



**IMPLEMENTATION OF  
THE JUDGMENTS OF  
THE EUROPEAN COURT  
OF HUMAN RIGHTS:  
ARMENIA**

---

**European Implementation Network  
January 2021**



The European Implementation Network works with NGOs and others across Europe to promote the full and timely implementation of judgments of the European Court of Human Rights ("ECtHR").

The most successful work on implementation of ECtHR judgments combines advocacy at the national level with engagement with the supervision process at the Committee of Ministers of the Council of Europe.

EIN supports work at both levels through advocacy, training, and resources.

© European Implementation Network  
2 allée René Cassin, F- 67000 STRASBOURG, FRANCE  
[contact@einnetwork.org](mailto:contact@einnetwork.org)

Author: Matteo Zamboni  
Concept: George Stafford and Ioana Iliescu  
Cover Photo: Artak Petrosyan [via](#) Unsplash.com  
Final Photo: Gor Davtyan [via](#) Unsplash.com

The statistics in this document are valid as of 27 November 2020. They were drawn on that date from the Council of Europe's implementation database, [HUDOC-EXEC](#).

Published January 2021

# FOREWORD

Judgments of the European Court of Human Rights are rightly celebrated for bringing justice to victims of human rights violations. However, they are only a first step towards human rights protections. Unfortunately, judgments can remain pending implementation for very long periods of time. This can mean that human rights violations continue to occur. EIN aims to highlight examples of this by assessing the implementation record of Council of Europe member states. In doing so, we hope to raise awareness and incentivize both governments and wider civil society to play a pro-active role in the implementation of judgments of the European Court of Human Rights.



This report examines the implementation record of Armenia. It identifies certain positive developments, including a significant increase in government reporting.

However, the report also shows that there is room for improvement. There are currently 19 leading judgments pending implementation. Out of the leading cases from the last 10 years, 47% of them remain unimplemented. Each of these represents a systemic and recurring human rights problem that has not yet been effectively addressed. This means opportunities to bring domestic legislation, policies and practices into line with European human rights standards are being lost, while human rights violations continue to reoccur. Freedom of assembly, medical care in prison and just compensation for expropriation are some of the areas in which measures are called for.

In other member states of the Council of Europe, we have seen that systematic implementation of judgments of the European Court of Human Rights has been achieved with the help of strong institutional structures. Our experience has also shown that increased involvement and an ongoing collaborative relationship between national authorities and civil society can lead to significant progress, turning the judgments of the European Court of Human Rights into human rights protections. We hope that the dissemination of this report will help inform future work on the implementation of judgments in the Republic of Armenia.

*Professor Başak Çalı  
EIN Chair*

# WHY IMPLEMENTATION MATTERS

## *Musheg Saghatelyan v. Armenia* and the protection of the right to peaceful protest

Mr Saghatelyan is a politician who supported the defeated candidate in the 2008 presidential elections. After the result was announced, he took to the streets of Yerevan to gather in Freedom square with other protesters and denounce widespread irregularities. The protest triggered clashes with security forces. In this context, Mr Saghatelyan was taken by police forces and detained overnight. Formal charges were eventually brought against him, following which he was formally arrested and placed in pre-trial detention. **Shortly afterwards, the charges were dropped, but rather than freeing Mr Saghatelyan the authorities raised new accusations, extended his detention on remand, and convicted and sentenced him to 5 years' imprisonment.**

Throughout the proceedings, Mr Saghatelyan alleged that the charges were fabricated and claimed to be a victim of arbitrary prosecution. He also complained of having been beaten by police officers while in detention. However, his allegations remained unanswered, as no formal investigation was launched into them. Eventually, his rights were vindicated by the European Court of Human Rights. However, **reforms to protect the right of Armenia are still ongoing. The reforms are assessed in the Council of Europe's procedure for monitoring the implementation of judgments of the European Court.** The case of Mr Saghatelyan was selected as the leading judgments in a group of cases concerning the repression of the 2008 protests.



**The convention system has the power to make a real difference to people's lives and to help bring about positive changes across the continent**

(Secretary General of the Council of Europe, 4 September 2020, DC 106 (2020))



Chris Slupski via Unsplash

In their action plan to the Committee of Ministers, the Armenian authorities indicated that the just satisfaction awarded by the ECtHR was paid to the applicant, that the criminal case against him had been re-opened, and that his conviction was quashed. As regards general measures, the government pointed to several **legislative initiatives** (including the 2015 constitutional reform; **the introduction of the crime of torture into domestic law**; and the amendments to the legislative framework concerning freedom of assembly). In addition to this, Armenia created an **independent state body (the Special Investigative Service)**.

However, NGOs argued that these measures are not sufficient to resolve the complex human rights problems identified by the ECtHR, or to avoid recurring violations. The **views of both the government and NGOs were taken into account by the Committee of Ministers**, which, in its decision of 2020, welcomed the positive steps taken by the authorities, but nonetheless prompted them to finalise the legislative initiatives envisaged and to continue to take determined action in order to fully overcome remaining problems.

# WHY IMPLEMENTATION MATTERS

## How Implementation Works

The implementation of the Saghatelyan group of cases can be taken as an example of the complex nature of the implementation process, as well as the importance of exchange between government, the Council of Europe and civil society.

### The Judgment of the ECtHR



With the judgment of 20 September 2018, the ECtHR found that Mr Saghatelyan's rights under **Article 5** had been severely breached on account of his **unacknowledged detention**. In addition to this, the ECtHR identified a **violation of article 3** for the failure to investigate the applicant's complaints of ill-treatment, a **violation of article 6** for the excessive limitations on his right to defence, and a violation of **article 11** for the violent dispersal of the peaceful protest and the detention of the participants.

### The involvement of the CoE and other International Organisations



The CoE and other international organisations played a very active role in the implementation of this group of cases. The Venice Commission drafted an opinion on the 2015 constitutional reform, while the Committee Against Torture, and the European Committee for the Prevention of Torture gave a positive assessment of the domestic legislation introducing the crime of torture. The central human rights issue of this group of cases was also addressed in the framework of the 2020 UPR of Armenia. Moreover, the UN Special Rapporteur recently welcomed the authorities' efforts to guarantee freedom of assembly. Finally, the measures to be taken to implement this group of cases fall into the scope of the CoE Action Plan for Armenia 2019-2022.

### The measures enacted by the Government



With the action plan of 2 April 2020, the authorities pledged to take targeted measures to remedy the violations found by the ECtHR and prevent similar violations in the future. Among other things, Armenia passed **constitutional amendments in 2015**, **introduced the crime of torture**, **reformed the legislative framework on freedom of assembly**, and established the Special Investigative Service. Moreover, the government undertook to pass an overall reform of the code of criminal procedure.

### The Role of Local NGOs



The actions of the authorities were scrutinised by a coalition of NGOs which filed Rule 9.2 submissions to highlight that, in spite of some positive achievements, **(i) ill-treatment by police forces is not yet criminalised**; **(ii) the criminal code still provides for statute of limitations to apply to charges of torture**; **(iii) the establishment of the SIS didn't change the practice of investigations**; and **(iv) despite the adoption of the new legislation on freedom of assemblies, episodes of violence occurred in connection with recent protests**.

### The supervision of the Committee of Ministers



In its decision of 4 June 2020 the Committee of Ministers welcomed the actions taken by the authorities, but called on them to finalise the adoption of the new legislative framework without further delay in order to fully overcome the problems identified by the ECtHR, and particularly the new code of criminal procedure.

# EVALUATING THE IMPLEMENTATION PROCESS

## Key Figures (1)

Number of leading judgments pending implementation

19

As of November 2020, a significant number of leading ECtHR judgments against Armenia are still pending implementation. This means that the **human rights problems identified by the judgments have not been resolved**, and are therefore likely to recur.

Average time leading cases have been pending

3 years  
11 months

The average **time** each leading judgment has been pending is moderately long. However, there are **seven** leading judgments that have been pending implementation for **over five years**. These highlight serious issues such as torture and unlawful detention.



**Leading judgments** are those that identify a **new significant or systemic problem** in a country. Each leading judgment therefore represents a human rights issue that needs to be resolved via the implementation process.



Assessing the **proportion of leading judgments being implemented** is a good way to assess whether a country is carrying out general reforms to put into effect judgments from the European Court of Human Rights.



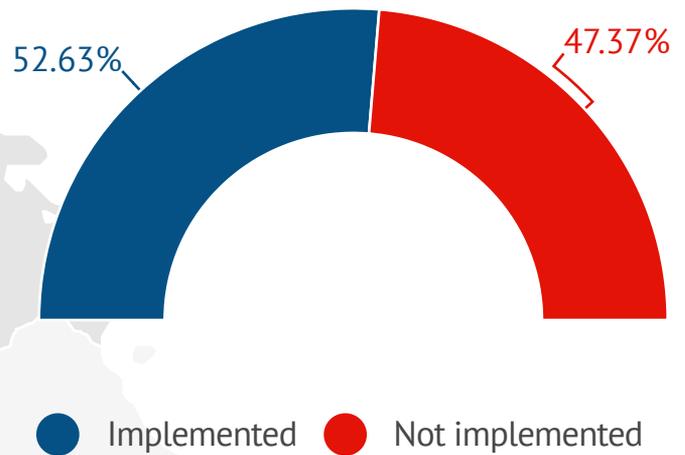
It is also necessary to look at the **overall number of leading cases pending**. The countries with the most serious non-implementation problem have both a high proportion of leading cases still pending **and** a high overall number of pending leading cases.

# EVALUATING THE IMPLEMENTATION PROCESS

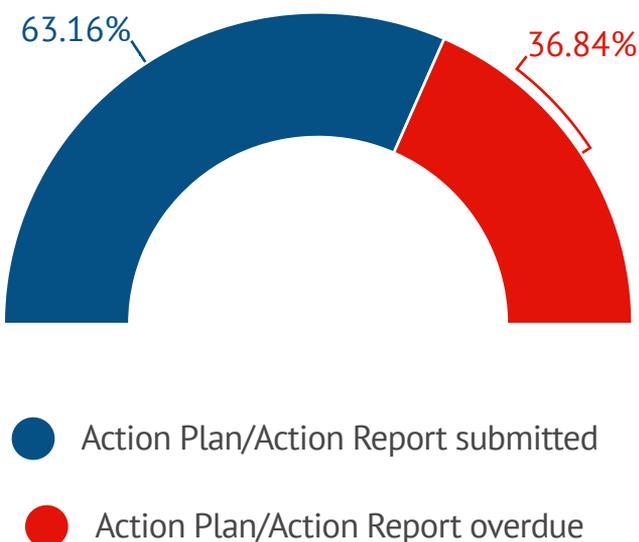
## Key Figures (2)

Nearly half of the leading judgments issued against Armenia in the past 10 years await full implementation. This means that nearly 50% of the systemic human rights issues identified by the ECtHR in recent times in the country have not been properly dealt. In the absence of general legislative and/or policy reforms indicated by the ECtHR in these judgments, the violations are likely to recur.

### Number of leading judgments from the last 10 years still pending



### Percentage of leading judgments with overdue Action Plan/Action Report

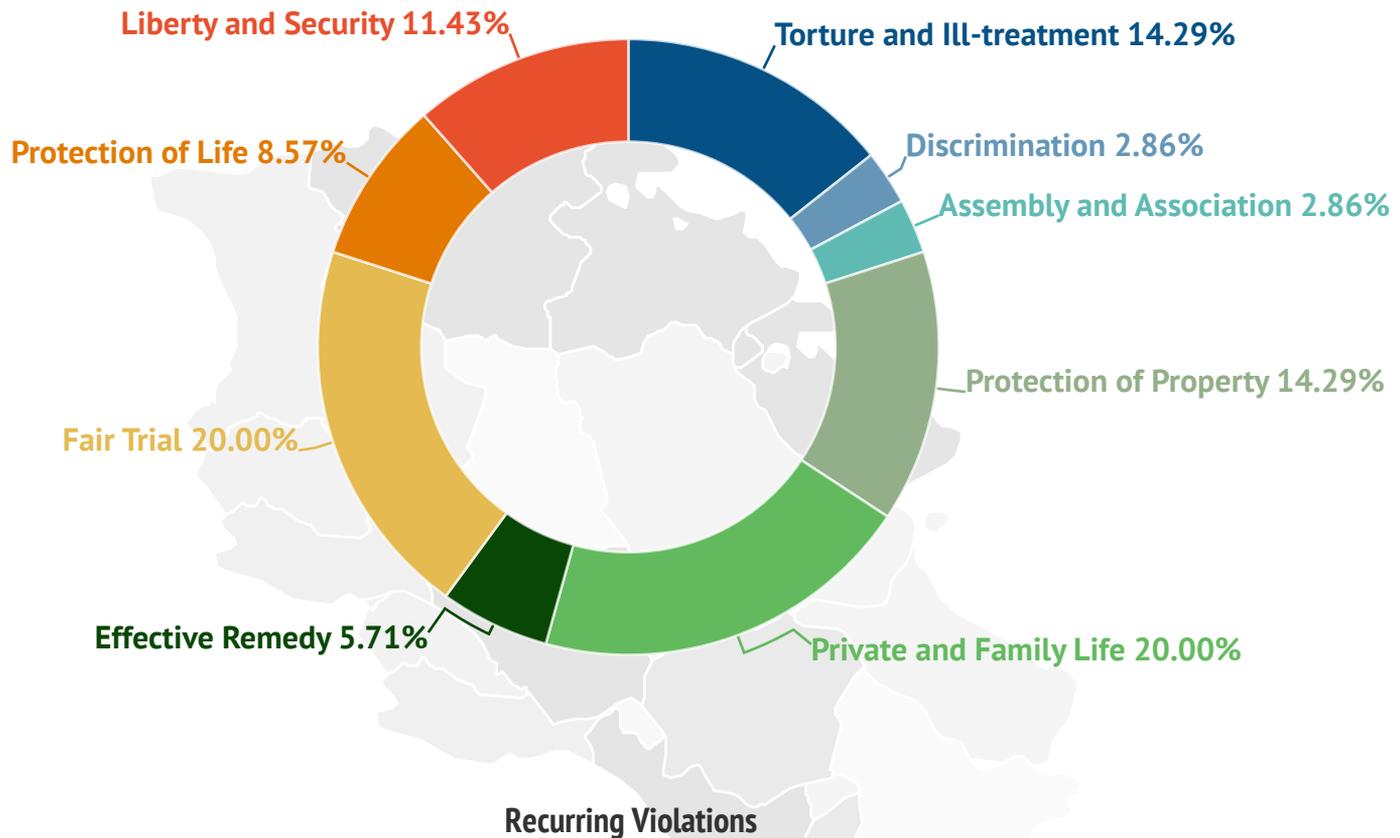


Looking at the pending leading judgments overall, it is worth noting that in more than one third of the cases the Armenian government have not yet submitted an **Action Plan** (i.e. the document setting out what steps are envisaged in order to implement the judgment) and/or an **Action Report** (i.e. the overview of the measures successfully taken). This is an obstacle to implementation, as the lack of an Action Plan and/or Action Report implies government inactivity in relation to the implementation process.

# EVALUATING THE IMPLEMENTATION PROCESS

## Type of Violation

Besides the percentage of implemented/non-implemented leading judgments, **the nature of the violation(s)** found by the European Court with leading judgments pending implementation is also worth noting.



A notable issue is the breach of the **right to liberty and security**, recurring in **4 different leading cases**. Issues include **unacknowledged detention**, lack of sufficient and adequate reasons to order and/or extend **pre-trial detention**, **arbitrary arrest**, and **prosecution**.

There are **5 findings** of a violation of Article 3 (**prohibition of torture and ill-treatment**) in the leading judgments pending implementation, including police **ill-treatment**, **poor conditions of detention**, and **lack of adequate medical care** in prisons.

The findings of a violation of the **right to fair trial** (in **7 pending leading cases**) concern both civil and criminal matters. They range from the breach of the accused person's right to defence, to the non-enforcement of final judgments, and the infringement of the principle of equality of arms.

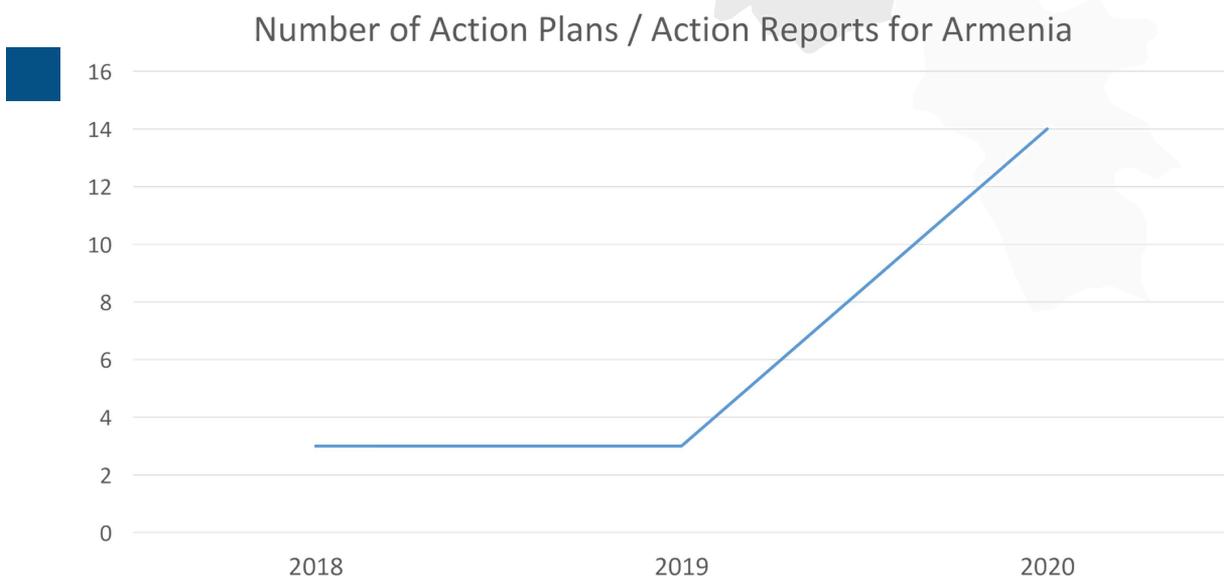
# ANALYSIS

## The State of ECtHR Implementation (1)

In the right conditions, **the implementation process is capable of assisting with positive reforms in Armenia**, leading to real human rights protections. The country's record is better than many others in the region.

Nevertheless, **some of the data raises concerns**. It is unfortunate that **almost half of the leading judgments** from the last ten years are still pending implementation. It is also notable that there are seven pending leading judgments that are **over five years old**.

It is important to recognise that the Armenian authorities are **increasing** efforts to respond to the leading cases pending implementation. In the year of 2020, there has been a **significant increase in government reporting** before the Committee of Ministers. The number of action reports and action plans **increased almost five times** compared to 2019 and 2018. The government has increased reporting on the implementation of judgments across the human rights spectrum, including on issues of torture, freedom of assembly, and fair trial.



# ANALYSIS

## The State of ECtHR Implementation (2)

The increased reporting is essential to moving the implementation process forward. The efforts of the authorities are to be **highly welcomed**. It should also be noted that the reporting is only effective if the measures described are sufficient to resolve the underlying issues - and the reforms are effectively executed. **Civil society has openly disagreed** with some of the measures proposed by the government, in multiple Rule 9 communications to the Council of Europe. However, the authorities have not, so far, incorporated most of these views into their actions plans.

If input from civil society is not incorporated into implementation reforms, this will **weaken the the effectiveness of measures taken**. Ongoing objections of civil society are also likely to **prevent the closure of the implementation process for a variety of cases**, prolonging their implementation and leading the supervision of some cases to remain open **for a long period of time**.

Experience from other Council of Europe member states has shown that important progress can be made through setting up **strong institutional structures responsible for implementation oversight**, based on a collaborative relationship and constructive engagement between civil society organizations, government authorities and/or the national legislature. Such structures appear to be most effective when they are composed of a wide variety of government representatives (ministries, government agent, ombudsman's office), as well as civil society and independent experts.

Given the **increasing efforts of the Armenian authorities and civil society** to engage in the ECtHR implementation process, the setting up of such an institutional structure could go a long way in improving collaboration and Armenia's implementation record.

# CASE STUDY (1)

## The right of detainees to proper medical treatment

Mr Harutyunyan was found guilty of fraud and other offences in 2004, at the end of a **trial he followed from a metal cage in the courtroom when not detained on remand.** He was sentenced to 7 years' imprisonment at Kosh prison, where, in spite of his medical record, **he was denied basic treatment, let alone transferred to a hospital.** After his first heart attack, he filed an application with the ECtHR successfully claiming multiple violations of Article 3 for the placement in the metal cage and the inadequate medical care. **At the time the judgment was delivered the applicant had already died due to a second heart attack.**

Inadequate conditions of detention are a widespread problem in Armenia. In response, the authorities have promised to take a **wide array of measures** in cooperation with the CoE and the EU, including the launch of trainings for public officials, the reform of the criminal code, the code of criminal procedure and the regulation on medical care in detention, in addition to other initiatives aimed at enhancing transparency in prison administration (including the creation of a website). Moreover, the **use of metal cages in courtrooms was abandoned, new detention facilities have started to be built, and prison visits from the Office of the Human Rights Defender (OHRD) were allowed.**

”

**the applicant was clearly in need of regular medical care and supervision, which was, however, denied to him over a prolonged period of time.**

(Ashot Harutyunyan v. Armenia, 15 June 2010, § 115)



Denny Müller [via](#) Unsplash.com

As noted by the Committee of Ministers, this is not enough to address the **root causes of the problem; i.e. the lack of a domestic remedy against ill-treatment.** The government agreed to keep prison healthcare as a key priority and undertook to implement the measures envisaged, among other things by completing legislative reforms and by increasing the number of doctors and health workers in prisons. Moreover, the authorities gave some information on the domestic remedies available and announced the creation of a new Centre for Penitentiary Medicine. Nevertheless, as suggested by the CM, without a detailed timing these undertakings risk delays to real change. These concerns are echoed by the OHRD, which made specific recommendations in terms of health care staff and available equipment in prison establishments.

The authorities presented a new action report in 2020. However, according to local NGOs much more needs to be done, as healthcare in prisons is still problematic in Armenia.

# CASE STUDY (2)

## Protections against expropriation

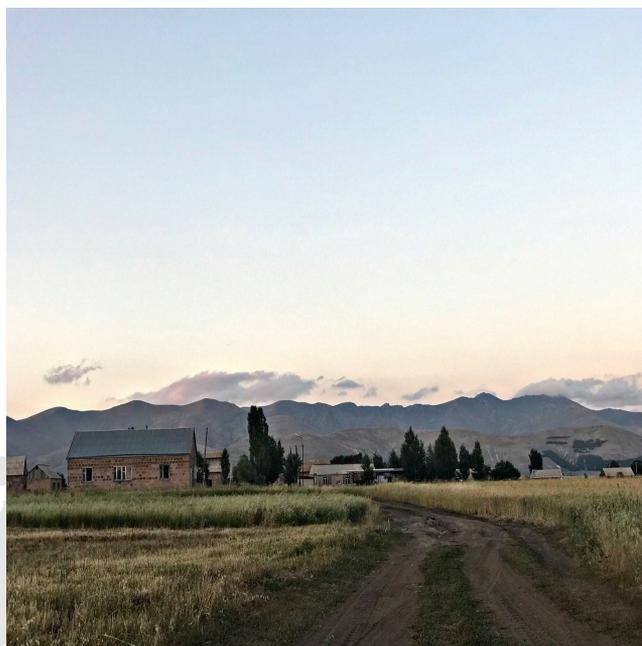
The Osmanyany-Amiragyan family lived from agriculture on a small plot of land they owned in Teghout village - until **their property was expropriated by a big company for mining purposes**. At the outcome of domestic proceedings, domestic courts valued the land at the equivalent of roughly 500 Euros - **without taking into account the fact that the land was the family's main, if not only, source of income**. The family then turned to Strasbourg, arguing that the sum they had received in compensation for the expropriation was inadequate. This argument was upheld by the European Court, which **criticised the domestic authorities for having failed to assess the real value of the property** and to ensure that the compensation would have covered their actual loss.

This is not an isolated incident, and many analogous cases reached the ECtHR. The case of Osmanyany and Amiragyan was selected as the leading case in a group of 8 cases concerning expropriation of agricultural land in the village of Teghout. As detailed in two submissions to the Committee of Ministers, the families were paid the just satisfaction awarded by the ECtHR. However, **families in a similar position who did not have cases in Strasbourg had to apply to the Court of Cassation**, asking for the re-opening of their cases. The outcome of these requests remains uncertain, as **the law on expropriation has not undergone any reform aimed at avoiding recurring violations**.



**there may be situations where compensation representing the market price of the real estate ... would not constitute adequate compensation for deprivation of property ... in particular if the property constituted [the] main, if not only, source of income**

(Osmanyany and Amiragyan v. Armenia, 11 October 2018, § 69)



Karine Avetisyan [via](#) Unsplash.com

With the action plan of 2019, updated in 2020, the authorities stated that parliamentary hearings were held between public institutions and civil society organisations, following which **the government accepted the need for a broad reform of the law on expropriation**. Having received this information, the CM decided to close the supervision process of these cases as regards individual measures, while continuing to examine the issue of the general measures.

As highlighted in a NGO communication, the law on expropriation still lacks sufficient guarantees for property owners. Moreover, in addition to those who won cases in Strasbourg, **another 43 families living in the same area were expropriated. They lacked the means or the opportunity to file an application with the ECtHR, but claim they suffered the same breach of their property rights.**

The need to find a solution that takes into account the situation of these families shows that the implementation process of this group of cases extends beyond the specific subject of expropriation in the cases that did come to Strasbourg.

# NGO ENGAGEMENT

NGOs play a crucial role in the implementation process. Through their **written submissions** and **informal briefings** they can shed light on the actual state of execution of a given group of cases, and prevent them from being closed too early.

These are some of the NGOs that have been engaging in the process of the implementation of ECtHR judgments concerning Armenia. They can be contacted for more information on specific cases.



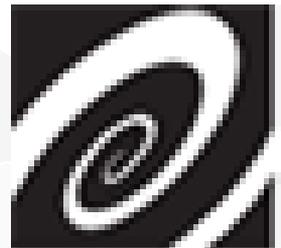
**Helsinki Citizens' Assembly Vanadzor**

Tigran Mets Avenue, 59, Vanadzor, RA



**Open Society Foundations - Armenia**

[info@osi.am](mailto:info@osi.am)



**Helsinki Committee of Armenia**

3a Pushkin str., Yerevan, RA

[info@armhels.com](mailto:info@armhels.com)



**Protection of Rights without Borders**

11 Amiryanyan, Yerevan, RA

[info@prwb.am](mailto:info@prwb.am)



# REFERENCES

## **On the group of cases concerning the protection of the right to peaceful protest (Musheg Saghatelyan group of cases)**

Action plan of the authorities of 2 April 2020 available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2020\)301E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2020)301E)>

Action report of the authorities of 4 October 2020 available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2020\)238E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2020)238E)>

Alisa Chilingaryan (Iravaban.net) Mushegh Saghatelyan is a man whom Robert Kocharyan avenged (17 August 2019) available at <<https://iravaban.net/en/246580.html>>

Communication from Open Society Foundations - Armenia, Helsinki Citizens' Assembly Vanadzor, Transparency International Anti-Corruption Center, Protection of Rights without Borders NGO, Law Development and Protection Foundation, Helsinki Committee of Armenia, of 21 April 2020 and reply from the authorities of 5 May 2020 available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2020\)401E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2020)401E)>

Concluding observations of the Committee against Torture on the fourth periodic report of Armenia of 26 January 2017 available at <[https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CAT/C/ARM/CO/4&Lang=En](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CAT/C/ARM/CO/4&Lang=En)>

Council of Europe Action Plan for Armenia 2019-2022 available at <[https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=090000168090762f](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=090000168090762f)>

Decision of the Committee of Ministers of 4 June 2020 available at <[http://hudoc.exec.coe.int/ENG?i=CM/Del/Dec\(2020\)1377/H46-2E](http://hudoc.exec.coe.int/ENG?i=CM/Del/Dec(2020)1377/H46-2E)>

Decision of the Committee of Ministers of 8 December 2016 available at <[http://hudoc.exec.coe.int/eng?i=CM/Del/Dec\(2016\)1273/H46-2](http://hudoc.exec.coe.int/eng?i=CM/Del/Dec(2016)1273/H46-2)>

Draft amendments to the Constitution of the Republic of Armenia, text adopted by the National Assembly of Armenia on 5 October 2015 to be submitted to a national referendum on 6 December 2015 available at <[https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-REF\(2015\)042-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-REF(2015)042-e)>

First Opinion on the draft amendments to the Constitution of the Republic of Armenia endorsed by the Venice Commission on 29 October 2015 available at <[https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD\(2015\)037-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2015)037-e)>

Report to the Armenian Government on the visit to Armenia carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment of 22 November 2016 available at <<https://rm.coe.int/16806bf46f>>

Human Rights Watch, Democracy on Rocky Ground, Armenia's Disputed 2008 Presidential Election, Post-Election Violence, and the One-Sided Pursuit of Accountability (25 February 2009) available at <<https://www.hrw.org/report/2009/02/25/democracy-rocky-ground/armenias-disputed-2008-presidential-election-post-election>>

JAMnews, European Court of Human Rights rules against Armenia in three cases (21 September 2018) available at <<https://jam-news.net/european-court-of-human-rights-rules-against-armenia-in-three-cases/>>

Judgment of the European Court of Human Rights, I section, of 20 September 2018 in the case of Mushegh Saghatelyan v. Armenia, app. no. 23086/08, available at <<http://hudoc.echr.coe.int/eng?i=001-186114>>

OSCE, Final report on Presidential Elections in Armenia of 19 February 2008 (30 May 2008) available at <<https://www.osce.org/odihr/elections/armenia/32115>>

Özenç Bilgili (European Implementation Network) Crackdowns on opposition protests in Armenia (5 December 2019) available at <<http://www.einnetwork.org/blog-general/2019/12/5/crackdowns-on-opposition-protests-in-armenia>>

Protecting civil society space: strengthening freedom of association, assembly and expression and the right to defend rights in the EU, study commissioned by the European Parliament, October 2020, available at

<[https://www.europarl.europa.eu/RegData/etudes/STUD/2020/659660/IPOL\\_STU\(2020\)659660\\_EN.pd](https://www.europarl.europa.eu/RegData/etudes/STUD/2020/659660/IPOL_STU(2020)659660_EN.pd)>

Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association of 13 May 2019 available at <<https://undocs.org/A/HRC/41/41/ADD.4>>

Report of the Working Group on the Universal Periodic Review on Armenia of 18 March 2020 available at <<https://undocs.org/A/HRC/44/10>>

Roman Kiselyov (European Human Rights Advocacy Centre) Mushegh Saghatelyan v Armenia Case Summary (20 September 2018) available at <<https://ehrac.org.uk/resources/mushegh-saghatelyan-v-armenia/>>

#### **On the statistics**

Statistics taken from the HUDOC-EXEC database <<https://hudoc.exec.coe.int/ENG#%7B%22EXECDocumentTypeCollection%22:%7B%22CEC%22%7D%7D>>, valid as of 27 November 2020

Armenia Country Factsheet available at <<https://rm.coe.int/168070973c>>

EIN country page available at <<http://www.einnetwork.org/armenia-echr>>

EIN explanation of the statistics available at <<http://www.einnetwork.org/about-our-data>>

#### **On the group of cases concerning the right of detainees' to proper medical treatment (Harutyunyan group of cases)**

Action Plan of the authorities of 16 April 2015 available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2015\)435E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2015)435E)>

Action Plan of the authorities of 18 January 2019 available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2019\)75E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2019)75E)>

Action Plan of the authorities of 9 October 2017 available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2017\)1150E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2017)1150E)>

Action Report of the authorities of 29 September 2020 available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2020\)745E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2020)745E)>

Association for the prevention of torture, Ashot Harutyunyan v. Armenia (15 June 2010) available at <[https://www.ap.torture.org/en/news\\_on\\_prevention/ashot-harutyunyan-v-armenia](https://www.ap.torture.org/en/news_on_prevention/ashot-harutyunyan-v-armenia)>

Communication from Helsinki Citizens Assembly - Vanadzor and Spitak Helsinki Group of 25 September 2013 available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2013\)1118E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2013)1118E)>

Communication from Helsinki Citizens Assembly - Vanadzor and Spitak Helsinki Group of 21 January 2020 available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2020\)1111E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2020)1111E)>

Communication from the Human Rights Defender of Armenia of 21 January 2019 and reply from the authorities available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2019\)120E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2019)120E)>

Concluding observations of the Committee against Torture on the report of Armenia 6 July 2012 available at <<https://atlas-of-torture.org/en/document/yqy1kqins1elemh55y4lsor?page=1>>

Concluding observations of the Human Rights Committee on the report of Armenia 31 August 2012 available at <[https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CCPR/C/ARM/CO/2&Lang=En](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CCPR/C/ARM/CO/2&Lang=En)>

Council of Europe Action Plan for Armenia 2015-2018 available at <<https://rm.coe.int/1680471d82>>

Council of Europe, 2019 News, the CTP visits Armenia (16 December 2019) available at <<https://www.coe.int/en/web/cpt/-/the-cpt-visits-armenia>>

Judgment of the European Court of Human Rights, III section, of 15 June 2010 in the case of Ashot Harutyunyan v. Armenia available at <<http://hudoc.echr.coe.int/eng?i=001-99403>>

Regional project : Reinforcing the fight against ill-treatment and impunity, Joint programme of the Council of Europe and the European Union, available at <<https://www.coe.int/en/web/national-implementation/projects-by-geographical-area/regional-illtreatment2>>

Report of the Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) to the government of Armenia upon the visit from 5 to 15 October 2015 of 22 November 2016 available at <<https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806bf46f>>

Strengthening healthcare and human rights protection in prisons (PGG), Joint programme of the Council of Europe and the European Union, available at <<https://www.coe.int/en/web/criminal-law-coop/pgg-armenia>>

**On the group of cases concerning the protection against expropriation (Osmanyanyan and Amiragyan group of cases)**

Action Plan of the authorities of 17 October 2019 available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2019\)1196E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2019)1196E)>

Action Plan of the authorities of 6 May 2020 available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2020\)424E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2020)424E)>

Communication from Open Society Foundations-Armenia, Protection of Rights without Borders NGO, Helsinki Citizens Assembly of Vanadzor, Transparency International Anticorruption Center, Law Development and Protection Foundation of 18 September 2020

Communication from the applicant of 15 July 2019 available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2019\)838E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2019)838E)>

Communication from the applicant of 8 August 2019 available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2019\)884E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2019)884E)>

Decision of the Committee of Ministers of 14 March 2019 available at <[http://hudoc.exec.coe.int/ENG?i=CM/Del/Dec\(2019\)1340/H46-1E](http://hudoc.exec.coe.int/ENG?i=CM/Del/Dec(2019)1340/H46-1E)>

Decision of the Committee of Ministers of 7 December 2017 available at <[http://hudoc.exec.coe.int/ENG?i=CM/Del/Dec\(2017\)1302/H46-2E](http://hudoc.exec.coe.int/ENG?i=CM/Del/Dec(2017)1302/H46-2E)>

European Court of Human Rights in Armenia, Project of the Council of Europe, available at <<https://rm.coe.int/16806f184a>>

Hovhannisyanyan Varazdat, The Problems of Expropriation Practice in the Republic of Armenia In 21st Annual European Real Estate Society Conference. ERES: Conference. Bucharest, Romania, 2014, available at <<https://eres.architexturez.net/doc/oai-eres-id-eres2014-211>>

Judgment of the European Court of Human Rights, I section, of 11 October 2018 in the case of Osmanyanyan and Amiragyan v. Armenia, app. no. 71306/11 available at <<http://hudoc.echr.coe.int/eng?i=001-186669>>

Kristine Aghalaryan, European Court Rules Against Armenia in Six Cases Linked to Teghout Mine (14 February 2019) available at <<https://hetq.am/en/article/100901>>

Report from the World Bank on Armenia: Strategic Mineral Sector Sustainability Assessment of April 2016 available at <<http://documents1.worldbank.org/curated/en/289051468186845846/pdf/106237-WP-P155900-PUBLIC.pdf>>

Resolution of the Committee of Ministers of 13 November 2019 on the execution of the judgments of the European Court of Human Rights in seven cases against Armenia available at <<http://hudoc.exec.coe.int/ENG?i=001-198723>>

Revised Action Plan of the authorities of 8 June 2016 available at <[http://hudoc.exec.coe.int/ENG?i=DH-DD\(2016\)746E](http://hudoc.exec.coe.int/ENG?i=DH-DD(2016)746E)>

**All the hyperlinks are accurate as of 1 January 2021.**





**IMPLEMENTATION OF  
THE JUDGMENTS OF  
THE EUROPEAN COURT  
OF HUMAN RIGHTS:  
ARMENIA**

---

European Implementation Network  
January 2021