



Office for Democratic Institutions and Human Rights

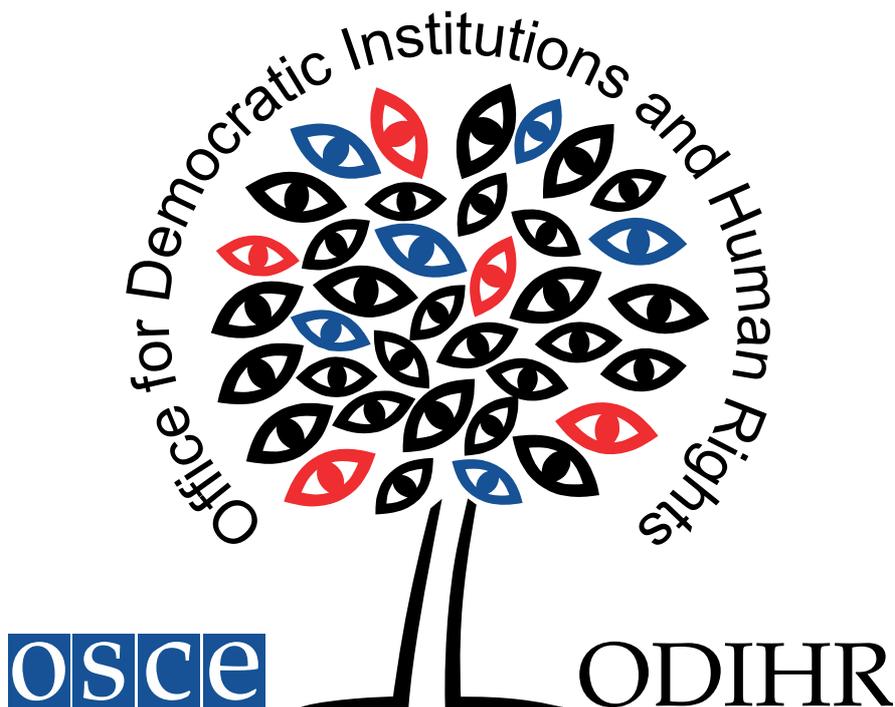
REPUBLIC OF ARMENIA

PARLIAMENTARY ELECTIONS

7 June 2026

ODIHR Needs Assessment Mission Report

9-12 February 2026



Warsaw
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I. INTRODUCTION

In accordance with its mandate, in anticipation of an official invitation to observe the 7 June 2026 parliamentary elections in the Republic of Armenia, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) from 9 to 12 February. The ODIHR NAM included Kseniya Dashutsina, ODIHR Senior Election Adviser and Vittoria Zanellati, ODIHR Election Adviser. The NAM was joined by Tim Knoblaue, Senior Programme Officer of the OSCE Parliamentary Assembly.

The purpose of the mission was to assess the pre-election environment and the preparations for the parliamentary elections. Based on this assessment, the NAM should recommend whether to deploy an ODIHR election-related activity for the forthcoming elections, and if so, what type of activity best meets the identified needs. Meetings were held with officials from state institutions, as well as with representatives of political parties, media, civil society, and international organizations. A list of meetings is annexed to this report.

ODIHR would like to thank the Ministry of Foreign Affairs of the Republic of Armenia for their assistance and co-operation in organizing the NAM. ODIHR would also like to thank all of its interlocutors for taking the time to meet with the NAM and share their views.

II. EXECUTIVE SUMMARY

Parliamentary elections will be held on 7 June, and preparations are taking place following the initialing of an agreement on establishing peace and ending a long-lasting conflict with Azerbaijan, heightened political polarization, and increasing political tensions between the ruling party and the opposition, as well as between the government and the leadership of the Armenian Apostolic Church. Most ODIHR NAM interlocutors underlined the key role of the upcoming elections in the country's future geopolitical trajectory and its democratic path. A minimum of 101 members of parliament are elected by proportional representation from closed lists in a single nationwide constituency.

These elections will be conducted under a significantly revised legal framework following amendments related to the electoral system, candidate registration, campaign finance and its oversight, the accreditation of citizen observers and operational aspects of election administration. Most ODIHR NAM interlocutors expressed general satisfaction with the legal framework and noted that the 2021 and 2024 amendments were adopted in an open, inclusive and participatory process, but the opposition representatives expressed concerns about the timing and lack of proper consultation on the 2026 amendments related to citizen observation. While legislative changes in the last five years address some prior ODIHR recommendations, several aspects remain unaddressed.

Parliamentary elections are administered by the Central Election Commission (CEC), 38 Territorial Election Commissions (TECs) and some 2,000 Precinct Election Commissions (PECs). Election preparations have commenced, including trainings for TEC members and for local government officials involved in the preparations. Most ODIHR NAM interlocutors expressed confidence in the technical capacity of the CEC, but had varied degrees of trust in its impartiality. Some ODIHR NAM interlocutors

expressed concerns that PECs might lack the capacity to manage elections efficiently due to the legislative changes and potentially insufficient training of party-nominated members. The recently created Information Systems Agency of Armenia (ISAA) is working with the CEC to enhance the protection of election-related information systems from cyber threats.

Citizens over 18 years of age have the right to vote, except those recognized incapable by a court decision or imprisoned for serious crimes. Voter registration is passive with the voter register extracted from the State Population Register maintained by the Migration and Citizenship Service of the Ministry of Interior. Most ODIHR NAM interlocutors have confidence in the accuracy of voter lists but some voiced concerns over the ability of displaced Armenian refugees to participate in the elections due to an overly burdensome and delayed process of obtaining citizenship.

To qualify as a candidate, one must be an eligible voter of at least 25 years old, be a citizen of and resident in Armenia for the preceding four years and have command of the Armenian language. Parties met by the ODIHR NAM did not express any concerns with regards to registration procedures or their impact on inclusiveness and did not anticipate challenges in complying with the legally mandated 30 per cent gender quota.

The official campaign starts 30 days before elections and ends one day before election day with a period of campaign silence. ODIHR NAM interlocutors anticipate a polarized campaign with harsh rhetoric, with contestants planning to employ a mix of traditional and online campaign methods. Early campaigning, including incurring costs related to the campaign, is not prohibited, and several ODIHR NAM interlocutors stated that it is a widespread practice to circumvent campaign rules. They also raised concerns about the potential misuse of state resources and possible pressure on voters, including public sector employees. Opposition parties met by the ODIHR NAM raised concerns over their ability to campaign freely, citing as politically motivated a number of recent criminal proceedings against senior party representatives.

Most interlocutors expressed serious concerns that hybrid threats such as foreign interference, cyberattacks and online disinformation could undermine the integrity of the electoral process. Most ODIHR NAM interlocutors welcomed the creation of the ISAA and of an informal working group under the auspices of the Prime Minister's Office with representatives from all ministries, the CEC and the ISAA, to strengthen inter-institutional co-ordination and support a more coherent response to such threats. However, several interlocutors expressed concerns about institutional capacity and preparedness to effectively detect and respond to such threats, particularly online, citing a lack of clearly defined mandates and an adequate regulatory framework.

Recent legislative changes to campaign finance legislation raised limits for annual party donations and campaign finance contributions and expenditures. Many ODIHR NAM interlocutors raised concerns about the lack of regulation of third-party campaigning. Campaign finance oversight is divided between the CEC's Oversight and Audit Service (OAS), and the Corruption Prevention Commission. Several ODIHR NAM interlocutors raised concerns regarding the transparency of party and campaign finances, the delayed disclosure of detailed information on funding sources due to the current oversight structure, and the lack of clarity over responsibility for some functions.

The media landscape is diverse but polarized. The public broadcaster has changed with the opening of the First Channel News and the closure of Shoghakat TV, operated under the auspices of the Armenian Apostolic Church - a decision described by several ODIHR NAM interlocutors as politically motivated. Both public and private broadcasters are obliged to present impartial coverage of the campaign and to provide free airtime on an equal basis. For the campaign, the Television and Radio Commission

informed of its plans to monitor 26 audiovisual channels for compliance with legal obligations, submit regular reports to the CEC and inform the public in case of any violations.

The recent legislative amendments did not address long-standing ODIHR recommendations to simplify the election dispute resolution system and broaden the rules on legal standing. ODIHR NAM interlocutors did not raise specific concerns with regards to the effectiveness of the judiciary in dealing with electoral disputes, while a few questioned the election administration's willingness and capacity to meaningfully review such disputes.

Citizen observer organizations, international organizations and representatives of contestants can observe elections. Citizen observers must meet specific requirements, including having a democracy and human rights focus in their charter for at least one year, which excludes newly established organizations. The 2026 amendments introduced stricter eligibility, transparency, and neutrality criteria, such as disclosing funding sources, publishing annual activity reports, and refraining from political involvement, and allow the CEC to revoke accreditation under certain conditions.

All ODIHR NAM interlocutors underlined the need for an extensive presence of an ODIHR election observation activity citing the highly polarized political environment, and regarded observation by ODIHR as a means to promote confidence and transparency in the electoral process. All ODIHR NAM interlocutors welcomed external review of the revised legal framework and its implementation, and the overall conduct of the elections, including on election day. Particular concerns were raised over the conduct and regulation of the campaign, including online, media coverage of the elections, and the transparency of campaign finances. Interlocutors also highlighted issues that would merit the attention of an ODIHR election observation activity, including allegations of vote-buying, the potential for the misuse of administrative resources and undue pressure on voters.

Based on the findings in this report, the ODIHR NAM recommends the deployment of an Election Observation Mission (EOM) for the upcoming parliamentary elections. In addition to a core team of analysts, ODIHR will request the secondment by OSCE participating States of 24 long-term observers to follow the electoral process countrywide, and 250 short-term observers to observe election day proceedings. In line with ODIHR's standard methodology, the EOM will include a media monitoring component, and will assess the campaign environment and activities across traditional media, online outlets, and social media platforms. The mission will also assess the institutional preparedness and effectiveness in identifying and responding to disinformation, misinformation, and potential foreign and domestic interference, as well as existing co-operation mechanisms with social media platforms.

III. FINDINGS

A. BACKGROUND AND POLITICAL CONTEXT

Armenia is a parliamentary republic with legislative powers vested in a unicameral parliament elected for a five-year term and executive power exercised by the Prime Minister nominated by the parliamentary majority. Following the 2021 early parliamentary elections, the Civil Contract Party obtained 71 out of 107 seats, the Armenia Alliance 28, and the With Honor Alliance 6.

On 6 February, President Vahagn Khachaturyan set parliamentary elections for 7 June. The election preparations are taking place following the initialing of an agreement on establishing peace and ending a long-lasting conflict with Azerbaijan, heightened political polarization over the country's geopolitical

trajectory, and increasing political tensions between the ruling party and the opposition, and between the government and the leadership of the Armenian Apostolic Church.¹

Following Azerbaijan's military action and the subsequent adoption of a ceasefire agreement on 20 September 2023, Armenia started a process of redefining domestic priorities as well as relations with its strategic partners.² These foreign policy shifts, coupled with the government's handling of developments after September 2023, drew criticism from the Armenian Apostolic Church and opposition parties and led to mass protests in May 2024, demanding the resignation of the Prime Minister. According to media reports and ODIHR NAM interlocutors, several senior clergymen and opposition representatives have been detained and prosecuted on various grounds.³ Most ODIHR NAM interlocutors underlined the key role of the upcoming elections in shaping the country's future geopolitical trajectory as well as its democratic path.

The legal framework includes guarantees to promote women's participation in political life.⁴ The outgoing parliament is comprised of 39 per cent women, while the outgoing cabinet includes four female ministers out of 12, but no regional governor is female. Some ODIHR NAM interlocutors noted that despite some progress women's full participation in political life continues to be challenged by longstanding gender norms, and male-dominated political practices and leadership structures.

ODIHR has previously observed twelve elections in Armenia, most recently the June 2021 early parliamentary elections.⁵ The final report, issued in October 2021, contains 24 recommendations, including 10 priority ones, for the authorities to improve the electoral process and bring it closer in line with OSCE commitments.

B. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

Parliamentary elections are primarily regulated by the 1995 Constitution, the 2016 Electoral Code, and the Law on Political Parties.⁶ Armenia is a party to the main international and regional instruments

¹ On 8 August 2025, the foreign ministers of Armenia and Azerbaijan initialed the agreed upon text of the [Agreement on Establishment of Peace and Inter-State Relations between the Republic of Armenia and the Republic of Azerbaijan](#). The initialization was witnessed by the Prime Minister of Armenia, the President of Azerbaijan and the President of the United States of America (USA), who also signed the [Joint Declaration](#). The document affirmed that the conditions have been created 'to finally embark on building good neighbourly relations on the basis of the inviolability of international borders and the inadmissibility of the use of force for the acquisition of territory after the conflict that brought immense human suffering.' It further stated that this 'reality, which is not and should never be subject to revision, paves the way for closing the chapter of enmity between our two nations.'

² Between 2024 and 2025, the government halted its participation and financial contribution to the activities of the Collective Security Treaty Organisation and signed strategic partnership documents with the European Union (EU) and the USA. In January 2026, the governments of Armenia and the USA adopted a joint statement releasing the implementation framework for the Trump Route for International Peace and Prosperity (TRIPP), a US-Armenian initiative aimed at reopening regional transport links.

³ In June 2025, Armenian security forces [reportedly detained](#) 16 people, including Archbishop Bagrat Galstanyan, a senior cleric who played a leading role in the 2024 protests, on charges of orchestrating a plot to overthrow the government. Since then, several other Church representatives were detained and prosecuted in [October](#), [December](#) and [February 2026](#) on various charges. Among opposition figures, in July 2025 former [President Serzh Sargsyan](#) was charged with bribery and illegal entrepreneurship, while a few [representatives of the Armenia Alliance](#) were stripped of their parliamentary immunity and prosecuted for abuse of power and money laundering. Some senior party representatives faced detention, including the mayor of [Gyumri](#) and of [Masis](#) from the opposition who were charged for corruption and hooliganism.

⁴ Gender quotas have been in place since the first parliamentary elections in 1999 and were progressively strengthened. The upcoming 2026 parliamentary election will be the first national vote evaluated under the 2025–2028 Strategy and Action Plan for the Implementation of Gender Policy.

⁵ See [all previous ODIHR election-related reports on Armenia](#).

⁶ Other legislation includes the 2011 Law on Peaceful Assemblies, the 2013 Law on Administrative Procedures, the 2017 Code of Administrative Offences, the 2021 Criminal Code, and the 2018 Law on the Constitutional Court.

related to the holding of democratic elections.⁷ The electoral legal framework has been significantly amended since the last parliamentary elections in 2021, 2024 and 2026.

The May 2021 amendments, introduced shortly before the last parliamentary elections, will be applicable for the first time in the upcoming elections. These amendments revised the electoral thresholds, extended the timeline for a potential second round, introduced changes to candidate registration provisions, and revised the campaign finance oversight system.⁸ The 2024 amendments to the Electoral Code, the Law on Political Parties, and other legal acts introduced provisions to strengthen the legally mandated gender quota, redistributed campaign finance oversight responsibilities, and the accessibility of the voting process.⁹ The January 2026 amendments to the Electoral Code were adopted in an expedited manner and introduced additional accreditation requirements for citizen observers, including disclosure of organizational capacity and funding, with a stated aim to prevent the misuse of the observer status. While all ODIHR NAM interlocutors noted that the 2021 and 2024 amendments were adopted in an open, inclusive and participatory process, the opposition representatives met with by the ODIHR NAM expressed concerns about the timing and lack of proper consultation on the 2026 amendments.¹⁰

Most ODIHR NAM interlocutors expressed general satisfaction with the legal framework, but some noted that it would benefit from further improvement, particularly in regards to the campaign finance legal framework. While recent changes addressed some prior ODIHR recommendations, several remain outstanding, including those related to effective dispute resolution, adequate protection of voters' personal data, measures ensuring the full transparency of media ownership, removal of restrictions on voting rights for persons with mental disabilities and provisions disqualifying newly created organizations from being accredited as observers.¹¹

A minimum of 101 members of parliament (MPs) are elected for a five-year term by proportional representation from closed lists in a single nationwide constituency.¹² The May 2021 amendments lowered the thresholds for mandate distribution to four per cent in case of parties and increased it to

⁷ Including the [1950 European Convention on Human Rights](#) (ECHR), [1966 International Covenant on Civil and Political Rights](#) (ICCPR), [1965 International Convention on the Elimination of All Forms of Racial Discrimination](#) (ICERD), [1979 UN Convention on the Elimination of All Forms of Discrimination against Women](#) (CEDAW), [2003 UN Convention against Corruption](#) (UNCAC), and [2006 Convention on the Rights of Persons with Disabilities](#) (CRPD). Armenia is also a member of the Council of Europe's European Commission for Democracy through Law (Venice Commission) and Group of States against Corruption (GRECO).

⁸ Other changes further specified certain campaign regulations and categories of campaign expenditures, introduced new provisions regulating the activity of the election administration and extended the deadline for accreditation of citizen observer organizations.

⁹ Mandates exceeding 70 per cent of the more represented gender are reassigned to candidates of the less represented gender to ensure at least 30 per cent representation, and where no such candidates appear on the electoral list, the corresponding mandates remain vacant. The 2023 ODIHR and Venice Commission [Joint Opinion](#) noted that this provision results in "elected persons (of the greater represented gender, commonly men) not [to] obtain the mandate though they have been elected according to their position on the list. (...) This may lead to a conflict with the right to elect and be elected as the voter does not know the final, relevant order on the candidate list when voting." Related 2024 amendments to the Criminal Code establish criminal liability for compelling a candidate to recuse or waive his/her mandate. These also introduced technical changes to the provisions regulating the activity of the election administration.

¹⁰ The 2026 amendments were presented in an extraordinary parliamentary session convened at the initiative of the Civil Contract Party and adopted both in the first and second readings within 24 hours. Representatives of the opposition were invited on short notice and did not attend the parliamentary discussions or vote. Some ODIHR NAM interlocutors stated that these amendments were triggered by [concerns](#) with impartiality of certain observer groups in the local elections in Vagharshapat in November 2025.

¹¹ Addressed recommendations related to further regulating the misuse of administrative resources and additional measures to enhance participation of persons with disabilities.

¹² The electoral system was changed by the 2021 amendments, which replaced the prior two-tiered proportional system which had candidates elected from a closed national list and 13 open district lists.

eight and ten percent for an alliance consisting of up to three parties or above four parties, respectively.¹³ If less than three parties and/or alliances pass the threshold, the three contestants with the highest number of votes gain parliamentary representation. The law provides for up to four reserved seats in parliament, one for each of the four largest national minorities according to the data of the latest 2022 census (Yezidis, Russians, Assyrians and Kurds).

The Constitution stipulates that the formation of a government requires a “stable parliamentary majority,” which is defined by the Electoral Code as 52 per cent of parliamentary seats.¹⁴ The 2021 amendments extended the timeline for the holding of a second round from 28 to 35 days after the first vote, in case no contestant achieves a simple majority and no governing coalition is formed within nine days from the finalization of results.¹⁵

C. ELECTION ADMINISTRATION

Parliamentary elections are administered by the Central Election Commission (CEC), 38 Territorial Election Commissions (TECs) and some 2,000 Precinct Election Commissions (PECs). The CEC is composed of seven members elected by at least three fifths of the parliament for a six-year term.¹⁶ Four CEC members are women. The 2024 amendments increased the requirement for representation of each gender included in the CEC, as well as TECs, to be not less than three members. TECs are professional bodies appointed by the CEC for a six-year term and are composed of seven members. TEC members are selected through an open competition and, following the 2024 amendments, members have to undergo an annual mandatory certification organized by the CEC.¹⁷ PECs are temporary bodies formed for each election composed of at least seven members, two of which are nominated by the respective TEC and the remaining by parliamentary parties or alliances.¹⁸ While the law does not provide minimum qualifications for PEC membership, the CEC informed the ODIHR NAM that all potential PEC members must first pass a certification course and test.

The 2021 and 2024 amendments introduced a number of technical novelties. The May 2021 changes provided for an extensive use of video recording in polling stations and during CEC and TEC meetings, increased the type and amount of information communicated via the CEC website, and introduced technical changes aimed at improving the transparency and efficiency of the counting process. The 2024 changes allowed the CEC to establish *ad-hoc* working groups during the election period to *de facto* hire support staff, further regulated the use of video recording and real time transmission of election day proceedings in some 1,800 PECs and of TEC sessions and potential recounts. The CEC informed the ODIHR NAM that it had actively participated in the process of amending the Electoral Code and that it does not anticipate any challenges in implementing the proposed changes in the forthcoming elections.

The CEC commenced the preparations, adopted the electoral calendar, and started trainings for lower-level commissions as well as for local government officials involved in preparations, including with a focus on preventing misuse of administrative resources. The CEC informed the ODIHR NAM of its

¹³ ODIHR has previously advised against raising the thresholds for alliances without a clear justification. See the 2021 ODIHR and Venice Commission [Joint Opinion](#) on the Electoral Code, paragraphs 45-51.

¹⁴ If the winning party or electoral alliance secures a simple majority but does not reach the 52 per cent threshold, it is granted additional seats to attain the required stable majority. The threshold, which used to be 54 per cent, was lowered by 2021 amendments.

¹⁵ This run-off is contested by the two leading candidate lists, which may form new alliances with parties that participated in the first round.

¹⁶ The current composition of the CEC was appointed in 2022.

¹⁷ Chairpersons, deputy chairpersons and secretaries are elected by each TEC from among their members.

¹⁸ If there are four or less parties and/or alliances in parliament, each faction can appoint two members per PEC; if there are five or more, each faction can only appoint one member. The chairpersons and secretaries of the PECs are distributed according to the parties' parliamentary representation.

plans to hold trainings for PEC members as well as party proxies in the coming months, and to launch voter education activities through various means, including social and traditional media. The CEC sessions are broadcast in sign language, and announcements and news are also accessible through a “Text-to-Speech” system. While recent changes aim at improving the accessibility of elections, a number of ODIHR NAM interlocutors criticized the adopted measures as insufficient to effectively promote the participation of persons with disabilities and expected the prospective list of premises to include a limited numbers of PECs due to insufficient efforts to make voting premises accessible.¹⁹ The CEC informed the ODIHR NAM that it does not have data on the number of accessible polling stations.²⁰

Most ODIHR NAM interlocutors expressed confidence in the technical capacity of the CEC, but had varied degrees of trust in its impartiality, and several raised concerns about what they view as a limited proactive approach to deal with election violations. Some ODIHR NAM interlocutors expressed concerns that PECs might lack capacity to manage elections efficiently due to the number of legislative changes and potentially insufficient training of party-nominated members.

Several ODIHR NAM interlocutors raised cybersecurity as a concern. The Information Systems Agency of Armenia (ISAA) was established in April 2022 to investigate and co-ordinate the response to cybersecurity incidents for the national critical infrastructure of Armenia, including the election infrastructure.²¹ Two ISAA staff members have been seconded to the CEC to provide advisory and technical support to protect election-related information systems in the upcoming elections, in particular, by ensuring that sensitive components of the electoral process are appropriately segregated from public networks, thereby limiting exposure to external cyber threats. ISAA also plans to participate in the trainings of TEC and PEC members to increase their awareness on cybersecurity.

D. VOTER REGISTRATION

Citizens of at least 18 years old can vote, unless convicted of a serious crime or declared mentally incapacitated by a court decision, the latter a restriction contrary to international obligations and standards.²² Voter registration is passive, with the voter register extracted from the State Population Register maintained by the Migration and Citizenship Service (MCS) of the Ministry of Interior (MoI).

¹⁹ These measures include adopting a booth design that enables voters with disabilities to exercise their right to elect without hindrance, while maintaining secrecy of the vote; reducing the number of voters per booth provided to each PEC from 750 to 600; providing assistive tools for voters with visual impairments; introducing the opportunity to voters with mobility difficulties to be included in the voter list of an accessible polling station of their choice. The CEC is required to publish the list of accessible polling stations 40 days prior to election day.

²⁰ The CEC informed the ODIHR NAM that it plans to conduct a comprehensive assessment of polling station accessibility at approximately 2,000 PECs with the support of international partners. Following the assessment, the list of accessible polling stations, along with an interactive map, will be published on the official website of the CEC 40 days prior to the elections. The CEC also informed that it developed an action plan to carry out awareness-raising activities with organizations dealing with the rights of persons with disabilities.

²¹ ISAA was created as a foundation by the Governor of the Central Bank to facilitate the formation of an electronic digital society, promote the digital economy and drive the digital transformation of society. The agency is headed by a board of trustees composed of three members, with one representative each from the Central Bank, the Ministry of High-Tech Industry and the Office of the Prime Minister. In December 2025, the parliament adopted a legislative package proposed by the Ministry of High-Tech Industry, including the draft laws on Cybersecurity, on Public Data, and on the Regulatory Authority for Information Systems, to establish a unified data policy and reduce cybersecurity risks arising from the digitalization of government services. To oversee and enforce these reforms, ISAA will become an independent regulatory body from 1 January 2027, named Information Systems Regulatory Authority, headed by a five member commission nominated by the parliament.

²² See Articles 12 and 29 of the 2006 [Convention on the Rights of Persons with Disabilities](#) (CRPD). Paragraph 48 of the 2014 [General Comment No. 1](#) to the CRPD states that “a person’s decision-making ability cannot be a justification for any exclusion of persons with disabilities from exercising their political rights, including the right to vote, the right to stand for election and the right to serve as a member of a jury”.

The voter register is updated twice a year based on data inputs from the MCS and can be inspected on a permanent basis on the CEC and MoI websites. It includes all eligible citizens who maintain a permanent residence in Armenia; while citizens abroad are not entitled to vote, a significant number of them maintain official residence in Armenia and are therefore included in the State Population Register and can vote if they return to Armenia. According to the CEC the voter register includes 2,489,031 voters, as of 16 February.

The MCS compiles preliminary lists for each PEC, posted at the polling stations and on the MoI and CEC websites no later than 40 days before election day. The final voter lists are posted at PEC premises two days before the elections and on the MoI and CEC websites seven days before. The MoI informed the ODIHR NAM of continuous efforts to verify the voter lists through door-to-door and field checks by the Community Police. Most ODIHR NAM interlocutors have confidence in the accuracy of voter lists. However, some voiced concerns over the ability of displaced Armenian refugees to participate in the elections due to an overly burdensome and delayed process of obtaining Armenian citizenship.²³ Some ODIHR NAM interlocutors raised concerns about the possible organized transportation of voters from abroad to participate in the elections in favor of a particular party.

Voters will be identified through the Electronic Voter Identification Devices (EVID) which contain an electronic, offline copy of the voter lists. Signed voter lists disclosing data on those who voted will be published after election day for public scrutiny. ODIHR has previously recommended to stop this practice to safeguard voter data privacy and secrecy of the vote, but most of the ODIHR NAM interlocutors support the measure as an effective tool to enhance transparency and prevent electoral fraud. The CEC informed the ODIHR NAM of its plans to purchase approximately 250 additional devices to replace those in need of maintenance and to undertake updates of the operating system.

E. CANDIDATE REGISTRATION

To stand as a candidate, one must be an eligible voter of at least 25 years old, be a citizen of and resident in Armenia for the preceding four years and have command of the Armenian language. Citizens holding another nationality are not eligible to stand as candidates and concealment of dual citizenship is criminalized.²⁴

Candidates can be nominated by political parties and party alliances, and lists may include up to 30 per cent of persons that are not party members. The May 2021 amendments provide that at least the first 30 candidates on the list presented by a political party, and up to 30 candidates on that of alliances, shall be approved by a decision of the party congress. Women and men must account for at least 30 per cent of the candidates, with a requirement that both genders are represented in each grouping of three consecutive candidates on the party's list.²⁵ Some parties informed the ODIHR NAM that they started organizing primaries to select their candidates. Despite a prior ODIHR recommendation, the law does not provide the possibility for candidates to stand individually. Parties met by the ODIHR NAM did not express any concerns with regards to registration procedures or their impact on inclusiveness, and did not anticipate challenges in complying with the gender quota.

Contestants should submit candidate lists and supporting documents to the CEC accompanied by a financial deposit. The May 2021 amendments decreased it to AMD 7.5 million for political parties and increased to AMD 15 million for alliances. The deposit is returned if a list obtains seats in parliament

²³ According to the [UNHCR Operations Data Portal](#), more than 115,000 ethnic Armenians were displaced since September 2023.

²⁴ Judges, prosecutors, military personnel, police officers, other categories of civil servants and election commission members are not permitted to stand as candidates.

²⁵ This does not apply to the section of the list with candidates representing national minorities.

or if a party or an alliance receives at least two per cent and four per cent of the valid votes, respectively.²⁶

F. CAMPAIGN ENVIRONMENT

The official campaign starts 30 days before elections and ends one day before election day. Early campaigning, including incurring costs related to the campaign, is not prohibited, and several ODIHR NAM interlocutors stated that early campaigning is a widespread practice to circumvent campaign rules. The May 2021 amendments prohibited candidates and organizations associated with them, as well as organizations linked to or managed by political parties, from engaging in charitable activities from the moment elections are officially called. Promising or providing voters with benefits or services free of charge or on privileged terms is also prohibited and can lead to criminal charges.²⁷ Candidates are prohibited from using administrative resources in the campaign, with the exception of security measures granted to high-ranking officials subject to state protection; the 2021 and 2024 amendments further detailed the definition of what constitutes misuse of administrative resources and expanded the list of subjects who are prohibited from campaigning.²⁸

Political parties met by the ODIHR NAM stated that the campaign will focus on foreign policy priorities, including the ongoing peace agreement negotiations, integration with the European Union and relations with neighboring countries, as well as domestic issues, including the economy, corruption, social welfare and the church-state relation. Contestants informed the ODIHR NAM that they plan to campaign primarily through social networks, but also using traditional campaign methods, including rallies, community meetings, door-to-door canvassing, and the distribution of leaflets to engage voters and media advertising. Several ODIHR NAM interlocutors anticipate a polarized campaign with harsh rhetoric and verbal attacks on opponents.²⁹ Moreover, they noted the potential for misuse of state resources and pressure on voters, including public sector employees.³⁰ Several opposition parties met by the ODIHR NAM raised concerns over their ability to campaign freely, alleging a number of recent criminal proceedings against senior party representatives and mayors were politically motivated.

Most interlocutors voiced serious concerns about the potential of hybrid threats to undermine the integrity of the elections, including foreign interference, cyberattacks and the spread of manipulative content online.³¹ Representatives of state institutions informed the ODIHR NAM of measures taken to address these challenges, notably the adoption by the government of the Concept of the Struggle Against

²⁶ Prior to the amendments, all contestants had to pay AMD 10 million and political parties also had to receive 4 per cent of valid votes to have the deposit returned.

²⁷ Article 221 of the Criminal Code further provides that contestants, their representatives, or affiliated individuals are prohibited from offering or promising money, goods, services or benefits to voters, either directly or indirectly, including under the guise of charitable activity from the moment the elections are called until the results are finalized. Several ODIHR NAM interlocutors from opposition parties criticized these provisions as broadly worded, noting they could be misused to target opponents as they lack a clear distinction between lawful political persuasion and unlawful inducements that interfere with voters' freedom of choice.

²⁸ The list includes the President of Armenia, public officials and employees (including civil servants, law enforcement, military personnel, and members of electoral commissions), members of independent and oversight bodies, as well as charitable, religious, international and foreign organizations, and accredited citizen observers.

²⁹ To prevent and discourage such practices, the ruling party informed the ODIHR NAM that its candidates and members are required to sign a code of conduct.

³⁰ In February 2026, several decisions on social support and wage increases, including higher pensions, benefits and salaries for Yerevan kindergarten employees were publicized by state and local authorities ahead of the elections. Citizen observers [criticized such measures](#), noting that while not prohibited by law, their timing and promotion during the pre-election period may raise concerns about the use of administrative resources and the impact on equal campaign conditions.

³¹ In January 2026, the Armenian Foreign Intelligence Service released its [2026 External Security Risks Report](#), noting that in 2025 Armenia faced various manifestations of hybrid threats, which, due to the elections scheduled for 2026, will highly likely become more comprehensive, complex and large-scale.

Disinformation 2024-2026, elaborated together with civil society and accompanied by an Action Plan.³² Most ODIHR NAM interlocutors viewed the creation of the ISAA as a positive step towards building resilience against such threats, and also referred to the recent establishment of an informal working group under the auspices of the Prime Minister's Office, bringing together representatives of all ministries, the CEC and the ISAA to facilitate inter-institutional co-ordination and information exchange on hybrid threats. However, several ODIHR NAM interlocutors expressed concerns about the institutional capacity and preparedness to effectively detect and respond to such threats, particularly online, citing a lack of clearly defined mandates and an adequate regulatory framework.

G. CAMPAIGN FINANCE

Campaign financing is primarily regulated by the Electoral Code and the Law on Political Parties. The May 2021 amendments to the Electoral Code provided that any unspent campaign funds are returned to the party rather than the state and expanded the definition of a campaign expenditure, partially addressing a prior ODIHR recommendation. Other recommendations related to reporting contributions and expenditures incurred before the start of the campaign, as well as to increase oversight resources, remain outstanding. Third-party campaigning and spending remain unregulated and is widespread, which was a significant concern among most ODIHR NAM interlocutors.³³

The law provides for public and private funding of political parties.³⁴ Donations from legal entities, foreign and anonymous sources are prohibited. Contestants are required to open a dedicated bank account for all campaign finance transactions.³⁵ The 2024 amendments provided that the campaign funds of a party or party alliance are limited to contributions made by that party or alliance. The CEC informed the ODIHR NAM that these changes aimed to ensure the effectiveness of financial control tools and procedures, but several ODIHR NAM interlocutors raised concerns that this will decrease transparency and efficiency of the oversight.

Campaign contributions and expenditures through the party's campaign bank account are limited to 800 million Armenian dram (AMD) for the first round and an additional 200 million for a second round.³⁶ Annual donation limits for political parties were increased by the 2024 amendments to one billion AMD, including up to ten million AMD by a single natural person. Campaign donations are exempt from the

³² The Concept presents a roadmap through three pillars: improving government strategic communications to counter false narratives, ensuring information integrity through co-operation between private sector and state regulatory bodies, and promoting national civic education programs.

³³ Citizen observers expressed dissatisfaction with the failure to address this regulatory gap in various electoral reforms over the past years, despite having long advocated for regulation.

³⁴ Parties may be financed through membership fees, donations from individuals, either monetary or in-kind, loans and income from party activities. Those that received at least two per cent of the vote in the previous elections are entitled to annual public funding. Following the 2021 early parliamentary elections, these include the Civil Contract, Republican Party, the "Armenia" Alliance as well as the Prosperous Armenia Party. Parties may also qualify for targeted funding and the 2024 amendments to the Law on Political Parties increasing the share of general funding relative to targeted funding from 60/40 to 80/20. They also narrowed the eligibility criteria for targeted funding to two requirements, such as maintaining a gender-balanced governing body and ensuring territorial representation in more than half of Armenia's administrative units (*marzes*), thereby eliminating the requirement to conduct research or produce publications on political programmes or public policy issues.

³⁵ Contestants are obliged to set up a campaign account within 5 days after the adoption of the decision on registering the candidates. Non-establishment of the campaign account constitutes grounds for the CEC to apply to the Administrative Court for revocation of the registration of a contestant.

³⁶ These are approximately EUR 1,801,802 and EUR 450,450 based on the exchange rate applicable in March (EUR 1 equals AMD 444). The law provides for administrative proceedings where contestants fail to report expenditures at their market value or exceed the maximum permitted spending limit. Overspending by more than 20 per cent of the maximum campaign expenditure limit constitutes grounds for the CEC to apply to the Administrative Court for revocation of a contestant's registration.

annual donation limits set for political parties, which several ODIHR NAM interlocutors criticized for resulting in the practice of excessive donations during election years.

Following the 2024 amendments, the CEC's Oversight and Audit Service (OAS) is responsible for oversight of campaign finance expenditures and contributions, while the Corruption Prevention Commission (CPC) oversees political party and campaign funding.³⁷ During the campaign, contestants are required to submit three interim campaign finance reports to the OAS, two prior to and one after election day, which are published on the CEC website within three days of submission. Following the registration of contestants, banks where temporary special accounts are opened must submit to the OAS a statement on all incoming and outgoing funds every three working days; the OAS shall consolidate this data, prepare a summary statement and publish it on the website of the CEC. In parallel, banks also submit to the CPC data on the balances, inflows and outflows of financial resources in the bank accounts of parties participating in elections (including within alliances) every three working days. The CPC summarizes this data and publishes a report on its website.³⁸ The CPC informed the ODIHR NAM that it is not legally required to disclose detailed information about the donors when preparing such reports, which will be disclosed in the annual report that parties are expected to submit for auditing purposes only in February 2027.³⁹

Several ODIHR NAM interlocutors raised concerns regarding transparency of the political and campaign finance legislation, the delayed disclosure of detailed campaign sources created by the current oversight architecture, the lack of clarity over responsibility for some functions, as well as the capacity of the OAS and CPC to effectively and timely identify violations.⁴⁰

H. MEDIA

Despite a limited advertising market, a high number of public and private media outlets operate in Armenia.⁴¹ While television remains an influential news source, social media have become the primary source of information. Most ODIHR NAM interlocutors noted media is polarized and that public television is widely perceived as reflecting a pro-government editorial stance. While several ODIHR NAM interlocutors stated that media environment has improved in the recent years, some reported difficulties in obtaining access to public information from the government and state institutions in a

³⁷ The May 2021 amendments transferred the financial oversight functions from the CEC's OAS to the CPC but according to ODIHR NAM interlocutors this transfer never materialized and was postponed annually, citing the CPC's limited staff and insufficient capacity to assume these responsibilities. The 2024 amendments reversed this latter change. The OAS operates independently of the CEC, consisting of three permanent members. The head is an independent official appointed by a decision of the CEC for a term of 7 years, while the other two employees are civil servants. Following registration of candidates lists, each party represented in the National Assembly may appoint one auditor with voting rights who has obtained auditor qualifications by the Audit Chamber. The CPC is composed of five members appointed by the Armenian parliament following a public competition, of which 2 position – including the chairperson – are vacant. The Acting Chairperson has been serving in this position for over 2 years.

³⁸ The CPC informed the ODIHR NAM that during the campaign it thoroughly investigates all campaign donations to determine if the transaction is beyond the limit and whether the amount is justified based on the donor's income. The CPC can issue administrative fines, while any serious violation is reported to the Prosecutor's General.

³⁹ The CPC informed that the data protection authority advised against disclosing detailed information but stated its readiness to provide such detailed information to citizen observers and civil society upon request.

⁴⁰ This perception was further heightened by a [civil society investigation](#) alleging that the ruling party systematically funneled large sums into its 2022 local election campaigns using the names of ordinary citizens who had never authorized such donations.

⁴¹ According to the Television and Radio Commission, 28 television companies operated in Armenia as of 2025. Of these, twenty-one are licensed broadcasters: five with nationwide coverage, six with capital city coverage, and ten with regional coverage. Three channels operate as public broadcasters without requiring licenses: First Channel, First Channel News, and Shoghakat, which are operated by Public Television Company of Armenia CJSC and Spiritual-Cultural Public Television Company CJSC. The remaining four channels are foreign or interstate broadcasters that operate under interstate agreements rather than Armenian licenses.

timely manner, and pointed to increased pressure on media such as the use of lawsuits, verbal attacks and threats against journalists;⁴² the latter are particularly visible and widespread on social networks and often targeting women media professionals.⁴³

The public broadcasting has changed since the last elections. Following amendments to the Law on Audiovisual Media of May 2024, First Channel News, which initially served only the capital area, was granted national coverage and started operating alongside First Channel and Shoghakat TV. Later, in 2025, Shoghakat TV lost its nationwide digital broadcast slot.⁴⁴ While the decision was presented as a financial and structural measure, several ODIHR NAM interlocutors characterized it as politically motivated, particularly against the backdrop of tensions between the authorities and the Armenian Apostolic Church, and expressed concerns about its impact on media pluralism. According to the Council of the Public Broadcaster, the decision was driven by financial considerations.

During the campaign period, contestants are entitled to both free and paid airtime, and public and private broadcasters have to provide contestants with equal access on non-discriminatory terms.⁴⁵ The 2024 amendments increased the free airtime on public broadcasters and radio, and introduced up to 25 minutes of free airtime per contestant in some private broadcasters, which was criticized by some ODIHR NAM interlocutors as negatively impacting their financial stability. Following the May 2021 amendments, mass media outlets operating online are also required to provide non-discriminatory and impartial conditions for candidates and political parties during the campaign period.⁴⁶ The Public Television Company is mandated to broadcast programmes presenting contestants' electoral platforms and to organize live pre-election debates, ensuring equal participation for all parties and alliances, in line with a prior ODIHR recommendation.⁴⁷ The public broadcaster informed the ODIHR NAM of its plans to fulfil all legislative requirements, including to organize televised debates.

Oversight of the compliance of broadcasters with campaign coverage requirements is entrusted with the Television and Radio Commission, which conducts systematic monitoring during the campaign period, prepares regular reports submitted to the CEC, reacts to violations and can recommend sanctions. The Commission informed the ODIHR NAM of its plans to monitor 26 audiovisual channels overall for compliance with legal obligations and to inform the public in case of violations.

I. ELECTION DISPUTE RESOLUTION

Election related disputes can be filed with election commissions and the courts. Decisions, omissions or inactions of election commissions can be lodged with the higher-level commission, while decisions

⁴² In Reporters Without Borders's 2024 World Press Freedom Index, Armenia ranked 34th out of 180 countries, up from 43rd in 2024, and 63rd in 2021.

⁴³ According to [Justice for Journalists](#), in 2025, the total number of attacks on journalists and media outlets in Armenia amounted to 230 incidents, representing a 30% increase compared with 2024. While the number of physical attacks and threats to life, liberty and health fell twofold, there was a significant rise - around 41% - in attacks carried out via judicial and/or economic means. The majority of these cases concerned allegations of insults, defamation or reputational harm, while only two lawsuits were related to copyright protection. Of the total number of attacks on media workers recorded during the year, 128 incidents originated from representatives of the authorities, 98 from non-state actors, and four from unknown individuals.

⁴⁴ The 2025 amendments to the Law on Audiovisual Media reduced the number of public broadcasters from three to two and removed the requirement to provide educational and cultural programming, with the authorities citing inefficient spending and the need to optimize state-owned media.

⁴⁵ The CEC determines the allocation schedule for free and paid airtime on broadcasters.

⁴⁶ Paid online campaign material may only be published on the basis of a written contract with the candidate, party, or their representative and must be financed from the campaign bank account. All online campaign materials must be clearly labelled and include information about the sponsor or commissioning party.

⁴⁷ The law requires at least three debates in the parliamentary elections, each lasting no less than 90 minutes, with at least one debate involving only the first-listed candidates of the electoral lists. All contestants must have the opportunity to participate in an equal number of debates.

of the CEC can be appealed to the Administrative Court.⁴⁸ The recent legislative amendments did not address long-standing ODIHR recommendations to simplify the election dispute resolution system and broaden the rules on legal standing.⁴⁹ Voters, media representatives, and observers can complain regarding violations of their individual rights, and proxies and commission members with respect to violations of their rights and those of other parties, candidates, and stakeholders.⁵⁰

The Administrative and Constitutional Courts informed the ODIHR NAM that all election related disputes are subject to public hearings, with prior notification of parties, and decisions are published. Both Courts informed the ODIHR NAM about their preparedness to deal with election-related cases within the prescribed deadlines. ODIHR NAM interlocutors did not raise specific concerns with regards to the effectiveness of the judiciary in dealing with electoral disputes, while a few questioned the election administration willingness and capacity to meaningfully review such disputes.

J. ELECTION OBSERVATION

Citizen observer organizations, international organizations as well as representatives of contestants can observe elections.⁵¹ Despite prior ODIHR recommendations that this requirement be removed, the Electoral Code continues to require citizen observer groups to include an explicit reference to democracy and human rights protection in their charter for at least one year prior to the announcement of an election, thereby disqualifying any newly created organization from being accredited. The amendments introduced stricter eligibility, transparency and neutrality requirements; to observe the upcoming elections, organizations will be required to have published the latest annual report of their activities, to reveal the sources of funding in their application, not include in its governing body individuals running as candidates and not support/campaign in favour of any contestant. The CEC may revoke the accreditation if circumstances have emerged under which the application for accreditation would be rejected.

IV. CONCLUSIONS AND RECOMMENDATIONS

All ODIHR NAM interlocutors underlined the need for an extensive presence of an ODIHR election observation activity citing the highly polarized political environment, and regarded observation by ODIHR as a means to promote confidence and transparency in the electoral process. All ODIHR NAM interlocutors welcomed external review of the revised legal framework and its implementation, and the overall conduct of the elections, including on election day. Particular concerns were raised over the conduct and regulation of the campaign, including online, media coverage of the elections, and the transparency of campaign finances. Interlocutors also highlighted issues that would merit the attention of an ODIHR election observation activity, including allegations of vote-buying, the potential for the misuse of administrative resources and undue pressure on voters.

⁴⁸ By law, appeals against decisions and actions of the election commissions can also be filed with courts; in cases of parallel judicial and administrative appeals, the administrative process is dismissed.

⁴⁹ Contestants, authorized representatives who were present during voting and vote count, and commission members can challenge PEC results at the TEC and further appeal TEC decisions to the CEC or the Administrative Court. Only a contestant can appeal the final election results to the Constitutional Court.

⁵⁰ Under the Law on the Constitutional Court, the results can be annulled if evidence shows that election fraud was organized, widespread, repeated, or systematic to an extent that they amount to a violation of the constitutional right to universal suffrage.

⁵¹ The 2026 amendments anticipated the deadlines for submitting a request to accredit citizen observer organizations to the last day for registration of electoral lists, on 3 May, with changes and supplements to the list of individual observers up to 3 days before election day.

Based on the findings in this report, the ODIHR NAM recommends the deployment of an Election Observation Mission (EOM) for the upcoming parliamentary elections. In addition to a core team of analysts, ODIHR will request the secondment by OSCE participating States of 24 long-term observers to follow the electoral process countrywide, and 250 short-term observers to observe election day proceedings. In line with ODIHR's standard methodology, the EOM will include a media monitoring component, and will assess the campaign environment and activities across traditional media, online outlets, and social media platforms. The mission will also assess the institutional preparedness and effectiveness in identifying and responding to disinformation, misinformation, and potential foreign and domestic interference, as well as existing co-operation mechanisms with social media platforms.

ANNEX: LIST OF MEETINGS

Ministry of Foreign Affairs

Robert Abisoghomyan, Deputy Minister
Karine Soudjian, Head, Division of Human Rights and Humanitarian Issues Department
Viktoria Melkumova, Second Secretary, Human Rights and Humanitarian Issues Department
Anna Haroyan, Third Secretary, Human Rights and Humanitarian Issues Department

Ministry of Justice

Tigran Dadunts, Deputy Minister
Tatevik Khachatryan, Department of Anti-Corruption Policy Development and Monitoring, Head of Monitoring Division
Rubina Mkhitarian, Head of Department of International Legal Cooperation
Marietta Mnatsakayan, Legal Expert

Ministry of Interior

Armen Ghazaryan, Deputy Minister
Karen Hakobyan, Deputy Chief of Community Police
Vardan Matevosyan, Deputy Head of Migration and Citizenship Service

National Assembly Standing Committee on State and Legal Affairs

Vladimir Vardanyan, Chair of the Committee
Arusyak Julhakyan, Member

Central Election Commission

Vahagn Hovakimyan, Chairperson
Nune Hovhannisyanyan, Deputy Chairperson

Corruption Prevention Commission

Mariam Galstyan, Acting Chairperson
Tigranuhi Khalafyan, Head, Department for Oversight of Public Servants Conduct

Constitutional Court

Edgar Shatiryan, Judge

Administrative Court

Karen Zariqyan, President

National Commission on Television and Radio

Tigran Hakobyan, President
Gohar Mamikonyan, Member

Council of the Public Broadcaster

Vasak Darbinyan, President
Aram Sukiasyan, Member
Irina Shakhnazaryan, Member
Ara Shirinyan, Member
Kristine Melkonyan, Member

Information Systems Agency of Armenia

Nerses Yeritsyan, Director

Political Parties

Hayk Mamijanyan, Head, With Honor parliamentary faction
Artsvik Minasyan, MP, Secretary, Armenia parliamentary faction
Anna Grigoryan, MP, Armenia parliamentary faction
Artur Khachatryan, MP, Armenia parliamentary faction
Hayk Konjoryan, Head, Civil Contract parliamentary faction
Sargis Khandanyan, MP, Civil Contract parliamentary faction
Narek Karapetyan, Co-ordinator, “Our Way” movement
Ms. Gohar Meloyan, Member, “Our Way” movement
Levon Sargizov, Member, “Our Way” movement
Artur Danielyan, Member, “Our Way” movement
Aram Vardevanyan, Member, “Our Way” movement
Arman Tatoyan, Head, “Wings of Unity” political initiative
Liparit Drmeyan, Member, “Wings of Unity” political initiative
Armen Galstyan, Member, “Wings of Unity” political initiative
Anush Ghavalyan, Member, “Wings of Unity” political initiative

Civil Society

Daniel Ioannisyan, Programs Co-ordinator Union of Informed Citizens
Sona Ayvazyan, Executive Director Transparency International
Genya Petrosyan, Director, Law Development and Protection Foundation
Artur Sakunts, Chairperson, Helsinki Citizens’ Assembly-Vanadzor
Mariam Yeghiazaryan, Board Member, Disability Rights Agenda

Media

Viktoria Stepanyan, Head of International Relations Department, Public Broadcaster First Channel
Narek Minasyan, Editor in Chief of International News, Public Broadcaster First Channel
Karen Harutyunyan, Editor in Chief, CivilNet
Siranuysh Gevorgyan, Managing Editor, Azatutyun (Radio Free Europe/Radio Liberty)
Kristine Barseghyan, Executive Director, Hetq.am
Hakob Karapetyan, Media Expert, Yerevan Press Club
Artur Papyan, Co-Founder, CyberHUB
Gegham Vardanyan, Editor in Chief, Media Initiative Center / Media.am

International Community

Representatives of diplomatic missions of Germany, Greece, Portugal, Russian Federation and Sweden.