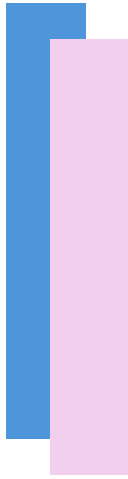


**CRIMINALIZATION OF THE ACTIVITIES OF
THE GEORGIAN CIVIL SOCIETY
ORGANIZATIONS: LEGISLATIVE
AMENDMENTS AND THEIR IMPACT**

2026

Human Rights Center (HRC)



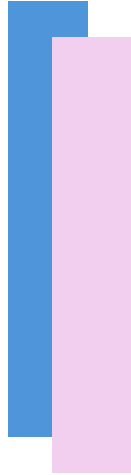


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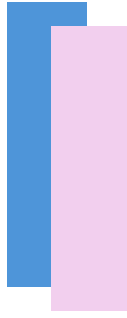
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Introduction

Civil society is one of the essential foundations of a democratic state, as it contributes to the protection of human rights, promotes accountability of state institutions, and civic engagement. In this context, it is particularly important to assess the extent to which the legislative amendments adopted in Georgia in recent years comply with the principles of a democratic society and whether the state ensures the existence and functioning of an independent civic space.

In the past years, the civil society in Georgia faced significant challenges. Particularly, the political and legislative developments that have unfolded since 2024 have created growing risks concerning the functioning of democratic institutions, the protection of human rights, and the freedom of civic space. Various legislative initiatives, including the Law on Transparency of Foreign Influence, the so-called Georgian analogue of FARA, amendments to the Law of Georgia on Grants and other subsequent regulations dramatically changed the legal environment for the operation of the civil sector. These amendments not only widened the state control mechanisms but also raised questions about their impact on the freedom of association and existence of civil society in the country.

The purpose of this document is to review the legislative amendments adopted in the recent years targeting the civil society, their political and social context, their practical impact on the activities of civil society, and their compliance with Georgia's international legal obligations. Additionally, the document evaluates the impact of the amendments on the democratic development of the country and its integration process into the European Union.



Political Context: Persecution of Civil Society

Since 2023, the political environment in Georgia has been characterized with increasing polarization and deteriorating conditions for the civil society. The process particularly worsened after the government began introducing legislative initiatives aimed at regulating foreign funding and the activities of civil society organizations. In parallel, large-scale protest demonstrations were held demanding the continuation of the country's democratic development, EU integration, and the protection of human rights. In response, the government employed legal, administrative, and violent measures against protesters. During the dispersal of the demonstrations, numerous cases of abuse of power were observed, including the use of unidentified special means.

Restriction of civic space acquired more systemic nature, and it was manifested into reinforcement of repressive legislation, politicization of law enforcement mechanisms and increasing oppression on people with dissent views. This process was accompanied by the disinformation campaign against civil society organizations and activists, physical assaults on them, inadequate response from the side of investigation and mass detention of protest participants. Additionally, administrative and criminal laws were more frequently used to restrict the protest and freedom of expression. Accordingly, the use of investigative mechanisms, financial restrictions, and selective legal practices has reinforced existing concerns regarding the lack of judicial independence.

For years, portraying the civil sector as “agents of foreign interests” has contributed to deepening public polarization and delegitimizing the activities of civil society organizations.

The OSCE Moscow Mechanism Report assessed the legislative and political developments, as well as indicators of democratic backsliding in Georgia during 2024-2025. In particular, the report highlights issues in the electoral environment and legislative amendments that restrict the civic and political space, including the Law on Transparency of Foreign Influence, the so-called Georgian analogue of FARA, amendments to the Law on Grants, Law on Broadcasting and Law on Political

Association of Citizens. It also references the Law on Family Values and Protection of Minors, among others. These amendments cumulatively reinforced the state control mechanism, reduced the space for civic and political engagement, increased risks of arbitrary enforcement and had negative impact on the freedom of association, expression and media.¹



Overview of New Legislative Amendments Targeting the Civil Society

- Legislative amendments of March 4, 2026

On February 2, 2026, the Georgian Dream adopted a package of amendments to the Law on Grants, which officially entered into force on 4 March 2026².

In accordance with the legislative amendments, a grant is “funds transferred in monetary or in-kind form, in exchange for which the grant recipient provides technical assistance in the form of sharing technologies, specialized knowledge, skills, expertise, services, and/or other types of assistance.”³ The legislative package allows such a broad interpretation that it could potentially apply to any citizen, including, in theory, families of emigrants. Moreover, during a session of the Legal Committee, a representative of the Georgian Dream clarified that if a transfer is made for a “political purpose,” it would be considered a grant, and the recipient would be “obliged to obtain prior approval from the Government of Georgia.”⁴

Under the new legislation, a grant is “funds transferred in monetary or in-kind form that are used, or may be used, to carry out activities intended to influence the Government of

¹ Organization for Security and Co-operation in Europe, Office for Democratic Institutions and Human Rights; OSCE Fact-Finding Mission to Georgia (2026). *Report under Paragraph 12 of the Moscow Mechanism Document on Human Rights and Fundamental Freedoms in Georgia: Developments Following the Spring 2024 Events*, 12 March 2026, pp. 26–51 [Untitled](#)

² On Amendments to the Law of Georgia on Grants” (Registration No. 252/3-XIMP, final revised version) see [link](#)

³ Law of Georgia on Grants, Article 2, 1⁵(a).

⁴ Radio Free Europe/Radio Liberty, “[Parliament Begins Consideration of ‘Grants Law’ Package with Tightened Rules](#),” February 2026

Georgia, state institutions, or any segment of society, and which are aimed at shaping, implementing, or changing Georgia's domestic or foreign policy. It also includes funds used, or potentially used, for activities deriving from the political or public interests, approaches, or relations of a foreign government or a foreign political party."⁵

The legislative package notably widens the state control on foreign funding, activities of civil society and political actors. According to the amendments, the concept of a "grant" has been substantially broadened to include not only direct financial support but also any form of assistance that may be used to influence public or political processes, which in turn allows for a wide scope of interpretation.

A particular restriction is imposed on activities that, according to the assessment of the government, are linked to the formation, modification, or influence of Georgia's domestic or foreign policy. As a result, under such broad interpretation, this may encompass any advocacy, monitoring, research, human rights protection, or other civic activities carried out with international funding. Moreover, the restriction applies to both legal entities and individuals.

The strictest part of the legislative package concerns the introduction of criminal liability. Violations of the rules established under the Grants' Law have become punishable not only administratively but also under criminal law. Article 319¹ has been added to the Criminal Code of Georgia, according to which violations of the Law of Georgia on Grants and unlawful cooperation with a foreign organization or foreign individual are punishable by a fine, community service, or imprisonment for up to six years. This amendment is particularly noteworthy as it extends beyond the scope of administrative regulation and transfers certain actions related to civic activities into the realm of criminal law. At the same time, the concept of "unlawful cooperation" and related regulations leave room for broad interpretation, increasing the risk of selective enforcement and arbitrary application. The combination of vague legal formulations and severe sanctions may create a so-called chilling effect, whereby the fear of criminal liability leads organizations and individuals to refrain from engaging in human rights protection, advocacy, research, or other public-interest activities.

⁵ Law of Georgia on Grants, Article 2, 1⁴

The amendments also affected the political rights⁶. According to the Law on Political Association of Citizens, “it is prohibited for a party member to be a person who, under an employment contract with an organization acting in the interests of a foreign power, had fully or partially received income. Such a person is also barred from party membership for eight calendar years from the year in which they last received income from an organization acting in the interests of a foreign power.”

This restriction effectively limits the political participation of individuals employed in the civil sector and establishes links between foreign funding and political rights as a basis for exclusion. The regulation creates a risk that individuals working in civil society organizations may be treated differently from other citizens, even though their activities may be related to human rights protection, research, education, or other public-interest work. Such approach may become an indirect mechanism for restricting political participation and may lead to a so-called chilling effect, where individuals refrain from engaging in both civic and political processes to avoid professional or legal consequences.

Representatives of the government justify the restrictions by the need to protect Georgia’s sovereignty. According to them, foreign funding has been used to support polarization and violent protests. However, human rights defenders argue that the amendments deliberately establish a repressive legal framework aimed at ultimately suppressing independent civil society, protest movements, and critical voices.

- Legislative Amendments of April 15, 2026

In April 2026, the ruling political party Georgian Dream introduced amendments to the Law on Grants through an accelerated procedure.⁷ The amendments concern the financial operations of the diplomatic missions, consular institutions and international organizations accredited in Georgia. Namely, the financial resources received by these entities for the purpose of carrying out their activities, and which are connected to the pursuit of their political, public, or diplomatic interests, will no longer be considered grants. The authors of the amendments explain that this initiative does not introduce a new regulation and merely serves to “clarify” the already existing practice.⁸

⁶ “On Amendments to the Organic Law of Georgia on Political Associations of Citizens,” Article 7¹.

⁷ Law of Georgia “On Amendments to the Law of Georgia on Grants” ([Registration No. 282/3-XImp, initiated version, draft law of Georgia](#))

⁸ Radio Free Europe/Radio Liberty; [“Changes to the Law on Grants Are Planned – The Ruling Party Calls it a ‘Clarification’”; 07.04.2026](#)

If the existing legislation already excluded these entities from the scope of regulation, it is unclear why additional clarification became necessary, when the overall environment regarding the regulation of foreign funding had already become significantly stricter. It became obligatory to get approval from the government to receive grants, and the measures of criminal liability had widened.

This amendment raised several significant issues. Firstly, it demonstrated existence of exceptions, because in parallel to the tightened regulations, some exceptions were created for concrete entities. Secondly, the formulations used in the law, like “political interest,” “public interest” or “influence,” still leaves possibility for wider interpretation that is problematic in relation with the principle of legal certainty. Additionally, the practice of “clarifications” raises questions about legislative clarity because the necessity to constantly make clarifications after the law is already adopted demonstrates the existence of insufficiently clear regulations. At the same time, the authorities showed a differentiated regulatory approach toward different actors - strict control mechanisms were primarily concentrated on the civil sector.



State Grants and Formation of Alternative Civil Society

In 2025, following amendments to the Law on Grants, the Agency for the Management of State Grants was established, which was authorized to provide grants to non-governmental organizations from the state budget. According to the explanatory card, the purpose of this amendment was to create a source of state funding for the civil society as a counterbalancing mechanism to the support received from “foreign actors.” However, the agency was created in parallel legislative environment, when the government significantly tightened the conditions to receive international funding for the independent civil society organizations and adopted the system of getting government’s approval for foreign grants.⁹ As a result, the amendments shall be perceived not only as

⁹ Radio Free Europe/Radio Liberty; [“Some Get Millions, Others Get Punishment – Georgian Dream Knows How to Distinguish NGOs”](#); 19.02.2025

an alternative source of funding, but rather as an attempt to reorganize the civic space, in the frame of which the international support is replaced by the financial mechanisms controlled by the state.

The activities of the Agency raised additional questions about its transparency and independence. In accordance with the international standards, including the guiding principles of the OSCE/ODIHR, the state funding for the civil sector is allowed only if this process relies on equal availability, transparent criteria and respect for the independence of nongovernmental sector. However, the existing model was criticized because the decision-making process grants wide discretion to the state, while independent organizations have effectively found themselves in a constrained position regarding the access to international resources. Additionally, among the organizations, which received funding from the Agency, were recently established entities that raised questions about selective funding mechanisms and intensified discussions about the potential emergency of so-called GoNGOs, the organizations created or supported by the state, which create alternative space for the independent civil society but, in practice, remain under the influence of the government.¹⁰

In an environment, where independent organizations are restricted to have access to international resources, and the state simultaneously creates and funds alternative mechanisms, there is a risk that the competitive environment within the civil sector will gradually be replaced by actors more closely aligned with the state. Such an approach may affect the core function of the civil society –independent monitoring and ensuring of accountability of the government performance.

¹⁰ Ibid



Impact of the Legislative Amendments on the Civil Society

Impact of the adopted legislative amendments goes beyond the restriction of the operation of concrete organizations and creates wide systemic impact on the civic space. The regulations significantly weakened the financial sustainability of the organizations, and some organizations had to stop their activities at all. Additionally, the working environment for human rights defenders became unsafe, cooperation between the media and civil sector weakened and number of international partnerships reduced. These processes negatively affected the democratic development and EU integration process of the country.

The legislative amendments adopted against civil society are not limited only to legal or administrative restrictions. Information provided by the CSOs by August 2025, the cumulative effect of the Law on Transparency of Foreign Influence, so-called FARA and the amendments introduced into the Law on Grants turned up particularly negative for independent civil society. Namely, 34 organizations reported that they had suspended their work; seventy-four indicated a reduction in their activities, and an additional twelve emphasized that they would soon be forced to suspend their operations altogether. Problems in the financial sustainability became one of the main challenges – 109 organizations reported the difficulties to obtain funding; 90 of them could not get new financial resources at all. In parallel to that, 97 organizations reported either reducing staff numbers or losing their employees entirely. 49 organizations remained without paid personnel and continued activities solely through volunteer efforts by management or/and staff. In parallel to the legislative restrictions, mechanisms of informal oppression were also applied. Namely, 62 organizations became targets of disinformation and propagandist campaigns; 32 organizations report reputational harm and difficulties in cooperating with partners. The impact of the restrictive environment is particularly severe for local community organizations: According to the Center for Strategic

Development and Research of Georgia (CSR DG), 77 community groups out of registered 114 ones had already ceased their activities by 2025.¹¹

The above data shows that the impact of the repressive legislative framework has already exceeded the restriction of the operation of concrete organizations and created wider and more systemic risk, which undermines the existence of the independent civic space. In parallel to that, reduction of independent organizations affects those services, monitoring mechanisms and human rights activities, which they provide for various social groups. As a result, population has limited access to human rights or other services.



International Legal Standards and Obligations of the State of Georgia

The legislative amendments targeting the civil society in Georgia contradicts the international obligations of the State of Georgia, particularly the freedom of association and freedom of expression. Article 11 of the European Convention on Human Rights and Article 22 of the International Covenant on Civil and Political Rights protect the freedom of association, which includes the right of the organizations to operate independently and raise financial resources among others through international resources. In accordance with the standards established by the OSCE/ODIHR and the Venice Commission, restrictions on funding of the NGOs must be clearly defined, necessary, and proportionate, and must not result in the stigmatization or discrimination of organizations. The joint guidelines of ODIHR and the Venice Commission further state that the right to freedom of association would be rendered meaningless if organizations did not have the ability to freely seek and use resources, including foreign and international funding¹².

¹¹ GYLA, State of Human Rights in Georgia, 2025. P. 10-11, see [link](#)

¹² OSCE/ODIHR; URGENT OPINION ON THE LAW OF GEORGIA “ON TRANSPARENCY OF FOREIGN INFLUENCE”; 30.05.2024. [30-05-2024 Final ODIHR Urgent Opinion on Law on Transparency of Georgia.pdf](#);

The regulations, which require prior approval of the government to get foreign funding, come in conflict with these standards. They widely and ambiguously clarify the “political activities”, establishes criminal liability and creates the possibility of selective enforcement. In its 2024 assessment the Venice Commission mentioned that the Law on Transparency of Foreign Influence failed to meet the requirement of legality, including in terms of the clarity of its provisions.¹³ The same problem is observed in the amendments introduced in the Law on Grants, because vague provisions grant possibility to the government to perceive any activities of the civil society organizations, including labor, human rights, research, educational or advocacy, as “political influence.”

These amendments contradict the commitments taken by Georgia for the EU integration. On March 6, 2026, the High Representative Kaja Kallas and the Commissioner for Enlargement Marta Kos stated that “the adoption of the legislative package on foreign funding and political activity by the Georgian Parliament on 4 March is part of a systematic effort of the Georgian authorities to restrict the country’s democratic and civic space.” They said, the vague provisions of the new legislation create profound legal uncertainty and major risks of arbitrary and selective enforcement.¹⁴

The foreign ministers of the countries of the Weimar Triangle: France, Germany, and Poland, also noted that, the new regulations prove repressive approach toward the civil society and breach the commitments undertaken by Georgia *vis-à-vis* European Union.¹⁵ The OSCE/ODIHR also expressed its concern about the new legislative amendments.¹⁶

In the 2026 report prepared under the OSCE Moscow Mechanism, it is noted that since 2024, Georgia has experienced significant democratic backsliding, manifested in the shrinking of civic space, restrictions on freedom of expression and association, and the weakening of democratic institutions. In accordance with the report, legislative

¹³ EUROPEAN COMMISSION FOR DEMOCRACY THROUGH LAW (VENICE COMMISSION) GEORGIA; URGENT OPINION ON THE LAW ON TRANSPARENCY OF FOREIGN INFLUENCE; 24.05.2024; [CDL-PI\(2024\)013-e \(1\).pdf](#)

¹⁴ Georgia: Statement by the High Representative/Vice President Kallas and Commissioner for enlargement Kos on Georgia’s legislative amendments on foreign funding and political activity; 06.03.2026; [Georgia: Statement by the High Representative/Vice President Kallas and Commissioner for enlargement Kos on Georgia’s legislative amendments on foreign funding and political activity | EEAS](#)

¹⁵ Georgia - Joint Ministerial Statement by the Foreign Ministers of France, Germany and Poland on the adoption of legislative amendments on foreign funding and political activities; 10.03.2026; [Georgia - Joint Ministerial Statement by the Foreign Ministers of France, Germany and Poland on the adoption of legislative amendments on foreign funding and political activities - Ministry of Foreign Affairs Republic of Poland - Gov.pl website](#)

¹⁶ New legislation in Georgia curbing civic, political rights and freedom of expression raises serious concerns, OSCE human rights office says; 06.03.2026; [New legislation in Georgia curbing civic, political rights and freedom of expression raises serious concerns, OSCE human rights office says | OSCE Office for Democratic Institutions and Human Rights](#)

amendments had negative impact on the civil society, freedom of media and political pluralism. Additionally, the Government of Georgia was recommended to ensure free and safe functioning of the civil sector and to annul the restrictive legislation which contradicts the international obligations of Georgia.¹⁷

Continued pressure targeting the civil society and recent legislative amendments are not merely internal legal matters; they are directly linked to Georgia's international reputation, compliance with its human rights obligations, and the country's European Union accession process. Restrictive legislation weakens the independence of civil society, suppresses the presence of critical voices in the public field, and is inconsistent with the democratic standards that Georgia is legally and politically obliged to uphold under its international commitments.



Conclusion

The legislative amendments adopted in 2024-2026 substantially changed the working environment for civil society and created a legislative framework, where the state control on the independent civil society and civic-political activities has increased.

The amendments introduced into the Law on Grants and the regulations of the so-called foreign influence significantly expanded the discretionary powers of the government. It is particularly problematic to use such broad and vague terms like “political interest,” “exerting influence,” or “public activities,” because these formulations create high risk for arbitrary interpretation and selective enforcement. Furthermore, introduction of criminal liability and mechanisms to restrict political rights create additional barriers for civic activism and comes in conflict with the international standards of human rights.

¹⁷ OSCE Office for Democratic Institutions and Human Rights; OSCE fact-finding mission in Georgia (2026). Report based on paragraph 12 of the Moscow Mechanism document on human rights and fundamental freedoms in Georgia, covering developments since spring 2024; 12 March 2026. [Untitled](#)

The impact of the legislative amendments is not limited to the legal field only; in practice, many organizations have already been affected. Some organizations have been forced to suspend their activities, others cope with financial crises, reduce the personnel and international partners, and face other challenges. This process has also been accompanied by a so-called “chilling effect,” whereby organizations themselves ceased operations out of fear of sanctions, legal uncertainty, and political pressure. As a result, harm has been caused not only to individual organizations, but also to the country’s overall democratic development.

It is worth to mention the tendency of emerging new alternative CSOs, which are financed by the authorities that creates a risk of formation of pro-governmental civil society and possibility to replace independent civic space with them. Such an approach is problematic under international standards, because they undermine the independence of civil society.

Recent legislative amendments, including those adopted in 2026, fundamentally contradict Georgia’s international obligations. The European Convention on Human Rights, the International Covenant on Civic and Political Rights, the OSCE and the Venice Commission standards guarantee the freedom of association and expression, including the right to freely seek and use international resources. Assessments made by the international organizations, EU institutions and the OSCE confirm that the recent developments in Georgia are perceived as democratic backsliding. Accordingly, the current situation goes beyond a matter of domestic legislative policy and is directly linked to the perspectives of the democratic development, international reputation and EU integration process of Georgia. It is necessary to reconsider the current regulations in order to ensure their compliance with the international standards and to create a legal framework, which will ensure free, safe and independent functioning of the civil society.

Human Rights Center calls on:

- *The political party Georgian Dream:*
 - To repeal the legislative amendments which restrict civil society;

- To cease using the regulation of foreign funding as a mechanism of state control, including maintaining a system of prior government approval that restricts the activities of independent civil society organizations.
- To repeal all legal norms, which impose criminal liabilities for matters related to foreign funding and ensure proportionality of any restrictions with international standards.
- To stop using narratives that contribute to the discrediting and stigmatization of civil society representatives, human rights defenders, journalists, and activists, as these exacerbate polarization and increase their security risks.
- To ensure independent, effective and prompt investigation of all facts of violence, intimidation, prosecution and other forms of coercion against the civil society representatives, journalists and activists.
- To ensure coherence of the national legislation with the international obligations of Georgia, including the European Convention on Human Rights, International Covenant on Civil and Political Rights and OSCE/ODIHR standards.

➤ *To the International Organizations and Institutions:*

- To continue active monitoring of the state of human rights in Georgia, including through the mechanisms of the OSCE, the European Union, the United Nations, and the Council of Europe.
- To keep Georgia within international monitoring and political agendas, including in international reports, resolutions, and political dialogue formats.
- To intensify the support for the independent civil society by providing institutional assistance.