

INTERIM REPORT
11 September – 9 October 2024

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I. EXECUTIVE SUMMARY

- On 26 October, Georgia will hold its first parliamentary elections under a fully proportional system. The elections take place in the context of entrenched political polarization, continued political tension, opposition distrust in state institutions and concerns about protection of the right to association and expression. These are also the first elections since Georgia was granted EU candidacy status in 2023, a process according to EU Council conclusions of June 2024 *de facto* halted following the adoption of the Law on Transparency of Foreign Influence. The lead up to and the actual adoption of the law led to large-scale public protests.
- Since the last parliamentary elections, the Election Code has been amended over 20 times. The 2022 and 2023 amendments followed public discussions garnering broad support and although they did not provide the recommended comprehensive reform, addressed several previous ODIHR recommendations. The 2024 changes, however, were adopted without sufficient public consultation or consensus, and raised concerns about their impact. Moreover, several ODIHR recommendations remain outstanding, including those related to impartiality of election administration, misuse of administrative resources, campaign and campaign finance, media-related campaign regulations, and strengthening the framework for electoral dispute resolution.
- Preparations for the elections are ongoing, and the election administration has complied with all legal deadlines to date, has held training for various stakeholders and initiated a large-scale voter information campaign. Many ODIHR EOM interlocutors expressed trust in the election administration's technical and organizational capacities, but some ODIHR EOM interlocutors raised concerns that the simplified decision-making process of the CEC, the removal of the opposition-appointed deputy chairperson and the new appointment method of its members, could negatively impact the impartiality of the election administration.
- For the first time, electronic devices will be used in most polling stations for voter identification, counting, establishing and transmitting preliminary results. While introduction of these technologies has been supported by most stakeholders, some have expressed concerns about the capacity of Precinct Election Commissions (PECs) to manage the increased number of registered voters per polling station, which has doubled since the last elections, and underlined the need for further transparent auditing of the technology, and voter education to address misconceptions that the devices may be used to breach vote secrecy.
- There are some 3.4 million registered voters. The CEC has offered a number of options for verifying voter registration information and requesting corrections, both in-person and online. Most ODIHR EOM interlocutors did not raise significant concerns about the inclusiveness of the voter lists, but some noted inaccuracies mainly stemming from the potential presence of deceased voters and citizens *de facto* residing abroad on the list.
- Out of 40 applications received from parties, the CEC registered 27 electoral subjects, of which 19 submitted candidate lists, with 18 of them eventually registered as contestants. Political parties are not permitted to run in pre-electoral blocs, leading some political parties to form *de facto* coalitions

by registering their candidates on the lists of the leading parties within their coalitions. ODIHR EOM interlocutors did not raise concerns regarding the candidate registration process.

- Women's representation in elected positions remains low, despite constitutional provisions requiring the state to take special measures to ensure gender equality. The 2024 amendments abolished the mandatory gender quota, along with other temporary special measures, for candidate lists and other legislative measures aimed at increasing women's political participation, a measure criticised by several ODIHR EOM interlocutors for its potential negative impact on gender representation in politics. According to the CEC as of 11 October, there were 1,185 candidates. Women led 3 lists and some 29 per cent of candidates are women.
- Campaign messaging observed so far employs highly polarized rhetoric. The ruling party has framed the elections as a choice between peace and war, while most opposition parties present the elections as a referendum on country's geopolitical position. Some ODIHR EOM interlocutors raised concerns related to intimidation tactics allegedly directed against their campaign activities, as well as voters, by ruling party supporters and state authorities. Isolated instances of verbal attacks, destruction of campaign materials and physical altercations were reported by both ruling and opposition parties. Despite the existing regulations, several ODIHR EOM interlocutors highlighted shortcomings in the legislation and its implementation concerning the potential misuse of administrative resources.
- Political party income and expenditure are overseen by the newly established Anti-Corruption Bureau (ACB), which began scrutinizing parties' finances during the campaign period and has taken *ex-officio* actions to request additional reporting. All contestants submitted their first interim reports. The ACB published them online, but the law does not require it to scrutinize and publish its conclusions on these reports before election day. The ACB initially designated several civil society organizations (CSOs), including a citizen observer group as a 'subject with declared electoral goals' bound by campaign finance regulations, but reversed its decisions following the request of the government.
- The media landscape is diverse but highly polarized, reflecting political and business interests. Media faces a high number of civil defamation cases and threats to journalists' safety persist. The law guarantees contestants free airtime on most broadcasters, depending on their results in the previous parliamentary elections, the right to purchase airtime under equal prices, and participation in debates. Television stations are liable for the content of party advertising. In the campaign period, some nine media outlets have been sanctioned for breaching the free airtime provisions.
- To date, the election administration and the courts have received some 120 complaints, primarily concerning the appointment of lower-level election commission members, misuse of administrative resources, and violations of campaign rules; most complaints were dismissed after being reviewed on substance. Several ODIHR EOM interlocutors noted a low level of trust in the ability of law-enforcement, the election administration and the judiciary to effectively and impartially examine and adjudicate politically sensitive matters.
- As of 10 October, the CEC accredited 68 citizen observer organizations with 2,602 observers, and 51 international observer groups with 512 observers. Several CSOs have launched long-term observation activities, and many noted a more challenging operating environment resulting from their public stigmatization following the adoption of the Law on Transparency of Foreign Influence.

II. INTRODUCTION

Following an invitation from the authorities of Georgia to observe the parliamentary elections, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) deployed an Election Observation Mission (EOM) on 11 September.¹ The EOM, led by Eoghan Murphy, consists of a 12-member core team based in Tbilisi and 30 long-term observers deployed throughout the country from 19 September. Mission members are drawn from 22 OSCE participating States, and 48 per cent of mission members are women. ODIHR has requested participating States to second 350 short-term observers to observe the proceedings on election day.

III. BACKGROUND AND POLITICAL CONTEXT

On 27 August, in line with the Constitution, the president called parliamentary elections for 26 October. Following the 2017 constitutional amendments, these will be the first elections held under a fully proportional election system.² They also mark the first elections since Georgia was granted European Union (EU) candidacy status in December 2023; the accession has been *de facto* halted since June 2024.³

The political landscape is dominated by the ruling Georgian Dream (GD), in power since 2012. Following the 2020 parliamentary elections, nine political parties and coalitions won mandates with 90 of 150 seats obtained by GD. The United National Movement (UNM)-led coalition became the largest opposition faction with 36 mandates.⁴ In the following years, the opposition remained fragmented and intra-party instability led to the emergence of new political parties.⁵ Ahead of the upcoming elections, a number of opposition parties have united into three coalitions: Coalition for Change (composed of *Ahali*, *Girchi* – More Freedom, *Droa!*, and Republican Party), Strong Georgia (*Lelo*, For the People, Freedom Square, and Citizens), and Unity – to Save Georgia (UNM, European Georgia [EG] and *Strategy Aghmashenebeli* [SA]).⁶

The elections are being held amidst entrenched political polarization, and deep antagonism between the government and the president, and social discontent due to adoption of various legislation.⁷ In 2023 and 2024, large-scale protests emerged against the adoption of the Law on Transparency of Foreign Influence, initially withdrawn in 2023, but reintroduced and adopted on 28 May 2024.⁸ During and immediately

¹ See previous ODIHR election observation reports on [Georgia](#).

² In the 2020 elections, members of parliament (MPs) were elected through a mixed system, with 120 proportionally elected in a single nationwide constituency, through closed party lists, and 30 in single-member constituencies.

³ Georgia applied for EU membership in March 2022 and received candidate status in December 2023, contingent on taking the steps outlined in the European Commission's (EC) [recommendations](#). The June 2024 [conclusions](#) of the European Commission state that the adoption of the Law on Transparency of Foreign Influence represents backsliding on these steps, *de facto* leading to a halt of the process.

⁴ Other parties that won seats were: European Georgia (EG) with 5 seats; *Lelo* with 4; *Strategy Aghmashenebeli* (SA) with 4; Alliance of Patriots (AoP) with 4; *Girchi* with 4; Citizens with 2; and the Labour Party (LP) with 1.

⁵ Most notably, former Prime Minister Giorgi Gakharia left the GD to form the "For Georgia" party, while *Girchi* split into two factions: *Girchi* – New Political Centre (*Girchi*–NPC) and *Girchi* – More Freedom (*Girchi*–MF). Additionally, prominent UNM leaders Nikanor Melia and Nika Gvaramia formed a new party called *Ahali*.

⁶ As pre-electoral coalitions are prohibited by law, coalitions registered their candidates under the lists of their leading parties: "Coalition for Change" with *Ahali*, "Strong Georgia" with *Lelo*, and "Unity – to Save Georgia" with UNM. Other parties, such as Alliance of Patriots (AoP), "For Georgia", and *Girchi* – New Political Centre (*Girchi* – NPC), decided not to enter into coalitions.

⁷ Following the 2017 constitutional amendments, which concluded the shift from a presidential to a parliamentary system initiated in 2010, the current President Salome Zourabichvili is the last directly elected president. In October 2023, GD made an unsuccessful attempt to impeach the president for unauthorized foreign visits. On 7 October, the ruling party announced its intention to initiate another impeachment procedure against the president.

⁸ The law introduces new registration, reporting, and public disclosure requirements for civil society organizations (CSOs) and media that receive more than 20 per cent of their non-commercial revenue from foreign sources, labelling them as "organizations pursuing the interests of a foreign power". By 8 October, out of 476 applicants, 27 CSOs were officially registered as such by the Ministry of Justice.

following these events, many ODIHR EOM interlocutors reported violence and intimidation against the protesters, civil society and journalists. In July, the president, along with 38 MPs, and over 120 civil society and media organizations, challenged the constitutionality of the law with the Constitutional Court and requested provisional measures to suspend enforcement of the law. On 9 October, the Court ruled the case to be admissible but did not grant the request to suspend applicability of the law until its final decision. Many national and international organizations, including ODIHR, have voiced concerns about the potential negative impact on freedom of association and expression following the adoption of the law.⁹ On 17 September, the parliament adopted the “Law on Protection of Family Values and Minors”, which has been strongly criticized by a number of international organizations as well as several ODIHR EOM interlocutors for introducing measures that limit fundamental freedoms and stigmatize the LGBTI community.¹⁰

Women’s representation in elected positions remains low, despite constitutional provisions requiring the state to take special measures to ensure gender equality. Women hold 19.3 per cent of seats in the outgoing parliament, and only three out of 64 mayoral positions. In April 2024, the parliament abolished mandatory gender quotas on parliamentary candidate lists, along with other temporary measures to enhance women’s participation in public life, with some arguing that gender quotas are a form of positive discrimination and have already achieved their main task.¹¹ ODIHR negatively assessed the amendments and called “urgent action to put in place effective temporary measures to eliminate discrimination against women in public and political life”.¹² Moreover, several ODIHR EOM interlocutors stated that this represents a step back and might negatively impact gender representation in politics.

IV. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

The elections are governed by the 1995 Constitution, the 2011 Election Code, the 1997 Law on Political Unions of Citizens (LPU), and regulations of the Central Election Commission (CEC).¹³ Since the last parliamentary elections, the law has been amended over 20 times, with the latest changes adopted in June 2024. Several ODIHR EOM interlocutors raised concerns about the stability of the legal framework due to the frequent amendments and the adoption of numerous changes in close proximity to the election.

⁹ Several CSOs informed the ODIHR EOM that at the time of the adoption of the law they saw an alarming rise in pressure, physical as well as verbal attacks towards them, including by representatives of the ruling party. See ODIHR’s Urgent [Opinion](#) on the Law On Transparency of Foreign Influence and the Council of Europe (CoE) Venice Commission Urgent [Opinion](#).

¹⁰ The Law addresses issues related to marriage, adoption, and medical procedures for gender reassignment, and bans gatherings and provision of information at schools that “aims to popularize” non-heterosexual relationships, gender reassignment, or adoption by non-heterosexual persons. See the 17 September [statement](#) by the UN Human Rights Office spokesperson, which concludes that the law “contains provisions that present risks to a wide range of human rights [and i]t also contains vague formulations and perpetuates negative stereotypes about LGBTIQ+ people”. The CoE Venice Commission, in its [opinion](#) from 26 June 2024, called on the Georgian government to “reconsider this legislative proposal entirely and not proceed with its adoption”. On 4 September, the EU [deplored](#) the “rushed adoption” of the law.

¹¹ Gender quotas, introduced in 2020, mandated every fourth candidate on candidate lists to be of the opposite gender. In 2023, the parliament extended these quotas until the 2032 parliamentary elections. In April 2024, *Girchi* MPs, who initiated the amendments, obtained the support of the ruling party in exchange of their votes for the GD-proposed candidate for the CEC chairperson. See the ODIHR [opinion](#) of June 2024, which states that “the abolition of electoral gender quotas does not appear consistent with the constitutional obligation to adopt special measures to ensure the substantial equality of men and women and to eliminate inequality”. See also the 9 April [statement](#) by the United Nations in Georgia, which states that “[t]he abolition of quotas is a step back for gender equality”, and called on the country to “rake all the necessary steps to avoid actions that run counter to Georgia’s international obligations and that risk having a chilling effect on Georgian democracy”.

¹² See the June 2024 ODIHR “[Opinion](#) on Two Organic Laws of Georgia Amending the Election Code and the Law on Political Unions of Citizens in Relation to Gender Quotas”.

¹³ Other relevant laws include the 2004 Law on Broadcasting, 1997 Law on Fighting Corruption, 1999 Criminal Code, 1984 Administrative Offences Code, 1999 Code of Administrative Procedure, and 1999 General Administrative Code.

The 2022 amendments were adopted following broad consultations and cross-party support, and although they did not provide the recommended comprehensive reform, some of the changes addressed previous ODIHR recommendations, including measures to enhance the impartiality of members of lower-level election bodies and citizen observers, additional grounds for triggering an automatic recount, and adjusted deadlines in the election dispute resolution process.¹⁴ The 2024 amendments altered the decision-making process of the CEC, cancelled the position of the opposition-represented deputy CEC chairperson, and revised the procedure of nomination and selection of CEC members. The authorities stated that a majority of these changes aimed to improve the legislation and align it with the EU accession requirements; however, many other ODIHR EOM interlocutors noted that their adoption lacked public consultations or consensus and raised concerns about their impact (See *Election Administration*).¹⁵ The president vetoed most changes, but these vetoes were overridden by the parliament.¹⁶

Several ODIHR recommendations remain unaddressed, including those related to the appointment and nomination of election administration members, comprehensive regulations to prevent the misuse of administrative resources, enhancing campaign finance regulations and oversight, improving media-related campaign regulations, and strengthening the framework for electoral dispute resolution. Moreover, despite frequent revisions, the legislation contains some inconsistencies and lacks clarity due to repetitive and transitory nature of many of the provisions.¹⁷

The parliament, comprising 150 members (MPs), is directly elected for a four-year term. Parties compete under a fully proportional system in a single countrywide constituency with closed candidate lists. Contestants must surpass a five per cent threshold to qualify for seat allocation. The formation of pre-electoral coalitions is not permitted.

V. ELECTION ADMINISTRATION

The election administration consists of the CEC, 73 District Election Commissions (DECs), 3,031 in-country and 60 out-of-country Precinct Election Commissions (PECs).¹⁸ At each level, commissions are composed of eight non-partisan members and up to nine members appointed by parties represented in parliament. Non-partisan members must hold professional certificates and meet additional legal requirements aimed at ensuring their impartiality.¹⁹

Members of the CEC are appointed for five-year terms. Four of the current 17 CEC members (24 per cent) are women. Recent amendments shifted the responsibility for the nomination of non-partisan members, including the chairperson, from the president to the speaker of parliament, and abolished the position of the opposition-nominated deputy chairperson. Several ODIHR EOM interlocutors voiced concerns that

¹⁴ See the 2022 [Joint Opinion](#) of ODIHR and Venice Commission.

¹⁵ Only one amendment, which included the removal of the gender quota, was supported by one opposition party.

¹⁶ Out of five packages adopted in 2024, the president vetoed three: related to the removal of gender quotas, the removal of the opposition-appointed CEC deputy chairperson and the revision of CEC decision-making procedures.

¹⁷ The Election Code and other laws also contain references to no longer existing provisions.

¹⁸ Elections will not be held in Abkhazia and South Ossetia, territories currently not under the control of the government of Georgia. See the European Court of Human Rights (ECtHR) 2024 [judgement](#) in case of Georgia v. Russia. Out-of-country voting will be organized in 42 countries. Additional in-country PECs may be appointed by DECs in electoral precincts established in penal institutions, and in-patient facilities for more than 50 registered voters.

¹⁹ Non-partisan PEC members cannot be election contestants, their representatives, observers, media representatives, or individuals who, in any of the last two general elections, were appointed by a party as a commission member or representative, served as contestants, or have been political party donors since the last general elections. For the first time in these elections, following December 2022 legal amendments non-partisan PEC members are also required to obtain certificates.

these changes vest full control over the selection and nomination process of the CEC in the ruling party and eliminate the need to build trust across political platforms, required by previous legislation.²⁰

For the election period, the five permanent DEC members were joined by up to nine party-nominated and three temporary non-partisan members.²¹ Most PECs, which are temporary bodies formed ahead of each election, were established within the legal deadline of 26 September. Some DEC members and political parties, reported difficulties in securing nominees for all PEC positions, due to low remuneration, as well as concerns over potential pressure from local authorities and political parties. Within a four-day period, DEC members selected 24,047 non-partisan PEC members from 24,425 applicants, with a surplus of less than one per cent of applications, effectively limiting the competition.²² Women constitute 67 per cent of DEC members and 74 per cent of PEC members, presiding over 41 per cent of DEC members and 69 per cent of PECs.

To date, the election administration has met all legal deadlines. The CEC has adopted or amended several regulations, held regular, live-streamed sessions, and published all decisions in a timely manner. Under the June 2024 amendments, CEC decisions can now be adopted by simple majority in a second vote at the same session if the required two-thirds majority is not reached, reducing the need for broader consensus. While many ODIHR EOM interlocutors expressed trust in the election administration's technical and organizational capacities, some ODIHR EOM interlocutors raised concerns that these changes along with the new appointment method of the CEC members might negatively impact the impartiality of the election administration. Since the elections were called, the CEC has issued 13 statements to counter misinformation related to the electoral process and what it perceives as attacks on the integrity of the election administration.²³

The election administration has concluded training for DEC members, contestants, and representatives of media and CSOs. In September, a multistage training programme was launched for PEC members, focused on election-day procedures. The election administration also initiated a large-scale voter information and education campaign, consisting of in-person meetings, mock election days, and audio-visual materials broadcast in the media and online, with an emphasis on the verification of voter registration data, the use of election technologies, and ballot validity.

The CEC informed the ODIHR EOM of its continued efforts to improve the accessibility of the electoral process for persons with various types of disabilities, including through adjustments to its website and the provision of assistive tools in polling stations. Voter education materials include sign-language interpretation, and videos for citizens with hearing impairments. According to the CEC, some 40 per cent of the polling stations have been specifically adjusted to the needs of voters with physical disabilities.

VI. ELECTION TECHNOLOGIES

The 2022 legal amendments introduced the use of election technologies on election day with the stated aim to reduce the risk of manipulation and human error. In August 2023, a private vendor, *Smartmatic*, was identified to provide 4,865 optical vote-counting scanners and 7,526 voter identification devices. In these elections, a total of 2,263 polling stations (75 per cent) will be equipped with electronic devices for voter

²⁰ Eight non-partisan CEC members, including the chairperson, are selected by the parliament from candidates nominated by the speaker through an open competition. They are elected by a three-fifths majority of all MPs, or by a simple majority if no agreement is reached in the first vote. The current chairperson was appointed for six months in August 2021, with the term later extended following legal amendments aimed at unblocking the appointment process, which was deemed controversial by some opposition parties. In April 2024, four non-partisan CEC members, including the chairperson, were re-elected, while the mandates of the remaining non-partisan members are set to expire in 2025.

²¹ The CEC received 263 applications to fill in 219 vacant positions temporary non-partisan DEC members. For temporary non-partisan positions in 41 of 73 DEC members, the CEC received the exact number of applications as vacancies.

²² Due to the insufficient number of candidacies, the competition for 193 vacancies was relaunched. For 9,090 PEC leadership positions, the DEC members received 9,111 applications.

²³ See CEC press releases [here](#).

identification, ballot scanning, and results transmission.²⁴ According to projections by the CEC, some 90 per cent of the votes will be counted electronically. By law, these results will be considered preliminary, with only manually counted votes included in the final results protocols. Countrywide mock elections were conducted on 11 September in 598 electoral precincts, allowing 122,864 voters to experience the new technologies.²⁵

Most ODIHR EOM interlocutors support the introduction of election technologies as a way of enhancing confidence in election-day procedures.²⁶ However, some stakeholders expressed concerns over the increase in the maximum number of voters registered at polling stations with election technologies, from 1,500 to 3,000, asserting that PECs' limited experience with the devices, combined with larger voter numbers, could cause overcrowding. Several ODIHR EOM interlocutors also emphasized the need for voter education to address misconceptions that the devices could be used to breach vote secrecy, as well as the need for further auditing of the system.²⁷

VII. VOTER RIGHTS AND REGISTRATION

The right to vote is granted to citizens of at least 18 years old on election day, except those serving a prison sentence for a particularly grave crime, and those declared legally incapacitated by a court decision and placed in institutional care. The CEC compiles and maintains the unified voter list (UVL), based on the data from the civil register managed by the Public Service Development Agency (PSDA), and other state institutions.²⁸

Voters with valid identification documents are automatically included in a voter list based on their registered address, while voters with expired documents are excluded from the UVL until their documents are renewed. Following the 2023 legal amendments, ID cards issued prior to July 2011 with no expiration date ceased to be valid in July 2024. To ensure timely renewal of documents, the PSDA launched a large-scale campaign to issue new ID cards free of charge.²⁹ The PSDA informed the ODIHR EOM that between 12 September and 8 October, some 1,400 citizens, previously without valid documents or registered address, were included in the UVL.³⁰

Citizens could verify the accuracy of their registration data online, at government service centres, PSDA offices and PEC premises, and request corrections until 8 October. According to the CEC, five political parties and one observer organization requested copies of the UVL for verification. Special voter lists will be compiled of those unable to attend their regular polling stations, including citizens requiring mobile

²⁴ Voter identification and vote-counting devices will be used in polling stations with at least 300 registered voters, located in municipal centres or within a 20 km radius of these centres. Electronic devices for transmitting preliminary results will be used in all polling stations nationwide.

²⁵ The CEC also conducted eight pilots of electronic technologies, the latest occurring during the parliamentary by-elections and extraordinary mayoral elections on 1 October 2023, when 103 electoral precincts were equipped with electronic devices. In July 2024, the CEC conducted smaller-scale demonstrations of the technologies in 89 locations, with 43,864 voters participating.

²⁶ A compliance audit of all devices used in elections was conducted in October 2023, finding that the electronic hardware and software met international standards, national legislation, and technical specifications. On 18 September, the CEC announced that for these elections, it would conduct an additional audit shortly before and on election day.

²⁷ Additional concerns were raised about differing ballot validity criteria between the electronic and manual counts, which could lead to discrepancies.

²⁸ Since 2013, the PSDA has conducted a project to clean the civil register, including by removing duplicates and identifying entries of deceased voters. To verify data, the PSDA receives relevant information from health institutions, various ministries, and municipalities regarding citizens who have not been beneficiaries of social services for over three years and actively verifies the data with the respective citizens.

²⁹ According to the PSDA, by 1 October, 194,118 of the approximately 260,000 affected citizens (75 per cent) already changed their IDs. Moreover, Georgians citizens who did not obtain electronic ID Cards but at the same time are passport holders, are eligible to vote.

³⁰ Voters with internally displaced status are registered under their current place of residence.

voting, election officials on duty, and voters in hospitals, in-patient facilities, penal institutions, or staying abroad.³¹ Most ODIHR EOM interlocutors did not raise significant concerns regarding the accuracy and inclusiveness of the voter lists, with some noting the potential for the continued presence of deceased voters and voters *de facto* residing abroad in the UVL. As of 2 October, the preliminary voter lists contained 3,482,952 voters.

VIII. CANDIDATE RIGHTS AND REGISTRATION

Registered voters over the age of 25 by election day, who have lived in Georgia for at least 10 years, are eligible to stand, except those deprived of candidacy rights or sentenced to imprisonment by a court decision. Only registered political parties may nominate candidates; contrary to OSCE commitments and international standards there are no provisions for independent candidates.³² Parties not represented in parliament require at least 25,000 supporting signatures to register, while parties represented in parliament can participate in the elections without any requirements to collect signatures.

Candidate registration was conducted in two stages. Non-parliamentary parties could apply to the CEC by 15 July and submit supporting signatures by 1 August.³³ Of the 30 applicants, the CEC rejected 11 for gathering insufficient signatures or failing to meet other registration requirements and dismissed the applications of 2 parties as ineligible.³⁴ Ten parliamentary parties applied to the CEC by the 30 August deadline. In total, the CEC registered 27 political parties as contestants.

Registered parties could submit their candidate lists by 26 September. Candidates cannot be members of another registered party, even if that party is not participating in the elections. By the legal deadline of 6 October, the CEC registered 18 of the 19 candidate lists submitted.³⁵ The May 2024 amendments allow political parties to designate their deputies as ‘delegates’ for voters registered in an electoral district; only GD has availed of this opportunity. Following the recent abolition of gender quotas on candidate lists, of the 1,185 parliamentary candidates, 29 per cent are women, and women lead 3 lists out of 18. Women accounted for 44.3 per cent of the party list candidates in the previous parliamentary elections. ODIHR EOM interlocutors did not raise concerns regarding the candidate registration process.

IX. CAMPAIGN ENVIRONMENT

The law provides for equitable campaign conditions. The official campaign period commenced on 27 August, and has been low-key to date, with most contestants engaging in door-to-door canvassing, social network outreach, meetings, and occasional larger rallies. Some opposition party representatives raised concerns regarding intimidation tactics allegedly by ruling party supporters and state authorities directed

³¹ Voters abroad who are registered on the consular register of the Ministry of Foreign Affairs are automatically included in the special lists abroad; others may apply for registration until 7 October. On 5 October, to address concerns about difficulties in registering to vote abroad, the CEC adopted a decree facilitating the inclusion of voters with deficiencies in address registration in the special out-of-country voter lists. As of 26 September, the MFA kept a record of 65,508 voters registered on the consular register.

³² Paragraph 7.5 of the 1990 OSCE Copenhagen Document provides that participating States will “respect the right of citizens to seek political or public office, individually or as representatives of political parties or organisations, without discrimination”.

³³ By law, prospective contestants had three days to correct omissions and issues identified in their registration documents and later in their submitted candidate lists. Of the 11 rejected applications, 7 prospective contestants failed to address the omissions within the deadline, while the remaining four did not resubmit any corrected registration documents. One party was registered after applying again following an initial rejection.

³⁴ One party’s application was dismissed due to the cancellation of its registration by the National Agency of Public Registry, and another was rejected because of the termination of the party chairperson’s authority.

³⁵ One candidate list submitted contained deficiencies, and the submitters failed to rectify the deficiencies.

against their campaign activities, as well as pressure on voters.³⁶ In some instances, ODIHR EOM interlocutors noted disruption of their events, while others reported incidents of verbal abuse, destruction of their campaign materials and isolated incidents of physical assaults reported by both ruling and opposition parties.³⁷ Difficulties in securing office space, campaign venues and places for posting campaign materials were also reported.³⁸

While most political parties include socio-economic issues in their platforms, their campaign messaging is dominated by issues pertaining to the overall geopolitical environment and the use of highly divisive rhetoric and imagery.³⁹ The ruling party has framed the elections as a choice between peace, represented by GD, and war, represented by its opponents. Most opposition parties present the elections as a referendum on Georgia's geopolitical position, expressing fears that government policies may hinder accession to the EU, a stated aim in the Constitution.⁴⁰ Representatives of the ruling party openly expressed their intention to file a lawsuit with the Constitutional Court after the elections, seeking the deregistration of the UNM, deeming its political standing as destructive to the country, and stated that the president and some CSOs are directly engaging in the election campaign, and claimed that their actions are inconsistent with their mandates.

In line with previous ODIHR recommendations, in 2021, the Election Code was amended to strengthen the regulation of campaigning by public sector employees.⁴¹ Launching new projects not included in the State budget within 60 days before the elections is not permitted. While not at odds with the law, in the months leading up to the campaign, the government made decisions to improve the financial status of a large number of people from various social groups, which some ODIHR EOM interlocutors perceived as financial incentives for the electorate.⁴² In September, the parliament enacted a law giving amnesty to a

³⁶ Concerns regarding the intimidation of voters were raised by ODIHR EOM opposition party interlocutors in Akhaltsikhe, Mtskheta, Ozurgeti, Signaghi, Didube district of Tbilisi and Telavi. Interlocutors in Akhaltsikhe, Chugureti, Kobuleti, Senaki, Tbilisi, Zestaphoni, and Zugdidi alleged pressure on public employees and those dependent on social assistance to support the ruling party.

³⁷ On 19 September, UNM activists were attacked while campaigning in Zugdidi. While UNM claims they were attacked by GD-affiliates, GD denies the allegation; the case is being investigated by the police. *Lelo* reported that their activists were assaulted during canvassing in Kareli on 8 September. UNM offices in Batumi, Keda and Zestaponi were reported as being defaced or robbed. GD reported that on 4 September, in Tskaltubo (Imereti region), a member died out of stress caused by a verbal assault from a UNM supporter. Reports on destroyed GD campaign material were also conveyed to the ODIHR EOM in Batumi, Samgori and Telavi.

³⁸ Issues with renting office space were reported by *Ahali*, For Georgia, *Lelo*, and UNM in such localities like Akhaltsikhe, Dedoplistskaro, Gardabani, Rustavi, Signaghi, and Tbilisi; UNM reported problems with access to campaign venues in Akhaltsikhe and Rustavi. In Akhaltsikhe, Ambroulari, Bolnisi, Chugureti, Tbilisi and Zestaponi, the opposition parties informed the ODIHR EOM that all or almost all public places for posting campaign materials are occupied by the GD. Similarly, in Akhmeta, Batumi, Mtskheta, Tbilisi and Telavi, contestants complained about limited access to billboard space, which has already been rented out to GD.

³⁹ The CEC introduced a voluntary code of conduct to encourage a peaceful and fair electoral environment. By the 13 September deadline, only 6 parties signed, including GD, while major opposition parties refused, calling it futile but some affirmed their commitment to a peaceful campaign without it.

⁴⁰ Art. 78 of the Constitution mandates “[t]he constitutional bodies shall take all measures within the scope of their competences to ensure the full integration of Georgia into the European Union and the North Atlantic Treaty Organization.” Most opposition parties have subscribed to the “[Georgian Charter](#)”, proclaimed by the president in May 2024 with the declared aim of immediately repealing “laws that contradict the European way”.

⁴¹ The law prohibits campaigning during state or municipality-funded events, as well as by public sector employees during working hours or in their official capacity. It also forbids unequal access to state or municipal spaces for contestants, the use of state-owned means during the campaign, and holding meetings involving public sector employees.

⁴² In February 2024, the Minister of Education, Science, and Youth [announced](#) a paid student internships programme, which is to employ 2,000 to 3,000 students starting in September 2024 in ministries, their subordinate bodies, and legal entities of public law. The same month, the government [proclaimed](#) a reduction of the interest rates for over 150,000 pensioners who had received loans at higher rates before 2023. In April 2024, the parliament [endorsed](#) an increase in pensions for retired law enforcement officers from 560 GEL to 1,000 GEL. The same month, the government took a [decision](#) to waive tax liabilities incurred and unpaid before 1 January 2021. The decision affected some 145,000 taxpayers. In June 2024, the prime minister [announced](#) that 1,855 individuals and 38 corporations would be exempted from penalty charges imposed during the COVID-19 pandemic, amounting to a total of 5.6 million GEL.

wide range of convicted individuals.⁴³ Despite the existing regulations, several ODIHR EOM interlocutors highlighted shortcomings in the legislation and its implementation concerning the misuse of administrative resources.

Campaigning on social networks is unregulated. Social networks, particularly Facebook, are the second most important source of information after television.⁴⁴ Most ODIHR EOM political party interlocutors emphasized the importance of conducting online campaigns. However, many expressed concerns about the possible impact of disinformation and manipulative content on campaign discourse and voters' choices.⁴⁵ The ODIHR EOM is monitoring campaigning on social networks for a qualitative analysis of its narrative and tone.⁴⁶

X. CAMPAIGN FINANCE

Campaign finance is regulated by the LPU and the Election Code, supplemented by regulations of the Anti-Corruption Bureau (ACB). The 2023 legal amendments reduced the annual expenditure cap of political parties from 0.1 per cent of the national GDP to 0.04 per cent, amounting to 32 million GEL for this year, prohibited donations from legal entities, and shifted party finance oversight from the State Audit Office (SAO) to the newly established ACB.⁴⁷

Parliamentary political parties receive annual public funding.⁴⁸ Campaigns may also be financed from political party funds and monetary or in-kind donations from natural persons. Citizens can donate up to 60,000 GEL per year to one or more parties.⁴⁹ So far, GD has received the most donations, significantly surpassing other contestants.⁵⁰

Contestants are required to submit campaign finance reports to the ACB every three weeks after the elections are called, with final reports due within one month after the publication of the final results.⁵¹ All 27 political parties registered as contestants submitted their first interim reports by the 19 September deadline, and the ACB published them online the same day. There is no legal provision requiring the ACB to publish its conclusions on the reports before election day. The ACB can only impose sanctions for non-compliance with party funding requirements and campaign violations, and request confidential information through a court decision.

⁴³ The president denounced the new Law on Amnesty as an “indirect form of voter bribery”.

⁴⁴ According to the [2023 Georgian Survey of Public Opinion](#), 53 per cent of respondents indicated social networks as a source of information, with 91 per cent of those indicating Facebook as the key social media platform. A number of ODIHR EOM interlocutors also noted the rising importance of TikTok.

⁴⁵ In September, Myth Detector, a fact-checking and debunking platform [informed](#) about newly-created Facebook pages targeting political parties ahead of the 26 October parliamentary elections. In August, Meta [announced](#) the removal of a coordinated inauthentic behaviour network originating from the Russian Federation that was targeting Georgia, Armenia, and Azerbaijan. The network included 76 Facebook accounts, 30 pages, and 11 accounts on Instagram.

⁴⁶ On 20 September, the ODIHR EOM commenced its monitoring of the campaign on social networks. The analysis includes the sample of over 60 electoral contestants and stakeholders, whose activities are followed on Facebook, Instagram, and TikTok.

⁴⁷ Donations from foreign, anonymous, publicly funded and religious entities, as well as cash donations, are prohibited.

⁴⁸ Public funding, calculated based on the number of votes received, is available to parties that passed the one per cent threshold in the last parliamentary elections. After the 2020 elections, 14 parties qualified for public funding, with GD receiving 41 per cent of the total annual allocation of 12.5 million GEL. Following the 2022 amendments to the LPU, which deny state funding to any political party that does not take up at least half of the parliamentary mandates that they won, and which suspend funding for six months, if half of its members do not attend parliamentary sessions without valid reasons, two parties lost their right to receive state funding.

⁴⁹ EUR 1 equals approx. GEL 3.

⁵⁰ According to [ACB data](#) of 21 September, in 2024, GD fundraised 9.8 million GEL, followed by *Ahali* with 2.2 million GEL, and *Lelo* with 2 million GEL.

⁵¹ Parties that reach the one per cent threshold based on the preliminary results and become eligible for state funding must also submit a report on funds used from the call of the elections until election day within 12 days after the election.

The May 2024 amendments to the LPU granted the ACB the authority to request the National Agency of Public Registry to initiate deregistration of a party for non-compliance with disclosure requirements for two consecutive years and gave powers to ACB to question individuals. On 7 August, the ACB *ex officio* requested political parties to submit financial reports for the period from January to August 2024. One party did not comply with the request.⁵²

Third-party campaigning is underregulated; however, the law provides for entities not registered as contestants to campaign if they publicly declare an intention to gain power, and bounds these ‘subjects with a declared electoral goal’ by campaign finance regulations. On 27 August and 24 September, the ACB designated several entities and individuals as ‘subjects with a declared electoral goal’ finding that they were conducting campaigns in line with opposition messages.⁵³ Many ODIHR EOM interlocutors viewed the designations as politically motivated. On 1 October, the prime minister acknowledged that the decision was in line with the law, but urged the ACB to review it.⁵⁴ On 2 October, the ACB revoked all related decisions, citing “national interests”.⁵⁵

While the establishment of a specialized party finance oversight body with an extended mandate and the capacity to effectively monitor campaign finances is in line with a previous ODIHR recommendation, many ODIHR EOM interlocutors expressed concerns that the ACB is vulnerable to government influence.

XI. MEDIA

The media landscape is diverse but highly polarized, mirroring the broader political power structures.⁵⁶ Media work in a financially challenging environment, shaped by an insufficient advertising market, leaving outlets dependent on political and business interests. Commercial television remains the main source of political information, with the most watched TV stations including *Imedi* and *Rustavi 2*, perceived as affiliated with GD, and *Mtavari Channel* and *TV Pirveli*, perceived as affiliated with opposition parties. The Georgian National Broadcaster (GNB) funded from the State budget enjoys a limited audience share.⁵⁷ Smaller, primarily internet-based outlets, considered by many ODIHR EOM interlocutors as providing more independent coverage, rely mainly on international grants. Many international and national media professionals and associated personnel raised concerns that the Law on Transparency of Foreign Influence may undermine independent journalism.⁵⁸

⁵² *Girchi*–MF informed the EOM that it did not comply with the ACB’s disclosure requirements due to the institution’s perceived political bias.

⁵³ On 27 August, the ACB [designated](#) as ‘subjects with a declared electoral goal’ the “Freedom Square” movement and the Eastern European Centre for Multiparty Democracy, their director and 24 members. On 24 September, Transparency International Georgia (TI Georgia) and its executive director, as well as the “Vote for Europe” movement, its director, and board members, received the same designation.

⁵⁴ On 6 September, the Tbilisi City Court granted the ACB’s motion to authorize access to bank information for the purpose of monitoring the financial activities of “Vote for Europe” and its founders. On 17 September 2024, the Tbilisi Court of Appeals upheld the judgment of the first instance court.

⁵⁵ Representatives of the ruling party informed the ODIHR EOM that the given status could preclude these organizations from taking part in election observation, and the ACB wanted to avoid the discreditation of the electoral process.

⁵⁶ Broadcasting license holders are legally bound to annually publish information on [ownership](#) and [revenues](#).

⁵⁷ Currently, the budget of GPB amounts to 0.14 per cent of the previous year’s GDP, as [reported](#), 110 million GEL (approx. 36 million EUR) for 2024. The formula to calculate the budget will change in 2026. For the latest audience share rates, see [here and here](#).

⁵⁸ In February 2024, over 70 Georgian media organizations signed a statement opposing the law.

The Constitution guarantees freedom of expression, and the legislation provides safeguards for civil defamation procedures and ensures the right to access public information.⁵⁹ However, international and national media CSOs reported on a high number of civil defamation cases, often ruled against media, and significant barriers in accessing public information.⁶⁰ Most ODIHR EOM interlocutors highlighted the protection and safety of journalists as a primary concern, citing a number of recent assaults.⁶¹

The law provides for pluralism, impartiality and fairness in broadcasting. The law grants ‘qualified’ contestants free airtime, the right to purchase airtime under equal prices, and participation in debates on public, community, as well as commercial broadcasters with nationwide coverage.⁶² By law, contestants qualify for free airtime based on their results in the previous parliamentary elections.⁶³ Broadcasters must ensure that the content of advertisements complies with the Constitution and certain legal provisions.⁶⁴ Broadcasters expressed uncertainty about the allocation of free airtime and content requirements in cases where contestants *join de facto* coalitions.

Provisions are overseen by ComCom, whose decisions are subject to mandatory judicial review. Since the start of the election campaign, the courts have sanctioned some nine broadcasters for breaching free airtime provisions.⁶⁵ On 27 August, ComCom started quantitative monitoring of 55 TV stations, as well as quantitative and qualitative monitoring of 7 TV stations. The ComCom informed the ODIHR EOM that its first report for the period of 27 August to 27 September will be published before election day. Requirements for news coverage are subject to self-regulation only and not implemented by ComCom.

On 18 September 2024, the ODIHR EOM started its standard media monitoring of six TV stations with nation-wide coverage and two online media outlets.⁶⁶

XII. PARTICIPATION OF NATIONAL MINORITIES

National minorities constitute 13.2 per cent of the population, with ethnic Azerbaijanis (6.3 per cent) and Armenians (4.5 per cent) being the largest groups. The Constitution grants national minorities full political

⁵⁹ The 2023 amendments to the Law on Broadcasting introduced enforcement measures by the regulatory authority Georgian National Communications Commission (ComCom) on ‘hate speech’, ‘incitement to terrorism’, and ‘obscenity’, with the declared aim of aligning the law with the EU Audio-Visual Media Services Directive. However, several ODIHR EOM interlocutors criticized these amendments, arguing that the restrictions are insufficiently defined and ComCom holds excessive sanctioning power. According to ComCom, they are finalizing guidelines on regulating hate speech and obscenity to address the issue.

⁶⁰ The EC, in its [Georgia 2023 Report](#), stated that “recent libel and defamation lawsuits and verdicts have a problematic effect on critical media reporting”.

⁶¹ See CoE Safety of Journalists Platform [alert](#) of 18 June and the [state’s reply](#) of 19 September.

⁶² Starting 50 days before election day, public broadcasters GPB, Adjara TV and Radio, as well as community broadcasters are required to provide a total of 5 minutes of free airtime per hour, distributed among ‘qualified’ contestants, while TV stations with nationwide coverage must offer a total of 7.5 minutes every three hours, with no contestant receiving more than 90 seconds per 3 hours. Additionally, GPB must provide free airtime to all other ‘non-qualified’ contestants at their discretion.

⁶³ By law, political parties and electoral blocs qualify for free airtime if they have passed the threshold in the previous parliamentary elections and if they are entitled to public financing. In case of blocs, the airtime has to be distributed equally. Diverging interpretations of the respective provisions by ComCom, the CEC and courts, including with respect to the use of airtime by *de facto* coalitions, has led to broadcasters and political parties repeatedly sanctioned.

⁶⁴ On 5 October, Mtavari Channel, Pirveli TV and Formula published a statement that they are refusing to air GD campaign ads which portray the elections as a choice between war and peace, using pictures of the war-torn Ukraine. According to broadcasters, GD is “exploiting the tragedy of the Ukrainian people” and that these ads are “immoral”.

⁶⁵ Prior to finalization of candidate registration, four TV stations were sanctioned by the court for airing ads which, according to the court, constituted campaigning on behalf of another contestant, including in cases where parties joined *de facto* coalitions. Three TV stations were sanctioned for refusing to air GD ads, which, according to them, contained “hate speech”.

⁶⁶ The Georgian Public Broadcaster (GPB), *Formula TV*, *Imedi TV*, *Mtavari TV*, *Pirveli TV* and *Rustavi2 TV*, as well as *netgazet.ge* and *tabula.ge*.

rights, and prohibits discrimination on national, ethnic, religious, or linguistic grounds. The formation of political parties that promote ethnic discord or have a regional character is prohibited.

Despite government efforts to improve their inclusion, national minorities are underrepresented in public and political life.⁶⁷ Only six MPs in the outgoing parliament (4 per cent) belong to national minorities. While the representation of non-Georgian ethnic communities in local government bodies more closely reflects their proportion of the population, their participation is often hindered by language barriers.⁶⁸ In these elections, some 4.6 per cent of the candidates represent national minorities, with only a few in advantageous positions on candidate lists. The CEC has prepared voter education and electoral materials, including ballot papers, in Armenian and Azerbaijani languages. National minorities constitute only two per cent of the DEC members.⁶⁹

XIII. ELECTION DISPUTE RESOLUTION

The law grants broad legal standing to contestants and registered observer organizations, but voters can only file complaints related to their voter registration data and voting rights. Most election-related disputes are subject to expedited procedures; decisions made by an election commission can be appealed to a higher commission, then a district or city court, with the Court of Appeals serving as the final instance. Election-related violations fall primarily under the jurisdiction of the election administration. Decisions on election-related offences are made by election commission chairpersons. Any sanctions imposed for such offences require review by a court.

In December 2022, some deadlines for election dispute resolution were extended, in line with previous ODIHR recommendations.⁷⁰ Nevertheless, some ODIHR EOM interlocutors noted that the deadlines for submitting and considering court appeals remain too short.⁷¹ As of 8 October, the CEC's received 87 complaints against election commissions or contestants, primarily related to the appointment and operation of PECs, misuse of administrative resources, and violations of campaign rules. Of these, 51 complaints were dismissed on substance, 7 were satisfied, and 29 cases are pending. Courts have ruled on some 30 election-related cases, including related to free airtime allocation and voting abroad. While generally cases are reviewed in open CEC sessions, certain types of complaints are decided by the chairpersons rather than the election commissions as collegial bodies. Courts hold public hearings and decisions are published on the CEC website.

The Interagency Task Force for Free and Fair Elections (IATF), mandated to prevent and react to election-related violations by public officials, was established on 28 June. By 7 October, the IATF had seven meetings and discussed issues reported in media and two notifications received from CSOs. Most opposition parties and CSOs opted not to participate in the IATF's work, citing its perceived inefficiency. The Ministry of Internal Affairs has initiated investigations into six criminal and one administrative offence

⁶⁷ The 2024 [Fourth Opinion on Georgia](#) of the Council of Europe Advisory Committee on the Framework Convention for the Protection of National Minorities states that “At the government level, persons belonging to national minorities are still very rarely or not at all represented in central government bodies [...] The representation of national minorities in local councils of the municipalities where persons belonging to minorities live in substantial numbers is disproportionately low [...] with the exception of local councils of two municipalities.”

⁶⁸ The 2023 European Commission against Racism and Intolerance (ECRI) [Report on Georgia](#) states that “according to the 2014 census, 44.5% of the ethnic Armenians and 73.9% of the ethnic Azerbaijani citizens had poor competence in the state language. This does not only create problems in their daily communications, but also reduces their ability to access services as well as education and employment opportunities.”

⁶⁹ According to the CEC, of the 1,241 DEC members, 24 are of Armenian and 1 is of Azerbaijani ethnicity.

⁷⁰ However, most of the existing deadlines applicable to the handling of electoral complaints and appeals continue to fall outside the recommended timelines. See the 2021 ODIHR and Venice Commission [Joint Opinion](#) and the 2022 [Joint Opinion](#).

⁷¹ The law provides for a two-day deadline for filing and consideration of appeals to courts, with one- and two-day deadlines for the submission and consideration, respectively, of any further appeal to the Court of Appeal.

related to the elections during the campaign period. Several ODIHR EOM interlocutors noted a low level of trust in the ability of law-enforcement, the election administration and the judiciary to effectively and impartially examine and adjudicate politically sensitive matters.⁷²

XIV. ELECTION OBSERVATION

The law provides for citizen and international election observation, as well as observation by candidate representatives. The December 2022 legal amendments introduced provisions to prevent party-affiliated individuals from serving as citizen observers; however, several ODIHR EOM interlocutors reiterated long-standing concerns that some registered citizen observer groups might seek to pursue political purposes on election day.⁷³ As of 10 October, the CEC accredited 68 citizen observer organizations with 2,602 observers, and 51 international observer groups with 512 observers.

Several CSOs, including the International Society for Fair Elections and Democracy (ISFED), the Georgian Young Lawyers Association (GYLA), Transparency International Georgia (TI Georgia) and Public Movement Multinational Georgia (PMMG), have launched long-term observation activities.⁷⁴ Many CSOs noted a more challenging operating environment resulting from their public stigmatization following the adoption of the Law on Transparency of Foreign Influence.⁷⁵

XV. ODIHR EOM ACTIVITIES

The ODIHR EOM formally opened in Tbilisi with a press conference on 12 September. The ODIHR EOM established regular contacts with the CEC, the Ministry of Foreign Affairs and other high-level state officials, candidates and other representatives of political parties, media, civil society, and members of the diplomatic and international community.

The OSCE Parliamentary Assembly (OSCE PA), the Parliamentary Assembly of the Council of Europe (PACE), the NATO Parliamentary Assembly and the European Parliament have each announced their intention to deploy observer delegations for election-day observation. Pascal Allizard (France) has been nominated to serve as Special Co-ordinator, and Pia Kauma (Finland) has been appointed as Head of the OSCE PA delegation.

*The English version of this report is the only official document.
An unofficial translation is available in Georgian.*

⁷² See also the 2022 [Concluding observations](#) on Georgia by the UN Human Rights Committee, which expressed concerns over “reports of the persistent lack of independence and impartiality in the judiciary of the State party”.

⁷³ A person cannot be registered as a citizen observer if they currently hold certain public offices, have been a party-nominated election commission member, electoral contestant, or contestant’s representative in the last two general elections, or have been a donor to a political party since the last general elections.

⁷⁴ All observer groups have already issued interim reports assessing the pre-electoral environment and plan to report on election day developments. ISFED informed the ODIHR EOM about its plans to deploy 1,500 observers on election day, GYLA 6000 and TI, in coordination with other CSOs, plans to cover all precincts in the country and some abroad. On 24 September, the ACB designated TI Georgia as a ‘subject with a declared electoral goal’, following which the organization suspended their election observation activities. These activities resumed after the ACB withdrew the designation on 2 October.

⁷⁵ Several citizen observer groups, including GYLA, ISFED, and TI Georgia publicly refused to comply with the law, raised concerns about its constitutionality and cited its potential impact on their work.