

Joint Submission to the Universal Periodic Review of Georgia

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The **International Federation for Human Rights (FIDH)** is an international human rights organisation federating 188 member organisations from 116 countries. Since its foundation in 1922, FIDH has been defending all civil, political, economic, social, and cultural rights set out in the Universal Declaration of Human Rights (UDHR).

The **World Organisation Against Torture (OMCT)** is the largest global network of organisations dedicated to ending torture, combating impunity, and protecting human rights defenders. Working with 200 member organisations in over 90 countries, OMCT provides support to victims and safeguards those at risk. It is part of the European Union's Human Rights Defenders Mechanism (ProtectDefenders.eu) and the United Against Torture Consortium.

FIDH and OMCT also provide a comprehensive and holistic system of support and protection for human rights defenders, including in the framework of the **Observatory for the Protection of Human Rights Defenders**.

The **Georgian Young Lawyers' Association (GYLA)** is one of the largest and most trusted human rights organizations in Georgia, which has been fighting to protect human rights since 1994. Over the years, GYLA has played a significant role in the protection of human rights, strengthening democracy, and establishing the rule of law. GYLA actively monitors and scrutinizes the activities of all branches of government to ensure they adhere to human rights protection standards. The organization conducts studies, prepares reports, and develops recommendations, advocating for necessary reforms at both national and international levels. GYLA was the first organisation in Georgia to offer free legal aid, significantly enhancing public access to justice. This service remains available throughout the country. Additionally, GYLA develops strategic litigation as a key tool for advancing human rights, advocating within domestic and international legal frameworks. A number of precedent cases won by GYLA have had a meaningful, positive impact on people's everyday lives.

Human Rights Center (HRC) is a Georgian human rights civil society organization, which was founded on 10 December 1996 in Tbilisi, Georgia. HRC is dedicated to the protection and promotion of human rights, the rule of law and peace in Georgia, and is a member of the International Federation for Human Rights.

A. Introduction

1. This submission was prepared jointly by the International Federation for Human Rights (FIDH) and the World Organisation Against Torture (OMCT) within the framework of the Observatory for the Protection of Human Rights Defenders, the Georgian Young Lawyers' Association (GYLA), and the Human Rights Center (HRC) for the fourth Universal Periodic Review of Georgia in 2025. The report examines the government of Georgia's compliance with its international human rights obligations, highlighting grave concerns over Georgia's recently enacted "foreign agents" legislation and its drastic impact on human rights defenders and civil society.

2. Despite Georgia's significant human rights commitments during its third Universal Periodic Review (UPR) in 2021, notably supporting 257 out of 285 recommendations, including recommendations to "ensure a safe environment for human rights defenders"¹ and to increase "the efforts of political leaders to publicly acknowledge and protect [their] important role (...) in the democratization process"², the human rights situation in the country, particularly concerning human rights defenders (HRDs), has deteriorated at an alarming rate. This decline, becoming especially pronounced since 2023, stands in stark contradiction to Georgia's international human rights law obligations.
3. This report draws on comprehensive desk research, as well as interviews held with human rights defenders from four leading Georgian civil society organisations in late June 2025. While informed consent was obtained to publish their accounts in anonymised form, their names and personal information are withheld for security reasons.

B. Context

4. Since the previous review in 2021, Georgia has experienced a significant deterioration in its human rights environment and democratic governance, characterised by legislative and institutional measures targeting civil society, independent media, and dissenting voices.
5. In February 2023, a parliamentary group affiliated with the ruling "Georgian Dream" party introduced³ restrictive laws "On Registration of Foreign Agents" and "On Transparency of Foreign Influence". The draft legislation would have required non-commercial legal entities – including civil society organisations and independent media – that received more than 20% of their funding from foreign sources to register as "organisations pursuing the interests of a foreign power".
6. The introduction of these laws prompted immediate and widespread peaceful public demonstrations in Georgia's capital Tbilisi and other regions of the country. Civil society representatives warned⁴ that the proposed legislation would stigmatise independent organisations, restrict access to funding, and severely undermine the rights to freedom of association and expression. In the face of domestic and international pressure, the ruling party formally withdrew the legislative package on 10 March 2023.
7. However, in March 2024, the "Georgian Dream" reintroduced the same legislative initiative with minor technical revisions. On 28 May 2024, the Parliament adopted the Law "On Transparency of Foreign Influence", overriding⁵ a presidential veto and disregarding the European Commission for Democracy through Law (Venice Commission)'s urgent opinion⁶ and calls of the international community.
8. This took place amid sustained protests, including daily rallies in front of the Parliament building and student-led boycotts. State authorities responded to the peaceful protests with violent illegal dispersals, arbitrary arrests and detentions, and instances of ill-treatment.⁷ Civil society representatives have been subjected to physical assaults and threats.⁸ Offices of multiple organisations opposing the law were vandalised by State-affiliated groups, and government-affiliated media engaged in a coordinated smear campaign portraying civil society organisations (CSOs) as agents of foreign powers and enemies of the state. The European Union (EU) warned⁹ that the adoption of this law would undermine Georgia's candidacy for membership to the EU, while multiple United Nations (UN) Special Rapporteurs,¹⁰ as well as international human rights organisations, expressed concerns regarding its incompatibility with the rights to freedom of association and expression.
9. On 28 November 2024, a statement by the "Georgian Dream" Prime Minister regarding the halting of the EU accession talks sparked another wave of mass protests. It came in the aftermath of the 2024 parliamentary elections, during which, among other systematic breaches, voting secrecy was widely violated. In November-December 2024, the authorities responded to the renewed protests with disproportionate use of force in Tbilisi, Batumi, and other cities. Police employed tear gas, water cannons, rubber bullets, severe beatings and arbitrary arrests against peaceful demonstrators. During the November-December protests, the torture and ill-treatment of peaceful demonstrators became a widespread and systemic practice.
10. On 1 April 2025, the Parliament adopted the "Foreign Agents Registration Act" (FARA), which entered into force on 31 May 2025. If applied, it could impose significantly more stringent requirements on civil society organisations compared to the previous legislation. In parallel, on 16 April 2025, the Parliament adopted amendments to the Law "On Grants", introducing a prior authorisation requirement for foreign donors.
11. In addition to the aforementioned legislative acts, between 2024 and 2025, the Georgian authorities have amended and increasingly used other laws at their discretion to target civil society organisations. These include the "Law on

Combating Corruption”, the “Law on Political Associations of Citizens”, amendments to the Criminal and the Administrative Offences Code, including penalising insults against public officials, the “Law on Broadcasting”, the “Law on Freedom of Speech and Expression”, and others. These laws increase penalties for criticising the authorities, enable demands for personal and other sensitive information, and allow human rights work to be named as political activity serving the interests of foreign states.

12. These developments have occurred against the backdrop of the concentration of all branches of power in the hands of a single political party, lack of independence of the judiciary and the erosion of fundamental freedoms, raising serious concerns about Georgia’s compliance with its international human rights obligations under instruments such as the International Covenant on Civil and Political Rights (ICCPR) and the European Convention on Human Rights (ECHR).

C. Scope of Georgia’s “Foreign Agents” Legislation

13. Georgia's "foreign agents" legislation consists of several increasingly restrictive laws and administrative regulations designed to control and suppress civil society organisations and independent media, including the "Law on Transparency of Foreign Influence", the "Foreign Agents Registration Act", and the recent amendments to the Law "On Grants". While allegedly aimed at ensuring transparency of foreign influence, these laws allow for the harassment and stigmatisation of human rights practitioners. They impose overly burdensome registration, reporting, and labelling obligations, introduce administrative and criminal liability for HRDs and CSOs, and significantly restrict access to international funding, severely and unjustifiably restricting the exercise of freedoms of association and expression in Georgia and creating a chilling effect for Georgian civil society.

1. Law “On Transparency of Foreign Influence”

14. Georgia's Law “On Transparency of Foreign Influence” requires non-governmental organisations and media outlets that receive over 20% of their annual funding from foreign donors to register as “organisations pursuing the interests of a foreign power” with the Ministry of Justice. Such organisations are required to submit an annual financial declaration; additionally, the law also foresees administrative fines for non-compliance, ranging up to 25,000 GEL (approximately 8,000 EUR) for failing to register or submit an annual financial declaration.
15. Despite entering into force in mid-2024, compliance with the law “On Transparency of Foreign Influence” has remained extremely limited. As of September 2024, only 476 organisations¹¹ – out of 33,465 registered and 3,789 active CSOs¹² – had registered under the new legal regime. Those that complied faced burdensome administrative obligations, including heavy financial reporting and the disclosure of foreign partners and beneficiaries. Although the law provides for administrative sanctions for failure to register, no penalties had been imposed as of July 2025.

2. Foreign Agents Registration Act

16. The Foreign Agents Registration Act significantly expands the repression against human rights defenders and civil society organisations. The unforeseeable, vague and broad definitions of key components of this Act could enable targeting individuals and CSOs receiving any foreign funding – regardless of proportion. As of 17 July 2025, the public register maintained by the Anti-Corruption Bureau lists only ten individuals and organisations that registered as “foreign agents”.¹³

a. Registration as “Foreign Agents” and Labelling Requirements

17. Under the Foreign Agents Registration Act (FARA), any natural or legal person engaged in "political activities" for the benefit or in the interests of a "foreign principal" is required to register as an “agent of a foreign principal” with the Anti-Corruption Bureau. Specifically, this includes persons acting “as an agent, representative, employee or servant” or “at the direction, request, instruction or control” of a “foreign principal” – namely a foreign government or political party, but also any individual located outside Georgia (unless that individual is a Georgian citizen living permanently in Georgia), or any group or organisation that operates under the laws of a foreign country or has its main place of business in a foreign country. This vague and convoluted definition creates significant legal uncertainty, allowing to qualify almost any human rights defender or civil society organisation as a “foreign agent”.
18. In practice, the obligation to register would not only extend to individual human rights defenders working with an actor deemed a “foreign principal” and civil society organisations – represented by their directors –, but would also

require the leadership of an organisation and other staff directly involved in “registrable activities” to register as “related persons”, a special category of “foreign agents”.

19. The initial registration must be submitted electronically and under oath within ten days after taking up activities that qualify the person as a “foreign agent” under the Foreign Agents Registration Act. The list of “foreign agents”, including the registration documents submitted, are published by the Anti-Corruption Bureau in a public online register.
20. The Anti-Corruption Bureau, designated as the central implementation body for Georgia's Foreign Agents Registration Act and the Law “On Grants”, oversees the registration process by monitoring and verifying the submitted applications. If the Bureau identifies a person suspected of not complying with the obligation to register as a “foreign agent”, it may initiate an inspection and request the submission of a registration application within 10 days. If the person fails to register, the Anti-Corruption Bureau is authorised to apply to the court with a motion to oblige the person to submit a registration application, to cease any action that violates the Law or a regulation established thereunder, and/or to cease acting as an agent of a foreign principal.
21. Should a “foreign agent” cease their “registrable” activities, they can deregister by filing a final statement with the Anti-Corruption Bureau.
22. Alongside the obligation to register, the Foreign Agents Registration Act imposes strict labelling requirements: under Article 4(2), materials produced by a “foreign agent” must be conspicuously marked as “distributed by an agent of a foreign principal on behalf of the foreign principal”, a requirement that significantly increases stigmatisation by forcing organisations to publicly associate with a term widely perceived as pejorative in Georgia. As specified in the regulations, the notice must be “easily perceptible”, placed at the very beginning of the document, and indicate the name and country of the “foreign principal”.

b. Extensive disclosure and reporting requirements

23. The Foreign Agents Registration Act establishes rigorous disclosure and reporting requirements for individuals and organisations deemed obliged to register.
24. In particular, as part of the initial registration as a “foreign agent”, applicants must submit an extensive registration form, disclosing detailed information about their activities, donors and funding. This includes the full name, address, date of birth, and citizenship of the applicant, as well as the grant agreements with a detailed description of the performance under the agreement detailing dates, locations, speakers, and topics where applicable. Directors registering an organisation must also indicate the legal form, establishment details, and information regarding the overall ownership or control structure, and provide the organisation’s foundational document, as well as any statutes and regulations. Additionally, it also requires a comprehensive table of employees, detailing each staff member's name, personal and contact information, position, type of employment and remuneration currency.
25. Beyond the initial registration, persons registered as “foreign agents” are obliged to notify the Anti-Corruption Bureau of specific changes or new agreements concluded with foreign donors within ten days, and submit supplementary statements with updated information, detailing the activities implemented, every six months. The information must be submitted under oath, and is publicly available in an online database maintained by the Anti-Corruption Bureau.
26. Furthermore, the Foreign Agents Registration Act establishes an ongoing obligation to submit two copies of any distributed information materials to the Anti-Corruption Bureau within 48 hours of dissemination, granting the Anti-Corruption Bureau unrestricted insight into their advocacy and positions.

c. Liability and Sanctions

27. Unlike the Law “On Transparency of Foreign Influence”, the Foreign Agents Registration Act foresees criminal liability for non-compliance. In particular, under Article 8(1), the mere failure to register as a “foreign agent” or failure to provide complete information or documents to the Anti-Corruption Bureau may result in fines of up to 10,000 GEL (approximately 3,150 EUR) and a prison sentence of up to five years. Article 8(4) explicitly states that failure to register or submit additional information is considered a continuous crime, and is not subjected to a

statute of limitations, creating an indefinite risk of prosecution. Additionally, violations of the requirement to label materials as produced by a “foreign agent” are punishable by fines of up to 5,000 GEL (approximately 1,500 EUR) and/or imprisonment for up to six months.

3. Amendments to the Law “On Grants”: Provisions Severely Restricting Access to Foreign Funding

28. The latest amendments to the Law “On Grants”, which entered into force in April 2025, introduced severe restrictions on the receipt of foreign funding for civil society organisations.
29. Under these amendments, with limited exceptions, any foreign grant to a Georgian organisation or individual must be explicitly approved by the “Georgian Dream” government or an official/agency designated by it. Donors are obliged to preliminarily submit the full grant agreement to the Georgian government for its approval, which must be evaluated by the authorities within ten days. The law does not indicate any grounds for approval or denial of grants.
30. Receiving a grant without prior government approval is explicitly prohibited and constitutes an administrative offense, which results in a heavy fine of double the grant amount imposed on the recipient of the grant. To enforce the law, the Anti-Corruption Bureau, responsible for monitoring the issuance and receipt of “unauthorised” grants, has been granted extensive control powers. This includes the right to adopt the regulations necessary to implement the law, to request extensive financial information and personal data from persons suspected of receiving “unauthorised” grants, public institutions or service providers, to question persons who “may possess information necessary for monitoring grants received without approval”, and to interrogate persons before a magistrate judge. In case of a violation, the Anti-Corruption Bureau draws up an administrative offense report, which is sent to a district court for consideration. The Bureau can also seize the property, including bank accounts, proportionate to the sanction amount. The seizure takes immediate effect and must be submitted to the court for confirmation, which has 15 days to decide on the matter.

D. Legal Analysis

31. Georgia’s “foreign agents” legislation raises serious concerns under its international human rights law obligations, especially the right to freedom of association enshrined in Article 11 of the European Convention on Human Rights (ECHR) and Article 22 of the International Covenant on Civil and Political Rights (ICCPR), to which Georgia is a State party. In particular, the right to freedom of association inherently “includes the freedom to seek, receive and use resources from natural and legal persons, whether domestic, foreign or international, without prior authorisation or other undue impediments”¹⁴. Any interference is only justified if it cumulatively meets the principles of legality, legitimacy and necessity/proportionality.
32. Georgia’s “foreign agents” legislation introduces terminology characterised by a lack of legal precision and foreseeability. Broad criteria, such as engagement in “political activities”, enable the arbitrary and unpredictable qualification of individuals and organisations as “foreign agents”, undermining the principle of legal certainty. From a legitimacy standpoint, the “foreign agents” legislation extends beyond the mere objective to ensure national security or public order by fostering transparency. Notably, statements made by State officials suggest that these laws are rather designed to silence and punish civil society for their critical stance toward the government, stigmatising dissenting voices as “foreign agents”.
33. Furthermore, the introduced legislation fails to satisfy the requirements of necessity and proportionality. Even if they pursued a legitimate aim, the introduced restrictions, such as the stigmatising registration and labelling requirements, the reporting requirements and the public disclosure of personal data do not constitute effective and the least intrusive means. Moreover, the laws impose disproportionate penalties, including substantial fines and severe criminal liability, for violations such as the mere failure to provide information to the Anti-Corruption Bureau, to label materials, or to register as a “foreign agent”, and effectively introduce a governmental veto right over the receipt of international grants for civil society.
34. Georgia’s “foreign agents” legislation also significantly infringes upon other fundamental human rights, including freedom of expression (Art. 10 ECHR, Art. 19 ICCPR), the right to privacy (Art. 8 ECHR, Art. 17 ICCPR), and the right to non-discrimination (Art. 14 ECHR, Art. 26 ICCPR). With respect to the Law “On Transparency of Foreign Influence”, this very conclusion was reached in May 2024 by both the European Commission for Democracy through Law (Venice Commission)¹⁵ and the OSCE Office for Democratic Institutions and Human Rights (ODIHR)¹⁶.

E. Impact of the “Foreign Agents” Legislation on Human Rights Defenders and Civil Society Organisations

35. Despite its recent entry into force, Georgia’s “foreign agents” legislation and the associated legal framework already generate a drastic impact on human rights defenders and civil society as a whole, which can be expected to further aggravate in the coming months. Although the laws are yet in the initial stage of enforcement, they have begun to profoundly reshape the operational environment and public perception of civil society organisations, resulting in substantial threats to the rights of both HRDs and beneficiaries.

1. Stigmatisation

36. As consistently emphasised by Georgian HRDs, including those interviewed for this submission, the expression “foreign agent” – a Soviet-era term widely understood as a synonym for “traitor”, “enemy” or “spy” – carries a highly negative connotation in Georgia and is inherently stigmatising. As highlighted by all interviewees, being labelled a “foreign agent” inflicts significant and lasting reputational damage, undermining public trust and the legitimacy of HRDs and CSOs. In this respect, the obligation to label materials with a “foreign agent” notice, thereby forcing organisations to assert a message they inherently disagree with, appears particularly damaging.

37. This effect is consistent with the State-sponsored misinformation, hate speech and systematic smear campaigns targeting human rights defenders and CSOs, which portray them as a “radical”¹⁷ “tool of political intervention”¹⁸ instigating revolutions to dismantle Georgia’s sovereignty in the interest of foreign powers with “black money”¹⁹.

38. As a result, all leading human rights organisations publicly refused to register as “foreign agents”, risking high fines and criminal prosecution, with only ten individuals and organisations listed as “foreign agents” in the Anti-Corruption Bureau’s database as of 17 July 2025.

2. Judicial Harassment

39. With extensive monitoring and enforcement powers granted to the Anti-Corruption Bureau under both the Foreign Agents Registration Act and the Law “On Grants”, Georgian human rights defenders are exposed to significant risks of arbitrary administrative and criminal prosecution and judicial harassment.

40. In June 2025, shortly after the end of the 10-days registration deadline provided under the Foreign Agents Registration Act, the Anti-Corruption Bureau proceeded to initiate inspections against eight prominent civil society organisations.²⁰ The leadership of the Academy for the Future of Georgia, the Civil Society Foundation, the Economic Policy Research Center, the International Society for Fair Elections and Democracy (ISFED), the Media Development Foundation, Sapari, the Social Justice Center and Transparency International Georgia received judicial orders issued by the Tbilisi City Court, obliging the organisations to submit extensive information, including sensitive personal data of their beneficiaries, covering the period from 1 January 2024 to 10 June 2025, to the Anti-Corruption Bureau.

41. While the Anti-Corruption Bureau based its initial requests on four laws – the Law on Combating Corruption, the Law on Political Associations, the Law “On Grants” and the Foreign Agents Registration Act –, the Tbilisi City Court omitted the Foreign Agents Registration Act (FARA) as a legal basis, compelling disclosure solely under the other three laws. However, as highlighted by legal experts, the orders are clearly unsubstantiated.²¹

42. All targeted organisations have publicly refused to provide personal information of their beneficiaries to the authorities, citing their obligations to ensure data confidentiality vis-à-vis their beneficiaries, especially based on attorney-client privilege.²² As the appeals filed against the orders were rejected,²³ these organisations face the immediate threat of legal enforcement for non-compliance. As confirmed by the interviewees, it can be expected that similar requests will be sent to other civil society organisations.

43. The intentionally broad language of the Foreign Agents Registration Act, combined with the introduction of severe criminal liabilities and credible reports of the judiciary’s instrumentalisation, creates an enabling environment for the judicial harassment and politically motivated prosecution of human rights defenders.

3. Threats to Operational Viability: Forced Discontinuation of Programmes and Dismantling of Civil Society Organisations

44. The latest amendments to the Law “On Grants”, which prohibit international donors to issue grants to Georgian recipients without the government’s consent, are expected to create a disastrous impact on the work of HRDs and CSOs, resulting in the imminent discontinuation of vital programmes and the complete dissolution of CSOs over the loss of international funding.
45. Until 7 July 2025, the Georgian authorities had failed to adopt provisions regulating the approval procedure for international grants. Reportedly, this has led to the cancellation of at least one major grant submitted to the Georgian government for its approval by the British Embassy: in June 2025, the British Embassy Tbilisi publicly announced its decision to cancel multiple grants intended for Georgian media outlets and civil society organisations working on electoral monitoring, as the Georgian authorities had not reacted to the grant proposal at all.
46. Yet, even as the ordinance of the Government regulating approval procedures has been adopted, several interviewees expressed scepticism that the Georgian authorities would approve grant proposals submitted by certain international donors, who are consistently targeted and labelled by Georgian officials as “saboteurs”, “enemies” and funders of “propaganda and extremism”. Additionally, several interviewees reported that certain international donors already refused to apply for government approval in order not to legitimise Georgia’s repressive legislation.
47. As a result, since the entry into force of the amendments in mid-April 2025, it became impossible for Georgian civil society organisations to legally receive funding from international donors, whether by renewing existing or signing new grant agreements. According to the interviewees, this impasse has already led to the imminent discontinuation of several vital programmes, including psycho-social, medical and legal support for victims of State-sponsored violence, which have been continuously financed by international donors for many years. The financial situation of civil society organisations could also be further exacerbated by fines for non-compliance with the Foreign Agents Registration Law, which may be imposed repeatedly, potentially forcing them into bankruptcy.
48. As it has become practically impossible to secure funding for human rights-related activities in Georgia, the interviewees anticipate that their organisations’ funding will run out within the next 6–24 months, forcing organisations to shut down entirely and employees to quit their jobs.
49. Therefore, the amendments to the Law “On Grants” could effectively force the entire CSO sector to cease operations over an inevitable lack of funding within the coming months, with dramatic and lasting consequences for the democratic and civic space, as well as for the enjoyment of human rights by the entire population in Georgia.

4. Psycho-Social Impact

50. The pervasive climate of fear, fuelled by Georgia's new legislative environment, severely affects the psychological well-being, personal lives and professional capacity of human rights defenders in the country.
51. In particular, interviewees consistently described operating under “intense emotional pressure”, characterised by chronic stress, anxiety, and despair. Additionally, the stigma of being publicly labelled as “foreign agents” profoundly exacerbates these psychological burdens, creating a sense of isolation.
52. In response to escalating security concerns, based on the attacks against civil society organisations in May 2024 and the hateful rhetoric of the ruling party, several interviewees expressed increased security concerns, resulting in a heightened sense of vigilance. Interviewees described that organisations adopted additional security measures, such as collectively not attending the office or constantly locking the office doors, destroying confidential information, and urgently implementing further cyber security measures. In this respect, all interviewees described profound concerns about the security of their beneficiaries, seeking ways to protect sensitive data that could be misused against them. This profound psychological burden also manifests physically, with interviewees reporting sleep disturbances and other stress-related health issues.
53. Additionally, this pressure also deeply affects the private and family lives of human rights defenders. For instance, interviewees recounted actively avoiding family gatherings to prevent confrontations with relatives or friends who support the ruling party. Moreover, the profound unforeseeability of the current situation has left many struggling to plan ahead, creating a sense of instability and uncertainty about their future.
54. In this atmosphere of fear, numerous human rights defenders have reportedly already abandoned their long-standing positions or even changed their entire field of employment. While some organisations report milder effects, one prominent Georgian human rights organisation confirmed losing up to 20% of its staff, predominantly

from its regional offices. This exodus, exacerbated by the anticipated lack of funding following the amended Law “On Grants”, threatens to force even more human rights defenders to abandon their work, and prevents young persons from becoming HRDs in the long term, leading to an acute risk of burnout for the remaining staff across the sector. This jeopardises the very capacity of civil society organisations to function, and results in socio-economic risks for those forced to leave their jobs.

5. Chilling Effect on Beneficiaries and Civil Society as a Whole, including Vulnerable Groups

55. Georgia’s “foreign agents” legislation creates a pervasive chilling effect on civil society as a whole, silencing any criticism of the government and instilling a climate of mistrust that extends beyond CSOs themselves to individuals in need of crucial support. In particular, in light of the hostile rhetoric discrediting CSOs as “foreign agents”, as well as the vast disclosure requirements and the recent information requests demanding sensitive data on beneficiaries, potential beneficiaries might become increasingly reluctant to turn to CSOs over a tangible risk of retaliation by authorities.
56. Furthermore, with CSOs being cut off from new funding and potentially forced to reduce or completely cease their activities, beneficiaries risk losing access to vital services and support, such as free legal aid for victims of State-sponsored or gender-based violence, psycho-social assistance, medical care and financial support, particularly in rural and marginalised communities.
57. The consequences will likely be particularly dramatic for individuals belonging to vulnerable groups, including women and members of the LGBTQ+ community, who are consistently targeted by the authorities through publicly disseminated misinformation, hate speech and other repressive legislation. Notably, in September 2024, the Georgian authorities adopted a series of laws, including the Law “On the Protection of Family Values and Minors” (“anti-LGBT law”), which prohibits the public endorsement and depictions of LGBTQ+ relationships and persons in educational materials and the media, effectively erasing any visibility of and advocacy for LGBTQ+ rights. The “foreign agents” legislation further exacerbates the situation of LGBTQ+ HRDs and organisations: by placing them at heightened risk of dissolution due to funding cuts and legal persecution, it deprives affected individuals of critical support such as access to information, psychological support and social services, including temporary housing, a unique and vital offer for LGBTQ+ persons in Georgia.

F. Conclusion

58. Georgia’s repressive “foreign agents” legislation fundamentally undermines the rights to freedom of association and expression, as enshrined in the ICCPR and the ECHR. It represents a clear failure to implement the recommendations to protect human rights defenders and to acknowledge the critical importance of their work, which Georgia explicitly accepted during its last UPR review.

G. Recommendations

59. In light of the above, we call on States to recommend to the government of Georgia to:
 - Immediately repeal the Law “On Transparency of Foreign Influence”, the Foreign Agents Registration Act, the recent amendments to the Law “On Grants”, and other legislation aimed at shrinking civic space, bringing it into full compliance with Georgia’s international human rights obligations, particularly regarding the rights to freedom of association and expression.
 - Eliminate all legislative and administrative barriers to the lawful receipt of international and domestic funding by Georgian civil society organisations, and ensure that CSOs can access and use grants freely without prior approval or arbitrary interference by state authorities.

- Adopt and vigorously implement comprehensive measures to prevent and combat state-sponsored hate speech and stigmatisation against HRDs, CSOs, and vulnerable groups, particularly the LGBTQ+ community.
- Guarantee freedom of expression and media freedom, including by refraining from misusing defamation or disinformation laws to silence critical voices, journalists, or civil society actors.
- Ensure prompt, impartial, and thorough investigations into all attacks, threats, and acts of intimidation against human rights defenders, and guarantee that perpetrators are held accountable in accordance with the rule of law.
- Ensure a safe and enabling environment for all human rights defenders to carry out their legitimate activities, free from intimidation, reprisals, or undue restrictions, in full alignment with Georgia's international human rights commitments.
- Ensure transparency and public accountability in the legislative process, including by publishing draft laws in advance, allowing adequate time for public input, and conducting meaningful consultations with all stakeholders and prior assessment of their impact on fundamental freedoms.
- Refrain from using arbitrary or politically motivated investigations, audits, or legal proceedings against civil society organisations, and journalists, and ensure that regulatory authorities act with neutrality and transparency.

Endnotes

¹ Recommendation 148.133: "Protect human rights defenders", UN Human Rights Council, Report of the Working Group on the Universal Periodic Review: Georgia, forty-seventh session, A/HRC/47/15, 1 April 2021.

² Recommendation 148.134: "Increase the efforts of political leaders to publicly acknowledge and protect the important role of human rights defenders and independent human rights institutions in the democratization process", UN Human Rights Council, Report of the Working Group on the Universal Periodic Review: Georgia, forty-seventh session, A/HRC/47/15, 1 April 2021.

³ Georgian Parliament, "The Committees assigned to the consideration of the draft law on registration of foreign agents according to the decision of the Bureau", 27 February 2023, available at <https://parliament.ge/en/media/news/biuors-gadatsqvilebit-kanonproekti-utskhoeli-agentebis-registratsiis-shesakheb-gansakhilvelad-komitetebis-gadaetsa>.

⁴ OMCT, "Georgia: Parliament must reject new "foreign agents" bill", 27 February 2023, available at <https://www.omct.org/en/resources/statements/georgia-parliament-must-reject-new-foreign-agents-bill>.

⁵ European Commission, "Statement by the High Representative with the European Commission on the final adoption of the law on transparency of foreign influence in Georgia", 28 May 2024, available at https://ec.europa.eu/commission/presscorner/detail/en/statement_24_2945.

⁶ European Commission for Democracy through Law (Venice Commission), "Georgia. Urgent Opinion on the Law on Transparency of Foreign Influence", Opinion No. 1190/2024, CDL-PI(2024)013, 21 May 2024, available at [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-PI\(2024\)013-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-PI(2024)013-e).

⁷ See GYLA, "Georgia: Human Rights Amidst the Russian Law Human Rights 60 Days Following the Revival of the Foreign Influence Transparency Bill", 2024, available at https://admin.gyla.ge/uploads_script/publications/pdf/rusuli%20kanoni.pdf.

⁸ OMCT, "Georgia : Serious deterioration of the situation of human rights defenders", 26 June 2024, available at <https://www.omct.org/en/resources/statements/georgia-serious-deterioration-of-the-situation-of-human-rights-defenders>.

⁹ European Commission, "Statement by High Representative Josep Borrell with the European Commission on the adoption of the 'transparency of foreign influence' law in Georgia", 15 May 2024, available at https://ec.europa.eu/commission/presscorner/detail/en/statement_24_2628.

¹⁰ OHCHR, "Georgia: UN experts condemn adoption of Law on Transparency of Foreign Influence", 15 May 2024, available at <https://www.ohchr.org/en/press-releases/2024/05/georgia-un-experts-condemn-adoption-law-transparency-foreign-influence>.

¹¹ Civil Georgia, "476 CSOs Register by Foreign Agents Law Deadline", 3 September 2024, available at <https://civil.ge/archives/622253>.

¹² National Statistics Office of Georgia, "Number of registered and active entities by organizational-legal form and size", last updated on 1 July 2025, available at <https://www.geostat.ge/en/modules/categories/67/by-legal-status>.

¹³ Public register of “foreign agents” maintained by the Anti-Corruption Bureau, available at <https://fara.acb.gov.ge/search/active-registrant>.

¹⁴ UN Human Rights Council, “General principles and guidelines on ensuring the right of civil society organizations to have access to resources. Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association, Clément Nyaletsossi Voule”, fifty-third session, A/HRC/53/38/Add.4, 23 June 2023, para. 11.

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