



Joint Submission by the Committee to Protect Journalists and Media Advocacy Coalition (Georgia)

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Executive summary

1. As organizations promoting press freedom, this submission focuses on Georgia's compliance with international human rights obligations related to freedom of the press and on developments since the last review in 2021. The submission identifies a sharp decline in press and media freedoms across a comprehensive range of indicators over this period.

2. In particular, the concerns raised in this submission relate to:

- Enactment of repressive legislation targeting independent media
- Physical assaults and impunity for attacks on journalists, particularly by law enforcement
- Criminal prosecution and imprisonment of journalists, detentions and fines
- Entry denials to foreign journalists, safety of foreign journalists seeking refuge
- Systematic use of captured institutions against the press
- Increasing SLAPP suits against the press
- Restricted access to public information and state institutions
- Disinformation and hate speech
- State advertising procurement and the media

Implementation of recommendations from previous review

3. Our commentary on the recommendations supported from the previous Universal Periodic Review (“UPR”) cycle are contained in the matrix of relevant recommendations in Appendix 1. All 37 recommendations relevant to press freedom and which were supported are assessed as “not implemented.”

Update on situation for media freedom since the last review

General observations

4. The submission identifies a sharp decline in press and media freedoms across a comprehensive range of indicators since the last UPR cycle in 2021. This decline has occurred amid a well-documented wider human rights deterioration and authoritarian turn by the ruling Georgian Dream party.
5. The human rights deterioration has been especially pronounced since the introduction of “foreign agent” legislation in May 2024, which led to a “de facto halt” in Georgia’s European Union (EU) accession process, and has accelerated since the outbreak of mass demonstrations against the Georgian Dream government’s decision to suspend EU accession talks following alleged fraud in parliamentary elections in October 2024. The EU accession process has required Georgia to undertake comprehensive rule-of-law reforms, as well as improvements related specifically to media freedom.¹ Its suspension has been accompanied by a departure from international standards and rapid adoption of repressive tactics drawn from an established authoritarian playbook (legislation, targeting of journalists, disinformation) previously employed in other regional states (Russia, Belarus, Azerbaijan).
6. There are numerous areas of concern raised in this submission, thematically clustered around the issues noted in the Executive Summary, above.

Specific issues of concern

Enactment of repressive legislation targeting independent media

7. Since the last UPR cycle, Georgian authorities have enacted a series of new laws and amendments heavily restricting the work of independent media and creating a chilling effect for independent reporting. Taken collectively, these laws threaten to radically reshape Georgia’s independent media sector, by removing legal protections for free speech, drastically restricting the foreign donor funding on which independent media rely, and introducing potentially crippling state control over popular independent broadcasters. The changes are likely to force large swathes of Georgia’s previously vibrant and diverse media sphere into closure or self-censorship and considerably strengthen government control over the information flow.
8. On May 14, 2024, Georgia’s parliament enacted the Law on Transparency of Foreign Influence, widely

referred to as the “foreign agent” law, despite mass public protests against the law, extensive criticism from rights organizations and the international community, and a veto by Georgian President Salome Zourabichvili.²

9. The law requires non-commercial organizations and media outlets receiving more than 20 percent of their funding from a foreign source to register under the stigmatizing label of “organizations pursuing the interests of a foreign power.” Such organizations are subjected to burdensome reporting requirements and broad powers of monitoring and surveillance from the Ministry of Justice. Financial penalties range from 5,000 to 25,000 Georgian lari (\$1,800 to \$9,100), with escalating sanctions for continued non-compliance.
10. On April 1, 2025, Georgia passed a second, harsher “foreign agent” law, the Foreign Agents Registration Act (FARA), under which any violations, even alleged inaccuracies or omissions in registration filings, can be sanctioned not just by fines but also by prison terms of up to five years.³ The law applies not only to legal entities and media outlets, but also individuals. It requires those receiving any form of foreign funding and engaging in broadly defined “political” and public activities to register under the deeply stigmatizing label of “foreign agent” and to label their published materials accordingly.
11. Both laws, currently in force, severely impact independent media, particularly online news outlets which are heavily reliant on foreign donor funding to ensure independence from the government and other political interests. The laws willfully mischaracterize the relationship between independent media and established international donor organizations: instead of recognizing that donor funding ensures independence, stigmatizing labels paint recipients as controlled by foreign forces. Media organizations can either continue receiving foreign funding to remain independent or reject such funding and risk financial dependence on domestic sources that may compromise editorial integrity. Overbroad provisions and severe penalties—applicable regardless of whether media and journalists register—can be used selectively and punitively by Georgian authorities, leading to a severe chilling effect on independent reporting.⁴
12. On October 3, 2024, Georgia enacted the Law on Family Values and the Protection of Minors, which bans broadcasters from disseminating content that “promotes identification with a gender other than one’s biological sex or relationships between individuals of the same biological sex based on sexual orientation” as part of a wider law against so-called “LGBT propaganda.”⁵ The prohibition, which is punishable by a fine, represents an undue restriction on media freedom and its vague terms effectively ban broadcasters from reporting on LGBTQI+ issues.
13. On April 1, 2025, Georgia enacted amendments to the Law on Broadcasting banning foreign funding of broadcasters and dramatically expanding the powers of the parliament-appointed broadcast regulator, the

Communications Commission.⁶ These amendments will heavily restrict the work of popular independent broadcasters, fundamentally altering Georgia's previously diverse broadcast media landscape.

14. Local broadcasters have long complained that the Communications Commission, whose members are elected by Parliament, is not impartial and applies excessive and punitive fines against critical broadcasters.⁷ In 2022 and 2023, Georgia extended the Commission's powers of sanction—which include fines of up to three percent of broadcasters' income and license suspension—to cover perceived instances of hate speech and obscenity.⁸ The 2025 amendments further extend these powers to cover complaints about factual accuracy, fairness, and privacy violations. This marks a fundamental change in media regulation, with broadcast standards previously governed by industry co- and self-regulation, turning the regulatory body from a licensing authority into a content arbiter with significant power over news coverage and editorial choices.
15. On April 16, 2025, Georgia enacted amendments to the Law on Grants, requiring foreign donor organizations to obtain government permission before providing grants to nonprofit organizations and the media and granting the state wide powers to monitor and interfere in the activities of organizations believed to receive foreign grants.⁹ The amendments, which allow authorities to refuse permission for grants on the grounds of conflict with undefined "state interests," will likely be used to restrict funding to media projects deemed critical of the authorities.
16. On June 26, 2025, Georgia enacted amendments to the Law on Freedom of Speech and Expression, systematically removing legal protections that have historically safeguarded the media. The changes significantly facilitate successful defamation suits against journalists by: (i) redefining defamation to remove the need for plaintiffs to demonstrate actual harm; (ii) shifting the burden of proof in defamation cases from plaintiffs to defendants; (iii) removing a series of qualified privilege defenses, including the public interest defense and taking reasonable steps to verify accuracy; (iv) removing a clause that prohibited courts from basing adverse decisions solely on journalists' refusal to reveal sources. Courts are now authorized to impose moral and property damage awards even when media outlets publish corrections or retractions.¹⁰ The changes are particularly concerning given the rising incidence of SLAPPs - Strategic Lawsuits Against Public Participation - targeting independent journalists (para. 44-49) and are likely to lead to self-censorship and severely undermine investigative reporting.

Physical assaults and impunity for attacks on journalists, particularly by law enforcement

17. Georgia has long had a well-documented problem with physical violence against journalists and impunity for such attacks.¹¹ Since the previous UPR cycle, this issue has become even more acute, with several episodes of large-scale and apparently organized violence against journalists reporting on important public

events. A noteworthy and deeply concerning feature of the violence since the last cycle is that it has been wielded most frequently by law enforcement officers. Yet convictions for attacks on journalists are rare. To date no law enforcement officers or masked groups responsible for dozens of attacks on media representatives during this period have been held accountable.

18. On July 5, 2021, more than 50 journalists covering a LGBT pride event in Tbilisi were attacked by anti-LGBT protesters.¹² Dozens of journalists sustained injuries including broken noses, broken teeth, fractured facial bones and cranial hematomas. Aleksandre Lashkarava, a camera operator for pro-opposition broadcaster TV Pirveli, sustained fractured facial bones in the attack and died three days after being discharged from hospital following surgery.¹³
19. In April 2022, around 30 individuals were convicted over the July 2021 attacks and sentenced to prison terms of up to five years, later reduced to four years on appeal.¹⁴ Human rights bodies including Georgia's Public Defender have criticized authorities' failure to prosecute alleged organizers of the violence.¹⁵
20. In March 2023, riot police beat or otherwise forcefully obstructed the work of at least 19 journalists covering mass protests against the Georgian Dream party's introduction of a draft "foreign agent" law.¹⁶
21. In April and May 2024, police assaulted or forcefully obstructed the work of more than a dozen journalists reporting on mass protests against Georgian Dream's renewed introduction and enactment of "foreign agent" legislation.¹⁷
22. During the run-up to the October 26, 2024, parliamentary elections and on election day, 70 journalists covering the elections were subjected to various forms of obstruction, assault, and abuse.¹⁸
23. In May 2024, amid mass protests over "foreign agent" law, a large-scale intimidation campaign targeted dozens of journalists as well as others who opposed the law. Stencil graffiti and dozens of posters denouncing prominent journalists Nino Zuriashvili and Gela Mtvlishvili as "foreign agents" were posted on the walls outside their homes and their news outlets' offices, while Zuriashvili's car was vandalized with obscene slogans. Dozens of journalists from prominent independent media, as well as their family members, received threatening and abusive phone calls from unknown individuals in a coordinated campaign linked to the foreign agent law.¹⁹ A ruling party MP celebrated the campaign and appeared to take responsibility, yet no one was held accountable.²⁰
24. Between November 28, 2024, and May 1, 2025, rights organizations have documented 145 incidents of attacks and other violations against 193 journalists reporting on mass protests against Georgian Dream's suspension of EU accession talks. Most of the physical attacks were committed by law enforcement officers.²¹ Several of the journalists were subjected to shocking assaults by police and sustained serious and potentially life-threatening injuries.²²
25. Incidents of particular concern include: on November 28, 2024, a police officer forcefully struck Guram

Rogava, a reporter with pro-opposition broadcaster Formula TV, on the back of his head, knocking him to the curb and leaving him hospitalized with facial and neck fractures; on the same day multiple police officers beat Publika reporter Aleksandre Keshelashvili, repeatedly striking him in the head, kicking him when he fell, taking his two cameras and detaining him, leaving him with a broken nose;²³ on December 7, 2024, more than a dozen masked individuals assaulted TV Pirveli reporter Maka Chikhladze and camera operator Giorgi Shetsiruli, grabbing Chikhladze by her neck, throwing her to the ground and repeatedly kicking her, and knocking Shetsiruli to the ground, repeatedly kicking him and stomping on his head; Chikhladze and Shetsiruli were hospitalized with concussions, cuts, and severe bruising.²⁴

26. Despite the extensive and shocking nature of this violence, no law enforcement officers or others responsible for dozens of attacks on journalists covering protests since 2023 have to date been prosecuted.²⁵
27. Local and international rights bodies have long highlighted ineffective investigation and a lack of political will as the main factors behind Georgia's rampant impunity for attacks on journalists.²⁶ During Georgia's last UPR, multiple states recommended strengthening the State Inspector's Service to allow it to adequately investigate allegations of abuses by state employees. Instead, in 2022, Georgia dissolved the Service and replaced it with two separate agencies, a move widely criticized by rights bodies and the UN.²⁷ A new agency, the Special Investigation Service (SIS), assumed the State Inspector's Service's duty of investigating abuses by law enforcement officials and was further tasked with investigating alleged obstruction of journalistic activities. The SIS has been widely criticized as ineffective, attributable to several factors: (i) the service has been overburdened by an excessive remit and under-resourced (ii) SIS dependence on the Prosecutor's Office to implement key procedural and investigative actions, while the Prosecutor's Office has shown a lack of political will to investigate politically sensitive cases;²⁸ (iii) a lack of political will within the SIS itself to investigate politically sensitive cases. As a result, despite launching frequent investigations into attacks on journalists, SIS investigations have failed to lead to prosecutions, still less convictions.
28. On July 1, 2025, Georgia dissolved the Special Investigation Service and transferred its functions to the Prosecutor's Office. The dissolution rather than strengthening of the independent investigative body has been criticized by rights bodies and is likely to further reduce the effectiveness and independence of investigation into attacks on journalists.²⁹
29. The unprecedented violence committed against journalists since November 2024 clearly demonstrates these systemic failings.³⁰ Analysis by submitting organizations highlights major investigative oversights and points to a coordinated state policy to undermine accountability for law enforcement violence.³¹ Among other failures: (i) despite rights groups documenting widespread inhuman treatment, investigators failed to apply appropriate legal qualifications, such as Articles 144¹–144³ (torture and inhuman treatment); (ii) although rights bodies including UN experts assessed that the scale of police violence pointed to command responsibility,³² the SIS refrained from examining the incidents within the framework of systemic violence and from initiating accountability procedures against those issuing unlawful orders.³³

30. On September 13, 2021, leaked information revealed that Georgia's State Security Service had illegally monitored the communications of at least 55 journalists, along with other public figures and clergy.³⁴ To date no one has been held accountable. Other episodes of apparent surveillance of journalists' communications have been reported and journalists feel certain that surveillance of members of the press by the State Security Service is widespread.

Criminal prosecution and imprisonment of journalists, detentions and fines

31. Since the last cycle, Georgian authorities have criminally prosecuted and jailed two prominent media managers - Nika Gvaramia and Mzia Amaglobeli - on charges widely viewed by the independent journalism community and international rights organizations as heavily disproportionate and politically motivated. Amaglobeli remains in custody and on trial—a trial that is monitored by rights groups, due to significant fair trial and other rights concerns—at the time of this submission. In each case, these prosecutions and jailings of well-known representatives of the independent media community appear to be aimed at intimidating journalists and exerting a chilling effect on reporting.

32. On May 16, 2022, a Tbilisi court sentenced Gvaramia, founder and then-general director and presenter for pro-opposition broadcaster Mtavari Arkhi, to three and a half years in prison on charges of abuse of power during a previous tenure as director at a different broadcaster. Human rights bodies including Georgia's Public Defender concluded that there was no legal basis for the allegations against Gvaramia to give rise to criminal liability.³⁵ Local and international human rights groups concluded that the disproportionate charges and sentence against Gvaramia were retaliation for the critical reporting of the broadcasters he ran, Georgia's largest independent broadcasters. On May 22, 2023, President Salome Zourabichvili, an opponent of the Georgian Dream government, pardoned Gvaramia, and he was released after serving more than a year in prison.³⁶

33. On January 12, 2025, police in the western city of Batumi arrested Amaglobeli, founder and director of independent news outlets Batumelebi and Netgazeti, following an altercation with a local police chief. Prosecutors charged Amaglobeli with the serious criminal charge of "attacking" a police officer, punishable only by a prison term of between four and seven years, although her lawyers and independent legal experts argue that the incident in question should at most have been classified as an administrative offense and subject to a fine.³⁷ A court ordered Amaglobeli to be held in custody pending trial, despite the absence of justification for such a step. Her prosecution on clearly excessive charges presents a deeply troubling contrast with ongoing total impunity for police involved in brutal violence against journalists (para. 24-29).

34. The case against Amaglobeli has been permeated by numerous rights and procedural violations and signs of political motivation, including: (i) Georgian Supreme Court case law has previously classified far more serious actions committed against police officers as much less serious offenses; (ii) top government officials including Prime Minister Irakli Kobakhidze have violated the presumption of innocence, spreading conspiracy theories that Amaglobeli acted on the "order" of outside forces; (iii) Amaglobeli has been held

in unjustified pretrial detention despite the minor nature of her offense; (iv) no effective investigation has been undertaken into police actions surrounding Amaglobeli's arrest, including allegations that the police chief spat in Amaglobeli's face, threatened and tried to assault her, and violated her rights in detention; (v) the court refused to admit large amounts of significant evidence and testimony submitted by the defense. At the time of submission, Amaglobeli remains on trial, having spent more than six months in detention. She undertook a hunger strike for 38 days following her arrest before ending the strike due to health concerns. Amaglobeli suffers from keratoconus, an eye condition which has severely deteriorated in prison, yet she has not received adequate examination or treatment in jail.³⁸

35. On August 3, 2024, police arrested Georgia-based Azerbaijani journalist and government critic Afgan Sadigov following an extradition request from Azerbaijan. Georgian courts granted Azerbaijan's extradition request despite evidence that the request was spurious and retaliatory.³⁹ On April 16, 2025, a Tbilisi court released Sadigov on bail following a ruling by the European Court of Human Rights barring his extradition pending a final ruling on his case.⁴⁰
36. Since late 2024, at least 37 cases have been documented of journalists reporting on anti-government protests being unlawfully fined under legislation banning protesters from "blocking roads."⁴¹ In addition, at least four journalists have been detained while reporting on anti-government protests since November 2024, often despite wearing identifying signs, showing police their press cards, or otherwise being identifiable as journalists.⁴² Several journalists detained since the outbreak of protests in November 2024 have alleged police beatings and physical mistreatment during detention.⁴³ Among those detained, reporter Guram Murvanidze was sentenced to eight days administrative arrest.⁴⁴

Entry denials to foreign journalists, safety of foreign journalists seeking refuge

37. Since 2022, Georgia has refused entry to at least 16 foreign journalists, including those with valid residency permits, in apparent retaliation for their critical reporting or for views and editorial policies deemed to conflict with the Georgian Dream party's geopolitical priorities.⁴⁵
38. Following Russia's 2022 full-scale invasion of Ukraine, Georgian border authorities denied entry to at least eight critical journalists fleeing repression in Russia.⁴⁶
39. Since Georgia's disputed October 2024 parliamentary elections, authorities have denied entry to at least six Western journalists, all of whom had previously reported on anti-government protests or alleged abuses by the Georgian Dream government.⁴⁷
40. Since the last review, no substantial progress has been made in investigating the 2017 abduction and unlawful rendition of Azerbaijani journalist Afgan Mukhtarli from Georgia to Azerbaijan, which resulted in his imprisonment for three years.⁴⁸

Systematic use of captured institutions against the press

41. Since the last UPR review, the Georgian Dream party has systematically captured state institutions, such that the judiciary, executive, legislative authorities, and nominally independent regulatory and investigative bodies operate in concert against civil society and the independent press.⁴⁹
42. In the judicial system, decisions increasingly appear politically motivated and directed by the interests of the executive branch. As regards the media, this has been particularly visible in cases of defamation (see para. 44-49), the unlawful fining of journalists covering protests (para. 36), and spurious criminal prosecutions against journalists (para. 31-34).
43. Georgia's broadcast regulator, the Communications Commission, whose members are elected by parliament, has continued to show a pro-government bias while its powers have dramatically expanded since the previous review (para. 13-14).

Increasing use of SLAPPs against critical media and journalists

44. Since the last cycle, there has been a notable increase in defamation lawsuits brought by politically influential individuals against critical media and journalists, aimed at silencing them – lawsuits often referred to as Strategic Lawsuits Against Public Participation (SLAPPs). The number of such lawsuits has exceeded 40 since 2021, and in a significant portion - around 70% - of those already adjudicated, the first instance courts ruled in favor of the plaintiffs, with higher courts subsequently upholding these decisions.⁵⁰
45. SLAPPs in Georgia are mainly initiated by individuals closely affiliated with the ruling Georgian Dream party, including high-level government officials, such as ministers, heads of state agencies, mayors and MPs, as well as their relatives, party donors, and affiliated institutions. For instance, in September 2022, the mother of the Georgian Dream Prime Minister filed a defamation lawsuit against pro-opposition broadcaster TV Pirveli and its journalists.⁵¹ The court ruled in the plaintiff's favor, ordering the media outlet to pay 5,555 GEL (1,750 EUR) in moral damages while also ordering the retraction of statements that were not made by the journalists themselves, but by an interviewee.⁵²
46. An increasingly concerning trend is the use of SLAPPs to claim punitive damages that could heavily impede the work of independent media. In September 2022, the Mayor of Tbilisi, the capital city, initiated a defamation lawsuit against independent broadcaster TV Pirveli and journalist Maia Mamulashvili. The mayor demanded the retraction of alleged defamatory statements and 100,000 GEL (30,000 EUR) for moral damages, a vast sum for independent broadcasters which operate on tight margins.⁵³ At that time, 11 other coordinated lawsuits filed by ruling party mayors were also pending against pro-opposition broadcaster Mtavari Arkhi and its founder, Nika Gvaramia, each requesting the same amount of 55,555 GEL (17,300 EUR) moral damages.

47. In addition to the growing number of SLAPPs filed, judicial handling of such cases raises serious concerns about systemic bias. Courts show preferential treatment toward plaintiffs affiliated with Georgian Dream. One characteristic trend is the accelerated processing of SLAPP lawsuits initiated by government officials, often exhausting all three instances in less than a year, while similar defamation cases filed by private citizens can take years.⁵⁴
48. Another troubling aspect of court practice in Georgia concerns the shifting of the burden of proof in defamation cases, particularly those with SLAPP characteristics. While the Law on Freedom of Speech and Expression, prior to the 2025 legislative amendments (para. 16), clearly placed the burden on the claimant, courts had increasingly required journalists and media outlets to prove the truth of their statements - contradicting the applicable domestic legal standard.⁵⁵
49. Given the growing number of SLAPPs and apparent judicial bias, the 2025 amendments to the Law on Freedom of Speech and Expression, which significantly facilitate defamation suits (para. 16), suggest the Georgian Dream party intends to pursue even more aggressive legal action against independent media. This will pose a severe threat to news outlets' financial survival and lead to a rise in self-censorship.

Restricted access to information and public institutions

50. Since 2022, Georgia has witnessed a sharp deterioration in the accessibility of public information. State institutions have systematically ignored their legal obligations when handling journalists' requests for public information. Media representatives routinely encounter unlawful legal and practical obstacles when seeking access to public information, and receiving requested information within legally prescribed timeframes has become extremely rare. Research by the submitting organizations has shown that approximately three fifths of public information requests from journalists are left without response from public institutions, representing a gross violation of Article 18.2 of Georgia's Constitution and relevant laws. Out of 204 public information requests submitted, only 12 were satisfied within the legally mandated 10-day period.⁵⁶ Public institutions commonly create artificial barriers to avoid releasing requested information. The administrative complaint mechanism, which should serve as a safeguard for citizens' rights, fails to fulfill its function in practice. Administrative bodies frequently misinterpret or broadly apply restrictive provisions, often resulting in the withholding of public information even when all legal prerequisites for its release exist.
51. A critical gap in Georgia's system is the absence of an independent oversight mechanism capable of ensuring effective supervision of public information accessibility. The judicial system has proven unable to respond effectively to systematic violations of the law. Court proceedings in public information access cases drag on for years, even in cases where public institutions' complete disregard for legal requirements is evident. Even when court disputes conclude successfully, there remains a risk that the same or similar information will

again be withheld by public institutions.⁵⁷

52. On February 7, 2023, new parliamentary regulations came into force restricting journalists' freedom of movement and right to film and record interviews in Parliament, and allowing Parliament to suspend journalists' accreditation for alleged violations.⁵⁸ Since then, at least 15 journalists have had their accreditation suspended, all from critical media outlets. All of the suspensions were initiated by complaints from members of Georgian Dream.⁵⁹

53. On June 26, 2025, Georgia enacted amendments to the Organic Law on Common Courts banning video and audio recordings and photography throughout court premises, unless media outlets receive advance permission from the High Council of Justice for each individual court session, which so far has not been granted for prominent cases. The changes appear designed to dramatically restrict public access to reporting on court cases of acute public interest, at a time of high interest in growing numbers of politically motivated prosecutions, including against journalists.⁶⁰

Disinformation and hate speech

54. The period since the last UPR has seen a marked rise in disinformation and hate speech. Analyses conducted by the submitting organizations show that disinformation and hate speech have become increasingly institutionalized and instrumentalized by the ruling Georgian Dream party. This has occurred particularly following Russia's 2022 full-scale invasion of Ukraine and Georgia's disputed 2024 parliamentary elections.⁶¹ Georgian Dream has shifted its rhetoric in ways that diverge from Georgia's traditional pro-Western stance, advancing conspiracy theories about a so-called "Global War Party,"⁶² and painting independent media, civil society and the opposition as agents of (Western) foreign influence.

55. The instrumentalization of identity-related issues by the Georgian Dream party continued as a core tactic in Georgia's disinformation landscape.⁶³ Especially in 2024, gender and identity-based narratives were deployed to serve domestic political objectives. Disinformation targeting LGBTQ+ individuals, women, and human rights defenders was strategically used to mobilize conservative voters, discredit civil society, and divert attention from governance-related issues.⁶⁴

56. Since the last UPR review, sexist and homophobic hate speech has proliferated. Whereas in previous years, such hate speech was predominantly associated with fringe far-right and pro-Russian actors, the Georgian government has increasingly sought to mainstream this rhetoric. Legislative changes in 2024 played a key role in this shift. The term "gender" was removed from Georgian legislation, erasing key protections for gender-based discrimination. A new law purportedly protecting "family values" has in practice worked to limit the rights of LGBTQ+ individuals, infringing on freedom of expression and assembly.⁶⁵ Gender-based verbal and online attacks on female journalists surged in the lead-up to the 2024 elections, with much of the rhetoric originating from ruling party members and their supporters.⁶⁶

State advertising procurement and the media

57. Analysis of the distribution of state advertising reveals a sharp increase in funds allocated to pro-government television channels in 2022-2023 and a decline for opposition channels, despite opposition channels holding a significant audience segment in television ratings.⁶⁷
58. The value of contracts signed with media outlets through intermediary companies for information services tripled in 2023, making it often impossible to identify the revenues received by individual media outlets.⁶⁸
59. Administrative bodies continued to collaborate and sign contracts with media outlets known for their homophobic editorial policies.⁶⁹ According to Recommendation #7 of the European Commission against Racism and Intolerance (ECRI) of the Council of Europe, member-states should adopt anti-discrimination policies when entering into contracts.⁷⁰ The government has disregarded this principle when awarding public service contracts. These outlets often disseminate identical materials targeting civil society organizations and political opponents.

Recommendations to Georgia by the submitting organizations

Enactment of legislation targeting independent media

60. Repeal all recently enacted repressive laws targeting independent media: the Law on Transparency of Foreign Influence, the Foreign Agent Registration Act, the October 2023 and April 2025 amendments to the Law on Broadcasting, the June 2025 amendments to the Law on Freedom of Speech and Expression and to the Organic Law on Common Courts, and restrictive clauses on the media in the Law on Family Values and the Protection of Minors.
61. Refrain from adopting and implementing any form of legislation on “foreign agents”. Ensure that independent media can access foreign donor funding in line with international standards.
62. Commit to upholding the legislation that regulated media prior to the adoption of the aforementioned laws and to improving it in line with international best practices.

Physical assaults and impunity for attacks on journalists, particularly by law enforcement

63. Ensure the safety and physical protection of journalists, camera operators and other media professionals, particularly during protests.
64. End impunity for physical attacks, harassment, and intimidation of journalists, particularly by law enforcement officers, by ensuring swift and effective investigation and prosecution. Adopt measures to identify and prosecute not only the individuals who directly commit the offenses but also those who order

them. This includes addressing command-level responsibility to combat systemic impunity.

65. Establish a genuinely independent body to investigate attacks on media with full institutional and hierarchical independence and the authority to conduct investigative and prosecutorial actions independently from the Prosecutor's Office, to guarantee impartial and effective investigations into misconduct by state agents.
66. Properly classify incidents involving the ill-treatment of journalists. They must not be treated merely as interference with journalistic activity but recognized, where applicable, as acts of inhuman or degrading treatment, torture, or abuse of power in line with relevant international human rights standards.

Criminal prosecution and imprisonment of journalists, detentions and fines

67. End politically motivated prosecutions of journalists.
68. Release journalists currently detained without sufficient legal grounds.
69. Ensure that prosecutions of members of the press are conducted to high legal standards and that journalists' right to a fair trial is observed.
70. Guarantee and respect the rights of detained journalists in custody and ensure their access to adequate medical and psychological treatment in line with international standards.

Entry denials to foreign journalists, safety of foreign journalists seeking refuge

71. Ensure that foreign journalists are not denied entry in retaliation for their work.
72. Take measures to ensure a safe environment for foreign journalists who seek refuge in Georgia.

Systematic use of captured institutions against the press

73. End the coordinated use of executive, legislative, judicial, and regulatory state bodies against the press.
74. Undertake comprehensive judicial reforms to ensure the independence of the judiciary, including by implementing requirements for judicial reform made as part of the EU accession process.
75. Take measures to ensure effective independence of regulatory bodies, in particular the Communications Commission. Ensure a broadcast regulation framework that enjoys industry support and complies with international standards.

Increasing use of SLAPP suits against media

76. End coordinated defamation lawsuits against critical media outlets, particularly those demanding excessive moral damages aimed at financially pressuring or punishing media outlets.

77. Repeal the recent regressive amendments to the Law on Freedom of Speech and Expression.

78. Adopt comprehensive Anti-SLAPP legislation that clearly defines SLAPPs, provides for the early dismissal of abusive lawsuits and introduces procedural safeguards for SLAPP defendants, in line with international standards on the protection of freedom of expression and public participation.

79. Ensure that legal practices are in line with international standards protecting press freedom by providing trainings and guidance on the chilling effect of SLAPPs to members of the judiciary and investigative bodies.

Restricted access to information and public institutions

80. Ensure that public institutions comply with legal requirements, including mandatory timeframes, for responding to media requests for public information.

81. Create an independent oversight mechanism capable of ensuring timely and effective supervision of public information accessibility.

82. Repeal the 2023 parliamentary access and accreditation regulations. Ensure journalists' access to Parliament in line with international best practices and ensure that journalists' parliamentary accreditation is not suspended in retaliation for their work.

83. Repeal the 2025 amendments to the Organic Law on Common Courts restricting journalists' right to record and photograph on court premises and allow journalists to cover court proceedings as they did prior to these amendments.

Disinformation and hate speech

84. Combat state-sponsored disinformation by refraining from promoting conspiracy narratives framing civil society as an enemy.

85. Strengthen safeguards against hate speech by developing an inclusive national action plan that addresses sexist, homophobic, and transphobic rhetoric.

State advertising procurement and the media

86. Ensure equal access to state advertising. Public funds should be allocated in proportion to audience reach and effectiveness, without political or editorial bias.

87. Implement Recommendation #7 of ECRI, by introducing clear anti-discrimination clauses in public

procurement rules. Exclude media outlets with homophobic or discriminatory content from receiving state funding.

88. Increase transparency of intermediary contracts and ensure detailed information about contracts signed through intermediary companies for media and information services.

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<https://cpj.org/2025/05/georgia-media-face-fewer-ways-to-survive-amid-foreign-funding-crackdown/>
- ⁴ The European Court of Human Rights has addressed similar "foreign agent" legislation elsewhere, finding that such laws violate associational rights when they impose stigmatizing labels and excessive regulatory burdens on civil society organizations. <https://www.echr.coe.int/w/judgment-concerning-the-russian-federation-16>
- ⁵ <https://cpj.org/2024/09/cpj-partners-condemn-georgian-bill-banning-lgbtq-content/>; see also:
<https://www.coe.int/en/web/venice-commission/-/opinion-1188>
- ⁶ <https://cpj.org/2025/03/georgia-set-to-pass-restrictive-broadcast-bills/>
- ⁷ <https://cpj.org/2023/10/georgian-parliament-reinstates-controversial-powers-to-sanction-broadcast-media/>;
<https://civil.ge/archives/668823>
- ⁸ <https://cpj.org/2022/10/proposed-amendments-to-georgias-broadcasting-law-raise-censorship-fears/>;
<https://cpj.org/2023/10/georgian-parliament-reinstates-controversial-powers-to-sanction-broadcast-media/>
- ⁹ <https://cpj.org/2025/05/georgia-media-face-fewer-ways-to-survive-amid-foreign-funding-crackdown/>
- ¹⁰ https://x.com/CPJ_Eurasia/status/1940816574912578010; <https://www.gyla.ge/en/post/saia-gamoxatvistavisuplebis-shesaxe-b-kanonshi-cvllilebebi>. The amendments also abolish a clause stating that in cases of the restriction of freedom of speech, the burden of proof must lie with the initiator of the restriction and that doubt must be resolved against the restriction of freedom of speech, as well as a clause preventing privacy claims from being used to suppress freedom of speech, particularly regarding high-ranking officials and public figures whose activities have clear public relevance. Taken collectively, the amendments to the Law on Freedom of Speech and Expression mark a significant departure from international standards on defamation law, protection of journalistic sources, and freedom of speech. Journalists face increased liability for defamation, higher financial risks, and fewer options for defense, and face impossible choices between protecting sources and avoiding legal liability.
- ¹¹ <https://cpj.org/wp-content/uploads/2024/10/Press-Freedom-and-the-Safety-of-Journalists-in-Peril-Rising-Polarisation-and-a-Climate-of-Fear-%E2%80%93-Findings-of-the-Press-Freedom-Mission-to-Georgia.pdf>
- ¹² <https://cpj.org/2021/07/journalists-attacked-by-anti-lgbt-demonstrators-in-tbilisi-georgia/>
- ¹³ <https://cpj.org/data/people/aleksandre-lashkarava/>
- ¹⁴ <https://cpj.org/2022/04/georgia-convicts-26-people-over-2021-attack-on-journalists-by-anti-lgbt-protesters/>;
<https://civil.ge/archives/521563>; <https://cpj.org/data/people/aleksandre-lashkarava/>. Four individuals convicted of attacking Lashkarava were released early under amnesty in November 2024:
<https://sakartvelosambebi.ge/en/news/four-convicted-in-lekso-lashkarava-attack-released-early-under-amnesty>
- ¹⁵ <https://www.ombudsman.ge/eng/akhali-ambebi/sakartvelos-sakhalkho-damtsvelis-gantskhadeba-2021-tslis-5-ivlisis-dzaladobidan-erti-tslis-shemdeg>; <https://ombudsman.ge/eng/akhali-ambebi/sakhalkho-damtsveli-5-ivlisis-jgufuri-dzaladobis-organizebisa-da-dzaladobisken-motsodebis-fakthebe-2-piris-mimart-siskhlissamartlebrivi-devnis-datsqebas-moitkhovs>
- ¹⁶ <https://cpj.org/2023/03/georgian-police-beat-obstruct-journalists-covering-protests-against-foreign-agent-law/>
- ¹⁷ <https://cpj.org/2024/04/georgian-police-assault-at-least-4-journalists-covering-foreign-agents-bill-protests/>;
<https://www.qartia.ge/ka/siakhleebi/article/97612-2024-05-01-18-54-53>;
<https://www.qartia.ge/ka/siakhleebi/article/97622>

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- ¹⁸ https://drive.google.com/file/d/1fp2KxXljHb22DWWy-P4MFDrUjTomH7i-/view?fbclid=IwY2xjawLZDbZleHRuA2FlbQIxMABicmlkETFEEd2Rmc1lXZUZBOWtyVnMxAR6fa7tQgrkrTsTATs o7XVCdJI-BwLDON2XFf8O6PdBuSohoa9ziZKUuoIjmOg_aem_Qv0b0Nib70dDcFXSxOJ0TW; https://drive.google.com/file/d/13LPzN-Eyg5mXijmvGeEmZVdnW0NdAKP4/view?fbclid=IwY2xjawL3yxleHRuA2FlbQIxMABicmlkETFEkdfRRWHFRckVI ZFZWMkxXAR6QYcY2NcftDBM06tFeUxudV2209de0HIU2oRxsgjIUe0_VWOBu6H1XbMvmow_aem_L3nXcO_fC cHl57AM-6zBwQ
- ¹⁹ <https://cpj.org/2024/05/georgian-journalists-threatened-after-covering-foreign-agent-law-protests/>
- ²⁰ <https://oc-media.org/georgian-dream-mp-admits-to-attacks-on-ngo-and-opposition-offices/>
- ²¹ <https://cmis.ge/aqciebze-dashavebuli-da-dajarimebuli-djurnalistebi/>;
<https://www.qartia.ge/ka/siakhleebebi/article/99312-list-of-incidents-involving-georgian-media-representatives-november-28-december-8-2024>
- ²² <https://cpj.org/2024/12/cpj-condemns-police-brutality-against-journalists-covering-georgian-protests/>
- ²³ <https://cpj.org/2024/12/cpj-condemns-police-brutality-against-journalists-covering-georgian-protests/>
- ²⁴ <https://cpj.org/2024/12/masked-men-assault-georgian-news-crew-covering-pro-eu-protests/>
- ²⁵ https://admin.gyla.ge/uploads_script/publications/pdf/GEORGIA%20IN%202023.pdf;
https://admin.gyla.ge/uploads_script/publications/pdf/OMCT-Briefing-Note-Georgia.pdf
- ²⁶ <https://cpj.org/wp-content/uploads/2024/10/Press-Freedom-and-the-Safety-of-Journalists-in-Peril-Rising-Polarisation-and-a-Climate-of-Fear-%E2%80%93-93-Findings-of-the-Press-Freedom-Mission-to-Georgia.pdf>;
<https://rm.coe.int/georgia-tp-review-of-soj-june2023-eng-2779-4462-8232-3/1680ac9348>
- ²⁷ The UN Press-release, 14.01.2022, The United Nations Country Team in Georgia expresses its regret over the decision of Georgian authorities to abolish the State Inspector's Service, Available at: <https://georgia.un.org/en/168152-united-nations-concerned-over-decision-georgian-authorities-abolish-state-inspector%E2%80%99s> [14.07.2025]
- ²⁸ Reports by the former State Inspector's Service had already pointed to inadequate prosecutorial and investigative oversight, highlighting difficulties in cooperation with the Prosecutor's Office, including by reclassifying cases under lighter charges, rejecting the well-reasoned motions submitted by the Inspector's Office, failing to summon police officers to testify in court, etc. Unfortunately, the reports of the former State Inspector's Service are no longer available on the websites of either the Personal Data Protection Service or the now-defunct SIS. On one hand, without the consent of the Prosecutor's Office, the SIS was unable to carry out any meaningful procedural and investigative actions; on the other hand, despite the SIS's flawed investigative strategies, misqualification of cases, and incomplete investigative measures, the Prosecutor's Office has failed to take any steps to correct or intervene in these shortcomings.
- ²⁹ <https://civil.ge/archives/683460>. CoE, Committee of Ministers, 1531st meeting, 10-12 June 2025 (DH), H46-18 Tsintsabadze group v. Georgia (Application No. 35403/06). Also, the Council of Europe's Committee of Ministers and the Venice Commission have repeatedly called on Georgia to strengthen independent investigative mechanisms and expand their jurisdiction. The dissolution of the SIS contravenes these recommendations, erodes trust, and reinforces a cycle of impunity. The absence of effective investigative oversight jeopardizes media freedom, the right to peaceful assembly, and fundamental human rights protections in Georgia. See CoE, Committee of Ministers, CM/Notes/1492/H46-14, 14 March 2024; and CoE, Committee of Ministers, CM/Del/Dec(2024)1492/H46-14, 14 March 2024, 1492nd meeting (DH), 12-14 March 2024, H46-14 Tsintsabadze Group v. Georgia (Application No. 35403/06), also, Venice Commission, Opinion on the Law on the Special Investigation Service and on the Provisions of the Law on Personal Data Protection Concerning the Personal Data Protection Service, 15-16 December 2023, Paras. 76-99.
- ³⁰ See GYLA et al., Human Rights Crisis in Georgia After the 2024 Parliamentary Elections (2025). pp. 59-71, Available at: https://drive.google.com/file/d/1CeEdjSLcpiK5f2nfyVbINGpyu4w_x5L/view [14.07.2025]
- ³¹ See <https://www.gyla.ge/en/post/adamianis-uplebata-krizisi-dokumentirebis-angarishi>.
- ³² UN Human Rights Experts, "Georgia must investigate use of force by police during demonstrations: Experts," January 28, 2025. Available at: <https://www.ohchr.org/en/press-releases/2025/01/georgia-must-investigate-use-force-police-during-demonstrations-experts>; and OMCT et al., Georgia: Preliminary Findings on the Investigation of Torture and Ill-Treatment Against Protesters from 28 November to 20 December 2024 (2025) Available at: <https://www.omct.org/site-resources/images/Preliminary-mission-findings-Georgia-Dec-2024-Final.pdf>
- ³³ In addition: A single case file was used to group hundreds of individual incidents of ill-treatment of peaceful activists and journalists, masking the severity of violations and diluting accountability; key evidence was destroyed or damaged, no high-ranking officials have been interviewed or summoned to court, hundreds of less effective investigative actions were conducted while the most critical issues remain insufficiently examined — obscuring the gravity of the violations and weakening accountability, thus reflecting a pattern of orchestrated cooperation between SIS and law enforcement agencies.

See Report of the Public Defender of Georgia On the Situation of Protection of Human Rights and Freedoms in Georgia, 2024 (2025), Available at: <https://ombudsman.ge/res/docs/202505231022648365.pdf>; See GYLA et al., Human Rights Crisis in Georgia After the 2024 Parliamentary Elections (2025). Available at: https://drive.google.com/file/d/1CeFdjSLcpjK5f2nfyVbINGpyu4w_x5L/view. Case Materials – N 199291124001, Correspondence Between: Special Investigation Service and other Agencies (Tbilisi City Hall (Letters N 22- 01243623386 and N 22- 01243623436); Parliament Administration (Letter N 7193/2-1/24); State Security Service (Letter N SSG 1 24 00299602); Special State Protection Service (N SSPS 7 24 000 53545); Ministry of Internal Affairs (Letters N MIA 8 24 03804291, N MIA 6 24 03973670, MIA 8 24 03973672).

³⁴ <https://transparency.ge/ge/print/12408>; <https://netgazeti.ge/news/625214/>

³⁵ Gvaramia was also fined 50,000 lari (US\$18,400). See <https://cpj.org/2022/05/georgian-pro-opposition-journalist-nika-gvaramia-sentenced-to-3-5-years-in-prison>

³⁶ <https://cpj.org/2023/06/cpj-welcomes-pardon-for-jailed-georgian-journalist-nika-gvaramia/>

³⁷ <https://cpj.org/2025/03/cpj-georgia-must-free-mzia-amaghlobeli-after-53-days-in-jail-for-a-slap/>; <https://cpj.org/2025/07/press-freedom-groups-condemn-hearing-demand-release-of-georgian-journalist-mzia-amaghlobeli/>

³⁸ <https://civil.ge/archives/689147>

³⁹ Authorities in Azerbaijan had repeatedly prosecuted Sadigov, including with lengthy prison sentences, on politically motivated charges and the extradition request coincided with an unprecedented wave of arrests of critical journalists in Azerbaijan.

⁴⁰ <https://civil.ge/archives/676473>

⁴¹ <https://cmis.ge/damoukidebeli-mediis-djurnalistebs-profesiuli-movaleobis-shesrulebis-dros-gzis-gadaketvas-edavebian-ganakhlebad/>. Given the size of these fines - 5000 lari (US\$1850), more than twice the average Georgian monthly salary - authorities' decision to unlawfully apply them to working journalists shows a desire to discourage news coverage of the protests and pressure independent media.

⁴² <https://cpj.org/2024/11/georgian-police-obstruct-detain-journalists-covering-election-protests/>; <https://cpj.org/2025/01/cpj-calls-for-release-investigation-of-2-georgian-journalists-detained-during-protests/>; https://www.mapmf.org/explorer?f.from=2024-11-28&f.country=Georgia&f.type_of_incident=Arrest%2Fdetention%2Fimprisonment&show=list

⁴³ <https://cpj.org/2024/12/cpj-condemns-police-brutality-against-journalists-covering-georgian-protests/>; https://www.mapmf.org/alert/32518?f.from=2024-11-28&f.country=Georgia&f.type_of_incident=Arrest%2Fdetention%2Fimprisonment; https://www.mapmf.org/alert/32459?f.from=2024-11-28&f.country=Georgia&f.type_of_incident=Arrest%2Fdetention%2Fimprisonment

⁴⁴ <https://cpj.org/2025/01/cpj-calls-for-release-investigation-of-2-georgian-journalists-detained-during-protests/>; Police allegedly wiped Murvanidze's phone during his detention to erase evidence that his arrest was unjustified: <https://oc-media.org/batumelebi-employee-accuses-police-of-hacking-and-wiping-phone-following-arrest/>

⁴⁵ <https://mediameter.ge/en/content/updated-regularly-border-closes-unwanted-journalists-who-and-isnt-welcome-georgia>; <https://cpj.org/2023/03/georgian-authorities-deny-entry-to-russian-journalist-aleksandra-shvedchenko/>

⁴⁶ <https://cpj.org/2023/03/georgian-authorities-deny-entry-to-russian-journalist-aleksandra-shvedchenko/>; <https://cpj.org/2022/03/cpj-urges-countries-to-give-refuge-to-russian-journalists-after-georgia-refuses-entry-to-dozhd-tv-s-mikhail-fishman/>. Two other cases of journalists from former Soviet countries are Belarusian journalist Andrei Mialeshka, who lived in Georgia after fleeing persecution in Belarus, and Armenian journalist Arsen Kharatyan, founder of AliQ Media, an Armenian-language news outlet serving Georgia's ethnic Armenian minority. See: <https://cpj.org/2024/09/georgian-authorities-deny-entry-to-belarusian-armenian-journalists/>

⁴⁷ The journalists have stated that the most likely reason for their entry denials was their critical reporting. See: <https://cpj.org/2025/07/georgia-increasingly-blocks-entry-to-western-journalists-amid-authoritarian-turn/>

⁴⁸ <https://cpj.org/2020/03/journalist-afgan-mukhtarli-released-from-prison-in/>; <https://hudoc.echr.coe.int/eng?i=001-235491>; A 2024 ECHR ruling found that Georgian authorities failed to conduct a satisfactory investigation into Mukhtarli's alleged abduction: <https://www.kavkaz-uzel.eu/articles/403395>; <https://hudoc.echr.coe.int/eng?i=001-235491>

⁴⁹ Media Environment of Georgia 2024, [https://static.dw.com/downloads/71281300/Media%20Environment%20of%20Georgia%202024%20\(ENG\).pdf](https://static.dw.com/downloads/71281300/Media%20Environment%20of%20Georgia%202024%20(ENG).pdf)

⁵⁰ Special Report Regarding SLAPP cases in Georgia, 2023, Georgian Democracy Initiative (GDI), <https://gdi.ge/storage/files/doc/SLAPP%20Report.pdf>

⁵¹ <https://tabula.ge/ge/news/691472-irakli-kobakhidzis-deda-tamar-zaalishvili-tv>

⁵² <https://www.radiotavisupleba.ge/a/32043035.html>

⁵³ <https://netgazeti.ge/life/627931/>. The lawsuit challenged a live report alleging that Tbilisi City Hall purchased buses at inflated prices, implicating the mayor, who repeatedly declined to address the issue publicly. Instead, he chose legal action against the media and the journalist. <https://formulanews.ge/News/50649>.

⁵⁴ Special Report Regarding SLAPP cases in Georgia, 2023, Georgian Democracy Initiative (GDI),

⁵⁵ Special Report Regarding SLAPP cases in Georgia, 2023, Georgian Democracy Initiative (GDI)

⁵⁶ IDFI, Freedom of Information in Georgia: Media and society in the face of systematic illegality, <https://idfi.ge/en/media-and-society-in-the-face-of-systemic-illegality>

⁵⁷ The Public Defender of Georgia has consistently highlighted these challenges, noting that the country faces a significant problem due to the lack of an effective institutional framework for protecting the right to access public information. This issue is particularly acute for journalists and human rights defenders, who depend on timely access to information for their work. The Public Defender has emphasized that delayed release of information may lose its original value to society and hinder the ability of media and civil society to perform their essential functions. See: IPN, Article, <https://www.interpressnews.ge/ka/article/814022-ombudsmeni-kveqanashi-mnishvnelovan-gamocvevas-carmoadgens-sajaro-informaciis-xelmisacvdomobis-uplebis-epekturi-institutis-ararseboba-sakitsi-gansakutrebit-mcvaved-dgas-zhurnalistebis-da-uplebadamcvelebis-mimartebit>;

<https://www.facebook.com/photo.php?fbid=1075084077319498&id=100044537465147&set=a.251767382984509>

⁵⁸ <https://cpj.org/2023/04/georgian-parliament-suspends-accreditation-of-6-pro-opposition-journalists/>

⁵⁹

https://drive.google.com/file/d/1rEci4TyMLHU9KWg2ssxe7WYEg47djaID/view?fbclid=IwY2xjawLkry5leHRuA2FlbQIxMABicmlkETfHRU1tSEpNRnFrTUhnazllAR42dIlEgPqM1A5rp88iDjRbKR7Qs-tnbroi3IoqlC_tHhd44TYY2Ut4YfHU0g_aem_YjQ5XEvg1KP7ERbdRTXpCg. In addition, when deliberating on controversial legislation, Parliament has repeatedly invoked a high security level that bans the presence of non-broadcast media in Parliament. See: <https://ipi.media/call-for-lifting-ban-on-journalists-access-to-georgian-parliament/>.

⁶⁰ https://x.com/CPJ_Eurasia/status/1940816574912578010; <https://idfi.ge/ge/amendments-to-the-law-completely-exclude-judicial-systems-accountability-to-society>

⁶¹ <https://mdfgeorgia.ge/eng/view-library/257/>

⁶² Media Development Foundation, Anti-Western Propaganda 2022, 2023, <https://mdfgeorgia.ge/eng/view-library/251/>

⁶³ Media Development Foundation, Anti-Gender and Anti-LGBTQI Mobilization In Georgia, 2023, <https://mdfgeorgia.ge/eng/view-library/243/>

⁶⁴ Media Development Foundation, Sexist Hate Speech and Homophobia - Amid 2024 Parliamentary Elections, 2024, <https://mdfgeorgia.ge/eng/view-library/265/>

⁶⁵ Venice Commission, “Opinion on the Draft Constitutional Law On Protecting Family Values And Minors,” 25 June 2024, [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD\(2024\)021-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2024)021-e)

⁶⁶ Media Development Foundation, Sexist Hate Speech and Homophobia - Amid 2024 Parliamentary Elections, 2024, <https://mdfgeorgia.ge/eng/view-library/265/>

⁶⁷ Media Development Foundation, Financial Transparency of Media, 2023, <https://mdfgeorgia.ge/uploads//Media%20Financial-ENG%202023.pdf>; TVMR Georgia - Nielsen's official licensed partner for television audience measurement in Georgia <http://www.tvmr.ge/ka/#/ka/main>; TMI - The exclusive licensee of Kantar Media in Georgia <https://www.tmi.ge/ka/pages/7>

⁶⁸ Media Development Foundation, Financial Transparency of Media, 2023, <https://mdfgeorgia.ge/uploads//Media%20Financial-ENG%202023.pdf>

⁶⁹ Examples include *PosTV*, *Imedi*, *Sakartvelos Respublika*, and others. Media Development Foundation, Financial Transparency of Media, 2023, <https://mdfgeorgia.ge/uploads//Media%20Financial-ENG%202023.pdf>

⁷⁰ ECRI Recommendations on National Legislation to Combat Racism and Racial Discrimination. Adopted on October 13, 2002 <https://www.coe.int/en/web/european-commission-against-racism-and-intolerance/>