

Comments of the Government of the Republic of Armenia on the “Memorandum on the human rights of Karabakh Armenians displaced to Armenia” by the Council of Europe Commissioner for Human Rights

The Government of the Republic of Armenia thanks the Council of Europe Commissioner for Human Rights, Mr Michael O’Flaherty for preparing the “Memorandum on the human rights of Karabakh Armenians displaced to Armenia”, following his visit to Armenia from 3 to 5 February 2026.

The Armenian authorities appreciate the Commissioner’s engagement on this matter and are pleased to note the Memorandum’s recognition of the cooperation and openness demonstrated by the Armenian authorities during the visit.

The Government also welcomes the Commissioner’s acknowledgment of Armenia’s progress in receiving, supporting and advancing the integration of refugee Armenians displaced from Karabakh to Armenia, particularly in view of the exceptional scale, urgency and complexity of the displacement. As noted in the Memorandum, this progress is reflected in the transition from the initial emergency response towards longer-term support and integration measures, including in the areas of legal residence, housing, employment, education, healthcare and other forms of social support.

The Government of the Republic of Armenia takes careful note of the observations and recommendations contained in the Memorandum and remains firmly committed to ensuring a rights-based response to the needs of refugee Armenians displaced from Karabakh to Armenia. In this regard, Armenia will continue implementing measures aimed at their further integration in Armenia, ensuring access to rights, services and sustainable support, while maintaining constructive dialogue and cooperation with the Commissioner for Human Rights, the Council of Europe and other international partners.

The comments below are intended to provide factual clarifications and additional information on the measures implemented or planned by the competent authorities in the areas addressed in the Memorandum.

In relation to paragraph 5 of the Memorandum

Since 2020, Armenia has welcomed approximately 131,000 refugee Armenians from Karabakh, including a significant influx of 115,000 in just a few days in 2023.

In relation to paragraph 11 of the Memorandum

As of 1 June 2026, Armenian citizenship has been granted to 26,541 persons displaced from Karabakh. In addition, 12,354 minors have acquired Armenian citizenship based on their parents’ status.

With the support of international donors, an administrative register of Karabakh residents has been developed, containing data on persons displaced from Karabakh in 2023. The adoption of the necessary legal acts providing the legal basis for the maintenance and operation of the register is currently underway, in accordance with the procedure established by law.

In relation to paragraph 12 of the Memorandum

As a result of legislative amendments introduced in 2025, beneficiaries of temporary protection may apply online through the Platform, subject to identity verification, for the replacement of a temporary protection/refugee certificate in cases of exchange or loss.

Notifications and decisions concerning the termination or cancellation of temporary protection status, as well as the invalidation of identity documents, are made available to the user through the Platform in the user's personal account.

In relation to paragraph 13 (also paragraph 22) of the Memorandum

As of 1 June 2026, within the framework of the housing program, certificates have been issued to 6,444 beneficiary families, encompassing a total of 26,432 displaced persons. Of these, 2,971 families, representing 13,384 individuals, have redeemed their certificates.

In relation to paragraphs 14-15 of the Memorandum

The Government of the Republic of Armenia has implemented a range of employment programmes to foster self-sufficiency and socio-economic integration, including tax incentives and financial grants for starting small businesses, while simultaneously strengthening educational capacity through the inclusion of Armenian teachers displaced from Karabakh in the national education system.

The Government also ensured that displaced pupils could continue their education, with enrolment facilitated through a simplified admission process, including cases where the required documentation was not available.

Currently Armenia is implementing several programs for refugees, including the "Inclusive Livelihoods National Framework for Refugees and Host Communities." This initiative, adopted in October 2025 in collaboration with the UNHCR, focuses on long-term integration, addressing housing, employment, and social services to meet the ongoing needs of refugees while fostering community support.

In relation to paragraph 17 of the Memorandum

For reasons of legal certainty and consistency with international practice, the appropriate term with regard to Armenians from Karabakh is “residents,” rather than “inhabitants.”

The “070” code documents issued to Armenians from Karabakh were intended exclusively for international travel purposes and served solely as the travel documents enabling the exercise of their right to freedom of movement.

As far as support is concerned, social assistance programmes were initially designed based on displacement status, regardless of legal status, without making eligibility conditional upon Armenian citizenship.

In relation to paragraph 19 of the Memorandum

Pursuant to the Law of the Republic of Armenia on Refugees and Asylum, refugees are entitled to free legal aid through the Office of the Public Defender. The Public Defender may assist in the proper drafting of applications submitted to the court, including requests for exemption from court fees.

At the discretion of the court, persons holding refugee status, due to their difficult financial situation, are entitled, when submitting a statement of claim or appeal, to apply for exemption from court fees, reduction of the amount thereof, or deferral (postponement) of payment. In light of established judicial practice, such applications are generally granted.

As regards appeals lodged by state authorities against judgments delivered in favour of Armenian refugees from Karabakh, such decisions are taken on the basis of relevant factual and legal considerations.

In relation to paragraph 20 and Recommendation 6 of the Memorandum

Emphasizing the key importance of the registration conducted during the displacement period, it should be noted that the registration carried out in the crisis period served as the primary mechanism ensuring the manageability, transparency and legality of humanitarian and legal processes, and enabled the identification of persons displaced within the state system.

In addition, it served as a basis for the provision of targeted social assistance. Within the framework of needs assessments, it enabled the accurate and targeted allocation of primary material, financial, medical and accommodation assistance programmes, as well as the identification of health conditions and specific needs, including disability, pregnancy, and the situation of minors.

The registration process also contributed to monitoring the security environment of displaced persons, facilitating family reunification, and enhancing the effectiveness of efforts to trace missing persons. It further supported the development of long-term state policies on employment, access to education, and housing provision for displaced persons.

Recommendation 6 of the Memorandum concerns the establishment of additional safeguards to enable displaced persons to exercise their right to judicial protection, inter alia through exemption from the state duty and the provision of legal aid.

With regard to state duty, Article 21 of the Law “On State Duty” provides for the possibility of granting concessions, including by reducing the amount of the state duty, deferring the payment deadline, or exempting a person from paying the duty. Article 22 of the same Law defines the categories of persons and types of cases in which individuals are exempt from paying the state duty by operation of law.

At the same time, exemption from the state duty may be granted either by operation of law or by a court decision in an individual case. Upon a party’s motion, and taking into account the circumstances of the case and the specific situation of the claimant, courts may apply such a concession. As a rule, when deciding on state duty concessions, courts take into consideration the person’s social situation, property status and actual ability to pay the state duty. Accordingly, displaced persons may apply to the court in each individual case and, where the relevant grounds exist, obtain a concession in respect of the state duty.

As regards legal aid, the grounds and procedure for receiving free legal aid are set out in the Law “On Advocacy”. In particular, Article 41(2) of the Law defines 21 categories of persons entitled to receive free legal aid, including, inter alia, persons without means, unemployed persons, persons recognised as socially vulnerable, refugees and asylum seekers in Armenia.

Thus, the existing legal framework provides mechanisms enabling persons in need, including Armenian refugees from Karabakh to Armenia, to seek exemption from state duty and to benefit from free legal aid where the relevant legal grounds are met.

At the same time, the competent authorities will continue to monitor practical issues arising in this area and consider them in the context of ongoing efforts to improve access to relevant procedures.

In relation to paragraph 21 of the Memorandum

The Government of Armenia continues provision of social assistance measures to refugee Armenians displaced from Karabakh in a more targeted manner focusing on the most

vulnerable segments of the refugee community. Furthermore, the Government has introduced support programmes for addressing long-term socio-economic needs of the refugees.

In relation to paragraph 22 of the Memorandum

Beneficiaries whose housing needs are fully covered under the state support program are not subject to credit-related limitations. Where additional financing is required beyond the value of the housing certificate, access to credit is governed by standard commercial lending practices applied by financial institutions, which fall outside the scope of the state program. Residential property prices are determined by market conditions.

In relation to paragraph 23 of the Memorandum

Following Government Decree No. 380-L of 26 March 2026, the level of support in regional areas has been revised to 4 million AMD per beneficiary, which has significantly improved the uptake and utilization of housing certificates. The current differentiation of support levels, including in Yerevan, reflects the program design and implementation parameters and does not constitute an outstanding implementation issue.

In relation to paragraphs 27-28 of the Memorandum

The Government of the Republic of Armenia attaches great importance to the inclusion and active participation of displaced women and girls in programs aimed at gender equality, prevention of all forms of violence and discrimination against women, provision of social support services to women subjected to violence, and economic empowerment of women.

Continuous awareness-raising activities are carried out in close cooperation with local and international organisations, within the framework of which displaced women and girls are provided with detailed information on their rights, state support programmes, professional services available to victims of domestic violence, as well as referral and alert mechanisms.

Funded by the state budget, the support centers for victims of domestic and family violence operating in Yerevan and all regions of the Republic of Armenia regularly carry out awareness-raising, economic empowerment and cooperation network-building activities for women and girls.

In addition, the Action Plan for the 2025-2028 Strategy for the Implementation of Gender Policy in the Republic of Armenia, adopted in 2025, identifies displaced women and girls as a target group and provides for their inclusion in awareness-raising, capacity-building and empowerment programmes.

In this context, a qualitative assessment entitled “Qualitative Assessment of Security and Vulnerability Issues among Refugee Women and Girls in Armenia” was conducted by the Armenian Government in cooperation with UNFPA in 2024.

The study aimed to assess trends and risks of gender-based violence among refugees in Armenia following the influx of more than 100,000 persons displaced from Karabakh to Armenia. A total of 142 persons participated in the study, including refugee women and adolescent girls, as well as representatives of organisations providing support to victims of gender-based violence from Yerevan and all regions of Armenia.

Based on the findings of the study, minimum standards were developed for support services and programmes provided to women, taking into account the priority needs of displaced persons and the specific considerations relevant to working with them. On the basis of these standards, on 13 February 2025, the Government of the Republic of Armenia adopted a Decree No. 158-N, which establishes the requirements for the activities, services and staff of support centres for persons subjected to domestic violence, as well as the procedure for the provision of services by such centres.

On December 4, 2025, Armenia adopted its Third National Action Plan (NAP) on Women, Peace and Security (WPS) for the period 2025–2027 (Decree of the Government of the Republic of Armenia N 1760-L) in alignment with the United Nations Security Council Resolution 1325 following the previous plans for 2019-2021 and 2022-2024. The new plan aims to enhance the role of women in peacebuilding and conflict resolution, reflecting Armenia's commitment to gender equality and the empowerment of women in all aspects of public life. This plan reflects the government's commitment to elevating women's right to equal participation in peace processes and decision-making, particularly in response to the urgent needs of vulnerable populations, including displaced Armenian women from Karabakh. Among its key objectives, the plan aims to strengthen legal and institutional frameworks for gender equality, enhance the protection of women's rights in conflict and post conflict situation.

Armenia remains open to further dialogue, exchange of information and cooperation with the Commissioner's Office, both on the issues addressed in the Memorandum and, more broadly, on matters relating to the protection of human rights, the promotion of democracy and the strengthening of the rule of law.