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NOTE

From: Commission services
To: Visa Working Party
Subject: Visa facilitation agreement with Armenia – background paper

In the context of the Eastern Partnership Summit Declaration of 7 May 2009, the EU and the partner countries stated their political support towards liberalisation of the visa regime in a secure environment and reaffirmed their intention to take gradual steps towards a visa free regime for their citizens in due course.

The EU-Armenia Visa Facilitation Agreement (VFA)¹ entered into force on 1 January 2014. As an international agreement, it generates rights and obligations for the contracting parties (EU and Armenia). The main objective of the VFA with Armenia is to facilitate the issuance of short-stay visas (Schengen visas) for an intended stay of no more than 90 days per period of 180 days to the citizens of Armenia. All citizens of the Union are exempted from the visa requirement when travelling to Armenia.

¹ Agreement between the European Union and the Republic of Armenia on the facilitation of the issuance of visas, OJ L 289, 31.10.2013, pp. 2–11.

The VFA facilitations concern “improved” Visa Code legal provisions to the benefit of Armenian visa applicants. In other words, this means that Armenian citizens, on the basis of the VFA, should enjoy certain procedural benefits when applying for Schengen visas unlike other citizens of third countries with whom the EU has not signed such international agreement. The most significant facilitations for Armenian visa applicants prescribed by the VFA relates to: documentary evidence (Article 4), issuance of multiple-entry visas (Article 5), visa fee (Article 6), length of procedures (Article 7), visa exemption for holders of diplomatic passports (Article 10).

The short-stay visa statistics from 2024 show that the number of visas issued in Armenia increased to 86.262 in 2024 comparing to 51.000 visa issued in 2019. The number of multiple entry visas has also increased since 2019. At the same time, the share of refusal rate rose from 8,7% in 2023 to 12,4% in 2024.

However, the Commission has received numerous complaints from Armenian citizens who have been unable to secure an appointment for the submission of a visa application, whether at the premises of external service providers or at Member States’ consular offices in Armenia. The complaints come also from high-level Armenian officials who raise Schengen visa issues in their visit in Member States’ capitals or in the exchanges with the EU leadership.

In most cases, complainants strongly criticise the lack of implementation of the VFA, pointing to excessively long queues and the inflated cost of visa applications resulting from the involvement of intermediaries. These intermediaries use sophisticated IT tools to secure appointments immediately upon their release, making it extremely difficult for applicants who do not rely on their services to book an appointment independently. Legitimate travel companies are likewise often unable to plan trips to the EU—whether for tourism, business, education, or medical purposes—without resorting to unethical or even illegal intermediaries.

A shortage of human resources in Member States’ consulates constitutes another tangible challenge. While some Member States have reinforced their consular staff, others have yet to address these shortages in Armenia. Likewise, outsourcing certain visa-processing tasks to external service providers has not proven to be an effective solution.

The complaints also highlight a very restrictive interpretation of the VFA provisions concerning the issuance of multiple-entry visas (Article 5) to *bona fide* Armenian travellers with a positive visa history (e.g. students, businesspeople, government officials). In a number of cases, the rules on multiple-entry visas set out in the VFA appear not to be applied. Measures applied by Member

States' consular offices to combat visa shopping are frequently perceived as a pretext for avoiding the proper application of the facilitated visa rules for Armenian citizens. Ultimately, booking a visa appointment at a consulate of a Member State that is not the applicant's main destination can itself generate visa-shopping practices, often resulting in visa refusals. In certain cases, even minor changes—such as altering a hotel or flight reservation—have led to the revocation of an issued visa, which is not consistent with the provisions of the Visa Code Handbook I.

The above elements indicate that Armenian citizens benefit little from the facilitations prescribed under the VFA, apart from the reduced visa fee, when lodging their visa applications. Member States' consulates appear to rely more frequently on the Visa Code and national legislation than on the provisions of the VFA in processing Armenian visa applications. A systematic lack of harmonised approach in the implementation of the VFA coupled with diverse practises among consulates in Yerevan, is often observed.

The Commission has consistently called on the Member States' visa authorities to improve their operational capacities and address this issue by releasing more appointments. Likewise, the issue has been numerously raised by the EU Delegation in local Schengen cooperation meetings, and in meetings with local Heads of EU Missions.

The persistent obstacles to obtaining Schengen visas in Armenia carry adverse political consequences, as they undermine the ongoing Visa Liberalisation Dialogue with Armenia, and to a significant extent, fuel Russian propaganda about the EU's intentions. This situation not only erodes the credibility of the VFA, but also damages the EU's image among Armenian visa applicants and Armenian society at large.

Questions to Member States:

- *Do you share the assessment that the situation for visa applicants in Armenia is difficult and that the provisions of the EU-Armenia VFA are not being fully implemented?*
- *What measures is your Member State planning to introduce to improve the situation?*
- *In your view, would collective action coordinated by the EU Delegation be necessary, and if so, what form should it take?*