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THE SEVEREST HUMAN RIGHTS CRISIS IN GEORGIA

REVIEW OF THE FINDINGS OF THE MOSCOW MECHANISM



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Introduction

On 12 March 2026, the OSCE's Moscow Mechanism published an extremely critical report concerning the state of human rights and fundamental freedoms in Georgia from spring 2024 to the present.¹ The report once again confirms the complete disregard for human rights, the practice of systemic and widespread violations, and developments and trends associated with the strengthening of authoritarian governance, which human rights defenders and international mechanisms have pointed out for years.

The severity of the report is further confirmed by the recommendations issued by the expert, which in fact concern the activation of practically every significant international-legal mechanism. The recommendations given to states, which fully encompass means of accountability both at the domestic and international levels, again underline the particular gravity of the situation in the country and the need for maximum engagement by the international community.

GYLA would like to provide the review of the Moscow Mechanism report, which analyzes the problems identified in various areas, the important recommendations, and the nature of the international and domestic mechanisms named therein.

1. What is the Moscow Mechanism of the OSCE?

The "Moscow Mechanism" (human dimension mechanism of the OSCE) allows for a fact-finding mission to be carried out in an OSCE participating State by independent expert(s) (rapporteur(s)). The Moscow Mechanism is activated when one participating State, with the support of at least nine other States, considers that a particularly serious threat has arisen to the fulfillment of commitments relating to human rights in a specific OSCE participating State.²

In relation to Georgia, the Moscow Mechanism was activated on 29 January 2026 by 23 OSCE participating States.³

Recommendations adopted within the framework of the Moscow Mechanism are not binding for states, yet they carry high reputational weight and enable OSCE participating States to base their responses to human rights challenges on facts and expert assessments.

¹ See the Report: <https://odihr.osce.org/news/odihr/662728>.

² <https://odihr.osce.org/odihr/20066>.

³ <https://odihr.osce.org/news/odihr/661963>.

2. Torture and Inhuman Treatment

According to the report, the rapporteur received statements from many individuals about alleged torture and inhuman treatment. Although the rapporteur cannot draw conclusions about their accuracy, they underscore the volume and consistency of the information received. At the same time, the rapporteur notes that some reports of torture were accompanied by photo-video material and medical documentation. These statements point to certain patterns of conduct by state agents, which is also confirmed by documentation produced by civil society. According to the report, the rapporteur also received information about serious cases of ill-treatment from the Public Defender. The rapporteur states that this material contains all the characteristics of torture *prima facie*.⁴

The report finds unconvincing the Ministry of Internal Affairs' claim that the force used against demonstrators was necessary and proportionate. It also notes that the majority of protesters were peaceful, and the demonstrations did not contain characteristics of an organized attempt to overthrow the state, which cannot be changed by violent actions of individual persons.⁵

The report also highlights the failure to investigate police violence. The rapporteur states that, while they lack the ability to assess investigative actions, it is likely that investigations are not effective and that Georgia probably violates the procedural aspects of the prohibition of torture.⁶

The recommendations presented in the report once again confirm the severity of torture and ill-treatment. In addition to recommendations directly addressed to the state, which concern refraining from ill-treatment and investigating it,⁷ recommendations addressed to the international community and other OSCE participating States are also noteworthy.

The report calls on the international community to consider applying universal jurisdiction with respect to officials and their superiors responsible for torture and inhuman treatment (*"Consider bringing perpetrators of torture and inhumane treatment and their responsible superiors to justice in national courts, wherever possible, including through invoking universal jurisdiction."*).⁸ **Universal jurisdiction** means the authority of domestic judicial systems to investigate and criminally prosecute persons responsible for particularly serious violations of international law, regardless of where the crime was committed and the nationalities of the

⁴ See the Report, paras 172-173.

⁵ See the Report, paras 174-178.

⁶ See the Report, paras 181-188.

⁷ See the Report, page 7.

⁸ See the Report, page 10.

perpetrators or victims.⁹ The reference to possible use of universal jurisdiction particularly underscores the gravity and scale of the violations.

Recommendations are also addressed to states that are parties to the UN Convention against Torture (CAT), the UN Committee against Torture, and the Subcommittee on Prevention of Torture (SPT).

According to these recommendations, CAT member States **“States Parties to CAT may consider submission of the application to the International Court of Justice.”**¹⁰ This mechanism entails a CAT State party submitting a communication to the Committee against Torture regarding another State’s alleged violation of the Convention (Article 21 of CAT). Such communications are rare,¹¹ and their mention further underscores the critical nature of the Moscow Mechanism’s findings.

According to these recommendations, CAT member States **“States Parties to CAT may consider submission of the application to the International Court of Justice.”**¹² The International Court of Justice (ICJ) is the UN’s principal judicial body.¹³ In certain cases, disputes between states under the Convention against Torture and other cruel, inhuman or degrading treatment or punishment can be examined by the ICJ. Under Article 30 of the CAT, any dispute between two or more states concerning the interpretation or application of the Convention that cannot be settled by negotiation may, at the request of one of them, be submitted to arbitration. If within six months from such a request the parties cannot agree on arbitration, any one of them may refer the dispute to the ICJ by request made under the Court’s Statute.

Based on the report, **the Committee against Torture and the Subcommittee on Prevention of Torture (SPT) pay particular attention to the situation in Georgia.**¹⁴ Both of these mechanisms are UN treaty bodies that monitor States’ compliance with obligations under CAT and its Optional Protocol, respectively.¹⁵

Also noteworthy is the recommendation issued to the states parties to the Rome Statute, according to which, **states parties to the Rome Statute may consider referral of the situation in Georgia to the International Criminal Court, taking into account the growing number of examples of political persecution, torture and other inhumane acts.**¹⁶

⁹ <https://www.hrw.org/topic/international-justice/universal-jurisdiction>.

¹⁰ See the Report, page 11.

¹¹ <https://www.omct.org/en/what-we-do/committee-against-torture>.

¹² See the Report, page 11.

¹³ <https://www.icj-cij.org/court>.

¹⁴ See the Report, page 11.

¹⁵ <https://www.ohchr.org/en/treaty-bodies/cat>; <https://www.ohchr.org/en/treaty-bodies/spt>.

¹⁶ See the Report, page 11.

The International Criminal Court (ICC, Hague Court) prosecutes individuals for the most serious international crimes, including crimes against humanity.¹⁷ Under the Rome Statute, a crime against humanity includes acts such as torture and other inhuman acts committed as part of a widespread or systematic attack directed against any civilian population, which intentionally causes severe suffering or serious injury to body or mental or physical health (see Rome Statute, Article 7).

In the context of the use of chemical agents during the 2024 protests, the following recommendation is particularly significant: **“States Parties to the 1992 Convention on Chemical Weapons may consider requesting the Executive Council of OPCW to clarify the alleged use of chemical weapons by Georgian**

authorities in accordance with Article IX of the 1992 Convention on Chemical Weapons.”¹⁸

Article 9 of the above-mentioned Convention concerns consultations, cooperation, and fact-finding. According to this article, any state party has the right to request assistance from the Executive Council in clarifying any situation which may be considered ambiguous or which gives rise to concern about the non-compliance of another state party with this Convention. Furthermore, any state party has the right to request the Executive Council to obtain clarification from another state party on any situation which may be considered ambiguous or which gives rise to concern regarding non-compliance with this Convention.

The report also urges the international community to **“provide protection and assistance to people who had to leave the country, including through the grant of international protection where relevant as well as through the treatment of injuries and trauma related to human rights violations.”**¹⁹ This recommendation highlights the severe and regrettable consequences of torture and systemic rights violations, including the need for treatment and rehabilitation of injuries and points to the problem of forced emigration, which typically further underscores the repressive environment in Georgia.

3. Freedom of assembly and expression

The report focuses on the difficult situation regarding freedom of assembly and expression. It critically assesses the steps taken against freedom of assembly, including the imposition of disproportionately high sanctions, the absence of an alternative sanction to administrative

¹⁷ <https://www.icc-cpi.int/about/the-court>.

¹⁸ See the Report, page 10.

¹⁹ See the Report, page 10.

detention for certain violations related to protest expression, the blanket ban on face coverings, and other restrictions. The report calls on the state to abolish them.²⁰

The report also criticizes the current situation regarding freedom of expression, including the sharp deterioration of the media environment and amendments to the Law on Broadcasting. The rapporteur also draws attention to cases of physical attacks on journalists. The report notes that the legislative amendments related to defamation carry a high risk of harming freedom of expression and creating a chilling effect.²¹

The report also negatively assesses the so-called anti-LGBTQ law on family values. It considers it incompatible with, among other things, the freedoms of expression, assembly, and association, and calls on the state to abolish it.²²

4. Freedom of Association

The report shares the critical assessments made so far by the Venice Commission and the OSCE/ODIHR regarding the amendments to the Russian law on the so-called FARA and the Law on Grants, and unequivocally points to their inconsistency with human rights. The report discusses the negative impact of these laws on other fundamental rights and freedoms, in addition to freedom of association, and calls on the state to repeal them.²³

5. Criminal justice and the right to liberty

The report draws attention to the selective and sometimes arbitrary use of criminal law to suppress dissent. This practice has a particularly chilling effect on those who disagree with government policies.²⁴ The report calls on the state to immediately and unconditionally release all political prisoners, especially members of the opposition, and to prevent their future detention on political grounds. The report also calls on the state to immediately release journalists and other participants in public debates who have been detained for exercising their freedom of expression. It further calls on the state to prevent future detentions in similar circumstances.²⁵

²⁰ See Report, p. 8, also, paras. 224-227.

²¹ See Report, para. 224.

²² See Report, p. 6, also, paras. 212-223.

²³ See Report, p. 6, also, paras. 191-211.

²⁴ See Report, paras 232, 233.

²⁵ See report, p. 7.

6. Independence of Judiciary

According to the recommendations in the report, the state should ensure and respect the independence of the judiciary,²⁶ including, in particular, through appropriate reform of the High Council of Justice.²⁷

In addition, due transparency of court proceedings should be ensured. According to the document, based on the analysis of successive reforms and the criticisms against them, it can be concluded that the main cause of problems with judicial independence in Georgia is the systemic control exercised by the High Council of Justice.²⁸ The Council has broad powers in relation to individual judges, including in matters of their appointment (including Supreme Court judges), promotion, secondment and disciplinary proceedings.²⁹ The document relies on the opinion of the Venice Commission, which indicates that there are still persistent allegations of corporatism against the Council.³⁰

In addition, the rapporteur believes that the broad powers of the High Council of Justice, the lack of transparency in its activities, as well as the perception in society that it is controlled and managed by an influential group within the judiciary, pose significant challenges to the right to a fair trial in Georgia.³¹ The rapporteur emphasizes the systemic challenges facing the Georgian judiciary, which have not been remedied during the period envisaged by this mandate. On the contrary, the deterioration in the quality of transparency of the High Council of Justice and the general courts has only exacerbated these challenges.³²

7. Free elections and political pluralism

According to the report, a growing problem in Georgia is the systematic erosion of political pluralism, which is reflected in policies aimed at destroying the opposition and targeting critical civil society organizations.³³ It is in this context that the document uses the term “state capture” to describe the establishment of control over state institutions by the ruling party. According to the report, such control makes it possible to quickly change legislation and use state institutions against political opponents.³⁴

²⁶ See report, p. 8.

²⁷ Ibid

²⁸ See report para. 105.

²⁹ Ibid

³⁰ See report para 290.

³¹ See report para 288.

³² See report para 290.

³³ See report para 298.

³⁴ See report para 299.

The document lists several mechanisms through which, according to the rapporteur, the opposition is being systematically weakened, including: steps taken to ban political parties, criminal cases against opposition leaders, inadequate response by the state apparatus to incidents of violence against opposition representatives, as well as discrediting campaigns and intimidating rhetoric in the media.³⁵ The report calls on the authorities to refrain from discrediting and intimidating the opposition and arbitrarily initiating procedures for banning political parties in the Constitutional Court.³⁶

In addition, according to the report, in the context of the violations identified during the 2024 and 2025 elections, it is important to consider the following recommendations:

An independent and impartial investigation should be conducted into all allegations of electoral violations.

Necessary changes to the organization of the elections should be made in line with the recommendations of the OSCE Office for Democratic Institutions and Human Rights (ODIHR) as reflected in its report on the 2024 parliamentary elections.

External observers (specifically, the OSCE/ODIHR mission) should be invited to attend the upcoming elections. The invitation should be sent sufficiently in advance to allow the mission to conduct its observation process in a fully effective manner.

³⁵ See report para 299–300.

³⁶ See report para 300.

Conclusion

As the above overview shows, the report states that the human rights situation in Georgia gives cause for concern in many areas and requires active monitoring by the international community. This is illustrated by the recommendation addressed to the UN Special Procedures.

The recommendation calls on the international community to “facilitate the involvement of the UN Special Procedures in the protection and promotion of human rights, and to consider establishing an Office of the UN High Commissioner for Human Rights in Georgia. Among the UN Special Procedures and other mechanisms of the Human Rights Council, particular attention should be paid to the following:

As the above overview shows, the report concludes that the human rights situation in Georgia is a cause for concern in many areas and requires active monitoring by the international community. This is illustrated by the recommendations addressed to the UN Special Procedures.

A, The recommendation calls on the international community to “facilitate the inclusion of UN special procedures in the protection of human rights. The Working Group on Arbitrary Detention (WGAD) – which is particularly useful as there is no requirement to exhaust domestic remedies;

B. the Special Rapporteur on torture and other ill-treatment;

C. the Special Rapporteur on the protection of freedom of opinion and expression;

D. the Special Rapporteur on the freedoms of peaceful assembly and of association;

E. the Special Rapporteur on the situation of human rights defenders;

V. the Special Rapporteur on the independence of judges and lawyers;

G. the Special Rapporteur on the rights of internally displaced persons;

H. the Special Rapporteur on minority issues;

J. the Special Rapporteur on the right to respect for private life;

J. the Independent Expert on sexual orientation and Protection from violence and discrimination based on gender identity;

L. Special Rapporteur on violence against women and girls, its causes and consequences;

M. Working Group on discrimination against women and girls”. ³⁷

This recommendation, in turn, includes a fairly wide range of UN special procedures among the mechanisms whose mandates are particularly relevant given the current situation in Georgia. This is due to the complexity of human rights problems in Georgia and the sharp deterioration of the situation in many areas.

Such a broad reference to international oversight and/or accountability mechanisms in the recommendations (a large part of which is included in this review), in addition to the severity of the situation within the country, may also be an indicator that, in the context of the dismantling of democracy, human rights protection, the institutional framework of the judiciary and the complete capture of the state at the national level, international instruments are given particularly great importance.

** (View the recommendations translated into Georgian).*

³⁷ See report para 10.

Annex: Recommendations of the Moscow Mechanism Report

About free elections:

1. Conduct independent and impartial investigation into all allegations concerning election irregularities.
2. Implement the necessary changes to the organization of the elections, according to the recommendations made by the OSCE Office for Democratic Institutions and Human Rights (ODHIR) in its report concerning the parliamentary elections of 2024.
3. Invite external observers (in particular an OSCE/ODHIR mission) to observe future elections. An invitation should be sent sufficiently in advance to enable ODHIR to conduct the election mission meaningfully.
4. Refrain from spreading defamatory information about the opposition and from rhetorical campaigns of intimidation and threats.
5. Refrain from the arbitrary initiation of procedures banning political parties in the Constitutional Court. Withdraw the currently pending applications.
6. Withdraw arbitrarily brought charges against leaders of political opposition (in particular based on Article 225, Article 318 and 319 of the Criminal Code)

About legislative reforms:

1. The Law on Transparency of Foreign Influence (TFI), the Foreign Agents Registration Act (FARA), and the provisions concerning foreign grants in the Law on Grants should be repealed. Given the breadth of their incompatibility with Georgia's international obligations, the Rapporteur does not consider them capable of being brought to compliance with those obligations by way of targeted amendments. In the event that Georgia does not decide to repeal these laws, they should be, at the minimum, amended in accordance with the recommendations of the Venice Commission. This means, in particular, striking out the obligation to reveal sensitive information about beneficiaries and cooperators of entities subject to the mentioned legislation; lowering the penalties for violations of the mentioned laws; significant limitations on the obligation to register as 'agents of foreign principals' by taking into account whether an entity indeed acts at foreign directions or not. The language throughout these laws should, furthermore, be much more precise.
2. Similarly, the recent amendments to the Law on Broadcasting concerning foreign financing and restrictions on content of broadcasting (Article 54) should be repealed.
3. The Law on Family Values should be repealed. This concerns, particularly but not exclusively, equation of same-sex relationships and transgender identity with incest, prohibition of 'popularization' of these notions, including through gatherings, a ban on gender-affirming care and change of sex markers in identity documents and civil acts.
4. The premises of the crime of high treason should be narrowed and made more specific so as to preclude interpretation that allows prosecuting mere critique of the government by entities falling within the scope of TFI or FARA.

5. Regulations which introduced an absolute ban on covering of faces during demonstrations should be repealed. Other regulations disproportionately limiting the right to assembly (such as automatic detention and disproportionately high fines) should be repealed or revised in order to ensure a proper balance between this right and considerations of public order.

6. In the course of reforming higher education, the autonomy of academic institutions should be respected.

About the prohibition of torture and other cruel, inhumane and degrading treatment or punishment:

1. Immediately cease the disproportionate use of physical force, in particular torture and other forms of ill-treatment against peaceful protesters, journalists and political opponents.

2. Ensure the proportionate use of force also against those protesters who exhibit violent behaviour.

3. Conduct immediate, independent and impartial investigations into allegations of torture and ill-treatment.

4. Ensure that the process of apprehension and transportation of detained persons conforms with the requirements of human dignity. Ensure decent conditions of detention.

5. To the extent possible, protect children from the impact of police raids and adopt child-sensitive practices during police operations.

About the right to liberty and security:

1. Immediately and unconditionally release all prisoners held for political reasons, in particular members of the opposition. Refrain from detaining them for political reasons in the future.

2. Immediately release journalists and other participants of public debate held for exercising their freedom of expression. Refrain from detention in similar circumstances in the future.

3. Respect the principles of legality, proportionality and due process when it comes to deprivation of liberty.

About the right to fair trial:

1. Ensure that the standards of fair trial are respected, including presumption of innocence, equality of arms, and the speedy access to legal assistance in criminal proceedings.

2. Guarantee and respect judicial independence, including, in particular, through the appropriate reform of the High Council of Justice.

3. Cease to place the accused, if there are no compelling security concerns, in any kinds of cages during judicial proceedings.

4. Ensure that legal representatives have access to relevant information, files and documents in sufficient time to provide effective legal support.

5. Ensure the adequate transparency of judicial proceedings.

6. Reform administrative offence procedures to ensure that detention cannot be based solely on uncorroborated police testimony.

About freedoms of assembly, association and expression:

1. Ensure the freedom of peaceful assembly in line with international standards like the General Commentary 37 of the UN Human Rights Committee of 2020 and case-law of the European Court of Human Rights (ECtHR).
2. Respect the right to spontaneous assemblies as part of the right to assembly.
3. Cease to target journalists covering protests. 4. Refrain from arbitrarily detaining and fining peaceful participants of protests.
5. Refrain from arbitrary sanctioning of natural persons and organizations critical of government policies and actions.
6. Ensure the protection of human rights defenders in accordance with the UN Human Rights Defenders Declaration of 1998 and the OSCE/ODIHR Guidelines on the Protection of Human Rights Defenders of 2014.
7. Limit restrictions on receiving foreign support by non-governmental organizations and broadcasters in Georgia to what is strictly necessary in order to safeguard national security and public order.
8. Refrain from any undue repression related to the performance of journalists' duties, and from the unjustified seizure of and damage to their equipment and footage.
9. Abolish the excessive restrictions on content of broadcasting under the Law on Broadcasting.

About the right to privacy:

1. Cease the campaign of stigmatization and intimidation against political opponents, civil society organizations (CSOs) and LGBT+ individuals and amend relevant laws accordingly.
2. Ensure that no unnecessary personal data is collected and no sensitive data is publicly available, including with respect to the implementation of TFI and FARA.

About accountability:

1. Provide the necessary means and resources to the Office of Public Defender of Georgia in order to enable it to perform all the Office's tasks, including those related to the national preventive mechanism.
2. Promptly investigate all allegations of torture and ill-treatment by police/security forces and unidentified, masked persons.
3. Provide effective judicial remedies for alleged violations of human rights.
4. Provide full redress and compensation to all victims of ill-treatment at the hands of State authorities. 5. Take appropriate disciplinary measures against officials credibly implicated in serious abuses.

About international cooperation:

1. Cooperate with the Venice Commission as well as other relevant international bodies whose mandate extends to Georgia and entertain their recommendations.

2. Cooperate with the Organisation for the Prohibition of Chemical Weapons (OPCW) to clarify the allegations concerning the use of chemicals against protesters.
3. Recognize the competence of the International Humanitarian Fact-Finding Commission according to the First Additional Protocol to the 1949 Geneva Conventions and ratify the remaining amendments to the Rome Statute of the International Criminal Court, having in mind the occupation of parts of Georgian territory by the Russian Federation.
4. Ratify the 2006 International Convention on the Protection of All Persons from Enforced Disappearance.

Recommendations to the OSCE Participating States:

1. Request and support the implementation of the above recommendations by the government of Georgia.
2. Ensure systematic follow-up to the findings of the Moscow Mechanism, including through periodic review in the Permanent Council.
3. Consider imposing targeted sanctions against persons responsible for the particularly serious violations described in the present report.
4. Continue efforts at facilitating a dialogue between all relevant actors.
5. Deploy an election observation mission for upcoming elections to ensure transparency and fairness.
6. Consider opening an OSCE office in Georgia.
7. Support independent civil society actors in Georgia and Georgian CSOs in exile.

Recommendations to the International Community:

1. Support initiatives aimed at reporting and documenting human rights violations in Georgia.
2. Consider bringing perpetrators of torture and inhumane treatment and their responsible superiors to justice in national courts, wherever possible, including through invoking universal jurisdiction.
3. Provide protection and assistance to people who had to leave the country, including through the grant of international protection where relevant as well as through the treatment of injuries and trauma related to human rights violations.
4. Provide support to human rights defenders and civil society organizations promoting and protecting human rights, including through facilitation of registration of CSOs in exile.
5. Provide support to Georgia for the purpose of introducing the necessary legal reforms.
6. Facilitate the involvement of the UN special procedures in the protection and promotion of human rights and consider the establishment of a country office of the UN High Commissioner on Human Rights in Georgia. Among the UN Special procedures and other mechanisms of the Human Rights Council, the special consideration should be given to:
 - a. Working Group on arbitrary detention (WGAD) - particularly useful as there is no requirement to exhaust national remedies
 - b. Special Rapporteur on torture and other ill-treatment
 - c. Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression

- d. Special Rapporteur on the rights to freedom of peaceful assembly and of association
 - e. Special Rapporteur on the situation of human rights defenders
 - f. Special Rapporteur on the independence of judges and lawyers
 - g. Special Rapporteur on the human rights of internally displaced persons
 - h. Special Rapporteur on minority issues
 - i. Special Rapporteur on the right to privacy
 - j. Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity
 - k. Special Rapporteur on violence against women and girls, its causes and consequences
 - l. Working Group on discrimination against women and girls
7. Actively engage in the follow-up to the Universal Periodic Review of Georgia.
 8. States Parties to the 1992 Convention on Chemical Weapons may consider requesting the Executive Council of OPCW to clarify the alleged use of chemical weapons by Georgian authorities in accordance with Article IX of the 1992 Convention on Chemical Weapons.
 9. States Parties to the Convention for the Protection of Human Rights and Fundamental Freedoms (European Convention on Human Rights; ECHR) may consider submission of inter-state application to the ECtHR in accordance with Article 33 of the European Convention on Human Rights (ECHR).
 10. States Parties to the ECHR, as well as other bodies like Venice Commission, Council of Europe Commissioner for Human Rights and CSOs may consider intervening in ongoing and future proceedings in the European Court of Human Rights.
 11. In case of the issuance of the judgments by the ECtHR, States Parties to the ECHR, as well as CSOs, may actively engage in implementation of judgments through the Committee of Ministers of the Council of Europe.
 12. States Parties to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (CAT) may consider submission of inter-state communication to the Committee against Torture.
 13. States Parties to CAT may consider submission of the application to the International Court of Justice.
 14. The Committee Against Torture as well as the UN Subcommittee on the Prevention of Torture (SPT) should give special consideration to the situation in Georgia.
 15. The Venice Commission should be involved in further assessments of relevant draft legislation.
 16. States Parties to the Rome Statute may consider referral of the situation in Georgia to the International Criminal Court, taking into account the growing number of examples of political persecution, torture and other inhumane acts.
 17. The Council of Europe (CoE) Commissioner for Human Rights may consider a mission to Georgia.
 18. The Secretary General of the CoE may request Georgia to furnish an explanation of the manner in which its internal law ensures the effective implementation of any of the provisions of the ECHR (Article 52 ECHR).