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Submission by the Women's Resource Center Armenia

to the UN Working Group on Discrimination against Women and Girls
Ahead of Armenia Country Visit, November 2025

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Rights Centre NGO is a dedicated NGO committed to the advancement of human rights and freedoms. The mission of the organization is to promote and protect human rights through monitoring, advocacy, strategic litigation, and non-formal education. Through monitoring and identifying human rights violations the organization provides in-depth analyses, and offers actionable recommendations to redress these violations while preventing their recurrence. It aims to foster a society where human rights are respected, protected, and upheld for all.

Introduction

The Women’s Resource Center (WRC) is one of the pioneering feminist organizations in Armenia, with over two decades of advocacy on gender equality, women’s rights, and anti-discrimination reforms. WRC has consistently engaged in international monitoring mechanisms, including Convention on the Elimination of All Forms of Discrimination Against Women, (CEDAW), the Universal Periodic Review (UPR), and special procedures, and has led national advocacy campaigns for gender-sensitive workplace legislation, sexual harassment prevention, sexual and reproductive health and rights and protection against gender-based violence.

This report is submitted in advance of the UN Working Group on Discrimination against Women and Girls’ visit to Armenia in November 2025. It addresses structural and systemic discrimination against women and girls, both in law and practice, focusing on:

1. **Reproductive health and rights**
2. **Discrimination in the world of work**
3. **Violence against women and girls**

The analysis draws on WRC’s research and advocacy, fieldwork with affected women, and coalition reports, as well as the latest recommendations of UN bodies and treaty mechanisms addressed to Armenia.

Executive Summary

Despite important legal reforms, systemic discrimination against women and girls persists in Armenia. This submission highlights three main areas of concern: **reproductive rights, workplace equality, and gender-based violence**. Women face barriers to accessing abortion and comprehensive sexuality education, a persistent gender pay gap and widespread workplace harassment, and inadequate protection from domestic and sexual violence. Cross-cutting challenges include the absence of a comprehensive anti-discrimination law and weak enforcement mechanisms.

Key recommendations include: abolishing the mandatory waiting period for abortion, ratifying ILO Conventions No. 189 and Council of Europe Convention on preventing and combating violence against women and domestic violence, adopting a comprehensive anti-discrimination law with an equality body, strengthening the Labor Inspectorate, and ensuring access to justice and remedies for victims of discrimination and violence.

I. Reproductive Health and Rights

Access to Abortion

Although abortion on request is legally available up to 12 weeks (11 weeks and 7 days under recent amendments), women face bureaucratic and practical barriers. Rural women often travel long distances to facilities, and the **mandatory 3-day waiting period** under the Law on Human Reproductive Health and Rights creates a disproportionate burden. Such requirements contravene

Armenia's obligations under **CEDAW Article 12** and **General Recommendation 24** on women and health.

Comprehensive Sexuality Education

Armenia lacks a national program of **comprehensive sexuality education (CSE)**. Current curricula are fragmented, rooted in abstinence-based approaches, and fail to provide rights-based knowledge on bodily autonomy and gender equality. This falls short of WHO standards and **CEDAW General Recommendation 36**.

Discrimination in Healthcare

Women from rural areas, women with disabilities and LBTQI women face systemic barriers and discrimination in accessing reproductive and maternal healthcare in Armenia¹.

- **Women with disabilities** are particularly excluded. Many clinics remain physically inaccessible, information is not provided in accessible formats, and women must often rely on relatives for accompaniment, undermining their right to privacy and confidentiality. Medical staff frequently lack training in ethical service provision, reinforcing stigma and dependence. Discrimination is especially visible in access to assisted reproductive technologies, where women with disabilities encounter stereotypes portraying disability as incompatible with parenthood². These barriers persist despite Armenia's obligations under the **Convention on the Rights of Persons with Disabilities (Articles 6 and 25)** to ensure accessible, inclusive, and gender-sensitive healthcare.
- **Rural women** face long travel distances to access abortion and maternal services. Stigma, lack of contraception information and unequal development of reproductive services remain widespread.
- **LBTQI women** report breaches of confidentiality, discriminatory attitudes from providers, and lack of specialized services. Many avoid healthcare entirely for fear of exposure or mistreatment.

These patterns create **unequal maternal healthcare across regions and groups**, reflecting systemic discrimination and contravening Armenia's obligations under the **International Covenant on Economic Social and Cultural Rights (ICESC) (Article 12)**.

¹ WRCA, The Invisible Rights Of Women In The Republic Of Armenia the Overall State Of Reproductive Health And Rights Among Various Groups Of Women, 2018 https://womenofarmenia.org/wp-content/uploads/2019/12/Reproductive-rights_report_.pdf

² WRC, Accessibility of Assisted Reproductive Technologies for Different Groups of Women, 2022 (Armenian) <https://shorturl.at/fMdlf>

II. Discrimination in the World of Work

Gender Pay Gap

Armenia records one of the widest gender pay gaps in the region. According to the World Bank (2024)³, women earn 25–30% less than men for the same work. The EU4Gender Country Profile (2024)⁴ found an overall gap of 39.2%, with the gap widening since 2018. An adjusted gender pay gap of 28.4% (UN Women/ArmStat)⁵ confirms that discrimination, not qualifications, drives the disparity.

Article 178 of the Labor Code only guarantees equal pay for the *same or equivalent work*, which is narrower than **ILO Convention No. 100** on equal remuneration. Armenia lacks gender-sensitive job evaluation systems, wage comparison mechanisms, and enforcement bodies. Occupational segregation remains pervasive, with women concentrated in low-paid sectors and men in leadership.

These disparities are further exacerbated by the unequal distribution of unpaid care and domestic work, which falls disproportionately on women. The lack of recognition and redistribution of unpaid work reduces women’s opportunities for full participation in the labor market and reinforces the gender pay gap.

Workplace Sexual Harassment

WRC’s 2022–2023 study⁶ found that from 590 respondents **42.7% experienced sexual harassment at work**, with over half resigning or being dismissed as a result. Although 2023 amendments to the Labor Code introduced a legal definition, enforcement gaps persist:

- Employers are not obliged to adopt prevention policies.
- No confidential complaint mechanisms exist.
- The Labor Inspectorate lacks mandate, expertise, and tools.
- Victims bear the burden of proof, with no access to free legal aid or compensation.

Focus groups revealed invasive interview questions, sexual advances during recruitment, and harassment from customers without employer protection. **98.6% of victims did not report incidents**, citing mistrust and fear of retaliation.

Gender-Based Discrimination

The service sector demonstrates systemic patterns of discrimination against women. Although the amendments to the Labour Code made in 2019 prohibit mentioning in job vacancy announcement any discriminatory condition, other than professional characteristics, qualifications, and skill job, in practice discriminatory requirements remain widespread⁷. Many

³ Armenia, Country Gender Assessment, World Bank, 2024 <https://documents1.worldbank.org/curated/en/099100824162527996/pdf/P179877-90d0c0e9-71f5-456a-a683-a1a576083a16.pdf>

⁴ Armenia, Country Gender Profile, EU4Genderequality Reform Helpdesk, 2024

https://euneighbourseast.eu/wp-content/uploads/2024/04/eu4genderhelpdesk_armenia_countrygenderprofile_2024-cgp_v3_compressed.pdf

⁵ Analysis of the gender pay gap and gender inequality in the Armenian labor market, UN Women and Statistics Committee of Armenia 2020. https://www.armstat.am/file/article/analysis_of_the_gender_pay_gap_armenia_am.pdf

⁶ WRC, Workplace sexual harassment in Armenia, Factsheet, 2023 <https://womenofarmenia.org/wp-content/uploads/2023/04/WSH-Factsheet.pdf>

⁷ WRC, Gender Discrimination Against Women in Labor Relations in Armenia – Research Outcomes, 2024, pages 29-40 <https://womenofarmenia.org/wp-content/uploads/2024/04/Research-Outcomes-1.pdf>

ads still demand that women be “young, pretty, well-groomed,” — criteria that are **not applied to men**. Women who do not conform to appearance-based stereotypes are frequently excluded from hiring.

Discrimination also extends to pregnancy and marital status, with women pressured not to have children to keep their jobs. Female employees are often expected to perform unpaid “feminine” tasks such as cleaning and making coffee. Leadership structures remain male-dominated, with men systematically favored for promotions⁸.

These practices reflect entrenched stereotypes and reinforce both horizontal and vertical segregation, in violation of **International Labour Organisation Convention 111**, which Armenia has ratified.

Informal and Domestic Work

Domestic workers, mostly women, are excluded from protection. Armenia has not ratified **ILO Convention No. 189**, the Labor Code does not define domestic work, and inspections cannot monitor households. Women in informal jobs lack contracts, social protection, or remedies.

Multiple and Intersecting Discrimination

- **Women with disabilities:** Women with disabilities face significant barriers to employment and participation in public life. Persistent stereotypes portray them as incapable of fulfilling professional or parental roles. Inaccessible workplaces, lack of reasonable accommodation, and insufficient training opportunities further limit their access to decent work. Employers often overlook or exclude women with disabilities, compounding their economic and social marginalization.
- **LBTQI women:** LBTQI women face double exclusion based on both gender and sexual orientation or gender identity. They remain unprotected in the absence of comprehensive anti-discrimination legislation and frequently experience stigma, breaches of confidentiality, and discriminatory practices in both employment and healthcare⁹.

III. Violence Against Women and Girls

Domestic Violence

Armenia adopted the Law on Prevention of Domestic Violence (2017, amended 2024), but implementation remains weak. Courts often revoke protection orders and survivors lack access to shelters outside Yerevan. Funding is inadequate, and harmful stereotypes permeate law enforcement and judicial practice, contrary to **CEDAW General Recommendation 35**.

⁸ Ibid, pages 12-15

⁹ Joint Stakeholder Submission On Labor Rights Situation In Armenia, 2025 <https://womenofarmenia.org/wp-content/uploads/2024/12/Stakeholder-submission-Labor-rights.pdf>

Sexual Violence

Sexual violence remains underreported and rarely prosecuted. Survivors face stigma, secondary victimization, and breaches of privacy in media coverage. Armenia has not ratified **the Council of Europe Convention on preventing and combating violence against women and domestic violence**, despite repeated recommendations by CEDAW (2022) and during the UPR (2020, 2025).

IV. Cross-Cutting Issues

Armenia has failed to adopt a **comprehensive anti-discrimination law**, despite repeated commitments since 2018. This leaves women without clear legal definitions of direct/indirect discrimination, harassment, or victimization, and without effective remedies.

The **Labor Inspectorate** is under-resourced and lacks authority to confidentially interview workers or investigate harassment. On **11 September 2025, Armenia ratified the International Labour Organization (ILO) Convention No. 190 on Violence and Harassment in the World of Work**. Ratification creates a binding obligation to establish effective mechanisms for protection from violence and harassment, including gender-based violence at work. However, the Inspectorate's current mandate and sanctioning powers remain insufficient to address such cases. It lacks the tools to require employers to adopt preventive policies, ensure behavioral change, and hold perpetrators accountable. Without strengthened authority and resources, Armenia risks failing to meet its new obligations under ILO Convention No. 190.

Recommendations

A. Reproductive Rights

1. Expand access to safe and affordable abortion services.
2. Abolish the mandatory 3-day waiting period for women who seek abortion per request.
3. Adopt a comprehensive sexual education curriculum in schools
4. Address discrimination in healthcare against rural women, women with disabilities and LGBTQI women.

B. Workplace Equality

5. Ratify ILO Conventions No. 189 and extend labor protections to domestic and informal workers.
6. Adopt a comprehensive anti-discrimination law and establish an independent equality body.
7. Develop gender-sensitive job evaluation and pay transparency mechanisms; oblige large employers to publish gender pay data.
8. Require employers to adopt harassment prevention policies, establish confidential reporting, and ensure liability.
9. Recognize, reduce, and redistribute unpaid care work.

10. Strengthen the Labor Inspectorate with investigative tools, gender training, and sanctioning powers specific to harassment and discrimination.
11. Ensure workplace accommodation for women with disabilities and inclusive hiring policies.
12. Remove barriers such as discriminatory recruitment and lack of flexible work arrangements.

C. Violence Against Women

14. Ratify the Council of Europe Convention on preventing and combating violence against women and domestic violence
15. Train judges and law enforcement on domestic violence dynamics, trauma-informed responses, and prevention of secondary victimization.

D. Cross-Cutting

17. Adopt comprehensive anti-discrimination legislation aligned with international standards to ensure that victims of discrimination and harassment have access to compensation and remedies.