institutional framework is in place, inland detection remains largely reactive and case-driven, with limited analytical support, risk-based targeting or structured inter-agency operational coordination. The level of enforcement of return and expulsion decisions remains low.

On legal migration, the Armenian authorities have made efforts to streamline the work permit systems, to improve labour inspection frameworks and to align their policies with international standards.

- **Adoption of a national migration strategy which ensures an efficient application of the legal aspects of migration policy, including fundamental rights standards (including for children), clear time frames, purposes, activities, results, performance indicators, as well as development and approval of the relevant action plan providing for the human and financial resources.**

The Armenian authorities are currently drafting a new strategy on migration and citizenship for 2026–2031, with EU support, which is planned to be submitted for public consultation in mid-2026.

With this future strategy, the Armenian authorities intend to put in place an integrated, evidence-based, and forward-looking framework for the governance of all dimensions of human mobility, serving for Armenia’s demographic resilience, human capital development, and international partnerships. The strategy is due to announce further changes to the legal framework for migration, asylum, and citizenship.

### 5.3 Asylum policy

- **Consolidation and approximation to the EU and international standards of the legal and institutional framework of the asylum policy in full compliance with the non-refoulement principle and comprising subsidiary protection, through adoption of legislation ensuring effective access to fair procedures for status determination, rights protection (freedom of movement, healthcare, education, non-discrimination, other labour and social rights), durable solutions, including the integration of seekers and beneficiaries of international protection, as well as special attention to persons in a vulnerable situation, including stateless persons.**

Armenia ratified the 1951 Convention Relating to the Status of Refugees and its 1967 Protocol in 1993.

The Armenian authorities aim to strengthen the legal framework for international protection, with amendments to the Law on Refugees and Asylum scheduled to be adopted in Parliament in the second half of 2026. The objective is to further align the country’s national asylum framework with EU and international standards by laying down clearly defined forms of international protection and ensuring effective access to fair and efficient asylum procedures. The draft legislation also seeks to guarantee access to legal aid, ensure fair and transparent procedures supported by reasoned decisions, strengthen safeguards for the processing of personal data, and improve procedural guarantees for asylum seekers at the border. Specific safeguards are planned for vulnerable persons, including children, as well as for foreign nationals subject to extradition or criminal prosecution.

Armenia is also preparing a new draft law on Stateless Persons. Organisational developments in this area in recent years include strengthened border referral mechanisms, preparatory work towards the setting-up of an Electronic Asylum Case Management System, and greater cooperation among institutions in the country working in the areas of migration, border management, the judiciary and social protection institutions.

The final phase of building a new temporary accommodation centre for asylum seekers near Yerevan is currently underway. The first asylum seekers are expected to be transferred to the new premises in the course of 2026. The new centre can accommodate up to 100 people.

On the basis of the above findings, it is recommended that in relation to block 2 benchmarks related to **Integrated border management, migration management and asylum** (first phase), the Armenian authorities:

#### Integrated Border Management

- *pursue the transition to ensure that border control in Armenia is under the full responsibility of the Armenian authorities;*

- *conclude and implement the new working arrangement with Frontex;*
- *draw up a future IBM strategy and an accompanying action plan in line with EU standards and with clearly defined responsibilities, realistic timelines and robust monitoring mechanisms;*
- *revise the draft action plan for 2026-2029 entitled ‘Developing the capabilities of the Border Guard Troops within the framework of the integrated border management system’ to include appropriate provisions on resources, accountability arrangements, measurable targets and performance indicators;*
- *reform and modernise the training system for border authorities, including the customs service and the police force in order to ensure consistently high professional standards in border control and border checks (as well in corruption prevention, combating smuggling, and the fight against trafficking in human beings), in line with the evolving responsibilities of national border forces and the requirements of the EU model of IBM;*
- *adopt a specific legal framework for an effective inter-agency cooperation and systematic information exchange between the country’s border, customs and police authorities, to ensure the sustainable implementation of the IBM model;*
- *conduct regular integrity risk assessments focusing specifically on border-related vulnerabilities, (such as document fraud, the facilitation of smuggling and corruption in inspection procedures) and further develop targeted preventive and mitigation measures to address the risks identified;*
- *introduce mandatory and recurrent anticorruption training for border guards, complemented by function-specific modules designed to increase the resilience of personnel operating in high-risk roles, including in document control, border checks, customs inspections, asylum screening and intelligence functions;*
- *codify the investigative protocols of the NSS, either within the relevant Code of Conduct or through accompanying secondary legislation, laying down clear procedures, timelines, evidentiary standards and proportionate sanctions in order to ensure predictable, fair and timely responses to misconduct and integrity breaches.*

#### Migration management

- *continue efforts to develop an appropriate legal framework to address challenges related to both illegal and legal migration;*
- *adopt a new migration strategy, providing a comprehensive and coherent policy framework that is aligned with current and projected migration flows as well as with international standards, supported by sufficient and sustainable state budget allocations;*
- *pursue the digitalisation of population and migration management processes, while ensuring full compliance with national legislation on personal data protection, which is currently undergoing significant development, and interoperability with the SPR;*
- *continue to conclude readmission agreements with the main countries of origin of current migration flows to strengthen effective, predictable and sustainable return and readmission arrangements.*

#### Asylum

- *make fully functional the new temporary centre for asylum seekers and transfer relevant applicants to it;*
- *adopt amendments to the Law on Refugees and Asylum and a new Law on Stateless Persons to further align the national asylum framework with EU and international standards.*

#### 6. Block 3: Public order and security

##### 6.1 Preventing and fighting organised crime, terrorism and corruption

- **Consolidation, according to the EU and international standards, of the legal and institutional framework for preventing and fighting organised crime, together with a national strategy and**

**action plan containing, within a clear timeframe, specific objectives, activities, results, performance indicators and sufficient human and financial resources.**

Armenia is a party to the United Nations Convention against Transnational Organized Crime (Palermo Convention), the United Nations Convention against Corruption (Merida Convention). The legal definition and criminalisation of various forms of organised crime are set out in Chapter 34 of the Criminal Code of Armenia, which establishes liability for crimes of a general nature against public security.

The Criminal Code which entered into force in July 2022 introduced, for the first time in Armenia, a system of criminal liability for legal entities. This framework lays down the grounds and conditions for establishing criminal liability, as well as the circumstances under which legal entities may be exempted from this liability. It further provides for a range of criminal-law measures applicable to legal persons, (including financial penalties, temporary suspension of specific activities, prohibition from operating within the territory of Armenia, and compulsory liquidation). However, no convictions related to legal entities have yet been recorded.

The new Criminal Procedure Code also introduced several significant structural and procedural changes that have a direct impact on the investigation and prosecution of serious and organised crime in Armenia. In particular, the formal preliminary phase for initiating a criminal case was abolished, with criminal investigations now commencing upon the registration of the first procedural document containing indications of a possible criminal offence.

In addition, operative-investigative activities were incorporated into the Criminal Procedure Code. This means that investigators from the Investigative Committee or the Anticorruption Committee are involved from the outset in all criminal proceedings. Within this framework, operative-investigative powers were vested exclusively in the Anticorruption Committee, while the Investigative Committee, responsible for investigating all crimes except corruption crimes, operates without operative powers, relying mainly on the powers of the police under the Ministry of Internal Affairs.

Drawing on an EU project implemented by the United Nations Development Fund (UNDP), the Armenian authorities have created in February 2026 a separate Centre for Crime Statistics and Research within the Ministry of Internal Affairs. This centre is intended to provide analytical support for decision-making within the Ministry and to give the authorities a more comprehensive overview of trends and developments in criminality.

Armenia is also drawing up a crime prevention strategy for 2026-2033, the adoption of which is planned for the second half of 2026. The draft version of this strategy shows Armenia's intention to strengthen its capacity to prevent crime through evidence-based policymaking, institutional coordination and targeted preventive measures. Armenia plans to strengthen its operational capacities in crime prevention through targeted skills development for the police, the introduction of innovative crime prevention technologies, and greater capabilities in areas such as cybercrime prevention, domestic and family violence, youth crime prevention and victim identification. The draft strategy also stresses the importance of strengthening local and international cooperation in the field of crime prevention. Armenia has benefitted of the acquired strategic intelligence analysis methodologies under the guidance of Europol within the framework of the TOPCOP project for the development of the draft strategy.

➤ **Consolidate the legal and institutional framework in the field of fight against trafficking in human beings and bring it into compliance with the EU and international standards including the development and approval of the relevant action plan providing for clear timeframes, objectives, activities, results, performance indicators, human and financial resources.**

Armenia has ratified the Protocol to Prevent, Suppress and Punish Trafficking in Persons as well as the Protocol against the Smuggling of Migrants by Land, Sea and Air, which both supplement the Palermo Convention. Armenia takes part in the Global Alliance to Counter Migrant Smuggling initiated by the

Commission and endorsed the Joint Declaration adopted at the International Conference organised by the Commission on 10 December 2025 in Brussels.

The new Criminal Code and Criminal Procedure Code laid down provisions on trafficking in human beings. In particular, Article 188 of the Criminal Code provides an updated definition of human trafficking and exploitation, while Article 189 lays down provisions on aggravated offences relating to trafficking committed against minors or persons in vulnerable situations.

In the last 10 years, Armenia has undertaken a range of legislative and institutional measures to strengthen its framework for preventing and fighting against trafficking in human beings and related forms of exploitation, in line with international standards. Amendments to the Law on the Identification and Support of Persons Subjected to Trafficking in Human Beings and Exploitation were adopted in December 2014 and May 2022 and laid down a comprehensive basis for victim identification and assistance mechanisms. In October 2022, a Government Decision approved criteria for recognising a person as a victim of trafficking or exploitation. Minimum quality standards for the provision of accommodation, subsistence support, psychological assistance, counselling, legal aid, and care services delivered by relevant institutions were then further laid down.

At strategic level, Armenia approved in January 2023, the 2023-2025 national action plan on combating trafficking and exploitation of human beings, together with an associated action plan. According to the Armenian authorities, preparatory work on the subsequent three-year national action plan is currently underway, with adoption envisaged in April 2026.

- **Consolidation of the legal and institutional framework for prevention and fight against corruption and adaptation thereof to EU and international standards, as well as adoption of a national anticorruption strategy, development and approval of action plan targeted at the enforcement of the said strategy and providing for clear time-frames, objectives, activities, results, performance indicators, human and financial resources, coordination of efforts of anticorruption bodies, including the Anticorruption Council and the Corruption Prevention Commission, aiming notably at ensuring the independence, efficiency, empowerment and accountability of the authorities responsible for the fight against corruption and strengthening the mechanisms for information exchange between them; establishment of a sound legislative and regulated institutional framework, including adoption of secondary legislation necessary for an efficient functioning of internal control mechanisms targeted at the prevention and repression of corruption (including corruption at high-levels, corruption in international transactions and protection of whistleblowers reporting on cases of corruption), corruption risks and at setting integrity standards within public institutions/authorities; consolidation of the legislative framework for the, amongst others, follow-up of GRECO (Council of Europe Group of States against Corruption) and OECD (Anticorruption Network – Istanbul Anticorruption action plan) recommendations.**

Since the reforms initiated in 2018, Armenia has significantly strengthened and harmonised its legal and institutional anticorruption framework, in line with international standards. The country is a party to the main international legal instruments and monitoring mechanisms for preventing and combating corruption, and it actively participates in the OECD Anticorruption Network for Eastern Europe and Central Asia and the OECD Public Integrity Indicators Initiative.

Armenia has consolidated its legislative and institutional reforms in response to recommendations arising from successive GRECO evaluation rounds. The new Criminal Code, in force since July 2022, broadened the scope of corruption-related offences, introduced criminal liability for legal entities, and further refined the constituent elements of corruption offences in line with international standards.

In parallel, dedicated bodies were entrusted with preventive and investigative mandates, notably the Corruption Prevention Commission, the Anticorruption Committee and two specialised units within the Prosecutor General's Office.

Armenia's fifth national anticorruption strategy (2023-2026) reflects concerns and recommendations raised by international partners and civil society organisations, as well as inputs from national anticorruption institutions. The strategy focuses on further strengthening the anticorruption framework and effective enforcement of legislation. A new anticorruption strategy is planned to be adopted in mid-2026 as one of the pillars of the overarching strategy for the justice sector.

The Corruption Prevention Commission is responsible for preventing corruption and safeguarding integrity across the public sector. Between 2021 and 2025, Armenia's asset declaration system was substantially expanded. As a result of this expansion, specified categories of public officials are now required to submit detailed declarations covering their assets, income, expenditures and interests. The Corruption Prevention Commission operates an electronic declaration system and is legally empowered to access government databases and financial records, including data ordinarily protected by bank secrecy, securities transaction confidentiality, insurance secrecy and credit information.

The Corruption Prevention Commission conducts integrity checks and issues advisory opinions on candidates for appointment or promotion to judicial, prosecutorial, and other senior public positions such as the Anticorruption Committee and the Investigative Committee. Amendments to the Judicial Code adopted on 11 April 2024 introduced continuous integrity checks for judges, prosecutors and investigators, and several serving prosecutors and investigators underwent such assessments in 2024 and 2025. The Commission's opinions are advisory in nature and have at times been disregarded by appointing authorities. The package of new legislation aimed at increasing transparency and formalising the integrity opinion workflow was adopted by the National Assembly on 4 March 2026.

In January 2026, the National Assembly adopted amendments to the Law on the Corruption Prevention Commission, introducing a corruption risk assessment system within public authorities. The Law will enter into force six months after its adoption, following the approval of the Corruption Risk Assessment Methodology by the Corruption Prevention Commission.

The Corruption Prevention Commission also provides methodological support to public institutions in the drafting of sector-specific codes of conduct and is empowered to issue opinions on any deficiencies it identifies. The Corruption Prevention Commission currently lacks sufficient staff and sufficient legislative and financial resources to enable it to effectively fulfil its extensive mandate.

Preparatory work has commenced on a new Law on the Prevention of Corruption, which is intended to consolidate the existing regulatory framework governing conflicts of interest, gift acceptance, codes of conduct, incompatibilities and related integrity standards.

On integrity arrangements within the Ministry of Internal Affairs, a newly established Anticorruption and Internal Security Department has been entrusted with a broad mandate, including the conduct of disciplinary proceedings, the prevention and detection of corruption, the carrying out of inspections and operational activities, and the performance of integrity checks of personnel within the Ministry. The integrity framework was further strengthened in October 2025 through the adoption of the Law on Police Integrity and Discipline and subsequent secondary legislation, which together lay down standards, responsibilities and procedures for disciplinary investigations and integrity assessments of police officers and fire-rescue personnel. In accordance with the Law on Police Integrity and Discipline, candidates for police officer positions must undergo an integrity check before their first appointment. These integrity checks started being carried out in January 2026.

The Armenian Anticorruption Committee is the authority responsible for investigating corruption offences and the conduct of pre-trial criminal proceedings in corruption cases. Established by a dedicated law, the Committee enjoys a high degree of institutional independence and is empowered to carry out operational investigative activities. The Chairperson of the Anticorruption Committee is appointed by the government for a six-year term, renewable once.

The Anticorruption Committee is legally obliged to inform the public about its activities, while respecting the confidentiality of pre-trial investigations and the protection of state secrets. Although the number of corruption convictions is increasing, sentencing practice reveals the widespread use of suspended sentences, which risks undermining the deterrent effect of criminal sanctions and weakening public confidence in the justice system. In 2024, for example, custodial sentences were imposed on only 37 individuals, while 185 people received suspended sentences.

At present, the Anticorruption Committee lacks a comprehensive strategic approach to addressing corruption in high-risk sectors, that is aligned with European standards and good practices. The absence of a strategic and risk-based framework limits the Committee's capacity to conduct proactive, intelligence-led investigations, particularly in cases involving senior officials.

Although Armenia routinely seizes bribes in cases of active bribery, the systematic tracing and recovery of the proceeds of corruption remain limited. The Department for the Confiscation of Property of Illicit Origin within the Prosecutor General's Office focuses on asset recovery through civil forfeiture proceedings, but its mandate does not extend to criminal asset recovery. There is currently no centralised and specialised unit dedicated to the identification and tracing of assets within criminal proceedings, and investigators and prosecutors tend to prioritise evidentiary aspects of cases over asset recovery.

➤ **Consolidation of the legal and institutional framework for anti-money laundering and countering the financing of terrorism (AML/CFT), bringing it in line with EU and international standards set by the Financial Action Task Force (FATF).**

Armenia is a party to the key international legal instruments in the field of anti-money laundering and countering the financing of terrorism, including the United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (Vienna Convention), the United Nations Convention against Transnational Organized Crime (Palermo Convention), the United Nations Convention against Corruption (Merida Convention), and the International Convention for the Suppression of the Financing of Terrorism. In addition, Armenia has ratified the 2005 Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (Warsaw Convention). Armenia also participates in the Camden Asset Recovery Inter-Agency Network.

Armenia is a member of the Council of Europe's Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL). The last mutual evaluation report on Armenia by MONEYVAL was adopted in December 2015, followed by a follow-up report in July 2018. This report assessed at the time that Armenia had met or partially met most of the technical compliance and effectiveness requirements. The forthcoming MONEYVAL evaluation, scheduled for publication in 2026 following the on-site visit conducted in 2025, will constitute an important reference for the next assessment of this benchmark.

The Armenian Law on Combating Money Laundering and the Financing of Terrorism has been in force since 2008 and has undergone several amendments, most recently in June 2022, to reflect evolving international standards. Armenia has revised its Law on Crypto Assets to forbid cash transaction in the cryptocurrency sector as of 1 January 2027.

➤ **Regular update of the corresponding AML/CFT national strategy.**

The Armenian national strategy on combating money laundering, terrorist financing, and proliferation financing was initially adopted in 2014 and is subject to regular review and update every three years.

The current national strategy for the period 2025–2028 is grounded in a risk-based approach and is designed to address the key risks, vulnerabilities, and systemic deficiencies which had been identified in the national assessment of money laundering and terrorist financing for 2021–2023.

➤ **Consolidation of an Independent Financial Intelligence Unit, with adequate powers and resources.**

The Financial Monitoring Centre (FMC) was established in 2005 as a distinct unit within the Central Bank of Armenia. It operates as an administrative-type financial intelligence unit and functions as an intermediary between reporting entities and law enforcement authorities. The FMC's mandate is to combat money laundering and terrorist financing through the receipt, analysis, and dissemination of information relevant to AML/CFT activities. It currently employs 37 staff members, with plans to hire three additional staff in 2026.

At the domestic level, the FMC is among the few institutions within the Armenian law enforcement community which has formalised cooperation through memorandums of understanding with partner authorities within Armenia.

Although the number of suspicious transaction reports received by the FMC (366 in 2024) and the number of notices passed on by the FMC to law enforcement authorities (95 in 2024) remain low, international evaluations have consistently acknowledged the quality of the FMC's internal processes and analytical work.

➤ **Consolidation of the legal and institutional framework for asset recovery and bringing it in line with EU and international standards, including the establishment of an asset recovery office.**

The 2022 Criminal Code lays down a legal framework for the confiscation of illicit assets as a criminal-law measure. Article 121 of the Criminal Code regulates the confiscation of the proceeds and instrumentalities of crime. The introduction of criminal liability for legal persons under the 2022 Criminal Code has significantly broadened the scope of confiscation, which may now be applied to both natural and legal persons.

In parallel to conviction-based confiscation, Armenia has introduced a legal framework for non-conviction-based confiscation. On 16 April 2020, the National Assembly adopted the Law on Civil Forfeiture of Illegal Assets, laying down the legal basis for confiscation without a criminal conviction. Armenia has therefore a legislative framework aligned to a large extent with the obligations arising from the international agreements to which it is a party, but this framework is not yet aligned with EU standards.

The Armenian authorities have committed to reform the national system of asset recovery and to align it with EU standards.

➤ **Adoption of legislative framework for the protection of whistleblowers reporting, among others, on money laundering and terrorism financing.**

Armenia's legal framework has provided formal guarantees for the protection of whistleblowers since 2018, with significant amendments to the legislation adopted in 2022. The current legislation allows for the reporting of corruption offences, conflicts of interest, breaches of codes of conduct, incompatibility requirements, and declaration-related violations or other damage to the public interest.

Although Armenia's official Human Rights Defender has been formally empowered and equipped to receive complaints and applications from whistleblowers and related persons concerning alleged violations of their rights, no practical cases of whistleblower protection have been reported to date.

The Ministry of Justice has prepared legislative amendments to strengthen the whistleblowing framework. In particular, the draft amendments aim to explicitly extend coverage to potential violations related to money laundering and the financing of terrorism and will also include private entities of 250 or more employees in the scope of the law.

- **Adoption of a national strategy concerning drug policies, taking a balanced and comprehensive approach, including measures aimed to fight against drug trafficking as well as addressing demand and the harms related to drugs, in compliance with EU and international standards, as well as development and approval of action plan providing for clear timeframes, objectives, activities, results, performance indicators, human and financial resources designed to ensure the implementation of the national strategy.**

Armenia is a party to the United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (Vienna Convention) and the United Nations Convention against Transnational Organized Crime (Palermo Convention).

Drug-related crimes are one of the significant security and public health threats in Armenia. In recent years online drug trafficking has expanded in Armenia, rising from only eight registered cases in 2021 to 321 cases in 2024. Overall drug-related criminal investigations have also increased, reflecting both intensified law enforcement efforts and Armenia's growing use as a transit route for narcotic drugs. As of December 2025, the Police investigated 3,311 drug-related criminal cases, compared with 3,639 in 2024, 5,070 in 2023, 2,266 in 2022, and 1,544 in 2021.

In response to the growing threat the Armenian authorities adopted in June 2025 a strategic plan (2025-2027) on combating the non-medical use and illicit trafficking of narcotic drugs and psychotropic substances. The strategy and its related action plan identify 68 activities across 12 strategic areas, encompassing prevention, law enforcement, online trafficking, capacity building, international cooperation, and the provision of modern, evidence-based treatment, and rehabilitation.

- **Signature, ratification and transposition into national legislation of all relevant UN and Council of Europe conventions and respective protocols in the areas listed above and on the fight against terrorism, including the 2005 Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism as well as the 1996 Hague Convention on Protection of Children (Convention on Jurisdiction, Applicable Law, Recognition, Enforcement and Cooperation in respect of Parental Responsibility and Measures for the Protection of Children), the 2007 Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse, and the Additional Protocol to the Criminal Law Convention on Corruption.**

Armenia became a member of the Council of Europe in January 2001 and has since signed 83 Council of Europe Conventions, of which it has ratified 70. Armenia signed and ratified the 2005 Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism, which entered into force on 1 October 2008. It also signed and ratified the 1996 Hague Convention on Jurisdiction, Applicable Law, Recognition, Enforcement and Cooperation in Respect of Parental Responsibility and Measures for the Protection of Children, which entered into force on 1 May 2008. In addition, it signed and ratified the 2007 Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse, with effect from 1 January 2021. Armenia also signed and ratified the Additional Protocol to the Criminal Law Convention on Corruption, which entered into force on 1 May 2006.

Armenia is a party to all major UN crime-fighting and organised crime instruments that are open for ratification under the UN treaty framework. In the field of counterterrorism, Armenia has maintained a close cooperation with the United Nations Security Council Committee pursuant to Resolutions 1267 (1999), 1989 (2011), and 2253 (2015). Updated consolidated lists relating to ISIL (Da'esh), Al-Qaida, and associated individuals, groups, and entities are regularly received, examined, and verified by the competent Armenian authorities to ensure the compliance of its national procedures with international counterterrorism obligations. The national framework has been aligned with international standards, and in particular with the entry into force of the new Criminal Code in 2022, which provided a modernised approach to terrorism-related offences.

## 6.2 Judicial cooperation in criminal matters

### ➤ **Consolidation of the legal and institutional frameworks ensuring efficient mutual assistance in criminal matters.**

Cooperation between Armenia and EU Member States is primarily based on key Council of Europe instruments, in particular the European Convention on Extradition of 13 December 1957 and its additional protocols, the European Convention on the Transfer of Proceedings in Criminal Matters of 15 May 1972, and the European Convention on Mutual Assistance in Criminal Matters of 20 April 1959, together with its additional protocols.

Judicial cooperation with other countries in criminal matters is regulated at national level by Chapters 54 and 54<sup>1</sup> of the Criminal Procedure Code, which lay down the legal framework for extradition, mutual legal assistance, and other forms of international cooperation in criminal proceedings. International mutual legal assistance in criminal matters is also governed by the Law on Legal Assistance in Criminal Cases, adopted on 15 November 2024.

Taken together, these form a comprehensive legal framework allowing Armenia to pursue mutual legal assistance in criminal matters with partner countries.

### ➤ **Signature, ratification and transposition into the national legislation of relevant international conventions and the protocols thereof, in particular, the Second Additional Protocol to the European Convention on Mutual Assistance in Criminal Matters and the 2005 Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism.**

The Second Additional Protocol to the European Convention on Mutual Assistance in Criminal Matters was signed and ratified by Armenia. It entered into force on 1 April 2011. National legislation has been aligned with this Protocol. Furthermore, internal procedures have been initiated with a view to the ratification and implementation of the Third Additional Protocol in 2026.

Armenia signed and ratified the 2005 Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism, which entered into force on 1 October 2008.

## 6.3 Law enforcement cooperation

### ➤ **Introduction of effective coordination mechanisms between competent state agencies and establishment of a common data bank (of IT system) envisaging the right to direct access for relevant officials.**

The Armenian law enforcement authorities have access to a broad range of digital data sources covering law enforcement, population registration, migration, border management and international cooperation. However, access to and use of these data remain fragmented across multiple systems, with limited interoperability. Data use is predominantly reactive and case-driven, with limited application of proactive or intelligence-led approaches. Insufficient operational coordination and deficiencies in practical operational planning remain a challenge for the Armenian investigative authorities.

Further progress in this area will be enabled by the full implementation of the unified State Population Registry (planned for 1 January 2027) and greater interoperability between information systems, building on the new established Crime Statistics and Research Centre within the Ministry of Internal Affairs.

The 2022-2026 strategy for judicial and legal reforms also sets out plans to introduce an electronic

criminal case management system for pre-trial criminal proceedings ('e-criminal case'). This reform will be a key component of the government's broader efforts to modernise the criminal justice system and to improve its efficiency, transparency, and accountability. The e-case management system is planned to be fully operational by March 2027.

- **Pursuing effective structured cooperation through the implementation of the Working Arrangement with both Europol (including through the SIENA connection and the deployment of a liaison officer) and CEPOL, as well as continuing active participation in regional capacity-building projects in the Eastern Partnership area.**

In September 2021, a Working Arrangement was signed between the Armenian Police and Europol, which laid the groundwork for the subsequent implementing instruments (the Liaison Agreement and the Memorandum of Understanding on the Secure Communication Line - SIENA). These instruments formally entered into force in May 2024. Armenia has appointed a liaison officer to Europol and effectively deployed him in April 2026. This deployment will strengthen relations between Armenian law enforcement authorities, Europol, and other liaison officers of Europol's partners.

Armenian cooperation with CEPOL is based on a Working Arrangement signed in April 2017. The Working Arrangement should be renewed, in order to take into account the latest EU data protection legislation. Since the launch by CEPOL of the TOPCOP programme for Eastern Partners in 2020, Armenian law enforcement officials have participated in many training courses covering illicit drug trafficking, trafficking in human beings, illegal migration, organised property crime, online fraud, and cybercrime, as well as in CEPOL exchange and mentoring programmes.

The appointment of a national EMPACT coordinator within the Armenian Police significantly expands opportunities for Armenia's participation in EU-led operational cooperation frameworks.

#### 6.4 Data protection

- **Consolidation of the legal and institutional frameworks currently effective in the field of personal data protection, and bringing those in line with the EU and international standards, including through the adoption of by-laws, instructions and regulations to regulate appropriate processes, operations and procedures.**

The current Armenian Law on Personal Data Protection was adopted in May 2015. Following its adoption, government decrees were issued to regulate the technical and organisational aspects of personal data processing. The 2021-2026 government's programme recognises the strategic importance of strengthening personal data protection and outlines measures to improve the regulatory and institutional framework in this area. At present, the primary national data protection regulator in Armenia is the Personal Data Protection Agency operating under the Ministry of Justice.

The government endorsed in October 2025 a concept paper setting out plans to set up a new and independent personal Data Protection Authority. The planned institutional framework for this authority is expected to operate on the basis of strengthened legislation and modernised regulatory practices, providing greater protection of citizens' personal data and more effective enforcement mechanisms, in line with European data protection principles. The new law is planned to be adopted in Parliament in Q4 2026, while the new Personal Data Protection Authority is planned to be set up mid-2027.

- **Transposition into the national legislation of relevant international conventions, protocols and recommendations, including the 2001 Additional Protocol to the European Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data regarding to supervisory authorities and transborder data flows (ETS 181), the 2018 Protocol amending the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (CETS No. 223), and the Committee of Ministers of the Council of Europe Recommendation No. R (87) 15 regulating the use of personal data in the Police Sector.**

Armenia signed and ratified the Additional Protocol (ETS No. 181) which entered into force in September 2012. It also signed the ‘Convention 108+’ in October 2019 and ratified it in January 2022.

The Armenian authorities intend to adopt legislative amendments to ensure that the national data protection framework is harmonised with the most recent European standards and international best practices, including those stemming from the Council of Europe ‘Convention 108+’, its protocols and relevant Council of Europe instruments applicable to the law enforcement sector.

➤ **Establishment of an independent personal data protection supervisory agency vested with adequate powers and obligations.**

The current Armenian national data protection authority, the Personal Data Protection Agency, operates as a separate subdivision within the structure of the Ministry of Justice. It cannot therefore be regarded as compliant with the requirements and standards relating to the independence of a data protection supervisory authority.

The concept paper mentioned above and endorsed by the government in October 2025, envisages the establishment of an independent personal data protection authority. The envisaged model is of a collegial body composed of three Commissioners, empowered to conduct proceedings and investigations, adopt corrective measures and provide expert advice to public institutions and private entities.

The requirement for an independent authority arises from Convention 108 and Convention 108+, but also from Armenia’s commitments, in particular in the context of the Agreement signed in April 2024 between the EU and Armenia on the cooperation between Eurojust and the Armenian authorities competent for judicial cooperation. These commitments require Armenia to set up an independent data protection authority with guaranteed independence, sufficient resources and effective powers.

The mandate of the new Data Protection Authority will have to be clearly distinguished from the Information System Agency currently in charge of the management of the state information systems and which is planned to be transformed into a new body, in charge of cybersecurity and data management.

In light of the above, a comprehensive assessment of Armenia’s personal data protection framework should be carried out at a later stage, following the adoption and implementation of the planned legislative amendments and the establishment of the new Data Protection Authority.

On the basis of the above findings, it is recommended that in relation to block 3 benchmarks related to **Public order and security** (first phase), the Armenian authorities:

Preventing and fighting organised crime

- *adopt the crime prevention strategy together with its related action plan. The strategy should address both prevention and repression aspects, including operational cooperation among law enforcement agencies and cover organised crime in particular;*
- *continue developing analytical capabilities on serious and organised crime through the introduction of an intelligence-led policing model, with a view to developing a reliable and comprehensive situational awareness framework, such as a national serious and organised crime threat assessment (SOCTA);*
- *implement the Working Arrangement concluded with Europol, including by sharing operational information via SIENA;*
- *set up inter-institutional operational taskforces to regularly set, coordinate and implement joint operational objectives across all areas affected by organised crime;*
- *set up and operationalise an asset recovery office through clear standard operating procedures, with a well-defined mandate, sufficient powers and timely access to relevant information;*

- *strengthen capacities to combat cybercrime, including through targeted investment in technical tools such as IT infrastructure and digital forensics;*
- *continue to address risks related to crypto-asset transactions and the use of crypto-assets in committing financial crimes;*
- *dedicate additional resources to support the implementation of the activities set out in the action plan of the strategic plan for 2025-2027 on combating the non-medical use and illicit trafficking of narcotic drugs and psychotropic substances.*

#### Fight against corruption

- *adopt a new national anticorruption strategy that prioritises the sectors most vulnerable to corruption by integrating a robust risk-assessment framework;*
- *implement the amendments to the Law on the Corruption Prevention Commission and implement the national methodology for identifying corruption risks, thus enabling the introduction of targeted, risk-based anticorruption measures across public institutions and relevant private-sector entities;*
- *provide the Corruption Prevention Commission with sufficient financial, human and technical resources and strengthen the implementation of its integrity opinions;*
- *modernise the asset declaration system through the introduction of automated functions enabling systematic cross-checks against relevant government and financial databases.*
- *consolidate sector-specific codes of conduct;*
- *strengthen integrity awareness within the public sector, including through systematic information and training on whistleblowing mechanisms;*
- *increase the capacities of the Human Rights Defender's Office to enforce its mandate to implement its whistleblower-protection obligations;*
- *ensure effective implementation of the new Law on Police Integrity and Discipline and the accompanying secondary legislation;*
- *strengthen the operational capacity of the newly established Internal Security and Anticorruption Department of the Ministry of Internal Affairs;*
- *strengthen strategic coordination and intelligence sharing across law enforcement authorities, including through the establishment, under the coordination of the Anticorruption Committee, of a clear operational strategy to address high-level corruption.*

#### Data protection

- *set up and operate a robust data protection framework and establish an independent, fully functional national Data Protection Authority with a clear legal mandate, autonomous governance and sufficient human, technical and financial resources, in line with European and international standards, including the EU General Data Protection Regulation, the Law Enforcement Directive, Convention 108+ and relevant international guidance;*
- *ensure the clear delineation of powers and responsibilities between the future Data Protection Authority and the Information System Agency which is planned to be in charge of cybersecurity and data management in the near future.*

### 7. Block 4: External relations and fundamental rights

#### 7.1 Freedom of movements within the Republic of Armenia

#### ➤ **Improvement and consolidation of the legal framework regulating the registration of foreign citizens and stateless persons legally residing within the territory of the Republic of Armenia.**

The revised Law on the State Population Registry, adopted in July 2025, will modernise and unify Armenia's population registry and its legal framework. The Law introduces a unified, centralised and digital State Population Registry covering all persons legally residing in Armenia, including foreign nationals, stateless persons, refugees and asylum seekers (*see Section 3 above*). Foreign nationals and stateless persons will enjoy the same rights and be subject to the same obligations as Armenian citizens

with regard to the population registry, and they will be allocated public services numbers in the same manner as Armenian citizens. The new digital registry is scheduled to be operational on 1 January 2027.

### 7.2 Conditions and procedures for the issuance of travel and identity documents

- **Consolidation of legal and institutional frameworks ensuring the setup of an effective and fully functional system for the issuance of travel and identity documentation without any discrimination, including for women, children, persons with disabilities, displaced persons, persons belonging to minorities or persons in a vulnerable situation.**

The new unified Law on Identity Documents, currently being finalised, was drafted according to the principle of non-discrimination. The law will lay down a coherent and inclusive legal framework governing the issuance and use of all identity documents in Armenia from the autumn of 2026 (*see Section 4 above*). These documents will be fully compliant with ICAO standards.

The new central offices for the issuance of identity documents, planned to be fully refurbished, are designed to be fully accessible to persons with disabilities. However, many of the decentralised offices are currently inaccessible to persons with disabilities. Moreover, current procedures hinder full access to civil status and document services for persons with psychosocial or intellectual disabilities, which risks excluding vulnerable and marginalised individuals from effective access to identity documentation.

### 7.3 Rights of the citizens including protection of minorities

- **Adoption of a comprehensive anti-discrimination law, as recommended by UN and Council of Europe monitoring bodies, to promote equality and ensure effective protection against discrimination, including setting up a dedicated equality body.**

The government of Armenia is preparing a draft Law on the Prevention of and Protection from Discrimination. According to information received from the Armenian authorities, it seeks to prevent discrimination and ensure equal treatment and equal opportunities in the exercise of rights, freedoms and obligations for all individuals, and to prevent discrimination in line with international standards. It will define discrimination and its various forms and sets out a list of protected characteristics.

Under the envisaged institutional framework, the Human Rights Defender of Armenia would assume the role of the Equality Body. Its mandate would include monitoring compliance with anti-discrimination legislation and promoting equal treatment, preventing violations of the right not to be subjected to discrimination, and protecting the rights of victims of discrimination.

- **Signature, ratification and transposition into the national legislation of relevant UN and the Council of Europe legal documents promoting equality and addressing anti-discrimination, taking into account the provisions of the UN Convention “On the Status of Stateless persons” and the standing recommendations of the Council of Europe regarding the European Charter for Regional or Minority Languages. Consolidate policies to ensure the socio-economic inclusion of displaced persons.**

Armenia is a full party to the 1951 UN Refugee Convention and its 1967 Protocol, the 1954 Convention on the Status of Stateless Persons and the 1961 Convention on the Reduction of Statelessness. These instruments legally bind Armenia to ensure rights such as access to work, housing, education, social assistance, and identity documents for displaced and stateless persons. The draft Law on Stateless Persons is currently being finalised. It regulates the procedure for determining stateless status in Armenia, governs expulsion procedures and addresses documentation-related matters in accordance with the international treaties ratified by Armenia. The draft law guarantees the rights, freedoms and obligations of stateless persons in line with the United Nations conventions. Throughout the procedure laid down in the draft, the principles of the best interests of the child, non-discrimination, respect for fundamental rights and compliance with international standards are explicitly upheld.

The government of Armenia has drawn up a draft Law on National Minorities, which remains to be adopted by Parliament. Its objective is to guarantee the protection of the rights of national minorities and to promote their integration in line with international standards. The draft law aims to align Armenia's legislation with the Council of Europe Framework Convention for the Protection of National Minorities and the European Charter for Regional or Minority Languages. Following recommendations made in a joint opinion by the Council of Europe and the Venice Commission in 2024, the draft underwent extensive public consultations. The draft law guarantees the rights of national minorities to preserve and develop their traditions, language and culture. It emphasises the importance of intercultural dialogue and the free use of minority languages in public education. It also lays down the responsibilities of state and local self-government bodies with regard to national minorities, including obligations to facilitate their participation in decision-making processes.

Armenia has signed but not yet ratified the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence. The country has made progress in aligning its national legislation and policies with the convention's requirements.

Legal and institutional frameworks for child protection in Armenia have been gradually improving. The Law on Child Rights and the Child Protection System, adopted in October 2025, introduces legal definitions of child abuse, bullying, exploitation and neglect, and seeks to lay down a comprehensive framework for the protection of children's rights. In parallel, the draft programme on the protection of child rights for 2024-2029 (which is still pending government's approval), and the strategy on demography for 2024-2040 (approved in October 2024) extend the scope of child protection policies to all children, moving beyond the earlier, more limited focus on children in vulnerable situations. The proposed reforms prioritise family-based and foster care over institutionalisation, recognise child witnesses of domestic violence as victims, and strengthen labour protections for children.

The protection against child sexual exploitation and abuse was further strengthened following Armenia's ratification in 2020 of the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse. This step established a clearer legal basis for addressing child sexual exploitation and abuse. Further progress would require the adoption of a strategy for the prevention and combating of child abuse and sexual exploitation, as well as the creation of accessible, confidential and child-friendly reporting mechanisms for children to safely report violence and abuse.

Following the initial emergency relief, the authorities have made substantial efforts aimed at the long-term integration of the more than 115 000 displaced Karabakh Armenians. The displaced persons have been granted temporary protection status and have benefited from government support programmes. Such programmes have included cash assistance, grants for rent and utilities, support for the purchase of accommodation, as well as free access to education, healthcare, and social services. The rent and utilities programme provided universal coverage to all displaced Karabakh Armenians until June 2025, after which it was replaced by targeted assistance. More than 16 000 displaced children have been enrolled in Armenian schools. The authorities have also promoted the acquisition of Armenian citizenship through awareness campaigns and expedited citizenship procedures for Karabakh Armenians. Despite such efforts, the long-term integration of the affected population remains a significant challenge.

- **Establishing fair and transparent conditions for the acquisition of Armenian citizenship, which will also address the challenges linked to the facilitation of Armenian naturalisation and dual-citizenship, and mitigate the risk of abuse of the possible future visa-free regime. Refraining from developing an investor citizenship scheme.**

Recent changes to the Law on Citizenship, which entered into force on 1 January 2026, digitalised certain steps in the procedure to acquire citizenship, while leaving the eligibility criteria unchanged. The government of Armenia plans to adopt a strategy on migration and citizenship this year.

The existing conditions for acquiring Armenian citizenship are based on the applicant's level of

integration into Armenian society and include requirements related to residency, language proficiency and general knowledge. These conditions do not apply to ethnic Armenians, who benefit from a simplified naturalisation procedure.

Under the current Law on Citizenship, exemptions from the three-year residence requirement apply to persons of Armenian ethnicity, spouses of Armenian citizens, and parents or children of Armenian citizens. Citizenship may also be granted collectively in cases of repatriation or large-scale returns. While the Law initially prohibited dual citizenship, subsequent amendments introduced a limited acceptance of dual citizenship, particularly for Armenians residing abroad.

The existing legislative framework includes clearly defined eligibility criteria for naturalisation, the availability of legal remedies for rejected applications, and safeguards for stateless persons and the rights of children. However, the Law grants overly broad discretionary powers in exceptional cases, lacks procedural transparency, and contains ambiguities relating to dual citizenship resulting from inconsistencies between older statutory provisions and more recent practice.

The Armenian authorities are also reviewing the legal provisions for obtaining a residence permit in exchange for investment. The current legal framework allows for a special ten-year residence permit to ethnic Armenians and to foreigners carrying out economic or cultural activities in Armenia. Armenia does not intend to introduce an investor citizenship scheme.

- **Elaboration and adoption of a National Strategy and action plan on Human Rights, actively pursuing recommendations and standards, notably on equality and anti-discrimination, minority rights, personal data protection, effective access to justice and religious freedom by UN bodies, OSCE/ODIHR, CoE and the European Commission against Racism and Intolerance and other international human rights bodies.**

Armenia's national strategy for human rights protection and its accompanying action plan for 2023-2025 reached their term at the end of last year. The strategy and action plan covered a broad range of areas, including equality and non-discrimination, religious freedom, access to justice, prevention of torture and the right to health. They were largely informed by recommendations issued by international bodies such as the United Nations Human Rights Council, the Council of Europe and the OSCE. Instead of developing a new stand-alone human rights strategy, the authorities intend to subsume this field as one pillar in a broader national strategy on justice sector reform, to be adopted in the second half of 2026.

Armenia adopted a gender policy implementation strategy for 2025-2028 in April 2025. The strategy aligns with international standards, including the Convention on the Elimination of All Forms of Discrimination Against Women, the Beijing Platform for Action, the Sustainable Development Goals and the Istanbul Convention. The strategy seeks to ensure equal rights and opportunities for women and men across all spheres of public life through evidence-based and participatory approaches. In May 2025, Armenia adopted the third national action plan on women, peace and security for 2025-2027, developed in line with United Nations Security Council Resolution 1325.

To improve access to justice, the Armenian authorities have adopted a series of measures aimed at reducing judicial caseloads. These measures include legislative amendments allowing certain cases to be transferred to advocates or mediators, and an increase in both the number of judges and judicial salaries, intended to accelerate case processing. Under the judicial and legal reforms, a unified electronic justice system has been introduced, significantly reducing the civil case backlog. Armenia's Centre for Arbitration and Mediation, established in 2023, promotes alternative dispute resolution mechanisms, and mandatory mediation has been introduced for selected categories of family law cases.

Although alternative measures are applied more frequently, the extensive use of pre-trial detention continues to be of concern. As of October 2025, 50.8% of persons held in penitentiary institutions were pre-trial detainees. This is also a primary driver of overcrowding in penitentiary institutions. In line with

a ruling of the Constitutional Court, courts are now required, after a certain period, to assess the efforts undertaken by investigative bodies to prevent unjustified prolongation of pre-trial detention. In criminal proceedings, the role of psychologists has been strengthened, and their participation is now mandatory in cases involving minors or persons with disabilities. Video recording of interrogations has also become obligatory, supported by the use of body-worn cameras by investigators.

Armenia underwent its fourth cycle of the Universal Periodic Review in May 2025. The government supported most of the 265 recommendations received, while noting (i.e. not supporting) 16 recommendations. The European Commission against Racism and Intolerance, in its 2023 report, recommended that Armenia's authorities take action in a number of areas, including supporting awareness-raising activities, in cooperation with the Human Rights Defender and relevant civil society representatives, on the importance of diversity and tolerance in society, with a view to preventing and combating hate speech, hate-motivated violence and all forms of discrimination.

On the basis of the above findings, it is recommended that in relation to block 4 benchmarks related to **external relations and fundamental rights** (first phase), the Armenian authorities:

- *ensure that persons with physical, psychosocial or intellectual disabilities have full access to the system for the issuance of travel and identity documentation;*
- *adopt the Law on the Prevention of and Protection from Discrimination, in line with international and European standards and with the recommendations of the Council of Europe;*
- *provide the future equality body to be established under the anti-discrimination law with sufficient and sustainable financial and human resources to fulfil its mandate, including for investigative, monitoring and litigation-related functions;*
- *adopt the Law on National Minorities ensuring the rights of national minorities to preserve and develop their traditions, languages and culture, with particular emphasis on both the free use of minority languages in public education and on the meaningful participation of representatives of national minorities in decision-making processes at national and local level;*
- *fully align Armenia's legislative framework with the provisions of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence and ensure the adoption and implementation of the necessary legal, institutional and policy measures, including victim protection mechanisms, capacity-building for relevant professionals and sustained awareness-raising initiatives;*
- *implement the Law on Child Rights and the Child Protection System adopted in October 2025 and adopt the comprehensive programme on the protection of child rights for 2024-2029, ensuring that all children, including children with disabilities and children in alternative care, are protected from all forms of violence, including trafficking, in line with international standards, including the 1996 Hague Convention on the Protection of Children;*
- *draw up a comprehensive strategy to prevent and combat child sexual abuse and exploitation, in line with the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse, ensuring the availability of age appropriate, accessible, confidential and child-friendly justice, reporting mechanisms. and support for child victims and witnesses;*
- *amend the Law on Citizenship to address outstanding issues related to the naturalisation and to the dual citizenship of ethnic Armenians, ensuring the establishment of clear safeguards to prevent any potential abuse in the context of a future EU visa-free regime;*
- *refrain from introducing an investor citizenship scheme and ensure that any investor residency scheme does not constitute an undue route to citizenship;*
- *carry out a comprehensive impact assessment of the implementation of the 2023-2025 human rights protection strategy and develop and adopt a successor strategy in a timely and inclusive manner.*

## 8. Overall assessment and next steps

In line with the established methodology, the Commission has assessed the implementation of the visa liberalisation action plan (VLAP) by Armenia on the basis of the information and relevant legislative and policy documents provided by the Armenian authorities. The desk-based evaluation was complemented with an on-site evaluation carried out by Commission services and the European External Action Service, assisted by experts from EU Member States, Frontex and the EU Delegation to Armenia.

The Commission also monitors the progress made by Armenia through the EU-Armenia Joint Visa Facilitation Committee, the EU-Armenia Joint Readmission Committee, the EU-Armenia Subcommittee on Justice, Freedom and Security, and the Human Rights Dialogue. In all of these frameworks there is an advanced level of dialogue and cooperation between the EU and Armenia.

On the basis of the above, the Commission considers that Armenia has made good progress in the implementation of the benchmarks relevant for the first phase (legislative and policy framework) of the VLAP, considering that the VLAP was officially handed over to Armenian authorities only in November 2025. The first set of benchmarks under block 1 (document security, including biometrics) and - within block 2 (on migration management) are already at an advanced stage of fulfilment. Armenia is also progressing well in the implementation of the first set of benchmarks related to the other policy areas covered under block 2 (integrated border management, asylum), block 3 (public order and security) and block 4 (external relations and fundamental rights) in the VLAP.

The findings of this first progress report by the Commission will be presented to the European Parliament and the Council. These findings will also be presented and discussed by the Commission with the Armenian authorities in the next Senior Officials meeting. The Commission will continue to support Armenia in the implementation of the VLAP including through dedicated technical and financial assistance from the Resilience and Growth Plan for Armenia being rolled out. The Commission will actively monitor the fulfilment of all benchmarks under the four blocks of the VLAP, with the support of EU Member States's experts. Additional EU evaluation missions will be organised in Armenia in the coming period in view of assessing progress made by the Armenian authorities in fulfilling all benchmarks under the first phase. The recommendations included in this report should guide the Armenian authorities in closing the gaps identified. This monitoring will inform forthcoming reports from the Commission to the European Parliament and the Council on the progress made by Armenia in implementing the VLAP.