

INTERIM REPORT
21 February – 14 March 2017

17 March 2017

I. EXECUTIVE SUMMARY

- On 29 December 2016, the president of the Republic of Armenia called parliamentary elections for 2 April. Following a referendum held on 6 December 2015, the Constitution was amended changing Armenia's political system from a semi-presidential to a parliamentary one. These will be the first elections held under a new proportional electoral system.
- Parliamentary elections are regulated by a comprehensive but complex legal framework, which was significantly amended in 2016 through an inclusive reform process that was seen by most OSCE/ODIHR EOM interlocutors as a step forward in building overall confidence in the electoral process. A number of previous OSCE/ODIHR recommendations have been addressed. Civil society organizations were initially involved in the discussions of the draft Electoral Code, but did not endorse the final text, as their calls to ease restrictions on citizen observers were not addressed.
- The elections are administered by a three-tiered system, comprising the Central Election Commission (CEC), 38 Territorial Election Commissions (TECs), and 2,009 Precinct Election Commissions (PECs). The CEC regularly holds open sessions and publishes its decisions on its website. The PECs were formed by the TECs on 11 March. Some OSCE/ODIHR EOM interlocutors expressed concerns about PECs capacity to deal with the new voting procedures.
- Voter registration is passive and based on the population register. OSCE/ODIHR EOM interlocutors generally assessed the accuracy of the voter list positively. In line with the law and in an effort to prevent voter impersonation, the CEC intends to publish scanned copies of the signed voter lists after the elections.
- On election day, in a further effort to prevent voter fraud, voters will be identified through electronic Voter Authentication Devices (VADs). The use of VADs has been welcomed by most OSCE/ODIHR EOM interlocutors. However, due to the late development of the software and testing of the VADs, concerns have been raised about their functioning on election day.
- In an inclusive process, the CEC registered candidate lists of five political parties and four party alliances. There are a total of 1,558 candidates of which 30 per cent are women.
- The official election campaign started on 5 March. Allegations have been raised about widespread vote-buying by most OSCE/ODIHR EOM interlocutors. There is also a prevalent perception that pressure and intimidation of voters will occur during the campaign.
- The media environment is dominated by politically affiliated television. A free Internet contributes to political pluralism and critical reporting. Contestants have so far received an equal amount of free airtime on the public broadcaster and have the right to purchase advertising time under equal conditions.
- The contestants provide regular reporting on campaign finance, including before election day. Despite a prior OSCE/ODIHR recommendation, so-called organizational expenditures, such as for campaign offices, transport, and communication are excluded from the reporting.

- The legal framework provides for international and citizen observation and entitles party proxies to be present at polling stations. To address potential overcrowding certain limitations were introduced on the number of citizen observers and media representatives at polling stations. Civil society and journalists raised concerns about these provisions.

II. INTRODUCTION

On 29 December 2016, the president of the Republic of Armenia, Serzh Sargsyan, called parliamentary elections for 2 April.¹ Following an invitation from the prime minister of the Republic of Armenia and based on the recommendations of a Needs Assessment Mission conducted from 30 November to 2 December, the OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR) established an Election Observation Mission (EOM) on 20 February.² The EOM, led by Ambassador Jan Petersen, consists of a 14-member core team based in Yerevan and 28 long-term observers (LTOs) who were deployed on 1 March throughout the country. Members of the EOM are drawn from 23 OSCE participating States. The OSCE/ODIHR has requested participating States to second 250 short-term observers to observe election day procedures.

III. BACKGROUND AND POLITICAL CONTEXT

As a result of constitutional amendments approved in a referendum on 6 December 2015, Armenia is transitioning from a semi-presidential to a parliamentary political system; reducing the powers of the president in favor of the prime minister and the parliament. These will be the first elections held under a new proportional electoral system.

At the last parliamentary elections in 2012, the Republican Party of Armenia (RPA) won 69 seats in the parliament and formed the government. In 2016, it signed an agreement to enter a coalition with the Armenian Revolutionary Federation (ARF), which holds five seats in the parliament. The parliamentary opposition includes Prosperous Armenia (PA) with 33 seats, the ANC with 7 seats, Armenian Renaissance (AR) with 5 seats, and Heritage with 4 seats.

IV. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

Parliamentary elections are regulated by a comprehensive legal framework, primarily consisting of the 1995 Constitution (last amended in 2015), the 2016 Electoral Code, and Central Election Commission (CEC) regulations. The legal framework also includes the Law on Political Parties, Law on Freedom of Assembly, Criminal Code, Administrative Code, and the Law on the Constitutional Court. The reform process that led to the 2016 Electoral Code was characterized as inclusive and seen by most OSCE/ODIHR EOM interlocutors as a step forward in building overall confidence in the electoral process. Civil society organizations were initially involved in the discussions of the draft Electoral Code, but did not endorse the final text, as their calls to ease restrictions on citizen observers were not addressed.

The new Electoral Code addresses a number of previous OSCE/ODIHR and Council of Europe's Venice Commission recommendations.³ It provides for improved voter identification, publication of the signed voter lists, measures to enhance the independence of election authorities, removal of the

¹ Armenian National Congress (ANC) initiated collection of signatures to challenge the constitutionality of the Presidential Decree, on the grounds that due to transitional provisions of the Constitution the elections should have been called for a later date, but failed to obtain the required 27 MP signatures.

² See all previous [OSCE/ODIHR reports on Armenia](#).

³ See [Joint Opinions of the OSCE/ODIHR and Venice Commission](#) related to Armenian electoral legislation.

mandatory test for citizen observers, and an increased quota for women on candidate lists. Amendments also clarify important provisions related to campaigning, campaign finance, candidate registration, and complaints and appeals.

Some prior OSCE/ODIHR and Venice Commission recommendations remain unaddressed including those related to citizenship and residency requirements for candidates, electoral thresholds applied for alliances to enter parliament, formation of candidate lists for national minority representatives and the narrow rules on legal standing for submitting electoral complaints.

The new electoral system is complex. A minimum of 101 MPs are elected through a two-tier proportional system, with candidates elected from a single national list and 13 district lists.⁴ To qualify for the distribution of seats, political parties must pass a threshold of five per cent and alliances of parties must pass seven per cent. The system also provides for a total of up to four reserved seats for the largest national minorities (Yezidis, Russians, Assyrians, and Kurds). In line with the Constitution, a “stable parliamentary majority” (defined as 54 per cent of seats) must be achieved to form a government.⁵ If a stable majority is not formed as a result of the elections, or by subsequently building a political coalition within 6 days after finalization of the results, a second round may be held between the top two candidate lists 28 days after election day.

V. ELECTION ADMINISTRATION

The elections are administered by a three-tiered system, comprising the CEC, 38 Territorial Election Commissions (TECs), and 2,009 Precinct Election Commissions (PECs).⁶ The CEC is a permanent and professional body, composed of seven members elected by parliament for six-year terms. All CEC members, including three women, were re-elected in October 2016 by a strong majority vote. The composition of the CEC has raised concern among civil society due to its alleged poor performance in previous elections.⁷

The CEC has been regularly holding open sessions, streamed online and attended by observers, media, and party representatives. Decisions and agendas are published on the CEC website, although sometimes with delay.⁸ The CEC is responsible to ensure uniform implementation of the law and has approved guidelines for TECs, PECs, observers, and proxies, as well as a number of clarifications of the Electoral Code.⁹

The CEC has developed voter education materials on new election day procedures, including with sign language, which are broadcast on public and commercial media. While all OSCE/ODIHR EOM interlocutors welcomed CEC efforts to increase public awareness and ensure consistent implementation of the law, some contestants and NGOs voiced concerns about the reluctance of the CEC to react to potentially contentious issues.¹⁰

The TECs, formed in 2016, are professional bodies composed of seven members appointed by the CEC for six-year terms.¹¹ According to the CEC, women comprise 35 per cent of TEC members with

⁴ In addition to choosing a national list, a voter can also make a preference for one candidate from district list.

⁵ With a view to ensuring a stable parliamentary majority, the winning list may be assigned additional seats.

⁶ This number includes 12 PECs in prisons and pre-trial detention facilities.

⁷ Seventeen civil society organizations issued a [joint statement](#) criticizing the appointment of the CEC.

⁸ CEC normative decisions are to be published on the website after they are reviewed by the Ministry of Justice. As a result, some CEC instructions appeared on the website after one week from the date of their adoption.

⁹ All CEC legal clarifications were provided upon request from civil society organizations.

¹⁰ For example, the CEC declined to clarify seemingly vague legal provisions on invalidating voting envelopes containing items other than ballots. Some OSCE/ODIHR EOM interlocutors claimed that lack of such clarifications leaves room for arbitrary and unreasonable actions of the PECs on election night.

¹¹ The TEC members are drawn from among self-nominated qualified voters.

16 per cent of women in management positions.¹² The TECs are responsible for supervising PECs, handling complaints against PECs, recounts, and tabulating the results. Within the legal deadline of 11 March, all TECs formed their respective PECs. Many OSCE/ODIHR EOM interlocutors expressed confidence in the work of the TECs.

The PECs are responsible for organization of voting, counting, and transfer of results to the TECs. Members of the PECs are primarily nominated by parliamentary parties.¹³ The chairs and secretaries of PECs are distributed proportionally to the strength of the parties in parliament. Although potential PEC members are trained and certified before their appointment, some OSCE/ODIHR EOM interlocutors expressed concerns about PECs capacity to deal with the new complex voting procedures.

VI. VOTER REGISTRATION

All citizens over the age of 18 on election day are eligible to vote, unless declared incompetent by a court decision. The amended Constitution grants prisoners convicted for lesser offenses the right to vote.¹⁴ Voter registration is passive and voter lists are based on the State Population Register, which is maintained by the Passport and Visa Department (PVD) of the police and includes all voters with a permanent residence in Armenia.¹⁵ As of 13 March, there were 2,564,244 registered voters.¹⁶

The preliminary voter lists were posted at polling stations for public scrutiny by 21 February. As required by law, on the same day, the PVD published the entire voter register on its website.¹⁷ Voters can request corrections, inclusions and deletions related to themselves or other voters until 23 March.¹⁸ Following longstanding requests of the opposition and civil society and in an effort to prevent impersonation, the CEC will publish scanned copies of the signed voter lists from all PECs after election day, allowing for public checks of those who reportedly voted, including those *de facto* residing abroad. All OSCE/ODIHR EOM interlocutors regard this as an important deterrent of fraud, regardless of the concern that private data of voters will be disclosed.

OSCE/ODIHR EOM interlocutors generally assessed the accuracy and inclusiveness of the voter lists positively, at the same time acknowledging that a significant number of voters residing abroad continue to appear on the voter list, as they have the right to be registered. Several political parties and civil society expressed concerns that district candidates were pressuring voters to change their permanent residence to districts where they are running for election.¹⁹ However, the PVD reported that to date there were no significant surge in requests to change address, compared to the same period a year ago. As a measure to facilitate the right to vote, voters not residing at their permanent residence can request up until 10 days before election day to vote at their temporary residence.²⁰

¹² By law, at least two members in each TEC should be of the other gender.

¹³ Each parliamentary party or coalition may appoint one member to each PEC, while respective TEC appoints two members. There is no gender requirement for PEC members.

¹⁴ Previously, all those serving a prison sentence were ineligible to vote. As of 7 March, a total of 1,145 pre-trial detainees and 455 prisoners will be able to vote in penitentiary institutions. The remaining some 2,400 prisoners who committed serious crimes will not have the right to vote.

¹⁵ According to the law, voters without permanent address can register to vote if they apply to the PVD.

¹⁶ According to the 2011 census, a total of 2,190,686 citizens over the age of 18 are actually residing in Armenia.

¹⁷ Published information includes voters' names, dates of birth and addresses, listed by polling stations. The PVD will publish the updated final voter register four days before election day.

¹⁸ Voters can be added to the voter list on election day only based on relevant decision by the PVD or a court.

¹⁹ As reported to the OSCE/ODIHR EOM, at least three candidates pressured voters to re-register to Yerevan districts.

²⁰ By 13 March, 1,249 voters had made such a request.

In a further effort to prevent potential electoral fraud through impersonation and misuse of voter list entries, voters will be identified on election day through the use of electronic Voter Authentication Devices (VADs), which contain an electronic copy of the voter lists. Voters' ID will be scanned and the VADs will check if the voter is registered in that polling station and if the voter has already been marked in the system as having voted. Voters' fingerprints will also be scanned and may be used for a subsequent centralized check for multiple voting in case of complaints.²¹

The introduction of the VADs has been welcomed by most of the OSCE/ODIHR EOM interlocutors, although some noted that the late development and testing of the applied software may lead to issues with functionality and operability. The CEC informed the OSCE/ODIHR EOM that a limited test of the VADs during local elections on 12 February 2017 revealed some technical issues, but that it has taken steps to address the identified shortcomings. The CEC provides access to the VADs and the source code upon request to political parties, but not to the public.

As part of a cross party agreement reached on 15 June 2016, the Electoral Code requires that web cameras be installed inside and outside of polling stations so that election day procedures could be recorded and observed via the Internet. Political parties and accredited observers will also be able to request copies of the recorded footage after election day for the purpose of supporting potential complaints. Due to financial limitations, only the interior of the 1,500 largest polling stations will be covered, representing 93 per cent of registered voters.

VII. CANDIDATE NOMINATION AND REGISTRATION

The candidate nomination process commenced on 6 February and ended on 16 February. In an inclusive process, and by the 26 February deadline, the CEC registered lists of all five political parties and four party alliances that presented lists.²²

Eligible voters who have attained the age of 25, have resided in and been a citizen of only Armenia for the preceding four years, and have a command of the Armenian language may be elected.²³ Judges, prosecutors, military personnel, police officers, other categories of civil servants, and election commissioners may not stand as candidates.

Candidate lists are nominated by political parties and party alliances and can include non-party members.²⁴ Each contestant submits a single national list with a minimum of 80 candidates and district lists corresponding to the 13 electoral districts.²⁵ In addition, the national lists may include a separate part with up to four candidates for each of the seats reserved for the four largest national minorities.²⁶ Political parties and alliances must also submit a financial deposit and, if the list receives more than four per cent of the valid votes, the deposit is returned.²⁷

²¹ The Criminal Code imposes prison sanctions for negligent or intentional misreporting of voter impersonation.

²² The ARF, Armenian Renaissance (AR), Communist Party of Armenia (CPA), Congress-Armenian People's Party alliance (CoAPP), Free Democrats (FD), Ohanyan-Raffi-Oskanian alliance (ORO), the RPA, Tsarukyan alliance (TsA), and YELK alliance.

²³ Language proficiency may be proven either by having secondary or higher education or by passing a test. The language test was administered by the Ministry of Education and Science, which informed the OSCE/ODIHR EOM that all 11 candidates who took the test received certificates on Armenian language proficiency.

²⁴ According to the CEC, fifteen per cent of the nominated candidates were non-partisan.

²⁵ Maximum 1 candidate per 15,000 voters may be included in a district list. The district candidates have to appear on the national list.

²⁶ Only AR, CoAPP, RPA, and TsA nominated candidates for the national minority list. Some other parties cited difficulty in finding minority candidates that were not loyal to the ruling party.

²⁷ The deposit is AMD 10 million (some EUR 19,450). EUR 1 is approximately AMD 514 (Armenian *Dram*).

All contestants complied with the legal requirement that each gender must be represented by at least 25 per cent of candidates on the national lists, with each gender appearing in each integer group of four candidates. The gender quota applies at the time of registration and for distribution of obtained and vacant seats. Approximately 30 per cent of the 1,558 candidates registered are women.

VIII. CAMPAIGN ENVIRONMENT AND CAMPAIGN FINANCE

The official campaign period started on 5 March and ends 24 hours before election day.²⁸ The campaign started slowly and has recently intensified. The Electoral Code provides for equal opportunities for contestants during the official campaign period, including equal access to public resources, free and paid airtime, poster space, and premises for meeting voters. Campaigning by government officials is prohibited while performing their official activities.²⁹ It is prohibited to locate campaign offices in the buildings used by state and local self-government bodies, and to place campaign posters on state buildings.³⁰

On 8 March, the CEC verbally warned one of the contestants against promising goods and services during the campaign and stated that appropriate measures will be taken in case of repeat violations.³¹ The Electoral Code does not prescribe gradual sanctions for campaign violations, with either warnings or de-registration applied.

Widespread allegations have been raised about vote-buying by most OSCE/ODIHR EOM interlocutors.³² There is also a prevalent perception that pressure and intimidation will occur during the campaign, including through the abuse of state resources.³³

Depending on their available resources, political parties campaign through rallies, car parades, door-to-door canvassing, posters, media advertisements and use of social media with messages related to unemployment, infrastructure and investments, as well as national security.³⁴ Most contestants informed the OSCE/ODIHR EOM that they rely on their national headquarters for campaign strategy and materials. Electoral platforms of most contestants were published on their websites. Women are active during the campaign as candidates; however, they are rarely placed in decision-making positions in campaign headquarters.

In line with the law, all contestants opened a special bank account for their campaign finance transactions. The campaign funds may include contributions from voters, and own funds of candidates and parties.³⁵ Contributions from legal entities, as well as from foreign and anonymous sources are not allowed. The law limits campaign expenses to AMD 500 million per contestant for the first round and an additional AMD 200 million for a potential second round.

²⁸ Although there is no legal prohibition to campaign before the official start date, there were no evident campaign activities before 5 March, with the exception of RPA billboards visible in Yerevan.

²⁹ For example, governors of Gegharkunik and Vayots Dzor, mayors of Agarak (Meghri) and Hrazdak, and three deputy governors in Kotayk took leave to be able to campaign full time.

³⁰ On 24 February, the CEC published the list of venues allocated for campaign events, as prescribed by law.

³¹ The TsA was warned for promising services and goods to voters at a rally in Tavush region in violation of Article 19.6 of the Electoral Code.

³² At the time of this report, 19 out of 24 cases of vote-buying under investigation were dismissed due to lack of evidence. See *Complaints and Appeals*.

³³ The OSCE/ODIHR EOM received credible reports of intimidation of voters from Syunik region. On 10 March, voters from Agarak and Kajaran villages trying to attend a YELK campaign event were threatened by representatives of their employer.

³⁴ The OSCE/ODIHR EOM has observed 26 rallies: AR(3), FD(3), ORO(3), RPA(4), TsA(8), and YELK(5).

³⁵ Respectively, AMD 500,000, AMD 5 million, and AMD 100 million. The law does not explicitly regulate receiving in-kind donations.

Contestants are required to submit two financial reports before election day, which are published on the CEC website.³⁶ Despite a prior OSCE/ODIHR recommendation, so-called organizational expenditures for campaign offices, transport, and communication are excluded from reporting. The CEC's Oversight and Audit Service (OAS) is mandated to control and ensure integrity and transparency of the finances of contestants.³⁷ Six auditors financed from the state budget were appointed by the parliamentary parties to work with the OAS on campaign finance.

IX. MEDIA

Freedom of expression is guaranteed by the Constitution and legislation. According to media NGOs, in a growing number of cases involving access to public information the courts have decided in favour of the plaintiff, although some media professionals reported to the OSCE/ODIHR EOM that there was an insufficient response by authorities to information requests. Defamation was decriminalized in 2010; instead, the Civil Code provides for damages of up to AMD 2 million. Media NGOs informed the OSCE/ODIHR EOM that following a 2011 Constitutional Court decision that encouraged the use of non-pecuniary measures, such as public apology and refutation, the number of civil defamation cases declined.

The media landscape is characterized by a limited advertising market with only a few media outlets self-sustainable. Major commercial television (TV) stations are financed by business and political groups and are perceived to be strongly associated with the government, as is public TV. Journalists informed the OSCE/ODIHR EOM of interference into editorial autonomy, self-censorship, and discouragement of critical reporting of the government on television.

There is no interference in Internet freedom, with online news sources contributing to increased political pluralism and critical reporting on the government. Some online media outlets, financed by international donors, provide space for in-depth and investigative journalism.³⁸ Several recent cases of violence by law enforcement bodies against journalists were not prosecuted.³⁹

On 27 February, the CEC allocated a total of 60 minutes free airtime on the public TV *HI* and 120 minutes on public radio to each contestant. In addition, parties have the right to purchase political advertising time on public and commercial TV under equal conditions.

The Electoral Code stipulates that news programmes on public and commercial TV and radio shall provide “impartial and non-judgemental information” on candidates’ campaigns. The National Commission for Television and Radio (NCTR), which is tasked to supervise the implementation of the media-related provisions during the campaign and to monitor the broadcasters, has not clarified this provision.⁴⁰ Media representatives informed the OSCE/ODIHR EOM that they interpret this provision as obliging them to broadcast an equal amount of campaign coverage for every contestant in each programme. On 5 March, the NCTR started quantitative monitoring of editorial campaign coverage and will issue two reports during the campaign, and one after election day. On 24 February,

³⁶ According to the Central Bank, as of 10 March, the RPA spent some AMD 125 million for campaign purposes, ORO 38 million, the TsA AMD 25 million, and other contestants collectively spent some AMD 34 million.

³⁷ The Electoral Code states that the OAS shall act independently from the election commissions and not be accountable to them; however, the law does not clearly set its institutional status.

³⁸ Hetq.com, Radio Liberty, and Civilnet.am.

³⁹ The OSCE Representative on Freedom of the Media [called for protection of journalists’ rights](#), ensuring [guarantees of reporters’ safety](#) and [for thorough investigations of incidents](#) involving the journalists.

⁴⁰ On 18 January, the NCTR published a “monitoring methodology” related to the implementation of legal provisions, but did not further clarify the term “impartial and non-judgemental information.”

the OSCE/ODIHR EOM started qualitative and quantitative media monitoring.⁴¹ According to this monitoring, contestants have so far received an equal amount of free airtime on *HI*.

X. COMPLAINTS AND APPEALS

Under the Electoral Code, decisions, actions, and inactions of election commissions can be appealed to the superior commission, while complaints against the CEC are under the jurisdiction of the Administrative Court.⁴² Complaints against election results are solely under the Constitutional Court's purview.⁴³ Complaints regarding inaccuracies in the voter lists can be filed to the PVD, the decision of which can be further appealed to a first instance court.

Contrary to previous OSCE/ODIHR recommendations, the rules on legal standing remain narrow. Complaints may be filed by voters, media representatives, and observers with respect to violations of their rights; by proxies and commission members with respect to violations of their rights and those of other parties, candidates, and stakeholders. Contestants, proxies (if they were present during the vote count), and members of the PEC in question may challenge precinct voting results at the TEC and further appeal TEC decisions to the Administrative Court. Only contestants, but not voters, can appeal the final election results.

To date, the CEC and TECs have received no complaints, and the Administrative Court received two complaints from two prospective candidates who failed to obtain four-year residency certificates. One was withdrawn by the applicant and another dismissed by the court as unfounded.⁴⁴ Complaints are heard in open sessions with decisions published online.

The Prosecutor General has set up a working group to investigate allegations of election-related offences.⁴⁵ So far, the group has identified approximately 130 cases, mostly related to vote-buying and obstruction of voting rights; 31 cases were referred to the police for further inquiry and the rest were dismissed as groundless.⁴⁶

Most OSCE/ODIHR EOM interlocutors stated that there is a public reluctance to report electoral offenses due to lack of trust in the election administration, courts and law enforcement bodies to impartially and effectively handle them.

XI. CITIZEN AND INTERNATIONAL OBSERVERS

The legal framework provides for international and citizen observation and entitles party proxies to be present at polling stations. In order to be accredited, citizen observer groups are required to adopt an internal code of conduct for their observers and to hold their own trainings. In addition, the new Electoral Code requires citizen observer groups to include in their charter explicit aims related to

⁴¹ The monitored media include: *HI* (public TV), Armenia TV, *Kentron TV*, *Shant TV*, and *Yerkir Media* (commercial TV channels), and three online news sources *aravot.am*, *armtimes.com*, and *hetq.am*.

⁴² All election-related complaints can also be applied to the courts, but, in line with previous OSCE/ODIHR and Venice Commission recommendations, the Electoral Code now provides for the exclusion of parallel handling of complaints at election commissions and courts.

⁴³ Such an appeal may be filed on the fifth day after promulgation of the final results to the Constitutional Court, which has 15 days to decide on it. It is unclear if complaints can be filed earlier than on the fifth day.

⁴⁴ In the first case, the applicant did not meet the four-year residency requirement due to his work with the United Nations as a private consultant, while the second applicant failed to provide official proof of his studies abroad.

⁴⁵ Allegations are identified by means of monitoring various media sources, receiving calls by citizens on a hotline, and individual reports. The law does not provide for expedited deadlines to investigate and address election-related violations within the electoral period.

⁴⁶ Due to previous public reluctance to report vote-buying, the 2016 amendments to the Criminal Code decriminalized the receiving of a bribe, if reported, in line with a previous OSCE/ODIHR recommendation.

democracy and human rights protection for at least one year preceding the elections. On 22 February, the CEC refused accreditation of “Civilian Headquarters” due to non-compliance with the latter requirement.⁴⁷ As of 14 March, CEC accredited 18 citizen organizations with total of 7,386 observers as well as 42 international observers.⁴⁸

To address potential overcrowding, the Electoral Code was amended to introduce potential limitations on the number of citizen observers and media representatives at polling stations. Such limitations may only be imposed if agreed by a majority of PEC members and, in any case, the limitation on the number of observers cannot be below 15.⁴⁹ Civil society and media interlocutors of the OSCE/ODIHR EOM raised concerns that restrictive provisions, including on limitation of the number of observers at polling stations, lacked legal clarity and created room for arbitrary implementation. Some NGOs informed the OSCE/ODIHR EOM that the deadline for applications for accreditation, 15 days before election day, would create hurdles in mobilizing observers.

XII. OSCE/ODIHR EOM ACTIVITIES

The OSCE/ODIHR EOM opened in Yerevan with a press conference on 21 February. The EOM has met with the President, the Minister of Justice, the Deputy Minister of Foreign Affairs, the President of the Constitutional Court, the CEC Chairperson, the Prosecutor General and representatives of political parties, civil society, and the resident international community. The EOM has established regular contacts with the CEC, TECs, governmental institutions at national and local level involved in the electoral process, political parties, civil society, and the media.

For election day observation, the OSCE/ODIHR EOM will be joined by delegations from the OSCE Parliamentary Assembly, the Parliamentary Assembly of the Council of Europe, and the European Parliament. Mr. José Ignacio Sánchez Amor of Spain has been appointed by the OSCE Chairman-in-Office as Special Co-ordinator to lead the OSCE short-term observers.

*The English version of this report is the only official document.
An unofficial translation is available in Armenian.*

⁴⁷ This organization was previously accredited and observed local elections in October 2016.

⁴⁸ Some international NGOs active in election observation were officially refused an invitation to observe the elections with a formal explanation that there is no need for additional observation.

⁴⁹ Visitors, international observers, and representatives of TV are exempt from this limitation.