

**Comments of the Government of Armenia on the Report of the Committee of Experts
presented to the Committee of Ministers of the Council of Europe
in accordance with Article 16 of the European Charter for Regional or Minorities Languages**

General Comments

Armenian authorities attach a great importance to the opinion of the Expert Committee and find those comments and recommendations useful for the further implementation of the Charter. It is worth to be said that the implementation of the Charter is also strengthened by the process of fulfillment of the obligations undertaken by the Framework Convention of the Protection of National Minorities.

At the same time, some setbacks monitored by the Committee are recorded because of the specificity of the ethnic composition of the Republic of Armenia, and to the facts that non-Armenian ethnic communities are very few, they live diffused in the society, as well as that the process of democratic reforms is still underway. For example, ongoing process of amending the Law on Local Self government bodies and problems with composition of their budgets hampers the resolution of such an important issue as pre-school education. We would like to point out that this is a problem in the Republic as a whole and not only for the national minorities.

The package of the Constitutional amendments was adopted in the referendum on 27 November 2005. The Constitutional reform addressed some issues of the national minorities in Armenia as well. Therefore, some questions and issues that were mentioned in the report of Committee of Experts will be clarified and updated in the forthcoming national report.

Hereby we provide some comments on the Report.

Comments on different paragraphs of the report

1. Comments on paragraphs 9 and 11

The following table presents the official data on the population of Armenia.

**Table 1
Distribution of Resident Population of RoA in towns and villages according to the census of 2001**

	Armenian	Assyrian	Yezidi	Greek	Russian	Ukrainian	Kurd	Other
Total	3145354	3409	40620	1176	14660	1633	1519	4640
Town	2041622	524	7413	853	10489	1386	315	3551
Village	1103732	2885	33207	323	4171	247	1204	1089

In the report is mentioned that *the Yezidi speakers are Zoroastrians*. In reality the Yezidi speakers call themselves (their religion) "sunworshipper", while Zoroastrianism means fire-worshipping. Yezidis take offence in case of calling them Zoroastrian.

2. Comments on the Report concerning the implementation of the obligations under Article 8 (Education)

Concerning 25, 53, 54, 55, 61 and 62 paragraphs of the Report we would like to inform that in 2005 textbooks of Yezidi for the first, second and third grades and "The ABC" of Assyrian were published. The process of up-dating teaching materials is continuing.

We would like to inform also that with the assistance of the Open Society Institute, a manual "Write and Read Assyrian" for preschool and primary school classes was published.

With the support of UNICEF a textbook of Assyrian Language for primary schools was elaborated and will be published before September 2006.

A manual "Classical Assyrian" was published in January 2006.

Based on a fact that new manuals are being published the complete training of Assyrian and Yezidi language teachers is envisaged in 2006.

It is necessary to clarify that the all the schools in the list of sixteen "protected schools" out of total number of 400, which are not included in the "optimisation programme", are those where regional or minority languages are taught. Attached is the list of those schools (Table 2).

Table 2

The list of towns with ethnic minorities where schools are funded regardless of the number of students

	Town/school	Province	Minority
1	Tellek school	Aragatsotn	Yezidi
2	Shamiram school	Aragatsotn	Yezidi
3	Alagyaz school	Aragatsotn	Kurds and Yezidi
4	Ria-Taza school	Aragatsotn	Kurds and Yezidi
5	Derek school	Aragatsotn	Yezidi
6	Sipan school	Aragatsotn	Yezidi
7	Sangyar school	Aragatsotn	Yezidi
8	Amre-Taza school	Aragatsotn	Yezidi
9	Shenkani school	Aragatsotn	Yezidi
10	Jamshlu school	Aragatsotn	Yezidi
11	Getap school	Aragatsotn	Armenians and Yezidi
12	Ortachai school	Aragatsotn	Yezidi
13	Gyalto school	Aragatsotn	Yezidi
14	Baysz school	Aragatsotn	Yezidi
15	Barozh school	Aragatsotn	Yezidi
16	Ferik school	Armavir	Yezidi

Concerning the information which the Committee of Experts has got during the "on-the-spot" visit, and according which representatives of some minorities informed that the list does not cover all schools where regional or minority languages are taught, and that Assyrian language education would be especially difficult if the "optimisation programme" is carried out as envisaged, it is necessary to mention that the problem was presented by those rural Assyrian schools, which insist on keeping the Russian as the educational language for the Assyrians.

The obligation of RoA to organize the teaching Assyrian for Assyrian speakers, as it is their mother tongue, and to guarantee teaching of Armenian, as it is the state language of RoA. Those Assyrians who had education in Russian have problems with either enough knowledge of Assyrian, or enough knowledge of state language – the Armenian. The issue of protection of the Assyrian schools in the framework of current education policy would have been resolved if the Assyrians agree to have education provided on Assyrian and Armenian.

The responsible bodies for the establishment and support of the pre-school education institutions are local self-government authorities. Pre-school education institutions can be established and maintained based on their local budget and for which they will be accountable to the local community. In case of necessity they can apply to the Ministry of Education, or educational departments of the Administrative centers of the regions (marzpetaran) for methodological assistance.

Ministry of Education and Science of the Republic of Armenia approves annually the Exemplary educational plan for the National minorities, according to which necessary timing is provided for teaching of Minority languages and history.

Concerning the anxiety of the Committee of Experts on high percentage of pupils not attending school, lack of teachers and the irregular school attendance the Board on National Minorities and Religion of the Government in 2004 initiated and implemented a research in which particularly were analyzed problems of lack of teachers and irregular school attendance. Now preparation of plan of measures is in process.

Concerning the request of the Committee of Experts to provide information on use of Yezidi and Assyrian languages in technical and professional education, we would like to inform that the Board on National Minorities and Religion of Government is making great efforts to persuade Yezidi parents to allow attendance of their children in classes of their mother tongue. This initiative meets obstacles as Yezidi parents do not see the practical perspectives of education on mother tongue. Concerning Assyrians, it is necessary to mention that they wish to and often insist on getting professional education on the Russian or the Armenian languages.

A research was initiated by the Board on National Minorities and Religion in 2004, to find out problems of school education of Assyrians, Yezidis, Kurds and one part of Russians (Molokans) and to try to solve those problems. The research revealed a number of problems, which are easy solvable and based on the findings proposals/projects are being prepared to be implemented by the country in this field.

3. Comments on the Report concerning the implementation of the obligations under Articles 9 (Judicial authorities) and 10 (Administrative authorities and public services)

In response to the concerns raised in the paragraph 82, we would like to inform that during the court or other proceedings in State bodies it is efficient and favorable to use Armenian as an official language. If a minority representative masters the Armenian, it is expedient to use Armenian while he/she participates in a case, taking into consideration the circumstance, that the interpretation may not be valuable in all cases, e.g. because of absence of an interpreter who masters that language perfectly.

In cases when he/she may master Armenian bad, the usage of his/her minority language is provided for by the law. A minority representative may declare that he/she would like to use his/her minority language, even if he/she masters Armenian. In this case, nobody may oblige him/her to use the official language. Even ethnic Armenians, who declare that they do not master Armenian or master not very well, may use a language more preferable for them. There is no prohibition by the law in this regard.

In the paragraph 98 of the report is mentioned that according to the Article 27 of the Law on Foundations of Administrations and Administrative Procedure the translation is paid for by the administrative body. This formulation needs to be corrected because the mentioned Article of the Law only provides for that in case of submitting document in Minority language an administrative body "may require submitting its translation in Armenian." Consequently, a burden for recovering the expenses of translation shall fall on a person submitting it. In practice such a problem doesn't exist, because representatives of ethnic minorities know the official language and submit their applications and appropriate documents in Armenian.

The above mentioned also concerns the formulation of the paragraph 105.

4. Comments on the Report concerning the implementation of the obligations under Article 11 (Media)

The Public Radio of Armenia broadcasts daily programs in Yezidi, Kurdish 30 minutes each.

Programs called "Our home is Armenia" and "Armenia" are also broadcasted in Russian for 30 minutes each.

The "Our Home Armenia" is broadcasted every Monday and tells about the public and cultural life, problems and concerns of National Minorities of Armenia. The program is prepared by the assistance and active participation of members of Polish, Jewish, Ukrainian and Russian Communities.

The "Armenia" is broadcasted 4 days weekly and comments in general on the political, economic and cultural developments in Armenia, as well as on events taking place in different national communities of Armenia.