



## **The State of Implementation of Anti-Corruption Reforms in Light of the CEPA**

7th Meeting of EU-Armenia Civil Society Platform

The Armenia-EU Comprehensive and Enhanced Partnership Agreement (CEPA) plays a pivotal role in the Republic of Armenia's (RA) reform agenda by supporting democratic governance, the strengthening of the rule of law, and the improvement of public administration, including through the prevention of corruption, effective counteraction mechanisms, and anti-corruption education.

Despite noticeable progress in the fight against corruption within the framework of the CEPA, systemic challenges in the anti-corruption sector still persist. The independence of the Corruption Prevention Commission (CPC) and the Anti-Corruption Committee, and the transparency of the appointment of officials, are not fully ensured. The institution of confiscation of property of illicit origin has not yet been fully completed, and the effectiveness of anti-corruption education programs is difficult to assess due to gaps in evaluation mechanisms.

This policy brief analyzes Armenia's progress in 2025 in the implementation of the CEPA's anti-corruption reforms. It is based on the RA Anti-Corruption Strategy (Strategy) (2023–2026), its performance, and the observations of the EU-Armenia Civil Society Platform. The brief assesses the extent to which the steps taken align with the requirements of Articles 4 and 12 of the CEPA, highlights the key achievements and challenges, and proposes constructive measures to ensure the effective implementation of the policy.

### **Key Findings**

#### **1. Corruption Prevention and Strengthening of Integrity Systems**

##### **1.1. Status of the CPC and the Consolidated (Unified) Legal Act on Prevention**

In November 2024, a draft law on making amendments and additions to the "Law on the Corruption Prevention Commission" was presented for public discussion. The draft aimed to revise the institutional functioning of the CPC by stipulating a more inclusive mechanism for the election of members, with the participation of Civil Society Organizations (CSOs), increasing the individual accountability of members, and

clarifying the grounds and procedure for disciplinary liability. As of 2025, the draft has not been adopted. It was developed in fulfillment of an action outlined in the Strategy, which was intended to improve the procedures of proceedings carried out by the CPC, define their specificities, and clarify the functions of the CPC as an administrative body conducting proceedings.

The Ministry of Justice (MoJ) of the RA published a report on the performance of the Strategy for the first half of 2025, which indicates that the draft has been suspended. The proposed changes are to be considered within the scope of a consolidated legal act on the prevention sector, namely the "Law on Corruption Prevention," the development of which is also mandated by the Strategy to occur during 2025. Simultaneously, the draft of the consolidated legal act has not yet been submitted for public discussion, nor has it been clarified whether the consolidated law will be limited only to the area of prevention or will also include anti-corruption education and public awareness.

### **1.2. Public Disclosure of the CPC's Conclusions of Integrity Checks**

A key measure in the prevention sector, as set forth in the Strategy, is ensuring the requirement for public disclosure of the final part of the CPC's conclusions of integrity checks. The MoJ has developed draft laws and presented for public discussion; these drafts have not yet been adopted. CSOs have repeatedly raised concerns, emphasizing that there is still insufficient transparency and impact regarding the CPC's integrity assessments in the process of appointing officials, which underscores the necessity of adopting the legal act.

The Organisation for Economic Co-operation and Development (OECD) also expressed concerns on this matter in its 5th-round monitoring report,<sup>1</sup> highlighting a structural weakness: the lack of provision for the publication of CPC integrity assessments during the process of judicial appointments, which subsequently reduces the weight of these assessments. According to the report, appointments that proceed under negative conclusions, but lack sufficient rationale, are detrimental to both transparency and public trust.

## **2. Legal and Institutional Systems for Countering Corruption**

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<sup>1</sup> OECD, The Istanbul Anti-Corruption Action Plan, Armenia Fifth Round of Anti-Corruption Monitoring Follow-Up Report, p. 102 (Sept. 2025), available at [https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/09/armenia-fifth-round-of-anti-corruption-monitoring-follow-up-report\\_c898674e/3d273009-en.pdf](https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/09/armenia-fifth-round-of-anti-corruption-monitoring-follow-up-report_c898674e/3d273009-en.pdf)

### **2.1.The Anti-Corruption Committee**

The establishment of the Anti-Corruption Committee and its continuous staffing are significant achievements; however, the issue of the Committee's independence remains a key challenge. The OECD's 5th-round evaluation report on Armenia also highlighted concerns regarding the process of appointment and dismissal of the Committee's Chairman, referencing concerns raised by CSOs in 2024 regarding the dismissal processes of the leadership of the Committee and other bodies.<sup>2</sup>

Furthermore, the current system for selecting the Head of the Anti-Corruption Committee is problematic, as it allows the Government to make a discretionary decision, choosing one of the three candidates proposed as a result of the competition, without any obligation to select the candidate who scored the highest points. This implies that the final decision may be motivated by political or other considerations.

### **2.2.Improvement of the Institute of Confiscation of Property of Illicit Origin**

The Strategy provides for the improvement of the institution of confiscation of property of illicit origin by revising the model of the managing body, the system for the administration of confiscated property, and the platform for information exchange between investigative and prosecutorial bodies. These processes were scheduled to commence back in 2024; however, the corresponding legislative initiatives have not yet been published. Based on a submission by members of the National Assembly, the Constitutional Court (CC) assessed the contested provisions of the law and ruled that they comply with the Constitution, while simultaneously setting forth interpretations for their application.<sup>3</sup>

Thus, despite the CC's decision finding the law's provisions to be constitutional, the law has yet to be revised. This limits the full applicability and effectiveness of this institution.

## **3. Anti-Corruption Education**

Anti-corruption education includes measures and tools in pre-school, general education, higher, and post-graduate institutions. Programs on ethics, integrity, and anti-corruption have been introduced for children aged 5–6 in state pre-school educational institutions (PEI), covering all provinces (marzes) of the RA and Yerevan.

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<sup>2</sup> See The Istanbul Anti-Corruption Action Plan, Armenia Fifth Round of Anti-Corruption Monitoring Follow-Up Report (OECD, Sept. 2025), p. 137

See also: <https://iravaban.net/504083.html>

<sup>3</sup> Decision SDO-1776 of the Constitutional Court of 16.04.2025, available at [https://www.concourt.am/decision/decisions/6807363e2d4aa\\_SDV-1776.pdf](https://www.concourt.am/decision/decisions/6807363e2d4aa_SDV-1776.pdf)

Approximately 60% of PEI educators have been retrained on relevant topics. Within general education, the anti-corruption component was included in the curriculum of the "Social Science" subject, though it is currently implemented only in the Tavush province. The program is planned to be rolled out in stages in grades 9–12 during the 2025–2027 academic years.

Furthermore, dissertations and master's theses on anti-corruption topics have been completed at several educational institutions.

Despite these achievements, challenges persist in the sector, specifically the incomplete introduction of the evaluation system for anti-corruption educational programs and the absence of baseline knowledge assessment. This hinders the evaluation of the programs' effectiveness and their impact on students' educational levels.

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## **Recommendations**

### **I. Anti-Corruption Prevention Sector**

#### **(To the Government of the RA, the National Assembly, and the CPC)**

1. Ensure the comprehensive and inclusive development of the consolidated (unified) legal framework for prevention, in cooperation with specialized CSOs, and its adoption within the deadlines set by the Strategy. This framework must clearly define the independent and objective grounds for the formation of the CPC, its functions, and sectoral divisions.
2. Stipulate a clear mechanism for the publication of the CPC's conclusions of integrity checks in the RA Law "On the Corruption Prevention Commission" and related laws, in order to strengthen the transparency of appointments to public positions.

### **II. Anti-Corruption Counteraction Sector**

#### **(To the Government of the RA and the National Assembly)**

3. Review the procedure for the election of the Head of the Anti-Corruption Committee within the framework of the RA Law "On the Anti-Corruption Committee." This review must aim to reduce the degree of discretion and ensure the predictable influence of the competition score.

4. Develop and adopt amendments and additions to the RA Law "On the Anti-Corruption Committee," establishing clear and predictable provisions for the dismissal of the Committee's leadership, which will contribute to the institutional stability of the body.
5. Develop and adopt amendments and additions to the RA Law "On the Confiscation of Property of Illicit Origin," clarifying the regulations concerning the confiscation of illicitly obtained assets, including the management model, procedures for the disposal of property, and tools for inter-agency cooperation.

### **III. Anti-Corruption Education Sector**

#### **(To the Ministry of Education, Science, Culture, and Sports of the RA (MESCS) and the RA MoJ)**

6. Develop and adopt a legal act of the ESCS Minister that creates an evaluation mechanism for anti-corruption education, capable of objectively measuring the impact of subject programs across all target groups, particularly PEIs, general education schools, and higher education institutions.
7. Extend anti-corruption educational components to all provinces (marzes), ensuring the proportional training of teachers.

### **IV. General Recommendations**

#### **(To the Government of the RA)**

8. Utilize roadmaps to clarify the mechanisms for the alignment of the Anti-Corruption Strategy with Articles 4 and 12 of the CEPA, thereby ensuring the full harmonization of the reforms.

## Sources Used

1. Comprehensive and Enhanced Partnership [Agreement](#) (CEPA)
2. [Roadmap](#) for the Implementation of the Comprehensive and Enhanced Partnership Agreement between the European Union and the European Atomic Energy Community and their Member States
3. The RA Anti-Corruption [Strategy](#) and its [Action Plan](#) for 2023–2026
4. The RA [Law](#) "On the Corruption Prevention Commission"
5. The RA [Law](#) "On the Anti-Corruption Committee"
6. The [Draft](#) Law on making amendments and additions to the Law "On the CPC"
7. Monitoring [Report](#) on the Implementation of the RA Anti-Corruption Strategy and its derived Action Plan for 2023-2026 for the First Half of 2025
8. Annual Monitoring [Report](#) on the Implementation of the RA Anti-Corruption Strategy and its derived Action Plan for 2023-2026 for 2024
9. [Report](#) on the Public Monitoring Results of Actions Subject to Implementation in 2023-2024 of the 2023-2026 Action Plan for the Implementation of the RA Anti-Corruption Strategy, Armenian Lawyers' Association
10. OECD [Report](#) on Armenia's Fifth Round of Evaluation
11. Advisory [Opinion](#) of the Venice Commission on the RA Law "On the Confiscation of Property of Illicit Origin"
12. Constitutional Court [Decision](#) SDO-1776 of 16.04.2025

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*For more information, please contact the author: Syuzanna Soghomonyan, [syuzanna.soghomonyan@armla.am](mailto:syuzanna.soghomonyan@armla.am)*