Follow-Up Information Relating to Paragraph 50 (Participation in Public Affairs) of the Concluding Observations of the Human Rights Committee (CCPR/C/GEO/CO/5)

Submitted by

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Introduction

1. This submission by Georgian Young Lawyers' Association (GYLA) seeks to inform the Human Rights Committee about the steps taken by Georgia to implement paragraph 50 (Participation in Public Affairs) of the Committee's Concluding Observations (CCPR/C/GEO/CO/5), within the framework of its follow-up procedure.

2. The Paragraph 50 addressed the right to participate in public affairs under Article 25 of the Covenant, calling on Georgia to ensure the full enjoyment of this right. It set out recommendations concerning the independent investigation of electoral irregularities, transparency and oversight of campaign financing, balanced political representation in electoral commissions, and the protection of political pluralism, public debate and media freedom.

3. Since the adoption of the Concluding Observations (CCPR/C/GEO/CO/5), the situation regarding the implementation of Article 25 of the ICCPR has deteriorated significantly, marked by growing restrictions on political pluralism, a restrictive legislative and electoral framework, and a deteriorating electoral environment. These developments have further undermined the effective enjoyment of the right to participate in public affairs and are not adequately reflected in the State party's follow-up report.

4. This submission addresses the most pressing developments affecting the exercise of this right, including irregularities and restrictions surrounding the 2024 and 2025 elections; measures restricting political participation; actions undermining political pluralism, including court proceedings seeking the dissolution of opposition political parties and criminal proceedings against opposition leaders; restrictions on political party membership and out-of-country voting; and the broader shrinking of civil society space and deterioration of the media environment, both of which directly affect the exercise of political rights.

5. The State party was requested to submit its follow-up report by 28 July 2025.[1] Accordingly, this report covers developments that occurred both before and after that deadline. The inclusion of more recent developments is warranted by the continuing and escalating nature of restrictions on the right to participate in public affairs, which calls for the Committee's urgent attention. These developments also illustrate the cumulative and increasingly severe impact of the measures adopted by the authorities on the effective enjoyment of the rights protected under Article 25 of the Covenant.

6. These developments have taken place against the backdrop of a broader deterioration in the human rights situation in Georgia. This includes the widespread use of torture and other forms of ill-treatment during the 2024-2025 protests; the crackdown on the rights to freedom of peaceful assembly, association and expression; and politicisation of criminal justice. These developments have been extensively documented by local human rights organisations,[2] international civil society

[1] According to information published by the Committee, it received the State report on 23 July 2025.
[2] GYLA et al, Human Rights Crisis in Georgia Following the 2024 Parliamentary Elections, 28 November 2024 - 28 February 2025, 2025, https://admin.gyla.ge/uploads_script/publications/pdf/HUMAN%20RIGHTS%20CRISIS%20IN%20GEORGIA%20-%20final.pdf, [25.11.2026].

organisations[3] and international human rights mechanisms, including OSCE Moscow Mechanism,[4] and OHCHR.[5]

Shrinking Civil Space

7. In 2024, the Parliament adopted the Law on Transparency of Foreign Influence, which sought to stigmatise non-commercial organisations by portraying them as entities pursuing foreign interests and imposed burdensome registration and reporting requirements. The law attracted widespread criticism, both domestically and internationally, including negative assessments by the Venice Commission[6] and OSCE/ODIHR.[7]

8. The restrictive legislative framework was further intensified in spring 2025 through the adoption of the Foreign Agents Registration Act, which introduced additional and broadly formulated registration obligations under the designation of a "foreign agent", as well as criminal liability for non-compliance.[8] Amendments to the Law on Grants also prohibited the receipt of foreign grants without prior government approval.[9] In March 2026, further amendments expanded the definition of a grant and introduced criminal liability for receiving "prohibited grants", punishable by up to six years' imprisonment.[10]

9. In its assessment of the 2026 amendments, the Venice Commission warned that "the exercise of freedoms of association and expression as well as the right to political participation is thereby likely to be curtailed, not only through direct prohibitions, but more importantly through the creation of a legal environment in which the risks associated with civic engagement become too great to assume".[11]

10. Alongside these legislative restrictions, civil society organisations and human rights defenders faced increasing harassment in 2025, including through monitoring by the Anti-Corruption Bureau and the misuse of criminal justice mechanisms. Such measures included the freezing of bank accounts, searches of residential premises and summons for questioning.[12]

11. Intimidation has also targeted individuals for their legitimate human rights activities and engagement with international mechanisms. This has included the summoning of civil society representatives for questioning in December 2025 over interviews given to international media,[13]

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[3] World Organization Against Torture (OMCT), Torture and Ill-Treatment During Protests and Suppression of Political Dissent in Georgia in November-December 2024, 2025, https://file.omct.org/production/files/OMCT-Briefing-Note-Georgia.pdf?dm=1743065992, [25.11.2026]; Amnesty International, Georgia: Anatomy of Repression: 500 Days of Protest, Crackdown and Resilience, 2026, https://www.amnesty.org/en/documents/eur56/1115/2026/en/, [25.11.2026].
[4] OSCE Moscow Mechanism Report on Georgia, 12.03. 2026, https://odihr.osce.org/odihr/662725, [25.11.2026].
[5] A/HRC/59/66, https://docs.un.org/en/A/HRC/59/66, [25.11.2026]; A/HRC/62/58, https://docs.un.org/en/A/HRC/62/58, [25.11.2026].
[6] Venice Commission, CDL-AD(2024)020, https://www.coe.int/en/web/venice-commission/-/cdl-ad-2024-020-e, [25.11.2026].
[7] OSCE ODIHR, Georgia: Urgent Opinion on the Law "On Transparency of Foreign Influence", 30.05.2024, https://odihr.osce.org/odihr/569922, [25.11.2026].
[8] Venice Commission, CDL-AD(2025)034-e, https://www.coe.int/en/web/venice-commission/-/cdl-ad-2025-034-e, [25.11.2026].
[9] Ibid.
[10] Venice Commission, CDL-AD(2026)026-e, https://www.coe.int/en/web/venice-commission/-/cdl-ad-2026-026-e, [25.11.2026].
[11] Ibid, § 80.
[12] GYLA, Human Rights Situation in Georgia 2025, pp. 9-10, https://admin.gyla.ge/uploads_script/publications/pdf/HUMAN%20RIGHTS%20SITUATION%20IN%20GEORGIA%202025.pdf, [25.11.2026].
[13] Ibid,

as well as attempts to intimidate individuals for their cooperation with the OSCE Moscow Mechanism in March 2026[14] and their participation in the OSCE Warsaw Human Dimension Conference in October 2026.[15]

12. The media have also been subjected to direct physical attacks, particularly while reporting on the 2024-2025 protests.[16] They have also faced legislative restrictions concerning foreign funding and the regulation of "impartiality and fairness"[17] as well as the use of SLAPPs[18] and instrumentalization of criminal proceedings to intimidate or silence journalists.[19]

Parliamentary Elections of 2024

13. The 2024 Parliamentary Elections were marked by significant violations. Monitoring by the Georgian Young Lawyers' Association ("GYLA") has observed a range of systemic violations that have influenced both the pre-election environment and the process on the Election Day, as well as the developments afterwards.[20]

14. Gender quotas were abolished in 2024, which significantly deteriorated and reduced the chances of female participation in politics.[21] Prior to the elections, the Parliament passed several amendments that worsened the electoral environment.[22] New regulations which relate to the rules governing the activities of the CEC and its scope of authority, created the risk of reducing the independence of the CEC.[23] Among them was a reduction in the quorum required for decision-making within the CEC from a 2/3 majority to a simple majority. [24] Such framework ultimately excluded opposition parties from decision-making processes.

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[14] Amnesty International, Georgia: Authorities' response to damning OSCE report amounts to "witch-hunt", 17.03.2026, https://www.amnesty.org/en/latest/news/2026/03/georgia-authorities-response-to-damning-osce-report-amounts-to-witch-hunt/, [25.11.2026].

[15] Human Rights House Foundation, 08.10.2026, https://www.facebook.com/reel/1813798916304873, [25.11.2026].

[16] GYLA et al, Human Rights Crisis in Georgia Following the 2024 Parliamentary Elections, 28 November 2024 - 28 February 2025, 2025, pp. 52, 68-70, https://admin.gyla.ge/uploads_script/publications/pdf/HUMAN%20RIGHTS%20CRISIS%20IN%20GEORGIA%20-%20final.pdf, [25.11.2026].

[17] GYLA, Human Rights Situation in Georgia 2025, p. 13, https://admin.gyla.ge/uploads_script/publications/pdf/HUMAN%20RIGHTS%20SITUATION%20IN%20GEORGIA%202025.pdf, [25.11.2026].

[18] The Tbilisi City Court's decision on SLAPP (Strategic Litigation Against Public Involvement) against TV Company Formula is a precedent, 15.07.2025, https://www.gyla.ge/en/post/GYLA-Formulacase-SLAPP, [25.11.2026].

[19] CPJ, Georgia opens criminal probe into independent broadcaster Formula TV, 25.06.2026, https://cpj.org/2026/06/georgia-opens-criminal-probe-into-independent-broadcaster-formula-tv/, [25.11.2026].

[20] GYLA, 2024 Observation Mission of the 2024 Parliamentary Elections Monitoring Report of the Pre-Election Environment, Election Day and the Post-Election Period 1 April – 16 November 2024, 2025, https://admin.gyla.ge/uploads_script/publications/pdf/OBSERVATION%20MISSION%20OF%20THE%202024%20PARLIAMENTARY%20ELECTIONS_2024.pdf, [25.11.2026].

[21] Ibid. See also Venice Commission, CDL-AD(2024)023, https://www.coe.int/en/web/venice-commission/-/cdl-ad-2024-023-e, [25.11.2026].

[22] GYLA, 2024 Observation Mission of the 2024 Parliamentary Elections Monitoring Report of the Pre-Election Environment, Election Day and the Post-Election Period 1 April – 16 November 2024, 2025, pp. 31-36, https://admin.gyla.ge/uploads_script/publications/pdf/OBSERVATION%20MISSION%20OF%20THE%202024%20PARLIAMENTARY%20ELECTIONS_2024.pdf, [25.11.2026].

[23] Ibid, pp. 31-36, 40.

[24] Ibid, pp. 40.

15. During the pre-election period, National Communications Commission of Georgia repeatedly used its regulatory powers against media outlets, having been expressed in imposing financial penalties and manipulating regulations.[25]

16. People working in the public sector with opposition sympathies faced pressure, particularly, the dismissal of persons based on their political opinions have been recorded.[26] On election day, multiple procedural violations were documented, including systematic violations of ballot secrecy, unauthorized individuals present at polling stations, and influence from ruling party representatives on election commissions.[27]

17. At all polling stations across Georgia, where electronic technologies were used (2263 precincts), the will of the voter was clearly visible when ballots were inserted into the vote-counting machine in a reversed position, as the marker left a trace on the other side of the ballot.[28] Following the elections, based on the violation of the principle of secrecy of the ballot, GYLA filed complaints in 73 district election commissions, requesting the annulment of results in 2 263 precincts. However, the courts did not satisfy these claims. The only exception was the Tetritskaro District Court, which upheld GYLA's lawsuit; nevertheless, this decision was later overturned by the Court of Appeals.[29] In 2025 GYLA lodged an application to the European Court of Human Rights in regards to the mass violation of the secrecy of the ballot during the 2024 Parliamentary Elections.[30]

Municipal Elections of 2025

18. According to the 2026 EU enlargement report regarding Georgia, Municipal elections were held in a highly polarised and repressive environment which severely undermined the competitiveness and transparency of the process.[31] These included legislative amendments favouring the ruling party, a boycott by most opposition parties, the lack of impartial election administration, voter intimidation and the lack of OSCE/ODIHR and credible domestic observers.[32]

19. For the first time in the 30-year history of the GYLA, in the context of systemic pressure and restrictive legislation on the observer organizations, GYLA was unable to observe the elections with a traditional observation mission.[33]

Restrictions on Right to Vote of Citizens Living Abroad

20. On December 17, 2025 the Parliament adopted amendments to election code, prohibiting the opening of polling stations in the buildings of Georgian embassies and consulates abroad, consequently restricting citizens living outside the country from participating in parliamentary elections.[34] The new regulation does not serve any legitimate purpose. It creates an artificial

[25] Ibid, pp. 85-90.
[26] Ibid, pp. 7, 81-83.
[27] Ibid, pp. 8, 102, 108-114, 117.
[28] Ibid.
[29] Ibid.
[30] GYLA has lodged an application to the European Court of Human Rights in regards to the mass violation of the secrecy of the ballot during the 2024 Parliamentary Elections, 20.03.2025, https://www.gyla.ge/en/post/evropuli-sasamartlo-archevnebi, [25.11.2026].
[31] European Commission, Georgia 2026 Report, p. 3, https://enlargement.ec.europa.eu/georgia-report-2026_en, [25.11.2026].
[32] Ibid.
[33] GYLA, Analytical Review of the Election Period, 2025, https://admin.gyla.ge/uploads_script/publications/pdf/ANALYTICAL%20REVIEW%20OF%20THE%20ELECTION%20PERIOD.pdf, [25.11.2026].
[34] GYLA, Restricting the voting rights of citizens residing abroad is unacceptable, 18.11.2025, https://www.gyla.ge/en/post/sazgvargaret-xmismicemis-upleba-saia, [25.11.2026].

financial and social barrier – in the form of high flight costs, forced dismissal from work, and other related pressures – forcing hundreds of thousands of Georgian emigrants to effectively give up their right to participate in elections.[35] It should be noted that the income earned by immigrants from working abroad is often critically important for both the immigrants themselves and their family members.[36]

21. While Article 25 of the ICCPR does not explicitly require States to provide for out-of-country voting, and neither do other international treaties, with the exception of the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (to which Georgia is not a party), the relevant legal context and state practice must nevertheless be carefully examined when assessing these restrictions. Taking into account the increasing mobility of European citizens and the specific circumstances of individual States, governments should adopt a positive approach towards facilitating the exercise of voting rights by citizens residing abroad.[37]

22. In the specific context of Georgia, decades of practice of out-of-country voting demonstrate that the State has consistently established polling stations at Georgian embassies and consulates abroad since the 1990s.[38] Throughout this period, the authorities have had the necessary material and human resources to ensure that citizens residing abroad could freely express their electoral will at these locations.[39] Against this background, the current restrictions appear arbitrary and lack sufficient justification.

Restrictions on Party Membership

23. The 2026 amendments to the Organic Law on Political Associations of Citizens have introduce a new ground of ineligibility for political party membership for a person who has received income, in whole or in part, on the basis of an employment contract concluded with an "organisation pursuing the interests of a foreign power". Such a person shall be prohibited from membership of a party for a period of 8 years running from the calendar year in which he or she last received income from an "organisation pursuing the interests of a foreign power".[40]

24. The definition of an "organisation pursuing the interests of a foreign power" corresponds to that contained in the Law on Transparency of Foreign Influence, including non-commercial entities more than 20% of whose total income received during a calendar year derives from a foreign power. The notion of what may constitute a "foreign power" encompasses a wide range of entities, including foreign governments, foreign nationals, foreign non-govermental and commercial legal persons.[41]

25. The exclusion from political life constitutes a particularly severe interference with fundamental political rights, in particular because the restriction applies irrespective of whether the individual has engaged in any unlawful conduct.[42]

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[35] GYLA launches strategic legal proceedings to protect the voting rights of Georgian emigrant citizens, 14.04.2026, https://www.gyla.ge/en/post/GYLA-emigrantebis-xmisuplebistvis, [25.11.2026].
[36] Ibid.
[37] Venice Commission, CDL-AD(2026)029, § 142, https://rm.coe.int/updated-report-on-out-of-country-voting/48802e4478, [25.11.2026].
[38] GYLA launches strategic legal proceedings to protect the voting rights of Georgian emigrant citizens, 14.04.2026, https://www.gyla.ge/en/post/GYLA-emigrantebis-xmisuplebistvis, [25.11.2026].
[39] Ibid.
[40] Venice Commission, CDL-AD(2026)026-e, § 40-42, https://www.coe.int/en/web/venice-commission/-/cdl-ad-2026-026-e, [25.11.2026].
[41] Ibid.
[42] Ibid.

Amendments Regarding Persons "with a Declared Party-Political Aim"

26. The 2026 amendments to the Organic Law on Political Associations of Citizens have replaced the concept of a "person with a declared electoral aim" with the broader concept of a "person with a declared party-political aim" and extend the corresponding regulatory framework.[43] The concept could encompass individuals or organisations engaged in activities promoting democracy, good governance, human rights, or other public policy issues, even where they did not intend to participate in elections or seek political office.[44]

27. Following the 4 March 2026 amendments, "the receipt by a party of any foreign funds shall entail the imposition of liability on the leading official of that party under the procedure established by the Criminal Code of Georgia." Moreover, "the restrictions established for a party by this Chapter [concerning donations and expenses] shall apply to a person who has a declared party-political aim of his or her own and who uses relevant financial and other material resources in order to achieve that aim".[45]

28. According to the Venice Commission assessment, the broad concept of a "person declaring party-political aims", considerably expands the scope of State supervision over political activity. These measures are likely to produce a deterrent effect extending well beyond those directly affected by the legislation and could, as it was stated in the online meetings, result in the absence of a whole generation from the political sphere. They discourage participation in political life, create powerful disincentives for individuals to engage with civil society organisations and are capable of fundamentally altering the conditions under which political participation takes place.[46]

Proceedings to Ban Opposition Parties

29. Amendments adopted in May 2025 extended the grounds for prohibiting a political party to parties that substantially reproduce the declared objectives and/or the substance of the activities of a party previously banned by the Constitutional Court. Under further amendments adopted in October 2025, individuals associated with a political party banned by the Constitutional Court may be prohibited from engaging in party activities, holding state-political or political office, and participating in elections.[47]

30. On 22 October 2026 the Constitutional Court of Georgia began consideration of the constitutional claim submitted by 88 members of Parliament seeking the banning of opposition political parties.[48] The claim targets five opposition parties: "United National Movement"; "Coalition for Change – Gvaramia, Melia, Girchi, Droa"; "Strong Georgia – Lelo, For the People, For Freedom!"; "the Federalist Party"; and "Gakharia for Georgia".

31. According to the Central Election Commission, in the 26 October 2024 parliamentary elections, the parties "Coalition for Change – Gvaramia, Melia, Girchi, Droa"; "United National Movement"; "Strong Georgia – Lelo, For the People, For Freedom!"; and "Gakharia for Georgia" collectively

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[43] Ibid, § 39.
[44] Ibid, § 58.
[45] Ibid, § 43.
[46] Ibid, § 73.
[47] GYLA, Personalized Lawmaking in Georgia as a Means of Unjustly Restricting Rights, A Review of Restrictive Legislative Amendments Adopted Since 2024, 2026, pp 12, 14, https://admin.gyla.ge/uploads_script/publications/pdf/PERSONALIZED%20LAWMAKING%20IN%20GEORGIA%20AS%20A%20MEANS%20OF%20UNJUSTLY%20RESTRICTING%20RIGHTS.pdf, [25.11.2026].
[48] Constitutional Complaint N1979 available at https://www.constcourt.ge/ka/judicial-acts?legal=20244, [25.11.2026].

received 784,830 votes.[49] If the Constitutional Court upholds the claim, this would effectively deprive at least 37.79% of participating voters of their political choice.

32. The claim's legal reasoning fails to meet international standards governing the prohibition of political parties. It undermines the principles of political pluralism and multi-party democracy as it seeks to eliminate all parties that enjoy substantial public support and were endorsed by the Georgian electorate in the most recent parliamentary elections.[50] It is particularly concerning that the Constitutional Court faces significant challenges in terms of its independence and impartiality.[51]

Criminal Proceedings Against Opposition Politicians

33. The authorities have also pursued criminal proceedings against leading opposition politicians, raising concerns about the use of criminal law to restrict political pluralism. As of October 2026, eight opposition leaders face charges in the so-called "sabotage case" initiated by the Prosecutor General on 6 November 2025. The charges include sabotage, assistance in hostile activities against a foreign state, financing activities directed against Georgia's constitutional order and national security, and calls for the violent change of the constitutional order or the overthrow of the government.[52]

34. Three of the defendants: former President Mikheil Saakashvili (United National Movement), Droa leader Elene Khoshtaria, and Nika Melia (Coalition for Change) are already imprisoned following convictions in separate cases.[53]

35. Three others, Girchi leader Zurab Japaridze, Nika Gvaramia (Coalition for Change), and Giorgi Vashadze (Strategy Agmashenebeli), have already served sentences for boycotting the Georgian Dream parliamentary commission in 2025. [54]

36. Mamuka Khazaradze and Badri Japaridze, leaders Dzlieri Sakartvelo - Lelo, For the People, For Freedom, were also sentenced for boycotting the commission but were subsequently released following a pardon.[55]

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[49] Summary protocol of the results of the October 26, 2024 elections of the Parliament of Georgia, https://www.matsne.gov.ge/ka/document/view/6309474?publication=0, [25.11.2026].

[50] Joint Statement by Georgian Civil Society Organizations on the Constitutional Lawsuit Seeking to Ban Opposition Parties, 21.10.2026, https://www.isfed.ge/eng/gantskhadebebi/qartuli-samoqalaqo-sazogadoebis-organizatsiebis-ertoblivi-gantskhadeba-opozitsiuri-politikuri-partiebis-akrdzalvis-shesakheb-sakonstitutsio-sarcheltan-dakavshirebit, [25.11.2026].

[51] European Commission, Georgia 2025 Report, 4.11.2025, p. 20, https://euneighbourseast.eu/wp-content/uploads/2026/08/georgia-report-2025.pdf, [25.11.2026].

[52] Prosecution Service of Georgia, 06.11.2025, https://pog.gov.ge/news/sabotazhis-utskho-qveknisatvis-mtrul-saqmianobashi-dakhmarebis-saqartvelos-konstitutsiuri-tskobilebisa-da-erovnuli-ushishroebis-safudzvlebis-tsinaaghmdeg-mimartuli-saqmianobis-dafinansebis-da-saqartvelos-konstitutsiuri-tskobilebis-dzaladobit-shetsvlisaken-sakhelmtsifo-khelisuflebis-damkhobisaken-motsodebis-faqtebze-siskhlissamartlebrivi-devna-daitsko-mikheil-saakashvilis-giorgi-vashadzis-nika-gvaramias-nikanor-melias-zurab-girchi-jafaridzis-elene-khoshtarias-mamuka-khazaradzis-da-badri-jafaridzi?lng=eng, [25.11.2026].

[53] Civil Georgia, Georgian Opposition Braces for New Jail Verdicts Amid Search for Broader Strategy, 20.07.2026, https://civil.ge/archives/744437, [25.11.2026]; Amnesty International, "Georgia: Opposition politician Elene Khoshtaria given politically motivated prison sentence for graffiti", 24.03.2026, https://www.amnesty.org/en/latest/news/2026/03/georgia-opposition-politician-elene-khoshtaria-given-politically-motivated-prison-sentence-for-graffiti/ [25.11.2026].

[54] OSCE fact-finding mission on Georgia (2026) under paragraph 12 of the Moscow Mechanism Document Report on Developments in Georgia in Respect of Human Rights and Fundamental Freedoms since Spring 2024, 12 March 2026, § 159, https://odihr.osce.org/odihr/662725, [25.11.2026].

[55] Civil Georgia, Kavelashvili Pardons Lelo/Strong Georgia's Khazaradze, Japaridze Ahead of Local Vote, 05.09.2025, https://civil.ge/archives/699375, [25.11.2026].

37. Former prime minister and leader of Gakharia for Georgia, Giorgi Gakharia was also charged on 10 November 2025 with abuse of power and endangering lives in connection with events during his time as Minister of Internal Affairs in 2019, including the dispersal of a demonstration and the establishment of a checkpoint near Russian-occupied territories.[56]

38. Following their visit to Georgia from 10 to 12 November 2025, the co-rapporteurs of the Parliamentary Assembly of the Council of Europe (PACE) for the monitoring of Georgia, expressed deep concern about the criminal charges brought against the leadership of democratic opposition parties, stating "These charges are clearly politically motivated and should be seen in connection with the recent appeals to the Constitutional Court to ban several major opposition parties in Georgia. Such actions have no place in a democratic society. We urge the authorities to end these actions, which would effectively establish dictatorship in Georgia,"[57]

39. PACE, in its resolution, has characterized the charges against opposition politicians as 'politically motivated and trumped-up', expressing concern about the use of criminal proceedings against opposition leaders.[58] The OSCE Moscow Mechanism Rapporteur has also called on Georgia to "Withdraw arbitrarily brought charges against leaders of political opposition".[59]

[56] OSCE fact-finding mission on Georgia (2026), 12.03.2026, § 161. See also Response of the Government of Georgia to the "Report on Developments in Georgia in Respect of Human Rights and Fundamental Freedoms since Spring 2024" pg. 79-81, https://odihr.osce.org/odihr/662725, [25.11.2026]. OC Media, Former Georgian PM Gakharia ordered into pre-trial detention in absentia, 14.11.2025, https://oc-media.org/former-georgian-pm-gakharia-ordered-into-pre-trial-detention-in-absentia/ [25.11.2026]; Interpressnews, Tbilisi City Court upholds pre-trial detention imposed on Georgia Giorgi Gakharia in connection with the so-called Chorchana episode, 19.02.2026, https://www.interpressnews.ge/en/article/145854-tbilisi-city-court-upholds-pre-trial-detention-imposed-on-georgia-giorgi-gakharia-in-connection-with-the-so-called-chorchana-episode/ [25.11.2026].

[57] Explanatory memorandum by Ms Edite Estrela and Ms Sabina Ćudić, co-rapporteurs, The functioning of democratic institutions in Georgia, Doc. 16420, 03 June 2026, §19, https://pace.coe.int/en/files/36053/html, [25.11.2026].

[58] PACE Resolution 2664 (2026), https://pace.coe.int/en/files/36232/html, [25.11.2026].

[59] OSCE fact-finding mission on Georgia (2026) under paragraph 12 of the Moscow Mechanism Document Report on Developments in Georgia in Respect of Human Rights and Fundamental Freedoms since Spring 2024, 12 March 2026, p. 6, available at: https://odihr.osce.org/odihr/662725, [25.11.2026].