

***ADVISORY COMMITTEE ON THE
FRAMEWORK CONVENTION FOR THE
PROTECTION OF NATIONAL MINORITIES***

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

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Comments of the Government of Armenia on the Fourth Opinion of the Advisory Committee on the implementation of the Framework Convention for the Protection of National Minorities by Armenia - received on 13 February 2017

**OBSERVATIONS PRESENTED BY THE REPUBLIC OF ARMENIA
IN RESPECT OF THE FOURTH OPINION ON ARMENIA
BY THE COUNCIL OF EUROPE ADVISORY COMMITTEE ON THE FRAMEWORK CONVENTION FOR THE
PROTECTION OF NATIONAL MINORITIES**

<i>Opinion</i>	<i>Comment</i>
<p>In the Summary of the Opinion throughout the text it is mentioned that the new Electoral Code is currently under consideration at the National Assembly.</p>	<p>We would like to inform you that the new Electoral Code of the Republic of Armenia entered into force on 1 June 2016, part 9 of Article 95 of which defines that: <i>“Four mandates of Deputies shall be distributed among national minority representatives by the principle of one mandate to each of the first four national minorities with the largest number of resident population according to the data of the latest census preceding the elections.”</i>. Moreover, representatives of national minorities also took part in discussions held in the process of elaboration of the Electoral Code and their opinions have been taken into consideration.</p> <p>Taking into consideration the aforementioned, we kindly ask to make appropriate changes in the parts concerning this issue for the purpose of accuracy of submitted information, namely in paragraphs 17, 89 and to amend the recommendation of paragraph 92 as follows:</p> <p style="text-align: center;"><i>“The Advisory Committee calls on the authorities to ensure effective implementation of the provisions of the Electoral Code on national minorities.”</i></p>
<p>With regard to use of topographical indications in languages of national minorities as stated in the Summary of the Opinion, as well as in paragraphs 71, 73.</p>	<p>Pursuant to Article 6 of the Law of the Republic of Armenia “On geographical names, state and local self-government bodies of the Republic of Armenia, non-governmental organisations, legal and natural persons shall be entitled to make recommendations for naming or renaming. The recommendations shall be submitted to the relevant governors of marzes of the Republic of Armenia. The latter shall submit the documents justifying the proposal on renaming, as well as their</p>

conclusion to the authorised public administration body responsible for geographical names.

Naming and renaming of inter-settlement geographical objects in urban and rural localities of the Republic of Armenia shall be carried out as prescribed by Decision No 2387-N of the Government of the Republic of Armenia of 29 December 2005. According to that procedure, decisions on naming and renaming inter-settlement geographical objects **shall be adopted by the Council of Elders of communities.**

Division for Ethnic Minorities and Religious Affairs of the Staff of the Government of the Republic of Armenia shall annually make at least four visits to the rural communities of national minorities, during which, along with other issues, it shall inform about the right to signposting topographical indications in their languages as well. Moreover, in the second quarter of 2016, during the visit to 5 compactly inhabited Yezidi villages in Aragatsotn where all of the marz governors and Councils of Elders are Yezidi by national origin, delegates of the Republic of Armenia insisted on adding to the names of streets, village municipality, schools and shops in the villages names in their language.

Taking into consideration the aforementioned, we find it appropriate to add the word “continue” in the recommendation for immediate actions which reads as follows:

- **to continue** *facilitating consultations on the existing demands and needs pertaining to the use of minority languages for topographical indications in municipalities inhabited by a substantial number of persons belonging to national minorities; conduct an awareness-raising campaign by encouraging the use of minority languages in communication with local administration.*

Paragraph 5

“However, the underlying and widely held view shared by the majority population and the authorities is that Armenia is essentially a mono-ethnically homogenous and mono-religious state which limits the visibility of minorities in general, and leaves little room for other cultures and languages and their promotion.”

Minorities are perceived as groups contributing to a folkloric mosaic in the cultural spectrum of Armenia.

This sidelining of national minority issues is further exacerbated by the lack of attention paid by the mainstream media to their concerns.

In its most acute form the concept of “one nation, one religion, one culture” voiced by some media outlets is directed at religious minorities which are branded as sects and accused of undermining

With regard to the part specified in paragraph 5, we believe that there is misperception of the cause-and-effect chain and we ask to amend the paragraph as follows:

“In spite of the fact that minorities do not make up a great number in the country, which is conditioned by historical circumstances (genocide, loss of big part of homeland) the Government is taking possible steps to preserve their language and cultural identity”.

We ask to remove from the text the biased and unjustified assessment since it does not comply with the steps that have been taken by the Republic of Armenia for years. And quite the reverse, traditions of a number of national minorities (Russian Molokans, Yezidis, Assyrians), the cultural understandings, their zealous attitude to work and particularly the agricultural skills being elaborated by them have for a long time become an integral part of the ethnographic culture of Armenia and the diverse mosaic of the public.

We also ask to remove this part from the text of paragraph 5, which is not substantiated. We state that national minorities in the Republic of Armenia have never been perceived by public and authorities; moreover, they have never been “labelled” as religious minorities or sects, and there is not even a historical record of such conduct. And the concept of “one nation, one religion, one culture” is not a provision of the State Policy of the Republic of Armenia, but as it is stated in the conclusion of the Advisory Committee, it is voiced by some mass media that have the freedom of speech and are using the concept only for reinforcing the identity.

Armenian statehood.	
<p>Paragraph 7</p> <p>“The unresolved Nagorno Karabakh conflict, which intensified during the visit, the closed borders with neighbouring states and the resulting economic difficulties impact heavily on the social and economic situation of the majority and the minorities alike.”.</p>	<p>When referring to the issue of the Nagorno-Karabakh conflict, we find it appropriate to provide clear and objective information of what has happened, as it is incomprehensible what is meant by “intensification”; particularly, it is necessary to clearly mention in the text that, Azerbaijan unleashed large-scale offensive operations against Nagorno-Karabakh in April 2016, thus violating Trilateral Agreement of 1994 on ceasefire, signed by Azerbaijan, Nagorno-Karabakh and Armenia.</p> <p>From the very beginning of the Azerbaijani offensive civilian infrastructures and civilian population, including children and the elderly became intentional and indiscriminate targets. Among the first civilian victims was a 12 years old boy, who was killed in front of the school-building as a result of a Grad missile attack, while two others were wounded.</p> <p>In the village of Talish (Martakert region of Nagorno-Karabakh) three elderly persons including 92 years old woman were brutally tortured, mutilated and killed. Moreover, three captive soldiers of the Nagorno-Karabakh armed forces were beheaded by Azerbaijani armed forces in ISIL-style, which was subsequently publicized in social networks.</p> <p>That torture and murder of the civilians reminds of the massacre of hundreds of Armenians in the initial stage of confrontation in the cities of Sumgait, Baku, Kirovabad and other settlements of Azerbaijan. The aforementioned war crimes make it obvious what would happen to the population of Nagorno-Karabakh had the Armed Forces of Azerbaijan succeeded. In such circumstances, realisation of the right of the people of Nagorno-Karabakh to self-determination may not be questioned as the</p>

<p>Paragraph 7</p> <p>...”the closed borders with neighbouring states and the resulting economic difficulties impact heavily on the social and economic situation of the majority and the minorities alike.”.</p>	<p>physical existence of the people is at stake. It should be mentioned that the Secretary General of the Council of Europe made a statement on the threat of resumption of war on 2 April 2016.</p> <p>The same approach should also be adopted when speaking about the blockade mentioned in paragraph 7 since it is not clear who has imposed the blockades.</p> <p>The blockade of Armenia imposed by Azerbaijan and Turkey (since 1993) has its adverse impact on the exercise of the rights to adequate standard of living of Armenian population, both the majority and the minority, as well as on the socio-economic right of the latter including exercise of the right to development which is a violation of the norms of international law, including the Convention on Transit Trade of Land-locked States.</p> <p>As a consequence of the mentioned blockade, Armenia suffers losses amounting to tens of millions; in particular, the blockade has a seriously adverse impact on the growth of export of goods from Armenia, as well as on the pricing policy of imported goods. It also significantly limits the resources available for the purpose of implementing policies and projects designed for national minorities, contributes to emigration and unemployment. Emigration has led to reduction of the number of persons belonging to national minorities; national minorities, already being a small community, lose their business-minded and active members as well.</p>
<p>Paragraph 9</p> <p>“Difficulties encountered during the enumeration process, including the inaccuracy of collected data, lack of transparency and a delay in the publication of the results in December</p>	<p>It is recommended to review the assessments as they do not comply with the actual state of the affairs and are based on the lack of information. First of all, the preliminary data of the census conducted between 12 and 21 October 2011 inclusive were first published not in December 2013, but on 7 February 2012 during the press conference held at the National Statistical Service of the</p>

<p>2013 of the 2011 census have raised doubts as to the reliability of the published final results.”</p>	<p>Republic of Armenia, i.e. in just three months after completing the field work, (http://armstat.am/file/doc/99469158.pdf), about which is also specified in the part entitled “10. Results of 2011 population census of the Republic of Armenia” of the publication “Results of 2011 census of the Republic of Armenia (Indicators of the Republic of Armenia)” where information is included on publication of different summary indicators on the result of censuses conducted in other terms (on 31 October 2012, on 31 January 2013, in February 2013, on 30 April 2013 and 31 July 2013) and in other publications before publishing the final handbook. If the members of the Advisory Committee have read the complete Handbook (413 pages) published in December 2013 and 10 handbooks of Yerevan city (157 pages) and marzes of the Republic of Armenia (comprising 2 331 pages), it still does not mean that the publication of the results of the census has been delayed, especially when they have been published according to the timetable approved earlier (“Key organisational and methodological provisions of 2011 Population Census of the Republic of Armenia” approved by Decision No 07-A of the State Council on Statistics of the Republic of Armenia of 12 March 2011, see at: http://armstat.am/file/doc/99464428.pdf, page 18)</p> <p>Besides, organisation of 2011 census was transparent; it has been prepared and conducted in line with the main requirements for “Recommendation for the 2010 Censuses of Population and Housing of Conference of European Statisticians” (elaborated in cooperation with Eurostat, the UN Economic Commission for Europe, UN, New York and Geneva, 2006). In the course of preparing and conducting the census, clarifications have been presented thereon to the public through mass media or the Internet, as well as by means of posters and brochures providing information on the census, through advertising video clips and</p>
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	<p>public announcements, messages (SMS) sent to all mobile subscribers (see in detail in the section entitled “5. Preparatory phase of 2011 population census of the Republic of Armenia” in the publication “Results of 2011 census of the Republic of Armenia (indicators of the Republic of Armenia)” particularly in the part “5.3.4 Publicity and Information Campaign” in Armenian and English: http://armstat.am/file/doc/99479208.pdf, http://armstat.am/file/doc/99486533.pdf).</p> <p>Accordingly, we suggest removing this sentence.</p>
<p>Paragraph 16</p> <p>With regard to other ethnic groups not represented in the co-ordinating council</p>	<p>Concerns of the national minorities having been involved in the Co-ordinating Council become more visible and recognisable only due to the reason that the representatives of that ethnic group show active participation in public and civil life, they have found in themselves the will and the aspiration to be self-organised and to establish non-governmental organisations, they invest efforts to preserve their identity and unity, they are united by the aspiration to preserve their national traditions, religion and language.</p> <p>We think that more explicit conclusions should be made or this part should be entirely deleted.</p>
<p>Paragraph 28</p> <p>“The Advisory Committee notes however that many representatives of national minorities have raised concerns as regards the accuracy of the data collected.”</p>	<p>It is worth mentioning that the reason for it is that the data recorded as a result of census did not correspond to the figures expected (desired) by this or that ethnic minority leader, as they compare the data to the data in the register books of infinite term created by them, that are being updated with the newly arrived or newly born persons, but the data on the persons having left the country or on those who died are never removed from it; thus making the register books data-excessive and during separate events and/or meetings with the media they share the data desirable for them for the purpose of raising their credibility among national minorities, as well as for enjoying the privileges prescribed</p>

	<p>by the Law of the Republic of Armenia.</p> <p>We suggest deleting this formulation.</p>
<p>Paragraph 42</p> <p>“The Law on Fundamentals of Cultural Legislation (2002) remains the cornerstone regulating the principles and aims of cultural policy, state policies to promote the diversity of cultural expressions and support to be given to the cultures of national minorities.”</p>	<p>The figures “26.12” should be added after the number “2002” following the phrase “The Law on Fundamentals of Cultural Legislation.”</p>
<p>Paragraph 42-44</p> <p>Additional Information</p>	<p>The activities aimed at the cultural expressions of national minorities, as well as preservation of their spiritual-cultural heritage and ethnic identity, are implemented not only by the Ministry of Culture of the Republic of Armenia. Other state and community institutions are also involved and are responsible for providing financial and other material support for the implementation thereof. The main document regulating the support provided to the cultures of national minorities is the Law of the Republic of Armenia “On fundamentals of cultural legislation,” but it should be mentioned that the Republic of Armenia has joined the Convention on the Protection and Promotion of the Diversity of Cultural Expressions, regarding which a separate section of the state report presents the activities implemented in the cultural and educational spheres of national minorities. The text fails to mention that the supremacy of the direction of preserving and developing the ethnic identity and presenting folk art, as well as the general cultural policy conducted by the state in respect of national minorities is formed on the basis of the recommendations and conclusions of the special councils representing various spheres (theatrical, musical, etc.) and</p>

	<p>reporting to the Minister, which also include representatives of national minorities. The Opinion fails to reflect the fact of ongoing support of the Ministry to the processes of creative and professional self-expression of the representatives of national minorities acting and creating in different spheres of art, the existence of a separate line in the Ministry's budget on the allocations to the cultures of minorities, which enables implementing various theatre and concert programmes, holding exhibitions, festivals, and projects valuing and popularising the works of the representatives of national minorities (release of CDs, holding of anniversary events, publication of books, other programmes and events aimed at the promotion of the activity of representatives of national minorities).</p>
<p>Paragraph 45</p> <p>“Given that a number of national minority groups are relatively small, lacking both organisational and human resource capacity to initiate cultural undertakings, these groups are not in a position to articulate their needs in the cultural sphere and require more proactive support.”</p>	<p>Here is actually mentioned the small number of the national minorities and their internal organisational incapacity, whereas point 13 in the Explanatory Report of the Framework Convention for the Protection of National Minorities emphasises the protection of persons belonging to national minorities, who may exercise their rights individually and in community with others. It is no coincidence that the various definitions of the concept of national minority mention the will and efforts exerted to preserve and use one's own identity and unity, traditions, religion and language as an important criterion. The lack of the latter will make all the steps aimed at their preservation totally artificial. The experience shows that the efforts exerted by them in this direction have been a success.</p>
<p>Paragraph 49</p> <p>“The dominant discourse according to which Armenia is an ethnically homogeneous and mono-religious country leads to intolerance</p>	<p>There is no logical link between the two parts of this paragraph; it is unclear how the actions of the persons expressing such opinion and the circumstance of presumable intolerance to sexual orientation are interrelated. We recommend removing the aforementioned part.</p>

<p>and discrimination based primarily on sexual orientation.”</p> <p>“The unresolved Nagorno Karabakh conflict and painful memories of the past suffering of the Armenian people exacerbate insularity, a sense of patriotic duty and nationalism which are exploited by some media.”</p>	<p>On the contrary, the suffering of the Armenian people has made them more open and tolerant. The Armenian people perceive the pain and suffering of foreigners as their own and do their best to help them. Currently, the Armenians live in almost all the countries of the world, contributing to the development and prosperity of those countries; thus, we think insularity is out of the question here.</p> <p>Therefore, we recommend amending the sentence in accordance with the aforementioned text.</p>
<p>Paragraph 52</p> <p>“In July 2012, Article 10 of the Armenian Family Code was amended to increase the legal age of marriage for women from 17 years to 18 years old, making it the same as for men.”</p>	<p>Here reference is made to the amendment made to Article 10 of the Armenian Family Code (hereinafter referred to as “the Code”) adopted in July 2012, whereas the amendment to Article 10 of the Code was made on 30 April 2013. Thus, relevant corrections should be made.</p>
<p>Paragraph 59</p> <p>With regard to the references made to the Criminal Code of Armenia</p>	<p>The references made in paragraph 59 of the Criminal Code of the Republic of Armenia need to be clarified. In particular, the words “torture (Article 119 CC),” “premeditated damage to property” and “banditry (Article 179)” should accordingly be replaced with the words “torture (Article 309.1 CC),” “intentionally destructing or damaging property” and “robbery (Article 175)”.</p>
<p>Paragraph 65</p> <p>Additional Information</p>	<p>We would like to make certain clarifications:</p> <p>Pursuant to the Law of the Republic of Armenia “On television and radio” (hereinafter referred to as “the Law”), the operation of the following television companies shall be ensured in the territory of the Republic of Armenia: overall, 8 television companies having republican coverage use public digital network</p>

	<p>to broadcast in the territory of the Republic of Armenia. There is also one private television company of territorial coverage in each marz (province), which satisfies the interests of the population of the given territory. The law also provides for the operation of local television and radio companies until holding a new broadcasting competition in the marz including the mentioned territory and declaring the winner of the competition. Besides, the residents of the city of Yerevan and territories adjacent thereto have an opportunity to watch 18 TV channels, that is, all the television programmes in Yerevan, which were available also in the stage of analogue broadcasting.</p> <p>At the same time, we inform that, according to Article 55.1 of the Law, the private multiplexer is obliged to broadcast the multiplex through its own electronic communication network, the area of coverage of which shall not be less than that of the digital network of public broadcast of the Republic of Armenia, and that the National Commission on Television and Radio announced, according to the Law, the first competition for obtaining a licence for implementing the activities of a private multiplexer until 1 May 2016, which did not take place. Thus, there is still no private multiplexer operating in the Republic of Armenia.</p>
<p>Paragraph 66</p> <p>“In addition there are papers published in Yezidi: <i>Lalesh</i>, <i>Ezdikhana</i> (“The voice of Yazidis” in Armenian); Kurdish <i>Rya Taza</i> (New way), <i>Mijagetq</i> (Armenian-Kurdish)...”</p>	<p>Kurdish newspaper “Mijagetq” was renamed “Zagros” long time ago. We ask you to make relevant changes.</p>
<p>Paragraph 70</p> <p>“Close consultations with representatives of national minorities</p>	<p>No comment related to demands and needs pertaining to the use of national minority languages was made during periodic visits to rural communities of national minorities, as well as the</p>

should be maintained to regularly establish the existing demands and needs pertaining to the use of national minority languages in dealings with administrative authorities.”

meetings with the representatives of their non-governmental organisations, organised by the Division for Ethnic Minorities and Religious Affairs of the Staff of the Government of the Republic of Armenia. **This obviously proves the fact that there are no such demands and needs.**

With regard to paragraph 70, we inform you that according to the provisions of Article 27 of the Law of the Republic of Armenia “On fundamentals of administration and administrative proceedings”:

1. Administrative proceedings shall be conducted and administrative act shall be adopted in Armenian.

2. Persons speaking languages of national minorities in the Republic of Armenia may submit, as prescribed by law or in accordance with the international treaties of the Republic of Armenia, an application and documents attached to it in the language of such national minority for conducting the administrative proceedings. In that case the administrative body shall require Armenian translation of the documents.

3. The documents related to the conduct of the administrative proceedings and the records relating to the proceedings shall be in Armenian.

Where participants of the proceedings submit documents in another language, they shall, upon the request of the administrative body, submit also the Armenian translations of such documents as prescribed by law.

4. In the course of administrative proceedings, participants may use foreign languages. However, these persons shall ensure Armenian translation with the help of their translator, if

	<p>the administrative body is unable to provide for a translation.</p> <p>With regard to the use of the languages of national minorities in the course of oral communications of the representatives of national minorities with the officials of administrative bodies, an official who speaks any language of national minorities may communicate with them in that language.</p> <p>Based on the above mentioned, we note that the legislation of the Republic of Armenia does not create any obstacle for the persons participating in the proceeding with regard to using both Armenian or their own language at the proceeding, irrespective of the fact of speaking Armenian.</p> <p>Thus, there has been no problem in Armenia with regard to the language, especially taking into account the fact that all representatives of national minorities speak Armenian, and some officials also speak the languages of national minorities.</p>
<p>Paragraph 73</p> <p>“The Advisory Committee invites the authorities to adopt the necessary legislative provisions which would allow for direct participation of residents in the administration of community affairs...”</p>	<p>We recommend removing the words “would allow for direct participation of residents in the administration of community affairs”, taking into consideration the following:</p> <p>On 19 June 2013 the National Assembly of the Republic of Armenia adopted the Law of the Republic of Armenia “On making supplements to the Law of the Republic of Armenia ‘On local self-governance’”; the expected outcome of its enforcement is capacity-building of local self-government bodies through the establishment of closer relationships between them and different groups of population (including national minorities), develop participatory community institutions, establish the culture of democratic management as a separate level of public administration.</p> <p>One of the most important improvements of that Law is that the residents of the community may take the initiative to include a</p>

	<p>question in the meeting agenda of the Council of Elders (according to the Law in effect, only the Head of the Community and the Council of Elders enjoy that right). Naturally, residents representing national minorities also enjoy this right. This means that the right to participation in the administration of community affairs is already realised in legislation.</p>
<p>Paragraph 78</p> <p>Additional Information</p>	<p>We would like to recommend adding the following section:</p> <p>“The Minister of Education and Science of the Republic of Armenia approves upon its Order the “Model syllabus for secondary school (class) of general education of the national minorities” for each academic year, according to which for the subject of “native language and literature” of national minorities 4 class hours are allotted for grades 1-5, and 3 class hours are allotted for grades 6-12 on a weekly basis.</p> <p>Through the joint efforts of specialists of the National Institute of Education and the United Nations Development Programme, the manual “Dignity and Tolerance” has been developed and recommended for use for teachers and students in high schools”.</p>
<p>Paragraph 83</p> <p>“With regard to teaching Russian language, it was noted that in 43 schools in Yerevan, Ararat, Armavir, Gegharkunik, Lori, Tavush, Kotayk and Shirak <i>marzes</i> instruction of all subjects, with the exception of Armenian language, literature and history, is carried in that language. In addition, 60 schools teach intensive</p>	<p>We recommend paraphrasing the paragraph as follows:</p> <p>“With regard to teaching Russian language, it was noted that in 45 schools in Yerevan, Ararat, Armavir, Gegharkunik, Lori, Tavush, Kotayk and Shirak <i>marzes</i> all subjects, with the exception of Armenian language, literature and history, are taught in that language, and in all others schools they teach Russian as a foreign language”. In 65 schools in the country, Russian is taught intensively.</p>

<p>Russian-language courses, and all others teach Russian as a foreign language”.</p>	
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<p>Paragraph 84</p> <p>With regard to publishing textbooks in the languages of the national minorities</p>	<p>Publishing and distribution of Kurdish and Yezidi language textbooks for 1-12 grades is fully complete.</p> <p>The following amendment should be made after the third sentence in the same paragraph:</p> <p>“Teaching of Yezidi language and literature, culture and history is carried out in 1-12 grades. In the 1st grade it is carried out with the textbooks “Alphabet of Yezidi language”, in the 2nd grade with “Yezidi language” and in 3-12 grades with “Yezidi language and literature”.</p> <p>Teaching of Kurdish language and literature, culture and history is carried out in 1-12 grades. In the 1st grade it is carried out with the textbook “Alphabet (of Kurdish language)”, in 2-12 grades with “Mother language (Kurdish)”.</p> <p>Teaching of Assyrian language and literature, culture and history is carried out in 3-4 grades with “Alab-Bit” textbook.</p> <p>Textbooks for higher education institutions:</p> <p>In 2003, “Modern Hebrew” textbook by Arman Hakobyan was published. Currently, the second edition of the textbook is being prepared.</p> <p>In 2006, “Classic Assyrian” textbook by Arman Hakobyan was published, the Russian translation of the book was published in 2010 in Moscow. In 2015, monograph “Introduction to Aramaic and Assyrian studies” by the same author was published. Both textbooks are of major importance in terms of preservation and</p>
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	<p>propaganda of the spiritual and intellectual heritage of Assyrian people.</p> <p>Three books by Arman Hakobian mentioned above have been approved by the Order of the Minister of Science and Education of the Republic of Armenia as textbooks for the students of higher education institutions.”</p>
<p>Paragraph 85</p> <p>Addition</p>	<p><i>We would like to recommend adding the following section:</i></p> <p>“A 30-hours training course for 31 teachers of Yezidi language and literature in general education institutions was carried out by the National Institute of Education in August and September 2016”.</p>
<p>Paragraph 89</p> <p>“... in line with Article 89.5 of the constitutional amendments of 22 December 2015 which stipulate that “places shall be assigned in the National Assembly for representatives of national minorities””.</p>	<p>We draw your attention to the reference to Article 89.5 of constitutional amendments. Since Article 89 does not have any paragraph 5, the relevant reference should be made to paragraph 2. Please, correct.</p>
<p>Paragraph 88-89</p> <p>Additional Information</p>	<p>Information provided in these paragraphs needs to be updated. Thus, the results of local elections that took place in 2013 are cited, whereas a regular election of local self-government bodies took place in September-October 2016, so it would be more appropriate to cite the results of these elections. With regard to the Electoral Code, as it was mentioned above, it has already been adopted.</p>
<p>Paragraph 97</p> <p>With regard to the first and</p>	<p>We recommend editing the first and second sentences as follows:</p>

second sentences	<p>“Enlargement of municipalities envisaged by the “Concept Paper for enlargement of communities and establishing inter-community unions” approved by the Government of the Republic of Armenia on 11 November 2011” is practically applied. In 2015-2016, 140 communities were enlarged and merged into 18 communities. In 2017, it is envisaged to carry out at least 18 programmes for enlargement of communities. In the case of both implemented and designed programmes, the Government is guided by the criteria defined in the above-mentioned Concept Paper, which states in particular that “the communities inhabited with national minorities may be enlarged only with the communities predominantly inhabited by the representatives of the same nation”.</p>
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