



Report

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Defending Democracy in Georgia

*Civil society resilience vs. authoritarian
consolidation*

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Table of Contents

Summary	4
Introduction	5
Georgian Dream’s Pillars of Control	5
The Rapid Escalation of Repression	7
Civil Society’s Response	13
International Responses	15
Conclusion	17
Endnotes	23

Summary

Georgia has been driven into the grey zone between formal democracy and authoritarian consolidation by its ruling party. Society's capacity for resistance has proved durable, though. Georgian Dream has enacted repressive legislation, beginning with the 2024 Law on Transparency of Foreign Influence and culminating in the 2026 criminalization of the receipt of any foreign funding without prior state approval. Civil society organizations (CSOs) face criminal liability for accepting foreign support, opposition parties face judicial bans, independent media face funding prohibitions, and protesters face felony charges. The party has also dismantled, captured, or neutralized the safeguarding institutions of democracy. Its authoritarian consolidation rests on four pillars of control: institutional capture, narrative manipulation, coercive legalism and economic capture. Georgian Dream has moved from labeling to licensing to criminalizing CSOs, the aim being to eradicate them and to replace them with compliant substitutes. CSOs, independent media, and the protest movement that began after the 2024 elections have been the primary targets of repression as they are the only remaining counterweight to Georgian Dream.

Civil society has responded with unprecedented resilience, including through the longest continuous daily protests in Georgia's modern history, mass refusal to register under the "foreign agents" legislation, the country's first nationwide strike, and coordinated litigation before the Constitutional Court and the European Court of Human Rights. International actors have imposed targeted sanctions, suspended assistance to the state, and invoked the OSCE's Moscow Mechanism, yet their leverage has been blunted by vetoes within the EU, failures of coordination, and Georgian Dream's willingness to absorb the economic costs.

There have been shortcomings in civil society's response, however: advocacy framed in terms that Georgian Dream can exploit through identity politics; near-total dependence on foreign funding, which has left the sector financially brittle; failure to contest the information space among audiences sympathetic to Georgian Dream; and legal contestation pursued reactively rather than strategically. Civil society must shift from a protest to a construction mentality, aiming to build the institutions, capacities, and parallel infrastructure on which democratic recovery will depend. It should organize on the understanding that Georgian Dream seeks to eradicate it. It should shift the contest from identity politics to people's material concerns, and build domestic constituencies and durable funding bases rather than rely on external support. Strategic litigation and the pre-bunking of regime narratives should be central tactics rather than last resorts, and the information space should be treated as a front in its own right. Above all, civil society should invest in the people who will build the parallel civic infrastructure needed for democratic recovery by supporting the conversion of the skills of street mobilization into those of institution-building.

The EU and other international actors should restructure their conditionality toward Georgia's government around verifiable benchmarks with automatic consequences, and provide sustained institutional funding to civil society and independent media instead of short-term, project-based support. They should invest in building a practical resilience infrastructure abroad for civil society, make full use of the channels that remain open inside the country (not least academic cooperation), and refuse cooperation with politically motivated international legal proceedings brought under money-laundering and counter-terrorism instruments. Regional and international coordination among civil society actors should be systematized to enable mutual learning, solidarity, and collective advocacy.

Introduction

Democracy has come under sustained assault very quickly in Georgia. In less than three years, a reforming candidate for EU membership has been reduced to being described by the European Commission as a “candidate country in name only”.¹ Its civil society and protest movement remain the chief obstacle to full authoritarian consolidation. In December 2023, the EU granted Georgia candidate status, conditional on nine steps, including ensuring that civil society could operate freely. Yet, the Georgian Dream party that has been in power since 2012 passed the controversial Russia-style Law on Transparency of Foreign Influence in May 2024 (it was introduced in December 2022, withdrawn in March 2023 due to massive public protests, reintroduced in April 2024, and finally adopted after parliament overrode a presidential veto). The government followed with additional repressive and antidemocratic legislation, which prompted the EU to declare the accession process “de facto halted”. The October 2024 parliamentary elections were marred by what the Organization for Security and Cooperation in Europe’s Office for Democratic Institutions and Human Rights (OSCE/ODIHR) called “significant irregularities”, including voter intimidation and vote-buying.² In November 2024, Prime Minister Irakli Kobakhidze announced Georgia was suspending EU accession negotiations until 2028. In March 2026, the government passed legislation criminalizing the receipt of foreign funding without prior authorization. In 2025, CIVICUS downgraded Georgia’s civic space from “Narrowed” to “Repressed”.³ Today, civil society organizations (CSOs) face criminal liability for accepting foreign support, opposition parties and their leaders face judicial bans and incarceration, independent media face funding prohibitions, protesters face felony charges for repeated participation in rallies and standing on sidewalks, and the institutional safeguards that might restrain these measures have all been dismantled, captured, or neutralized. This amounts to a program of legal and institutional change to consolidate Georgian Dream’s authoritarian control over political life, with the closure of civic space at its core.

This paper argues that Georgian Dream’s authoritarian consolidation is based on four mutually reinforcing pillars of control—institutional capture, narrative manipulation, coercive legalism, and economic capture. CSOs, independent media, and the sustained protest movement that began in November 2024 have become the primary targets of repression because they are the remaining counterweight to this architecture. The paper first presents these pillars of control. It then details Georgian Dream’s repression of civil society, how civil society and international actors have responded, and the limitations of these responses. It ends by outlining how this challenge could be addressed better.

Georgian Dream’s Pillars of Control

Georgia is in a grey zone between formal democracy and authoritarian consolidation that Georgian Dream has constructed. Formal legislative and electoral processes remain in place, but genuine accountability and political competition have been replaced by one-party and one-man domination. This system rests on four interlocking pillars: institutional capture, narrative manipulation, coercive legalism, and economic capture.

Institutional Capture

The crisis is the product of more than a decade of institutional capture by Georgian Dream, which accelerated markedly after 2021. Courts, regulatory bodies, the central bank, the presidency, and cultural and educational institutions have been subordinated to the party and function on the basis of political loyalty to it. Georgian Dream has also tried to bring civic space under state control, most decisively through the 2024 law against “foreign influence”. These trends converged in the 2024 parliamentary elections, whose official result cannot credibly be seen as reflecting the preferences of voters given the documented vote-buying, intimidation, breaches of ballot secrecy, and procedural manipulation. Repression of the ensuing protests, Georgian Dream’s hyper-divisive rhetoric, harassment of civil society, and a sharp rupture with Georgia’s Western partners followed, alongside the increased personalization of power in the party’s founder and de facto leader, Bidzina Ivanishvili, whose informal authority now supersedes constitutional processes.

Narrative Manipulation

Coercion alone could not sustain Georgian Dream’s dominance in a society with strong pro-EU sentiment. The party has therefore worked systematically to construct an alternate political reality, following the model of “spin dictatorship”.⁴ Its fear-based narratives present the country as besieged by conspiratorial forces—a “Global War Party”, a “deep state”—with a deliberate vagueness to foster confusion rather than conviction among the public. The implausible claim that Western partners want to drag Georgia into war with Russia has gained traction through disciplined repetition. Following the example of the Fidesz government in Hungary, Georgian Dream’s propaganda has increasingly targeted the EU, recasting it as a punitive, unaccountable actor. The aim of such “post-truth” propaganda is not to generate beliefs but exhaustion,⁵ so that citizens overwhelmed by contradictory claims abandon the effort to distinguish truth from fabrication, a condition scholars term “informational learned helplessness”.⁶ Parties that are effectively satellites of Georgian Dream voice the most openly anti-West positions, allowing the regime to test and normalize its radical claims while retaining deniability over them.

Coercive Legalism

Rather than suspending legality, Georgian Dream has weaponized it against its opponents and critics. The 2024 “foreign influence” law was followed in 2025 by the far more repressive “foreign agents” legislative package with criminal sanctions, amendments requiring government approval for virtually all instances of foreign assistance, and criminal liability for political party leaders over prohibited funding. The result is preventive repression: overlapping statutes, discretionary enforcement, and severe penalties deter civic participation even in the absence of prosecution or universal enforcement. The authoritarian nature of the transformation of the legal landscape has been compounded by procedural erosion, with laws adopted within days under accelerated legislative procedure and without consultation. These laws, especially given their cumulative effect, are incompatible with European democratic standards.

Economic capture

The boundary between state policy and oligarchic interest has dissolved, not least given Ivanishvili's personal fortune, which is estimated at about \$2.7 billion,⁷ a substantial share of GDP. Success in business has become contingent on political alignment: Georgian Dream loyalists benefit from state contracts and regulatory forbearance while dissenters face audits and exclusion. The influx of Russian capital, re-exports, and sanctions-adjacent commerce since the invasion of Ukraine in 2022 has produced strong economic growth that rests on regulatory arbitrage rather than productive capacity, tying business elites closer to the party. But, as prosperity has not reached ordinary citizens, whose living costs have soared, Georgian Dream now leans more heavily on the other pillars of control. Systemic corruption has become deeply entrenched within and around the government, serving as a mechanism for elite enrichment and political patronage, as demonstrated by high-profile cases involving figures such as former intelligence chief Grigol Liluashvili, former defense minister Juansher Burchuladze, and former prime minister Irakli Garibashvili.⁸ Selective prosecutions discipline disloyal insiders rather than constrain corruption.

Each of the four pillars shores up the others: for example, propaganda legitimizes repressive laws, laws protect elite economic arrangements, economic vulnerability makes people susceptible to anti-Western narratives, and institutional capture prevents any body from playing an independent role. This has produced a system that is resilient to any single point of challenge and difficult to dismantle.

The Rapid Escalation of Repression

As in other hybrid regimes, CSOs in Georgia constitute an essential infrastructure for democratic resilience. The following examples show their importance for accountability, transparency, and citizen participation. Transparency International Georgia has been the principal anti-corruption watchdog, publishing investigations into public-procurement fraud and state capture that government auditors decline to pursue. The Georgian Young Lawyers' Association, leading a national coalition of nearly 100 organizations, provides legal aid and human rights defense that the judiciary's declining independence renders increasingly necessary. The Europe-Georgia Institute, operating as an independent civic platform, mobilizes and educates youth to make an informed choice and advance the country's European aspirations. The International Society for Fair Elections and Democracy deployed over 1,400 observers for the 2024 elections, providing the primary independent record of irregularities that the captured state institutions ignored. When the EU made the ability of civil society to operate freely a condition for Georgia's accession progress, it acknowledged that a functioning civic sector is a prerequisite for the rule-of-law reforms that enlargement demands. The destruction of this infrastructure therefore does not merely affect Georgia's democracy and governance; it undermines Georgia's EU integration.

In Georgia, as elsewhere, civic space has become a battleground because independent organizations are the most visible constraint on executive power that the regime cannot co-opt. Where elections are systematically manipulated and formal institutions are increasingly captured, civic actors are uniquely threatening for the regime

because they are organized, often internationally funded and networked, and constitutionally protected in ways that make outright suppression costly. Georgian Dream's approach to civil society has been characteristic of such regimes, favoring legislative restriction over blanket prohibition. The design imposes escalating compliance burdens that exhaust CSOs' organizational capacity while maintaining a veneer of legality—a strategy of slow strangulation. The aim is to sever the link between citizens' grievances and organized collective action. Georgian Dream has followed an escalatory approach mirroring Russia's decade-long intensification of "foreign agents" legislation from administrative fines to criminal penalties and Hungary's progression under the Fidesz government from the transparency law to the creation of the Sovereignty Protection Office. Georgia's case also shows how external authoritarian influence intersects with and reinforces domestic incentives in the introduction of restrictive legislation. Georgian Dream's March 2026 legislative package matches the international pattern and legal template exemplified by the "foreign agents" framework in Russia: vague definitions of "political activity", presumption of foreign agency based on funding source, escalating penalties, and targeting diaspora-based organizations. According to the International Federation for Human Rights, Georgia followed in approximately one year a legislative trajectory that took Russia five years.⁹ The establishment in April 2025 of the State Grants Management Agency, which is intended to create what amounts to a government-controlled alternative civil society, demonstrates that the objective is to replace independent CSOs with compliant substitutes.

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The legal and regulatory framework for CSOs has shifted from a permissive registration regime to a multilayered system of control combining labeling, reporting, licensing, and criminal penalties. The 1997 Civil Code established a relatively liberal environment for CSOs, and for two decades the country had one of the most open civic spaces in the post-Soviet region. This framework has been progressively overwritten over the last two years. While Georgian Dream's legislation was originally designed to exploit the fact that about 90% of CSOs receive more than 20% of their funding from abroad,¹⁰ it was ultimately expanded through vague definitions to encompass all and any foreign funding. The Law on Transparency of Foreign Influence requires CSOs receiving more than 20% of their annual revenue from foreign sources to register with the Ministry of Justice as "organizations pursuing the interests of a foreign power", and it submits those that register to enhanced financial reporting and unannounced inspections, with administrative fines of up to GEL 25,000 (approximately €8,300 at the time of writing) for non-compliance. President Salome Zourabichvili vetoed the law, but parliament overrode her decision. The Venice Commission of the Council of Europe (CoE) stated in its May 2024 Urgent Opinion on the law that such a registration requirement carries a stigmatizing effect by presupposing that foreign funding implies foreign control. And, as Georgia's Civil Code and tax legislation already required CSO registration and financial reporting, it found that "no convincing explanation has been given on why the existing obligations would be insufficient".¹¹ The April 2025 Foreign Agents Registration Act introduced criminal penalties of up to five years' imprisonment for failure to register with the Ministry of Justice. The April 2025 amendments to the Law on Grants require foreign donors to obtain government approval before awarding grants, and they penalize recipients that accept unauthorized funding with fines of double the amount received, converting a notification system into a licensing regime. As

only a minority of CSOs have complied with the Law on Transparency of Foreign Influence, the government escalated by passing a legislative package in March 2026 that criminalizes the receipt of any foreign funding—including individual private transfers of any amount—without state approval, making it punishable by up to six years' imprisonment. The package also imposes an eight-year ban on political party membership on anyone employed by an organization that draws income from foreign sources and makes party leaders who accept foreign funding liable to up to six years' imprisonment. These provisions apply retroactively, meaning past employment or funding can trigger liability. A January 2026 amendment to the criminal code compounds this exposure by introducing an aggravated money-laundering offence—punishable by nine to 12 years of imprisonment—for “laundering” funds connected to political activity. As foreign funding received without approval can be treated as illicit income, organizations attempting to circumvent the grants regime risk prosecution as money launderers. The ban on political activity aims to exclude civil society professionals from formal politics, complementing Georgian Dream's simultaneous effort to outlaw the main opposition parties. Legally defining unauthorized foreign funding as money laundering also opens the door to abuses of international anti-money laundering cooperation mechanisms, allowing the regime to request financial information on CSOs, exiles, and their donors under the cover of compliance. All these measures create a regulatory environment in which virtually any contact between a Georgian organization and a foreign funder carries potential criminal liability, representing a transformation from administrative burden to existential legal risk.

Georgian Dream justifies its approach to civil society with a transparency and sovereignty-protection narrative that frames foreign funding as external interference rather than a legitimate component of the democratic infrastructure. Representatives of the party have repeatedly said the various laws and regulations are necessary to prevent the “Ukrainization” of Georgia through a “Maidan-style scenario”, orchestrated by what Ivanishvili has called the “Global War Party”—a purported Western-led conspiracy to use opposition parties and CSOs to draw the country into a conflict with Russia. Georgian Dream officials have argued that foreign-funded CSOs conduct “election campaigning” for the opposition, and cited foreign laws, particularly the Foreign Agents Registration Act in the United States and the Foreign Influence Transparency Scheme in Australia, as democratic precedents for preventing such actions. This rhetoric delegitimizes civil society criticism as externally directed, justifies restrictions as defensive measures proportionate to a national security threat, and aligns domestic discourse with Russian narratives concerning Western interventionism. The European Commission's 2025 enlargement report characterized the government's rhetoric as “systematically engaging in ... manipulative narratives and conspiracy theories, often mirroring Russian-type disinformation”.¹²

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The media framing and public discourse on civil society have become sharply polarized, as government-aligned outlets amplify the “foreign agent” narrative and independent media face mounting state pressure. The media landscape is bifurcated between a shrinking but resilient independent press and government-controlled propaganda megaphones, creating an information environment that has reshaped and distorted audience

perceptions, including by spreading Russian disinformation. As a result, public perceptions of civil society have split along partisan lines. According to the Georgia Caucasus Barometer, distrust of this sector rose from 23 to 32% between 2021 and 2024, notably from 25 to 39% among Georgian Dream supporters and from 20 to 41% among viewers of government-aligned television channels.¹³ Yet civil society retains greater public confidence than state institutions. In a January 2025 poll commissioned by the Civil Society Foundation, 36% of respondents assessed CSOs positively and 30% negatively, while 82% considered there was a political crisis, for which 78% held Georgian Dream responsible.¹⁴ Similarly, the 2026 EU Neighbours East annual survey found that 48% of respondents in Georgia said they trusted CSOs while 41% said they did not—compared with 41% trust in the government, 34% in parliament, and 21% in political parties, the least trusted institution. Some 56% said that the laws targeting CSOs and the media would harm Georgia’s EU accession, up from 50% a year earlier.¹⁵ Government-aligned media have amplified campaigns that included posters in cities depicting CSO leaders and journalists as “traitors, foreign agents and enemies”. As Tornike Zurabashvili has argued, the targets of this scapegoating have shifted over time—from the formerly governing United National Movement party to the media and CSOs, and latterly to a “Global War Party”, a “deep state”, and the EU.¹⁶ This has had a measurable effect: the share of Georgians holding a positive image of the EU fell from 60% to 43% between 2024 and 2025.¹⁷ Justice for Journalists documented 298 attacks and threats against media workers in 2024, a fourfold increase from 73 in 2023.¹⁸ Amendments to the broadcasting law, in force since April 2025, ban foreign funding for broadcast media, further narrowing the informational environment.

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Georgian Dream uses formal compliance with legal procedures to create a veneer of legitimacy and constitutionality that masks the destruction of civic space and authoritarian consolidation. The Law on Transparency of Foreign Influence was adopted through the normal parliamentary process, and the president’s veto was defeated through the constitutional parliamentary override mechanism. Yet, as the Venice Commission has noted, the process “left no space for genuine discussion and meaningful consultation, in open disregard for the concerns of large parts of the Georgian people”.¹⁹ This legalistic approach enables Georgian Dream to present each measure as an exercise of sovereign legislative authority and to frame international criticism as interference with democratic decision-making. The government has consistently cited laws in established democracies as precedents. In May 2024, however, the OSCE/ODIHR stated that the lobbying-transparency laws in the United States and Australia are “fundamentally different in their very distinct purpose and scope” from the Georgian ones because they target entities acting under the direction of foreign principals rather than equating all foreign funding with foreign control.²⁰

Georgia’s judiciary and accountability bodies, with their limited independence and signs of institutional capture, have largely failed to function as independent checks on the government’s repression of civil society. Without them, formal legal remedies offer little effective protection. The Constitutional Court has accepted to hear a challenge to the Law on Transparency of Foreign Influence but declined to suspend its enforcement pending

the ruling. This has allowed the law's chilling effect to become entrenched. After filing in October 2025 a lawsuit seeking to ban three major opposition parties on unsubstantiated charges of attempting to overthrow the constitutional order, in April 2026 Georgian Dream withdrew the case and refiled an expanded one adding another party—this reset the Constitutional Court's nine-month decision clock.

This has further instrumentalized the judiciary as a tool to eliminate political competition. After being aggressively weaponized to investigate and systematically harass civil society, the Anti-Corruption Bureau was dismantled in March 2026—with its functions shifted to the State Audit Office—shortly after its leadership faced international sanctions. The Anti-Corruption Bureau has demanded extensive personal data from more than 100 CSOs under the Law on Grants, declared Transparency International Georgia an “electoral subject”, while the Prosecutor's Office opened a criminal investigation in early 2025 into alleged “sabotage” connected to the protests, which provided the legal basis for freezing the bank accounts of 12 organizations in two waves: five in March 2025 (Human Rights House Tbilisi, Shame Movement, Nanuka's Fund, Prosperity Georgia, Fund for Each) and seven in August 2025 (International Society of Fair Elections and Democracy, Institute for Development of Freedom of Information, Georgian Democracy Initiative, Sapari, Social Justice Center, Civil Society Foundation, Democracy Defenders). In March 2026, the bureau's enforcement mandates under the grants and foreign-agents legislation were transferred to the State Audit Office, which by June 2026 had opened its first monitoring proceedings against a CSO. The dismantling in July 2025 of the Special Investigation Service, the independent body established in 2022 to investigate law-enforcement crimes, and the transfer of its functions to the prosecutor general's office removed the last institutional mechanism for holding the police and security services accountable for violence against protesters and civic actors.

Legal ambiguity serves a deliberate enforcement strategy. The March 2026 legislative package defines a “foreign grant” as any funding or material support from abroad deemed to “influence” public authority or any “segment of society” in shaping Georgia's domestic or foreign policy, a definition sufficiently expansive to encompass activities from journalism to academic research to public health advocacy. The term “foreign donor” has been expanded to include foreign individuals, meaning that even private financial transactions between individuals can be said to fall within its scope. The Venice Commission found that the Law on Transparency of Foreign Influence contained “overly broad and vague definitions, particularly ‘foreign power’ and ‘organisation pursuing a foreign interest’”, and that it conferred “excessive discretion” on the Ministry of Justice.²¹ This vagueness is intentional and enables selective enforcement against disfavored CSOs while leaving nominally compliant actors uncertain about their legal exposure. Georgia's legislation therefore violates the standard for the funding of associations set by the Venice Commission that legal provisions must be “clear, precise and certain, and should be interpreted and applied in a manner that enhances the effective exercise of the right to freedom of association”.²² This selective pressure is already manifesting itself, as demonstrated by the Anti-Corruption Bureau targeting six prominent watchdog CSOs with inspection letters under the Foreign Agents Registration Act. The CSOs, including Transparency International Georgia and the International Society of Fair Elections and Democracy, are threatened with criminal liability for failing to register as “agents of a foreign principal” based on broadly interpreted political activities.

The chilling effect of legal uncertainty and criminal liability has curtailed CSO activity. Although no CSO had been convicted at the time of writing, with several CSO leaders summoned by prosecutors on sabotage charges, the

impact of the restrictive legislation extends far beyond direct enforcement: the primary goal is deterrence rather than prosecution. The March 2026 legislative package sets no minimum financial threshold, meaning that transfers of any amount could require prior government approval, and defines a “foreign grant” expansively. Together these create legal uncertainty in which routine civic activity becomes potentially criminal. Human Rights House Tbilisi ceased operations entirely after its bank accounts were frozen in March 2025. The chair of the similarly targeted Democracy Defenders stated that “there is the near-total destruction of our resources ... we can no longer pay rent for offices or cover utility bills”.²³ In August 2025, as noted, the authorities froze the bank accounts of seven CSOs—all on the basis of evidence as insubstantial as a purchase of 30 gas masks and protective goggles as well as several flags. Following these actions, five of the affected CSOs lodged an application with the European Court of Human Rights (ECHR), which officially began its review of the merits of the case in June 2026. The court granted the application “Impact Case” status, noting its potential to significantly influence human rights case law, domestic legislation, and societal issues. The ECHR has requested that the government provide evidence justifying the freezing of the accounts and clarify the status of the criminal investigation. Some of these CSOs were reduced to operating on a voluntary basis. The cumulative impact is documented across the sector: unpublished research by the Social Justice Center in late 2025, based on interviews with 100 civil society representatives, found that 96% of organizations reported acute financial difficulties and 94% had reduced their activities, while only 37 of 114 community organizations active in Georgia’s regions in 2024 remained operational.²⁴ The timing of the accounts freeze—ahead of the EU’s expected decision to suspend visa-free travel for Georgian Dream officials—was widely interpreted as a pre-emptive strike to weaken the CSOs most capable of supporting any new wave of mass protests. The CSO Meter has assessed that the government has “strategically maintained an environment of unpredictability” designed to discourage long-term planning and effective advocacy.²⁵ In a 2022 ruling regarding Russia, the ECHR found that the cumulative effect of the “foreign agents” legal framework placed a “significant chilling effect on the choice to seek or accept any amount of foreign funding” and that the label was “unjustified and prejudicial”.²⁶ The adoption of civil society legislation in Georgia replicates this dynamic at a greater pace. The escalation from administrative fines to criminal penalties, from registration requirements to licensing obligations, and from organizational to individual liability has created a risk environment that can drive civic actors to avoid engagement.

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Civil society has also been systematically excluded from legislative processes that directly affect its operations. In April 2025, the parliament removed the statutory requirement mandating CSOs’ participation in public decision-making processes, formalizing the exclusion of civil society from policy formulation. This violates CoE standards and the EU’s conditionality requirements, which explicitly require civil society’s participation in decision-making at all levels. It also violates the OSCE/ODIHR–Venice Commission Guidelines on Freedom of Association, which state that “associations should be consulted in the process of introducing and implementing any regulations or practices that concern their operations”.²⁷ The CoE’s 2007 recommendation states that CSOs “should be consulted on

matters connected to their objectives and on proposed changes to the law which have the potential to affect their ability to pursue those objectives”.²⁸ The Venice Commission has stated that the adoption process for the Law on Transparency of Foreign Influence “left no space for genuine discussion and meaningful consultation”.²⁹

Civil Society’s Response

In reaction to the regime’s assault, Georgia’s civil society has adopted a multitrack strategy, demonstrating its resilience under sustained pressure. Its response has been characterized by collective action on a scale and of a duration unprecedented, encompassing mass street mobilization, institutional defiance, a coordinated legal effort across multiple jurisdictions, cross-sectoral solidarity, and the emergence of new forms of civic organization.

The most visible expression of resistance has been the sustained protest movement. Since the government suspended the EU accession negotiations in November 2024, Georgia has seen the longest continuous daily protest in its modern history, surpassing 500 consecutive days by mid-2026, on Tbilisi’s Rustaveli Avenue as well as in multiple cities. The movement has been primarily driven by students and young professionals with no emotional or cultural ties to the Soviet past—a generation that has grown up oriented toward the EU and is unwilling to accept the foreclosure of the possibility of membership. Their methods have drawn on the Western playbook of nonviolent civil resistance while incorporating distinctly Georgian elements, such as traditional *supra* (feast) and folk dances. The protestors have proven remarkably adaptive: when the police succeeded in preventing them from blocking Rustaveli Avenue, they shifted to pavement marches and movement through smaller streets. They absorbed the costs and continued when the authorities escalated legal penalties—extending administrative detention from 15 to 60 days, introducing the offence of “verbal insult” of officials, and elevating repeated minor protest-related conduct such as wearing a mask or blocking a roadway to felonies punishable by up to one year’s imprisonment. Between October 2024 and the end of 2025, first-instance courts ruled on cases against 973 individuals for petty hooliganism and 4,758 for failure to comply with police orders, imposing administrative detention in around 680 cases, according to official data provided to the OSCE fact-finding mission.³⁰ The movement’s persistence under these conditions shows a form of civic endurance without precedent in the post-Soviet space.

Despite the sustained pressure it is under, the protest movement has also demonstrated discipline and strategic patience that distinguish it from earlier episodes of protest. The overwhelming majority of demonstrations have been peaceful. For example, when a faction of the opposition tried to force its way into the president’s official residence in October 2025, the incident remained localized and quickly subsided, with the broader movement declining to identify with it. According to opposition figures, participants had allegedly been lured into a trap through contacts with representatives of the authorities, who reportedly encouraged the belief that riot police would defect.³¹ The protesters have opted for peaceful, long-term, and routine forms of resistance rather than expecting immediate regime change. This shows a maturation of civic culture whose long-term political consequences remain to be determined.

The Impact on EU Accession Requirements

The regime's destruction of civic space erodes Georgia's capacity to meet the EU accession requirements. A successful process requires not simply the absence of repressive legislation, but also functioning and active democratic institutions such as independent courts, accountable law enforcement, competitive elections, and a civil society able to monitor and contribute to reform implementation. The deterioration in Georgia's civic space undermines these prerequisites, with each legislative restriction simultaneously breaching a specific conditionality requirement and degrading the institutional capacity necessary to meet others. Election-monitoring capacity is compromised when the International Society for Fair Elections and Democracy's bank accounts are frozen and its staff face criminal investigation. Legal aid and human rights defense become precarious when the Georgian Young Lawyers' Association is subjected to inspection demands under the Law on Grants. The EU's Guidelines for Support to Civil Society in the Enlargement Region explicitly assess "the extent to which relevant laws allow CSOs to seek a broad range of funding, including from abroad, without undue restrictions".* The European Commission's characterization of Georgia as a "candidate country in name only" reflects the fact that Georgian Dream has not only stalled progress on the reform path, but dismantled the institutional foundations upon which reform depends.

* European Commission, Directorate-General for Neighbourhood and Enlargement Negotiations, [Guidelines for EU Support to Civil Society in the Enlargement Region, 2021–2027, June 2022](#).

Civic solidarity has been equally significant. Approximately 200 CSOs signed a joint pledge to defy the law. Of the 3,987 non-commercial organizations that the National Statistics Office recorded as active on January 1, 2026, only 385 had registered under the Foreign Agents Registration Act.³² According to the rapporteur appointed under the OSCE's Moscow Mechanism (see below), as of February 2026, the authorities had not fined a single organization for refusing to do so,³³ exposing the fundamental limits to enforcing the law and leading the government to escalate to criminalization. January 15, 2025 saw the country's first nationwide strike, with hundreds of companies suspending work for three hours to demand the release of detained protesters and new elections. The strike showed that frustration was not restricted to the traditional civil society sector but felt across businesses, cultural institutions, and professional communities. Theatre actors staged mobile performances to support arrested colleagues. Twenty-two independent media outlets united to crowdfund for survival under the slogan "The lights must stay on."

Civic actors have pursued legal challenges simultaneously across multiple jurisdictions. In July 2024, 121 CSOs and media outlets filed a challenge to the Law on Transparency of Foreign Influence in the Constitutional Court. With the domestic courts captured, CSOs have shifted the locus of legal contestation to international forums where the government's procedural legitimacy arguments carry less weight. In October 2024, 120 CSOs, 16 media organizations, and four individuals also lodged a case in the ECHR, arguing the law violates six articles of the European Convention on Human Rights, covering privacy, freedom of expression, freedom of association,

and the right to effective remedy. This cooperation strategy extends beyond litigation to coordinated advocacy before international political bodies, where CSO documentation has shaped institutional responses. The European Parliament's resolution of June 2026 drew extensively on CSO and independent media reporting of repression. Similarly, the OSCE Parliamentary Assembly's Hague Declaration in July 2026, adopted despite a walkout by the Georgian Dream delegation, endorsed the findings of the organization's Moscow Mechanism report grounded substantially in testimony from Georgian civil society representatives. The report demanded the repeal of legislation restricting civil society and media freedom.³⁴

Coalition-building has intensified. The Georgian Young Lawyers' Association continues to coordinate collective responses despite entering what it has described as "crisis mode" and suspending its free legal aid after the March 2026 grants-law amendments forced it to cut staff and redirect its remaining resources to strategic litigation. CSOs have collaborated to provide legal support to protesters, assisted in the payment of fines, and provided medical supplies—activities the government cited as evidence of "sabotage".

The regime's response to civil society's resilience has been to target its operational foundations directly, notably with the freezing of the bank accounts that imposed severe operational constraints. The targeted CSOs issued a joint statement vowing that they would continue their work. Several CSOs have relocated parts of their operations out of Georgia following the adoption of the 2024 law.

International Responses

The EU institutions have responded to Georgia's democratic backsliding through a graduated escalation of conditionality, suspending assistance and political contacts. In June 2024, the European Council declared the accession process "de facto halted" and suspended bilateral financial assistance to government institutions exceeding €120 million, as well as €30 million from the European Peace Facility. Political contacts were reduced, with the EU declining to conduct any official dialogue under the Association Agreement or to assess Georgia's Economic Reform Program, and then partially resumed at a low level. In January 2025, the European Council suspended visa-free travel for holders of Georgian diplomatic and service passports. The European Commission's 2025 enlargement report, described by EU officials as the harshest ever issued, said Georgia was experiencing "serious democratic backsliding marked by a rapid erosion of the rule of law".³⁵ Crucially, however, the EU has not revoked the country's candidate status nor suspended visa-free travel for all citizens. It has not imposed individual sanctions on regime figures either, due to blocks by Hungary and Slovakia. Between May 2024 and July 2026, the European Parliament adopted six resolutions on Georgia, leading up to the June 2026 one that branded the 2024 elections as "rigged", declined to recognize the legitimacy of the Georgian Dream government, and described the country's governance as "captured".³⁶ The report adopted in the June 2026 resolution calls on Georgian Dream to repeal the legislation stifling civil society and independent media, and demands the immediate and unconditional release of all political prisoners. It urges the EU and the member states to take action to safeguard and sustain the remaining independent media and CSOs, and to limit political contacts with the Georgian authorities to matters of strict necessity while strengthening engagement with civil society, independent media, and academic institutions.

The report reiterates the call for coordinated EU-wide targeted sanctions against Ivanishvili, Georgian Dream leaders, judges, prosecutors, and complicit media owners, urging exploration of collective mechanisms where unanimity fails. It also calls on the European Commission to establish a mechanism preserving visa-free access to the EU for civil society activists, journalists, and students. And it endorses recourse to CoE instruments.

In January 2026, 23 OSCE participating states invoked the organization's Moscow Mechanism for investigating human rights and democracy threats for the first time with respect to Georgia.

The responses of Georgia's donor and partner governments have included targeted sanctions and aid suspension. In December 2024, the United Kingdom sanctioned five Interior Ministry officials for human rights violations, and it designated two senior judges for serious corruption in April 2025. In February 2026, it also sanctioned Imedi TV and POSTV for their role in Russian-linked disinformation, a rare instance of media-sector sanctions that seek to disrupt regime-aligned propaganda that distorts the domestic information environment. Czechia, Estonia, Germany, Lithuania, Latvia, Poland, and Ukraine have imposed travel bans and asset freezes. In total, more than 230 persons have been subjected to some form of Western sanction. In January 2026, 23 OSCE participating states invoked the organization's Moscow Mechanism for investigating human rights and democracy threats for the first time with respect to Georgia. The report of the resulting independent fact-finding mission in March found that the regime had "limited the freedom of expression and freedoms of assembly and association" with its targeted legislation and restrictive administrative measures.³⁷ It calls for the repeal of the Law on Transparency of Foreign Influence, the Foreign Agents Registration Act, the foreign-grant provisions of the Law on Grants (judging them incapable of being brought into compliance with Georgia's international obligations through amendments), and the restrictive amendments to the Law on Broadcasting, as well as an end to the campaign of stigmatization against CSOs and the collection of sensitive personal data under the registration regimes. It further recommends the immediate release of persons detained for political reasons, the protection of human rights defenders in line with UN and OSCE/ODIHR standards, and cooperation with the Venice Commission. The report urges systematic follow-up through periodic review in the OSCE Permanent Council, targeted sanctions against those responsible for serious violations, and direct support to independent CSOs in Georgia and in exile, including facilitation of their registration abroad. The report also encourages the international community to support the documentation of violations, to engage UN special procedures, to intervene in proceedings before the ECHR, and to consider interstate applications under Article 33 of the European Convention on Human Rights.

The United States suspended \$95 million in government assistance and placed approximately \$390 million in aid under review in July 2024. In December of that same year, the US imposed sanctions on Interior Minister Vakhtang Gomelauri and an official in his ministry for human rights abuses against protesters. The US Department of the Treasury at the same time placed Ivanishvili (who made his fortune in Russia in the 1990s) on its Specially Designated Nationals and Blocked Persons list for "undermining the democratic and Euro-Atlantic future of Georgia for the benefit of the Russian Federation".³⁸ In May 2025, the US House of Representatives passed the MEGOBARI (Mobilizing and Enhancing Georgia's Options for Building Accountability, Resilience, and Independence) Act, which would mandate targeted sanctions on individuals, but the act has since been stalled

in the Senate. Since Donald Trump's return to the presidency in 2025, Georgian Dream has pushed for a "reboot" of ties with the United States, hoping his administration would overlook democratic backsliding in favor of a purely transactional relationship. However, the United States has largely maintained existing pressure, including the sanction on Ivanishvili, while clearly demanding that the government change its authoritarian trajectory and distance itself from China and Iran. Although Washington has resumed some diplomatic contact to preserve regional stability and economic interests, US officials have stressed that true normalization remains strictly contingent on concrete behavior changes by the government.

The leverage of external actors has been constrained by EU institutional vetoes, coordination failures among Western partners, and the Georgian government's willingness to absorb economic costs. Hungary and Slovakia blocked the imposition of EU targeted sanctions against Georgian officials in December 2024, exposing the unanimity requirement in the Common Foreign and Security Policy as a weakness. Hungary's Prime Minister Viktor Orbán was the only EU leader to congratulate Georgian Dream after the elections and visited Tbilisi while other EU leaders shunned the government. The measures of individual member states lack the coordination and cumulative weight of unified EU action. Different jurisdictions target different individuals under different legal bases, creating inconsistencies that Georgian Dream can exploit. While it has sanctioned Ivanishvili, the United States has also issued a general license permitting transactions with his extensive business holdings given his dominance of the Georgian economy, illustrating the tension between punitive intent and economic realities. The EU's suspension of more than €120 million in bilateral assistance, while significant, has not altered the government's calculus. Kobakhidze dismissed the 2025 enlargement report as "unfair and politically motivated".³⁹ Georgian Dream has continued consolidating its hold on power even at the cost of international isolation. This suggests that incremental increases in external pressure within the existing framework are unlikely to produce a change of direction. However, despite being limited in scope and not replicated at the EU level, the national sanctions have had secondary effects by demotivating Georgian Dream supporters and instilling uncertainty within pro-government media and political networks. This suggests that even partial sanctions targeting the information space can generate psychological and signaling effects.

Conclusion

Civil society's collective defiance has been one of the most powerful constraints on Georgian Dream's authoritarian consolidation. It has imposed significant reputational costs on the government and kept international attention focused on the crisis. But defiance is not a strategy and the approach taken so far has shortcomings.

The first concerns framing: civil society has too often fought the regime on the terrain the latter favors and has prepared. Georgian Dream's strategy requires keeping political contestation at the level of identity—pro-West versus pro-Russia, patriot versus traitor, sovereignty versus foreign influence—and it has invested years in trying to increase these divides. Civil society advocacy that has been framed predominantly in terms of EU values, geopolitical positioning, or abstract democratic principles has often had the unintended effect of reinforcing this framing.

The second shortcoming is structural: the civic sector entered the crisis almost wholly dependent on foreign funding and lacking sufficient domestic funding options to balance this. With the great majority of CSOs relying on foreign funds for a substantial share of their budgets, few had membership models, domestic philanthropy, or earned-revenue streams to fall back on. Georgia has a small economy, modest household income levels, a thin base of private wealth, and little tradition of significant domestic philanthropy. Moreover, businesses that could fund civic work face informal but well-understood government pressure, and those that support critical voices face tax inspections, regulatory harassment, and the loss of public contracts. Foreign support was therefore the only realistic way to sustain professional civic work, but the consequences of this have been severe—this lent the “foreign agent” narrative a surface plausibility and left organizations financially brittle. As a consequence of this situation, when their bank accounts were frozen in 2025, some of the country’s most established organizations were reduced to voluntary operation within weeks. The precedents in other countries, such as Russia and Hungary, are well documented, but contingency measures learned from them—financial reserves, banking arrangements outside of the country, secure custody of data and archives—require the flexible resources that a sector living from project grant to project grant did not have.

The third shortcoming lies in the information space, with the least effective challenge to Georgian Dream being against its narrative manipulation pillar of control. Despite the resilience of independent media, their reach remains largely confined to audiences already persuaded by the criticism of the regime. There has been no sustained, coordinated effort to reach constituencies among which the Georgian Dream’s narratives circulate unchallenged: older viewers of government-aligned television, rural communities, and ethnic-minority regions. These must be contested with content, formats, and distribution channels capable of reaching the audiences the regime currently dominates.

Georgia’s civil society needs to shift from a protest mentality to a construction one—from sustaining resistance to building the institutions, capacities, and parallel infrastructure on which democratic recovery will depend.

The fourth shortcoming is that legal contestation, across multiple jurisdictions, including European ones, has so far been pursued in a supplementary and reactive way rather than strategically. Challenges have been filed after laws were adopted rather than prepared in anticipation of them, with cases treated as individual proceedings rather than coordinated. The preservation of evidence to the standard required for future accountability also remained ad hoc.

Coordination across the civic sector has followed a similar pattern: coalitions have been assembled in response to emergencies—the joint pledge of defiance, the January 2025 strike—and have tended to dissipate once the immediate crisis passed, rather than consolidating into standing structures with an agreed division of labor.

Overall, Georgia’s civil society needs to shift from a protest mentality to a construction one—from sustaining resistance to building the institutions, capacities, and parallel infrastructure on which democratic recovery will depend. This must be embedded in short-, medium-, and long-term objectives, coordinated across the sector, and

pursued in parallel with mobilization rather than after it. It also requires recognition that civic infrastructure is not built exclusively by political activists: investigative journalists, documentarians, local organizers, cultural workers, educators, and influencers all contribute to the ecosystem from which sustained democratic politics eventually becomes possible. The recommendations below respond to the shortcomings identified.

Recommendations for Georgia's Civil Society

Plan based on the assumption that the regime intends to root out civil society entirely. The trajectory from labeling to licensing to criminalization of civic actors signals that Georgian Dream's goal is eradication. The sector should therefore prepare for a situation in which civic space has been entirely shut down. Coordination and contingency planning need to be institutionalized to replace improvisation in each crisis. The existing crisis-driven coalitions should be converted into a standing strategic platform with agreed objectives with different time frames, a division of labor, and shared services for digital security, financial administration, and legal defense, since no CSO can sustain these alone. Contingency protocols concerning financial reserves, secure custody of data and archives, and operating under designation as foreign agents, asset freezes, or dissolution must be in place before the next escalation toward the regime's goal of eradication. The CSOs that have relocated operations abroad should be integrated into this structure through defined roles to ensure that exile, which uses up considerable funds that would otherwise be used in the country, becomes an extension of the sector's resilience.

Shift the contest from identity terrain to material terrain. Civil society should ground its advocacy and public communication in the everyday consequences of Georgian Dream's authoritarian consolidation, such as jobs, prices, emigration, healthcare, local corruption, and the risks to remittance and an EU visa-free travel, rather than in EU values or geopolitical alignment. The latter allows the regime to frame every challenge through its preferred patriot-versus-traitor lens. Avoiding this requires systematic message-testing, the use of trusted local messengers, and campaigns in which European integration figures as the implied outcome of good governance rather than as the opening frame. The point is not to abandon the European argument but to stop making it in a register that only the already persuaded can hear.

Build domestic constituencies and resources, especially beyond Tbilisi. CSOs should develop membership schemes, small-donor campaigns, and earned-revenue models. This must extend beyond the capital, through regional chapters, local organizers, and a standing presence in ethnic-minority communities. The independent media crowdfunding campaign under the slogan "The lights must stay on" and the mass fundraising drive for children with Duchenne muscular dystrophy have shown that Georgians are willing to donate at scale. Constituency-building is simultaneously a legitimacy strategy and a de-risking strategy: a CSO with thousands of small domestic donors is harder to caricature as a foreign implant. It is also harder to handicap or destroy a CSO with an account freeze if it has a diversified base of such donors rather than one large foreign one or more as smaller, more frequent donations are easier to re-channel and avoids large sums being paralyzed. Given the size of Georgia's economy, domestic giving cannot replace international support, but even partial diversification of funding can change the politics and the risk profile of the sector. Donors should actively enable this effort; for instance, by allowing their grants to be used for constituency-building and by matching domestically raised revenue.

Elevate strategic litigation from a supplementary to a primary tactic. Civil society should establish a joint litigation capacity that selects and sequences cases deliberately across the Constitutional Court, the ECHR, and foreign jurisdictions; prepares challenges in anticipation of announced legislation rather than in reaction to it; and exploits the leverage created by the ECHR's designation of the account-freezing case as an "Impact Case". It should also systematize the documentation of cases of repressive detentions, account freezes, surveillance, and police violence to evidentiary standards usable in future prosecutions, sanctions designations, and an eventual transitional-justice process.

Treat the information space as a front in its own right. The information fight should command a share of civil society's resources commensurate with its importance for the regime, which has not been the case so far. Civil society and its donor partners should fund the production and distribution of content designed for non-aligned and government-leaning audiences; build partnerships with creators and influencers who command trust outside civil society circles; and prioritize platforms the regime cannot easily capture, such as YouTube and messaging applications, as independent broadcasters are under immense financial pressure. This must be accompanied by systematic monitoring and pre-bunking of Georgian Dream narratives spread through government-aligned media.

Invest in the people who will build the parallel civil society infrastructure. The protest generation is the sector's most significant asset, and the regime's eight-year ban on party membership for CSO employees is designed to keep it out of political life. Fellowships, salary bridges, and organizational training should support the conversion of the skills of street mobilization into those of institution-building, and give young activists reasons to stay engaged and not to leave the country. Such support should extend to cultural workers, educators, and documentarians, whose work sustains the civic identity on which any future democratic opening will depend. Human capital, unlike democratic legislation, cannot be restored by a future parliament: if it is lost, it will take many years to replace.

Recommendations for International Actors

Restructure EU conditionality around verifiable benchmarks with automatic consequences, reducing discretionary political decisions vulnerable to member-state vetoes. The EU's inability to impose unified targeted sanctions on Georgian officials reveals the structural weakness in its conditionality architecture, and the deterrent effect of the measures it has taken has been undermined by Georgian Dream's willingness to absorb financial costs and by the absence of clearly defined triggers for escalation. A more effective approach would establish specific benchmarks against which the democratic credibility of Georgia's government should be measured, based on, for example, the recommendations of the report adopted in June 2026 by the European Parliament and of the OSCE Moscow Mechanism fact-finding mission. These should include the repeal of laws incompatible with European standards identified by the Venice Commission, the restoration of frozen CSO bank accounts, the release of political prisoners and dropping of charges under the recent laws, the reinstatement or reform of independent judiciary and oversight bodies, the restoration of the statutory requirement for civil society participation in public decision-making—linked to automatic consequences that do not require unanimous approval in the European Council. Individual EU and other governments could also adopt these benchmarks. The qualified majority voting procedures available for certain aspects of implementing the Association Agreement could be explored.

Support the resilience of CSOs by moving beyond project-based funding cycles toward sustained institutional support that enables them to withstand protracted pressure. The EU's redirection of funding from government to civil society is a positive step, but its effectiveness will depend on whether support reaches CSOs through channels resilient to the government's escalating efforts to sever the link between civil society and its international partners. The vulnerability of civil society to these measures illustrates a structural weakness in the prevailing approach to international support: CSOs funded primarily through project grants from foreign donors have limited financial reserves, which makes them acutely vulnerable to asset freezes, account closures, and banking-sector pressure. They are also unlikely to be able to maintain some reserves outside Georgia that would mitigate the impact of such measures. The vulnerability is compounded by donor behavior: according to the OSCE rapporteur, numerous donors halted direct financial support to Georgian groups following the amendments to the Law on Grants in 2025 and 2026, narrowing the scope and capacity of their work precisely when resilience was most needed.⁴⁰ Donors should diversify their support mechanisms to include multiyear core funding that builds organizational reserves; emergency liquidity facilities held abroad and accessible when domestic accounts are frozen; legal defense funds for organizations and individuals facing criminal prosecution; and digital infrastructure support that enables continued operations under restrictive conditions. The European Endowment for Democracy, national political foundations, and bilateral development agencies should coordinate a sustained funding strategy calibrated to the Georgian context rather than to standard project cycles, and should involve local actors first and foremost, including the newer groups that have emerged from the protest movement. The EU should provide institutional support for litigation and make compliance with any eventual judgments in European courts a non-negotiable condition for the resumption of accession negotiations.

The EU should invest in building a practical infrastructure of resilience for Georgia's civil society beyond the country's borders. This should begin with dedicated assistance for Georgian CSOs to establish legal entities in member states, including simplified registration procedures, support in opening bank accounts—a persistent obstacle for relocated CSOs facing heightened due-diligence scrutiny—and long-term visa and residence pathways for civil society professionals, journalists, and academics at risk. Since the amendments to the Law on Grants have criminalized the receipt of foreign funding in the country, the EU should make fuller use of the funding instruments that remain legally accessible to Georgians, notably Erasmus+ and Horizon Europe, and construct umbrella arrangements through these schemes under which CSOs and individuals under threat can continue to receive support, whether through consortium participation, sub-granting, or hosted fellowships. Practical assistance should extend to tax and social security arrangements that enable relocated Georgians and those who remain in the country—for instance, working remotely for EU-registered entities—to regularize their status and pay taxes in an EU member state without exposing themselves or their partners to liability under Georgian legislation. Finally, educational exchanges should be substantially expanded to bring Georgian students, academics, and researchers to European institutions. This will protect an academic community now facing shrinking university autonomy and sustain the human capital on which Georgia's democratic recovery and eventual European integration will depend. Mobility should be paired with direct research support—joint projects and institutional partnerships—for those universities that have preserved a measure of independence, such as Ilia State University, and for scholars working outside or at the margins of state-funded institutions.⁴¹ Georgian scholars already in exile deserve equal attention, since sustained affiliation with European institutions is what will keep their expertise available to a future democratic Georgia.

Regional and international coordination among civil society actors should be systematized to enable mutual learning, solidarity, and collective advocacy. CSOs in Hungary, Russia, Kyrgyzstan, and elsewhere have accumulated experience in adaptation strategies, legal challenges, and operational resilience to similar repressive environments that could inform Georgian responses. Systematic peer-to-peer exchange, facilitated by international platforms such as the Civic Space Initiative, the International Center for Not-for-Profit Law, and regional networks, could strengthen CSOs' capacity to navigate restrictive environments. The work of the Georgian CSOs that have relocated operations abroad requires coordination with their in-country activities and with those organizations still fully based in Georgia. International advocacy efforts should be aligned across the OSCE, CoE, and UN human rights systems to maximize coherence. The pending ECHR case and the European Parliament's ongoing monitoring should be treated as complementary processes.

The EU should also make greater use of the economic leverage it has, beginning by signaling its willingness to target specific sectors affiliated with Georgian Dream enablers. Two are particularly relevant in this regard. The first is the fraudulent call center industry, which operates from Tbilisi largely with impunity and whose victims are overwhelmingly citizens of EU member states, the United Kingdom, and Canada. Investigative reporting has documented resulting losses running into hundreds of millions of dollars, protection for those responsible extending into the security services, and the swift resumption of operations after each publicized raid.⁴² Prosecutions have been limited almost entirely to junior employees, while the recent arrest of a former security services chief reflects factional conflict within the ruling elite rather than any intention to dismantle the industry. The second sector is the growing number of Russian IT and technology firms that have re-registered in Georgia since 2022 and now sell to the European market under a Georgian corporate identity.

Western governments and financial intelligence units, as well as international financial-integrity bodies, should treat requests for cooperation with money-laundering legal proceedings in Georgia targeting civil society with a presumption that they are politically motivated and reject them. This requires applying the human-rights refusal grounds built into existing anti-money laundering (AML) treaties; enhanced scrutiny of Georgia's Financial Monitoring Service by the Egmont Group of Financial Intelligence Units; the Financial Action Task Force and the Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (Moneyval) recognizing Georgia's legislation as abusing AML standards rather than compliance; Interpol anticipating abusive notices; and regulators ensuring bank de-risking does not sever civil society's remaining funding channels. Charges in Georgia that manifestly lack a genuine predicate offence give Western courts clean grounds for refusal.

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