



Ministers' Deputies

CM Documents

CM(2006)126 add 13 November 2006¹

Framework Convention for the Protection of National Minorities

Comments of the Government of Armenia on the Second Opinion of the Advisory Committee on the Implementation of the Framework Convention for the Protection of National Minorities in Armenia

For initial consideration by the Rapporteur Group on Human Rights (GR-H)

¹ This document has been classified restricted at the date of issue. Unless the Committee of Ministers decides otherwise, it will be declassified according to the rules set up in Resolution Res(2001)6 on access to Council of Europe documents.

I. GENERAL REMARKS

1. The Armenian Authorities welcome the Advisory Committee's second Opinion on Armenia of 12 May 2006. We appreciate the work done by the Advisory Committee in examining the fulfilment by The Republic of Armenia of its commitments arising from the Framework Convention and believe that the comprehensive and useful proposals of the Advisory Committee will contribute to the further implementation of the Convention.

The Armenian Authorities are willing to continue the dialogue with the Advisory Committee for discussing and solving the problems of national minorities of the Republic of Armenia in the scope of Convention. It will insure the further development of the state policy on national minorities. At the same time the responsible authorities of the Republic of Armenia would like to comment on and clarify some of the points mentioned in the II Opinion of the Advisory Committee.

2. The relevant Departments of the Government of the Republic of Armenia have received the second Opinion of the Advisory Committee. It was distributed among NGOs representing national minorities and Coordinating council operating with the staff of the Councillor of the President of the Republic of Armenia. Upon the submission of the Comments given by the Armenian authorities on the Opinion of the Advisory Committee it will be uploaded to the official web site of the Government of the Republic of Armenia.

II. RESPONSE TO THE MAIN FINDINGS

Monitoring process

Paragraph 6

In the 6th paragraph of the second Opinion of Advisory Committee it is said that: "Some of the representatives of national minorities were consulted in the preparation for the State Report."

In fact, all registered NGOs as well as intellectual and cultural workers representing national minorities have been informed about the preparation of the State Report. It was announced on the 6th of March 2004 during the discussion on occasion of the presentation of the edition of the Advisory Committee's First Opinion. During the same meeting the representatives of national minorities were invited to cooperate on preparation of the State Report. The first version of State Report was distributed to all NGOs to make their comments and suggestions. Only Yezidi and Kurds communities have responded to it.

General legislative and institutional framework

Paragraph 10

In the 10th paragraph it is said that "Most of the representatives of national minorities remain dissatisfied with the level of State support to activities aiming at preserving their cultures and languages." Unfortunately, Advisory Committee does not clarify in what areas of support the representatives of national minorities remain dissatisfied. If the issue is only in financing then numerous NGOs in Armenia have indeed problem with the lack of sufficient State resources. But if it is related to the state support for educational-cultural initiatives of national minorities then the State practically provides support almost to all initiatives.

Education

Paragraph 12

In the paragraph 12 of the Opinion, the Advisory Committee has mentioned that “textbooks and other literature in languages of national minorities have low quality as well as there are some shortages in the sphere of teachers’ training and pre-school education”. Since the process of publishing of textbooks in other languages, except of Russian started presently, it is obvious that they should pass trial. As to teachers’ training, it is worth to mention that the programs of personnel’s training in the Republic of Armenia are in process.

The Advisory Committee’s concern in the 13th paragraph that “the percentage of the girls from national minorities who failed to get education is very high” and we hope that experts from monitoring group have made certain of that, we should mention that this is the concern of the Armenian authorities as well and they are taking practical steps to solve the problem.

In the 15th paragraph it is said: “Persons belonging to some national minorities identify Russian as their preferred minority language and would like Russian to continue to be used as the language of education for their children. It is important that the legitimate increasing emphasis on education in Armenian is pursued so that it does not affect efforts to preserve minority language”.

We would like to inform that in this respect there are no obstacles for teaching any language chosen by minorities in the Republic of Armenia. This is the right of any citizen of the Republic of Armenia. It is another question that since secondary schools, which are financed by state budget the education, is accomplished in the state language of the country i.e. in Armenian, and there are additional academic hours for teaching of mother tongue, culture and history to national minorities. If any representative of national minority of the Republic of Armenia prefers another language instead of their mother tongue in the present case Russian, she/he has this right. However, we invite the Advisory Committee to pay attention to an important provision: the monitoring group met some leaders or some chairmen of the NGOs of national minorities and heard their opinions. The opinions of the leaders and the chairs of the NGOs of the same ethnic community were different. Anyway the opinion of certain leaders and the presidents of the NGOs of ethnic communities is not the opinion of ethnic community yet. Individuals of ethnic community of the Republic of Armenia as any citizen of the Republic of Armenia can have preferences on language of his/her children’s education and have rights to organize education according to those preferences. As far as the education is concerned which is financed by state budget then here in the case of the language the policy is directed toward:

- a) state language + mother tongue/or minority language + other languages
- b) mother tongue/or minority language + state language + other languages

The evidence of it is the 2nd article of “The Law of RA on Language”, which is about the language of education and stated that “General education and upbringing in the Republic of Armenia in communities of national minorities can be organized in mother tongue under the auspices of the State and by State program, with obligatory teaching of Armenian”.

It is necessary to add that term “mother tongue” is used as equivalent of “minority language” in the State Report i.e. the language which a given minority chooses as their “mother tongue”. The national census also allows ethnic communities of the Republic of Armenia to make a free choice of mother tongue.

Participation of national minorities in the media

Paragraph 16

On paragraph 16 Advisory Committee notes, that “Despite some progress since the first cycle of monitoring, the presence of minority languages in the media is still limited, especially on television. Here remain legal limitations to the amount of airtime allocated to minority language broadcasting on public radio and television”.

At present the Republic of Armenia maintains its commitment to implement requirements of the article 9 of Framework convention, including its third point according to which: "Parties should not restrict establishment and use of print media by persons representing national minorities. On the legal framework of television and radio broadcasting, as much as it is possible, and taking into consideration provisions of the first point, Parties should guarantee for persons representing national minorities to establish and use of their own media".

Legal norms of the State do not create any obstacles for representatives of national minorities from that respect. No obstacles were recorded by the representatives of national minorities in practice as well.

Participation of national minorities in public affairs and consultation of national minorities

Paragraph 17

In paragraph 17 Advisory Committee notes that "Persons belonging to national minorities are represented in local elected bodies, particularly in areas where they live in substantial numbers, but it is difficult for them to gain access to national elected bodies". We should say that Electoral Code of Armenia passed Council of Europe's expertise and most of national minority representatives think that they don't see difficulties concerning participation in state elected bodies.

Paragraph 18

The Advisory Committee raised concern in paragraph 18 that "Communication between the authorities and representatives of national minorities seems to be at times difficult, despite the existence of consultative bodies, such as the Coordinating Council for National Minorities. Representatives of minorities have been concerned by attempts to limit the channels of communication with their minority interlocutors, especially in the context of the draft law on nationals of non-Armenian origin and ethnic minorities". During the discussion of the second Opinion of the Advisory Committee, the representatives of national minorities expressed their disagreement concerning the statement that the existing law may hinder their capacity to communicate with the authorities.

RESPONSES TO ARTICLE-BY-ARTICLE FINDINGS

Article 3 of the Framework Convention

11. In the 24th paragraph the Advisory Committee considers that a small number of persons of Roma and Azeri origin, who are currently not included in the scope of application of the Framework Convention protection should be allowed to benefit from it, should they request it in the future. In respect of the abovementioned paragraph in the Advisory Committee's Opinion, the Government would like to inform that there are some small ethnic communities in Armenia who are not included in the scope of application of the Framework Convention. This list includes Udies, Abkhazians, Iranians, Abazins, Moldavians, Romanians, Mordvans, Bulgarians, Ingushians, Tatars, Osetians, Lithuanians, Latvians and others. Concerning Roma and Azeri persons, as Advisory Committee was informed during its second visit Armenia there is no Roma ethnic community in its traditional meaning. Armenian –Boshas, who are periodically being presented as Roma, in reality are not ethnic community, they are wholly integrated in Armenian community and prefer not to be presented as Roma. In any case minority policy of Armenia is open and the authorities ready to cooperate with all ethnic communities, irrespective of their involvement in Coordinating Council for National Minorities.

The draft law “on the Republic of Armenia citizens of non-Armenian ethnicity and ethnic minorities”

In the 28th, 31st and 115th paragraphs the Advisory Committee has noted that the vast majority of the representatives of national minorities in the Coordinating Council for National Minorities expressed dissatisfaction with regard to the draft law and were no longer in favour of adopting legislation on national minorities. According to them the current draft law does not provide any added value in relation to the existing situation from the one side and from the other side they express fears that in the field of education the draft law uses the term “mother tongue” when it refers to the protection of linguistic identity. The use of this term in the law might be problematic for “a number of persons representing national minorities”, including of ethnic origin other than Russian, who prefer Russian as their minority language and wish their children to receive education in this Language.

In this regard we would like to inform that some persons, who were against the draft law of 2005, are now wholly supportive of the developed version of 2006. The latest version of the draft was prepared in cooperation and consultation with them. The list of these persons includes ethnic community NGOs leaders of German, Polish and Russian communities. In addition it is necessary to mention that leaders of the different NGOs of the same ethnic community have different opinions about the draft law. For example, some of the representatives of the Jewish, Assyrian, Yezidi and Greek communities speak out for the draft law, and some of them are against it. Thus, we cannot consider that the majority of the Coordinating Council for National Minorities is against the draft law. On the contrary it is necessary to mention that 2/3 of the Coordinating Council for National Minorities for the draft law. Nevertheless, the draft law will pass the phase of the discussions; the opinions of national minorities will be taken into account and will be brought in line with the Framework Convention and international expertise. *See also comments in the 15th paragraph on the preferable language of education for national minorities and their understanding of the term of “mother tongue”.*

The concern expressed in 29th paragraph that “the draft law includes the criteria of citizenship to protect and increase the ethnic identity of persons representing national minorities. The Advisory Committee discussed that such strategy doesn’t reflect the spirit of sincerity and flexibility in proper way which is stipulated by the 3rd article and other provisions of the Framework Convention”, is accessible and will be made respective changes in the draft law.

Concern expressed in the 30th paragraph is that “existing draft law involves definitions of “non ethnic Armenian nationals” and “ethnic minorities”. Those who are not corresponding to these criterion and don’t belong to majority of population, will be considered as “non ethnic Armenian nationals” and will benefit from various quarantines than those representing “ethnic minorities”. The Advisory Committee thinks that this difference will bring into not fair contradiction of commentaries of people and groups and it doesn’t correspondent to the logic of the draft law. As to the rights of individuals and groups involved in draft law there is no discrimination in sense of the law. Though the government can be useful more efficiently to those who need assistance more.

The response to the concern expressed in the paragraph 31 of the draft law, which is use of “minority language” and “mother tongue” is in the commentaries of the 15th paragraph of the Advisory Committee /see the 7th paragraph of the opinion/.

Article 4 of the Framework Convention

In the 41st paragraph the Advisory Committee notes the views expressed by the majority of the representatives of national minorities that very little support is provided by the authorities in order to ensure equal opportunities of persons belonging to national minorities, especially with regard to effective participation in public affairs. Armenian authorities granted equal opportunities of effective participation in public affairs to all social strata and groups without national discrimination, even more sometimes authorities implement positive discrimination granting to national minorities additional opportunities of participation aiming to protect and develop their ethnicity. Taking into consideration the specificities of national minorities and the promotion of effective participation in public affairs, additional types of support are offered to national minorities to present their culture: musical festivals, exhibitions of paintings and decorative crafts and so on. Besides annual activities organized for especially national minorities, the representatives of national minorities are also involved in different activities organized by the Ministry of Culture and Youth Issues of the Republic of

Armenia (first and second state festivals of puppet art, first festival of photo art, number of art festivals and others). Apart from the support of cultural activities there is also support from state budget for media, publication of books on their mother tongues and radio programs. The Ministry of Youth and Culture organizes numerous and versatile events (for example, two festivals of puppet theatres, photography art festival, other theatres and so on) and involves the representatives of the national minorities. The Prime Minister of the Republic additionally involves representatives of national minorities to unforeseen and preplanned activities (various exhibitions and opening of monuments). Concerning specific grants given from the state budget it is necessary to mention, that the distribution policy is developed by Coordinating Council for National Minorities. The Department for Ethnic Minorities and Religious Issues of the Government of the Republic of Armenia consistently encouraged discussing the two proposals of distribution of the grants a) according to the needs of ethnic communities and b) according to the projects represented by the ethnic communities. The representatives of national minorities must face responsibility of discussing this issue and adopting a decision according to democratic procedure.

In the 42nd paragraph of its Opinion the Advisory Committee has mentioned that "the attention was paid to the discrimination taken place especially in regard to the Yezidis in the process of land privatization". We would like to draw attention of the Advisory Committee to the 35th paragraph of the State second report, which gives explanations on the issue.

In the 43rd paragraph the Advisory Committee informed that, "allegations of discrimination in access to social benefits and employment in the case of the Yezidi, although it noted that there seem to be no patterns of systematic exclusion of persons belonging to minorities from the labour market or from social benefits."

According to the "Law on State Benefit" the social benefit can receive the citizens of the Republic of Armenia, the foreign citizens who have proper status, the persons who have no citizenship, and as well as the persons who have status of refugee only in case of existence of corresponding legal basis. There is not a single request as registered in the official documents, certificates or applications for nationality recognition made to government institutions that were submitted by the national minorities. The project "Organization of payable public work" among a number of other places was also implemented in 4 Yezidi communities in Aragatsotn region: Sorik, Sipan, Avshen, Derek. Yezidi were involved in the same project in Ararat region, too. Generally these kinds of projects for employment are also being implemented in Kotajk, Armavir, Ararat regions which are populated by national minorities (Yezidis, Assyrians).

In the 48th and 118th paragraphs the Advisory Committee encourages the authorities to pursue their efforts towards mainstreaming minority issues into all relevant sectors of policy-making, and in particular, in the area of education, so as to ensure the effectiveness of measures to promote equal opportunities of persons belonging to national minorities and urges the authorities to ensure that the teaching of Yezidi, Kurdish, Assyrian and Russian languages is not hindered by the ongoing process of "rationalization". The commendable practice of granting the status of "protected schools" to schools with minority language teaching and of exempting them from the recommended threshold of 30 pupils to open a class should be continued.

Corresponding data have been given to experts of the Advisory Committee during their visit in 2006 to be assured that not only the equality of opportunities of accessible education of national minorities but also the distinctive peculiarities related to national minorities are always considered in educational projects in all possible cases. Special attention is paid to the issues of protecting and financing of the schools/classes of national minorities during the implementation and the development of the state policy on rationalization. However, exceptions are made for those schools where the threshold of 30 pupils to open up a class has been lowered to 5-7 pupils. The schools, which do not satisfy the demands of protected schools and are not included in the list also benefit from the same privilege. For example, there is no rationalization in Arzni and Verin Dvin villages as there are considerable numbers of Assyrian there. We would like to inform the Advisory Committee that in future State funding would be granted according to the number of pupils attending a school and other criteria such as if the persons belong to national minority. The same approach will be for the schools of national minorities.

Article 5 of the Framework Convention

In the 57th paragraph the Advisory Committee has mentioned that there were reported isolated cases of discrimination against representatives of Yezedi minority. The Advisory Committee encourages the authorities to prevent such treatment and to provide protection to the victims.

Concerning the paragraphs 60th, 62nd, 63rd we would like to inform that there are no abuses motivated by ethnic origin in the context of the military service, and in case of Yezidis there are no registered cases of abuse motivated by ethnic origin. Since November of 2003 about 60 NGOs, including NGOs of national minorities: "Union of Nationalities" and "National Union of Yezidi) are cooperating with Military Force of the Republic of Armenia. Periodically they visit the military units chosen by them and without any obstacle conduct investigations concerning social-legislative, everyday and sanitary-hygienic conditions, moral and psychological situation of staff and conditions of organization of military service.

The Ministry of Defence of the Republic of Armenia and above mentioned NGOs implement activities the goal of which is the establishment of friendly attitudes towards persons with national minority backgrounds. The authorities will pay special attention to the proposal of the Advisory Committee in the 63rd paragraph concerning "detailed control of possible cases of arousing ethnic hatred in media".

In the 61st paragraph Advisory Committee expressed the worries concerning Malakans' opinion that "alternative service, in the way that it is now, does not secure appropriate alternate to military service as it is not separated from the military-governmental system in proper measure". In this regard, we would like to inform that in the Republic of Armenia according to the "Law on alternative service" there are two levels alternative service i.e. "alternative military" and "alternative labour". Malakans, as well as any citizen of the Republic of Armenia, can choose their desirable type of alternative service. In practice there is only one case when Malakan chose alternative labour service. The Ministry of Defence of the Republic of Armenia does not have any relation to organization, implementation and supervision of alternative labour service. In fact the organization and implementation of the service is supervised by the administration organization where the service takes place and the Ministry to which the given organization is related or subordinate. At the same time we should inform that the law of the Republic of Armenia "On Alternate Service" passed the expertise of Council of Europe.

Article 9 of the Framework Convention

Concerning the 69th paragraph: The 29th and 41st articles of the law on "Television and Radio" of the Republic of Armenia confirm that the legislation of the Republic of Armenia doesn't prevent the citizens from other nationalities to be members of council of radio and TV company and also members of national commission of radio.

In the 71st paragraph the Advisory Committee notes, that authorities informed that the compensation of the limited economic resources of national minorities can be usage of existing TV Channels, it can be broadcasting of programs in minorities' languages or rebroadcasting of programs of ethnic homeland and neighbouring countries. The Committee mentions that this will be difficult to implement for those minorities who hasn't ethnic homeland. Moreover it also mentions that broadcasting of the programmers of ethnic homelands not always satisfies the needs of individuals belonging to national minorities. The authorities of the Republic of Armenia share this concern, but at this moment this is a temporary and supplementary resource and not the solution of the problem.

Article 10 of the Framework Convention

In the 80th paragraph Advisory Committee notices that " economic constraints are hindering the implementation of some of the rights with regard to the use of minority languages, including costs of translation of documents". In fact, in accordance with the 92nd article of law on "Administration and administrative proceedings" of the Republic of Armenia, the administrative body covered all expenses connecting to translation in case of presentation of the documents in languages of national minorities. The same is for the persons who participate in civil procedure. In the same way, in accordance with the 4th point of the 27th article of the law on "Administration and administrative proceedings" the participants of proceedings are allowed to use foreign languages during the implementation of the administrative proceedings. In this case administrative body secures translation into Armenian, except the cases when there isn't such possibility to secure this type of translation.

In the 82nd paragraph the Advisory Committee encourages the Armenian authorities to continue the pursuit of an open and pragmatic approach with regard to the use of minority languages in dealings with administration and to further promote full implementation of the rights established by the Law "on the foundations of administration and administrative proceedings". In this respect we should say that with regard to the rights determined by the Law "on the foundations of administration and administrative proceedings" of the Republic of Armenia, then they will also be included into the code of the administrative procedure in dealing with the establishment of professional administrative courts which is planned for 2007.

Concerning the comments relating to paragraphs 87 and 88 it is important to mention that in accordance with the article 6 of the Law "On geographical denominations" of the Republic of Armenia <state and local authorities of the Republic of Armenia and as well as NGOs, juridical and natural persons can make offer of naming and changing the names of geographical objects>. There is no legal restriction by the Law concerning the use of minority languages along with Armenian in topographical indications and signposting and this practice already exists in Armenia. Of course, it is quite acceptable the offer of consultations with national minorities in case of the use of signs.

Article 12 of the Framework Convention

Concerning the comments relating to paragraphs 93 and 97 we would like to inform that there is a special arrangement that provides additional hours of work of the staffs of the pre-school establishments for the incomplete groups of minority children. In case of absence of pre-school institutions in a given community should there be requests from the parents pre-school groups will be established. The network of pre-school institutions is able to function effectively only provided the demand of parents and financial recourses in the budget of the community. The pre-school institutions are under jurisdiction of communities and they function by the support of communities. There is no any document sent to any state institute of Republic of Armenia that contains prohibition of functioning or establishment of pre-school institution. Anyway, the issue is still on the agenda. The research has been transmitted to the Advisory Committee conducted on national minority school problems and it was informed that implementation of training programs by the Ministry of Education and Science is in process.

By paragraph 96 Advisory Committee expresses its concern that "number of national minority representatives called Advisory Committee's attention to the fact that no special assistance is given by the authorities to adults for teaching them Armenian". In this regard we would like to inform that "State agency on language" which is department of the Ministry of science and education many times announced it's readiness to organize free classes of Armenian for all age groups. This program hasn't been implemented because of absence of applicants. But the program is in force and can start anytime if there will be applicants.

By paragraph 100 Advisory Committee "invites the authorities to remain vigilant with regard to reported incidents of harassment and discrimination of pupils from minority backgrounds, in particular Yezidi". Concerning this comment we would like to inform that though no complains were received from national minority groups, including yezidies, about discrimination or harassment, issue was and remains in focus of attention of Ministry of Science and Ministry of Education of the Republic of Armenia as well as Department for Ethnic Minorities and Religious Issues of the Government.

Monitoring conducted by the Department indicated good atmosphere among minorities, rarely occurred conflicts didn't have national enmity or discrimination character.

In connection with the 102nd paragraph Advisory Committee during its visit to Armenia has been informed that there were three and not one textbook published and distributed among Yezidi communities and the process of publishing of the second textbook in Assyrian was underway.

Article 15 of the Framework Convention

Concerning paragraphs 124th, 125th and 153rd about the dissatisfaction of the representatives of national minorities in regard to their participation and consultations on the draft law on minorities we would like to inform that the draft law on minorities is elaborated with the participation of minorities. All who wished might take part not only in drafting process but also in numerous discussions. This issue was discussed in detail during the meeting held in the Department for Ethnic Minorities and Religious Issues of the Republic of Armenia with the monitoring group. Moreover, Department is concerned about the passive role of the representatives of minorities in those discussions. The concern about possibilities of restricting the channels of dialogue between minorities and authorities is even more surprising. In this regard we would like to inform that the Armenian authorities do everything in order to enlarge the opportunities and the ways of conducting dialogues and discussions. Moreover it should be mentioned that during discussion of second Opinion on Armenia of the Advisory committee in the Republic of Armenia the representatives of the Coordinating council on National minority's NGOs have been surprised with abovementioned conclusion.

Article 17 of the Framework Convention

By paragraph 131 Advisory Committee has mentioned, that "Some representatives of minorities for guaranteeing minority representation in National Assembly give preference to quotas or reserved seat system" and by 133rd paragraph "encourage authorities to work out facilities for improving national minority representation in elected bodies, especially in national level". Concerning the abovementioned we would like to say that there is a dual approach to the question - if some representatives of national minorities give preference to quotas or reserved seats systems, other representatives oppose that principle. They think that electoral systems of Armenia are not obstacle for national minorities to be elected and represented. Armenian authorities focus their attention on the necessity to keep authorities of all levels informed about problems of minorities and about minority participation in solving of problems that deal with them.

Article 18 of the Framework Convention

By paragraph 138 "Advisory committee notes with concern, that Nagorno-Karabakh conflict hinder general trans-border cooperation and expresses it's regret that political solution has not been reached yet", and by paragraph 139 "expresses it's hope that improved relations between parties and fair and stable solution of problem will open new opportunities for trans-border cooperation and will give a chance for internally displaced persons voluntarily return to their homelands". According to its accession commitments undertaken by Armenia, has pledged to continue the efforts to settle the conflict by peaceful means only and to use the considerable influence the Armenian authorities have over the Armenians in the Nagorno-Karabagh to foster a solution to the conflict (PACE Opinion No. 221 (2000), 13ii). Armenia continues to respect this commitment. At the same time, one should not forget that Armenia is the interested party of the NK conflict. Armenia is involved in negotiating process, as it is going under the OSCE Minsk Group and because Azerbaijani authorities refused to negotiate with the NK elected authorities. Armenia remains committed to the comprehensive and peaceful settlement of the Nagorno-Karabagh conflict on a mutually acceptable basis.

We would like to notice that in the current situation of the NK conflict when the atmosphere of mistrust and animosity between Armenian and Azerbaijani people has deepened deeply because of the policy followed by Azerbaijan, trans-frontier and regional cooperation has become more important as a mean of creating more stable atmosphere of mutual confidence. Armenia has always emphasized the creation of the atmosphere of trust and understanding as a precondition for the comprehensive resolution of this conflict by promoting mutual visits at various levels. International community supports Armenian position having in mind the international experience of resolving such conflicts.

CONCLUDING REMARKS

Conclusion of 150th paragraph doesn't reflect Armenia's reality. Most of the media published by minorities receive state assistance, and the language of publication is being chosen by minorities. As presented in Republic of Armenia's second report, requirements of Framework convention 9th paragraph is being consistently implemented in the country, as well as its second point which is: "Parties should not restrict establishment and use of print media by persons representing national minorities. On the legal framework of television and radio broadcasting, as much as it is possible, and taking into consideration provisions of the first point, Parties should guarantee for persons representing national minority's establishment and usage of their own media". Legal norms of the Republic of Armenia have no obstacles for representatives of national minorities from that respect. No obstacles were recorded by the representatives of national minorities in practice as well."

Conclusion made in paragraph 151 that "Many persons representing national minorities including those of non-Russian ethnic origin, who gives preferences to Russian education for their children expressed concern about increasing attention towards Armenian education", is not justified. As presented in this opinion about 7th paragraph preference of language of education is the right of minority /as well as any person live in Republic of Armenia/.

Conclusion made in paragraph 153 stating that "Law on ethnic minorities and citizens of non-Armenian origin of the Republic of Armenia" has been criticized by representatives of national minorities...by which "opportunities of national minorities for dialog with authorities can be limited" is far from reality. Law of RA doesn't give a possibility for such limitation. Advisory Committee didn't refer to provisions of the law, which contains such limitations. As it was stated in 10th paragraph of this opinion; NGOs represented in Coordinating Council on National minorities of the Republic of Armenia don't share this opinion.

On recommendations of paragraph 155

Authorities of the Republic of Armenia, within the bounds of their possibilities, are ready to continue to meet their obligations coming from the spirit and legal norms of Framework Convention. More, they fully correspond to the logic of the RA policy of interethnic relations. The same can be said about most of recommendations of the second opinion of the Advisory Committee. Only concern is the recommendation that says "Growing attention to teaching of Armenian will not be obstacle for persons representing national minorities to choose education in Russian", stressing that acting law on Language of the Republic of Armenia and practical policy in field of education of the Republic of Armenia contain those guarantees.