



## MEDIA ETHICS OBSERVATORY OF ARMENIA

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### EXPERT OPINION OF MEDIA ETHICS OBSERVATORY

Regarding the revocation of NA accreditation of “Zhoghovurd” daily editor-in-chief Knarik Manukyan and “ArmLur.am” editor-in-chief Sona Grigoryan

#### A. FACTS

1. On December 24, 2025, Knarik Manukyan, the editor-in-chief of “Zhoghovurd” daily newspaper, and Sona Grigoryan, the editor-in-chief of “ArmLur.am,” applied to Media Ethics Observatory. In their complaint, they stated that they had been stripped of their National Assembly accreditation for 1 year as a result of asking a ruling party deputy a question in the NA that he deemed undesirable.
2. According to the complainants, the process of revoking their accreditation was carried out under the supervision of the NA Speaker.
3. The complainants argued that the deprivation of their accreditation constituted a gross violation of Article 10 of the European Convention on Human Rights (ECHR), Article 19 of the International Covenant on Civil and Political Rights (ICCPR), as well as the principles put forward by the Representative on Freedom of the Media of the Organization for Security and Cooperation in Europe (OSCE).
4. On December 17, 2025, journalist Sona Grigoryan received a warning, and 2 days later she was stripped of her accreditation, preventing her from accessing the NA building in her capacity as a journalist for 1 year. Journalist Knarik Manukyan was issued a warning on December 18, and the following day her accreditation was withdrawn for one year for the same action (according to the official justification provided by the National Assembly, the journalists violated provision 1.6 of the security rules in effect in the RA National Assembly premises and building. Under this provision, media accredited to the National Assembly are prohibited from carrying out professional activities in specially controlled zones of the protected facility).
5. Knarik Manukyan is being stripped of the NA accreditation for the second time: the same scenario played out on December 15, 2023, in response to which journalistic organizations issued a [statement](#), while the court of first instance later recognized the NA staff's decision as unlawful.

## B. LEGISLATIVE AND ETHICAL NORMS

MEO [Regulations](#) entail the following:

5.4. MEO accepts for review information disputes involving entities officially engaged in the information field, and, when necessary, issues a statement or publishes an expert opinion.

## C. EXPERT OPINION

Media Ethics Observatory,

having reviewed the complaint submitted by the editor-in-chief of “Zhoghovurd” daily and the editor-in-chief of “Armlur.am” website, along with the administrative acts adopted by the National Assembly Staff, the Regulation on Journalist Accreditation in the National Assembly, the letter 1/5278 from the NA Chief of Staff, Secretary General dated December 19, 2025, and international documents related to freedom of expression, records the following:

- Freedom of expression and information is guaranteed under the RA Constitution, the Law “On Mass Communication,” Article 10 of the European Convention on Human Rights, Article 19 of the ICCPR, and the principles set out in the OSCE media freedom documents.
- A combined reading of these norms mandates that any restriction on the activities of journalists:
  - a) be lawful,
  - b) serve a legitimate purpose,
  - c) be necessary and proportionate in a democratic society,
  - d) not have a chilling effect.

MEO observes the following:

- The general and unspecified formulations used in the Regulation on Journalist Accreditation in the National Assembly (“obstruction,” “violation,” “unacceptable conduct”) fail to provide predictability for journalists and do not allow a reasonable understanding of which particular actions may be regarded as a violation. Such regulations contradict the principle of legal certainty and are inconsistent with the requirements established in the case-law of the European Court of Human Rights (ECHR), which requires that any restriction on freedom of expression be foreseeable and protected from arbitrariness. This circumstance contravenes the requirement that restrictions be “prescribed by law” under Article 10 of the European Convention on Human Rights, as interpreted in the case-law of the ECHR (*Sunday Times v. the United Kingdom*, *Şener v. Turkey*).
- The NA Chief of Staff’s December 2025 letter 1/5278-2025 concerning the most severe sanction imposed on journalists - the one-year deprivation of accreditation - did not substantiate the real gravity of the journalists’ conduct, nor did it evaluate the actual damage caused to the normal functioning of the National Assembly or the security risks. The document failed to provide measurable and objective criteria on the basis of which it would be possible to conclude that the interference in question was necessary and proportionate in a democratic society. Such an approach runs counter to the position developed by the ECHR on the application of

sanctions against journalists (*Cumpănă and Mazăre v. Romania, Stoll v. Switzerland*).

- MEO finds it concerning that, in this case, the application of the Accreditation Regulation allowed the NA Staff to act in the absence of clearly defined procedures and oversight guarantees, first issuing a warning and imposing a more severe sanction, namely, deprivation of accreditation, the very next day. Such a broad discretion, as exercised in relation to journalists Sona Grigoryan and Knarik Manukyan, is incompatible with the requirements set out in the case-law of the European Court of Human Rights, which requires that the discretion of state bodies in the field of freedom of expression be limited and safeguarded against arbitrariness.
- MEO also attaches importance to the fact that the imposition of sanctions came immediately after the journalists addressed politically acute and critical questions to deputies in the National Assembly, actions that stem from the journalists' exercise of their legitimate function of public oversight. In this context, the revocation of accreditation cannot be seen as a content-neutral measure and has a chilling effect, which runs counter to the safeguarding purpose of Article 10 of the European Convention. MEO considers this as a disproportionate administrative interference with the professional activities of journalists.
- Of particular importance is the fact that journalist Knarik Manukyan was already stripped of accreditation in identical circumstances in 2023, and the court recognized that decision as unlawful. Against this backdrop, the reapplication of the same measure cannot be regarded as an accidental or technical error and indicates a systematic and deliberate conduct.

MEO notes that the manner in which the NA leadership applied the accreditation regulation:

- may create a climate of undue caution and self-censorship among journalists;
- serves as a signal that posing sharp questions may result in restrictions on professional activities;
- undermines the transparency of the National Assembly, an institution that is subject to public oversight.

This represents not only an individual but also a broad public threat, as it restricts the public's right to receive information.

In light of these and similar facts, the Information Disputes Council, on its own initiative, examined the [Regulation on Journalist Accreditation in the National Assembly](#) and released an [Opinion](#) on its problematic provisions. The Opinion specifically noted: "One of the key principles set out in the Regulation is that accreditation constitutes a right of media outlets, rather than a requirement imposed by public bodies. Consequently, these bodies are only entitled to register an application, which cannot be interpreted and applied as a permit. This approach derives from Article 6 of the Law "On Mass Communication," which was incorporated from international law. As a result, there is a presumption in favor of granting accreditation. This means that an application for accreditation may be rejected, or an existing accreditation terminated only in cases of strict necessity conditioned by the public interest."

MEO recalls that on January 16, 2025, journalistic organizations issued a [statement](#) regarding the obstruction of the professional activities of journalists Knarik Manukyan and Sona Grigoryan. In that statement, they emphasized that the processes related to journalist accreditation in the NA run contrary to the guarantees of freedom of expression and media activities enshrined in the RA Constitution, the RA Law “On Mass Communication,” as well as a range of international documents ratified by Armenia.

MEO reiterates that an unhealthy, tense and conflictual atmosphere has developed between deputies and journalists in the National Assembly. In this setting, the accreditation procedure is being applied in practice not as an organizational mechanism, but as a lever for restricting the activities of specific media.

MEO deems it necessary to:

- revoke the decision to strip Knarik Manukyan and Sona Grigoryan of their accreditation;
- review the Regulation on Journalist Accreditation and bring it in conformity with international standards of freedom of expression;
- take tangible measures to create a healthy environment for professional interactions between journalists and deputies in the National Assembly.

***Adopted on March 23, 2026  
by the following MEO composition:***

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**Boris NAVASARDIAN**, Honorary President of Yerevan Press Club

**Davit ALAVERDYAN**, Chief Editor of “Mediamax” news agency

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**Ara GHAZARYAN**, Lawyer

**Nouneh SARKISSIAN**, Managing Director of Media Initiatives Center

**Suren DEHERYAN**, Founding Editor of “Ampop.am”

**Ashot MELIKYAN**, Chairman of Committee to Protect Freedom of  
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**Margarita MINASYAN**, Director of “Tsayg” TV Company

**Arsen KHARATYAN**, Founder of “Aliq Media” news and analytical website

**Arevik SAHAKYAN**, Executive Director of “Factor TV”

**Narineh AVETISYAN**, Executive Director of Vanadzor “Lori” TV Company

**Anzhela STEPANYAN**, Editor of Armavir “Alt” TV Company

*[Media Ethics Observatory](#) has been established by the media that have joined the Self-Regulation Initiative, which counts 100 members as of today. MEO is guided by the Code of Ethics of Armenian Media and Journalists, adopted on March 10, 2007 and revised at the May 18, 2024 general meeting of the Self-Regulation Initiative.*