



ENEMO International Election Observation Mission

GEORGIA PARLIAMENTARY ELECTIONS, 26 OCTOBER 2024

INTERIM REPORT 21 September - 13 October

Tbilisi
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The 2024 parliamentary elections in Georgia take place in a polarized and tense political environment. Key concerns include (1) the ruling party's strong influence on the composition of the Central Election Commission (CEC), (2) integrity of the information space and smear campaigns, and (3) the actions of regulatory bodies such as the Anti-Corruption Bureau (ACB) and the Communications Commission (ComCom). The use of state resources in the campaign has also raised concerns, particularly in the education sector, where pressure on voters has been reported. Despite these challenges, the CEC has adhered to legal deadlines, but concerns about fairness, impartiality, and civic engagement persist.

In September 2024, the European Network of Election Monitoring Organizations (ENEMO) officially deployed an International Election Observation Mission (EOM) to Georgia, to observe the upcoming 26 October 2024 Parliamentary Elections.

ENEMO has accredited a total of seven (7) Core Team experts based in Tbilisi. The Mission is headed by Dr. Zlatko Vujovic. ENEMO has additionally deployed eight (8) long-term observers (LTOs) in four (4) multinational teams throughout the country, based in Tbilisi, Zugdidi, Kutaisi and Gori. Additionally, the mission will conduct observation on the day of voting, where 80 STOs will reinforce the mission by observing the opening of polling stations, voting and counting processes on Election Day.

This is ENEMO's third mission to Georgia. ENEMO has already gained considerable experience through observing elections in the region since the creation of the network in 2001. The presence of ENEMO during the 2024 Parliamentary Elections will provide the national and international community with elaborate information about the electoral process. Up until 13 October 2024, ENEMO CT experts and long-term observers have conducted 151 meetings, out of which 45 with election management bodies, 25 with political parties and candidates, two with state officials, 16 with media, 21 with domestic civil society organizations, 22 with other domestic and international election observation missions, in addition to observing over 20 election management bodies sessions and trainings and seven campaign activities (meetings or rallies).

The mission is monitoring and assessing the overall political and electoral environment, the right to elect and stand for election, the conduct of election management bodies, campaigning, gender representation, voting and tabulation processes, electoral dispute resolutions and other crucial aspect of the process, based on international standards for democratic elections and the national legal framework. ENEMO will raise the awareness of the domestic and international community regarding the main challenges and problems observed in the elections, thus advocating for adequate policy changes through the adoption of concrete recommendations in its final report.

This interim report is based on ENEMO's findings on the national level and throughout the regions¹ observed from 21 September to 13 October 2024. The mission will issue its statement of preliminary findings and conclusions after Election Day and will remain in the country to also follow potential complaints and appeals. The final report will be issued within sixty days from the certification of results.

The content of the document is the sole responsibility of ENEMO.

¹ Excluding regions of Abkhazia and Tskhinvali region.

Executive summary

The 2024 parliamentary elections in Georgia take place in a highly polarized political environment, marked by disputes over the 2020 election results and the controversial Law on Transparency of Foreign Influence, which triggered protests and international backlash. Georgia's EU integration has stalled, with Western countries freezing aid and imposing sanctions on officials. Societal divisions over LGBT+ rights and related discriminatory law have intensified. The ruling Georgian Dream frames the election as a choice between war and peace, while opposition parties, led by President Salome Zourabichvili, present it as a choice between Europe and Russia.

The upcoming elections mark a key transition to a list proportional system, following electoral reforms initiated in 2017. The legal framework for the 2024 Georgian elections has been subject to frequent amendments, but many changes have failed to fully address recommendations from international bodies such as the Venice Commission and OSCE/ODIHR. Despite reforms, gaps remain in areas such as electoral integrity, campaign finance, and media regulations, crucial for Georgia's EU integration plan. Recent reforms, often adopted without broad consultations, have raised concerns about transparency, particularly regarding the integrity of the Central Election Commission (CEC).

The 2024 parliamentary elections in Georgia will be the first held under a list proportional system, with all 150 seats filled from closed party lists. While this system tends to enhance political representation, especially for smaller parties, the ban on pre-electoral coalitions and the 5% electoral threshold pose significant challenges for political competition.

The election process in Georgia is managed by a three-level administration: the CEC, 73 District Election Commissions (DECs), and 3,031 Precinct Election Commissions (PECs). Reforms introduced in December 2022 aimed to enhance professionalism and public confidence. However, controversial changes in 2024 shifted the nomination power and weakened consensus-based decision-making, raising concerns about the CEC's independence. Despite these issues, ENEMO notes that the CEC has efficiently managed election preparations, meeting legal deadlines and maintaining transparency, though the changes have increased the ruling party's influence and reduced impartiality.

DECs and PECs face challenges related to low application numbers for non-partisan positions and transparency issues. DECs generally operate professionally but suffer from inconsistent session announcements to observers. PECs, temporarily established for elections, struggle with political pressure, high resignation rates, and unequal pay between professional and party-nominated members. Despite these issues, the CEC has organized training for PEC members, though attendance by party nominees has been inconsistent.

All citizens over 18 years old in Georgia can vote, except those convicted of particularly grave crimes or declared legally incapacitated, a condition that ENEMO criticizes as contrary to international standards. Voter registration is passive, centralized, and regularly updated by the

CEC. As of September 2024, almost 3.5 million voters were listed. However, the number of out-of-country voters increased by 45% since the previous election, leading to criticism from opposition parties and civil society, who called for more polling stations in key cities.

The right to run for office in Georgia is granted to citizens over 25 who have lived in the country for at least 10 years, though restrictions exist for those deprived of voting rights or sentenced to prison, which conflicts with international standards. Independent candidates are not allowed, violating OSCE and other international obligations. The law no longer allows pre-electoral coalitions. Non-parliamentary parties needed 25,000 supporting signatures by 15 July to apply. Seventeen out of 30 non-represented parties were registered, and 10 parliamentary parties were accepted.

In Georgia, new election technologies, including voter identification devices and optical ballot scanners (PCOS), will be used in 75% of precincts, covering 90% of voters. These technologies aim to increase trust and reduce errors, but manual ballot counting remains legally binding. The introduction of these technologies reduced the number of PECs by 20%, raising concerns about potential delays and overcrowding. Despite large-scale voter education efforts, there are fears of confusion over the new ballot format and disinformation about PCOS compromising vote secrecy.

The election campaign, starting on 27 August, has been highly polarized, focusing on Georgia's relations with Russia and the EU. Disinformation, such as the "Global Party of War" narrative, has distorted the election environment. While largely peaceful, reports of harassment, attacks on party offices, and activist surveillance persist, often unreported due to mistrust in law enforcement. The ruling party has disproportionately used state resources and billboards, while opposition parties, especially smaller ones, face restrictions in airtime and campaigning. ENEMO notes abuse of state resources, particularly in the education sector. Concerns were raised about the Amnesty Law, viewed as a potential tool for the ruling party to gain favor with voters.

The 2024 amendments to the Election Code introduced stricter campaign finance regulations, banning donations from legal entities, alongside caps on loans, expenditures, and individual donations, although third-party financing remains underregulated. The Anti-Corruption Bureau (ACB) oversees campaign finance, with authority to investigate and freeze assets. Concerns have arisen over the ACB's actions, including labeling non-electoral organizations such as Transparency International - Georgia and Vote for Europe as "subjects with a declared electoral goal," leading to reports of self-censorship among civil society. ENEMO notes that these practices raise serious concerns about freedom of expression and the ACB's independence.

The media landscape in Georgia is politically influenced, with private media owners often linked to political parties. ENEMO raises concerns over threats to journalists, especially after the 2021 attacks. The Communications Commission (ComCom) oversees media, including free airtime and hate speech regulation, but its decision to act only on complaints rather than proactively in cases of hate speech has increased financial risks for media outlets. Social media, used heavily for campaigning by smaller parties, has also been a platform for disinformation, including the ruling party's narrative of a "Global Party of War." Meta's threat response removed a coordinated disinformation network from Russia in August.

Women's political participation in Georgia remains low, with only 19% of parliamentary seats held by women. The 2020 gender quotas were removed in 2024, despite opposition from women's rights advocates and a veto by President Zourabichvili. ENEMO notes this contradicts international recommendations and has already reduced the number of women on party lists.

Georgia lacks formal mechanisms or quotas to ensure representation of national minorities, who make up 13.2% of the population but remain underrepresented. While the CEC has launched an information campaign and provided materials in Azerbaijani and Armenian, ENEMO highlights that the absence of minority quotas limits their political inclusion.

Georgia has made progress in promoting political participation for persons with disabilities through accessible polling stations, sign language translation, and tactile ballots. While the CEC has trained interpreters and held informational sessions, implementation is inconsistent, especially in rural areas. Barriers persist, and disabled individuals remain underrepresented in election bodies.

Electoral parties, initiative groups, and observer organizations can submit complaints on electoral disputes, while voters may only do so if their personal rights are violated. Most disputes follow expedited procedures, with decisions appealable at higher levels, including district or city courts and the Court of Appeals. While swift resolution is crucial, short deadlines, particularly for the Court of Appeals, have raised concerns, as they may hinder the collection of sufficient evidence and case preparation, potentially affecting fairness, especially for complex cases.

An online registry for election-related complaints ensures public access to complaints and decisions, with election commissions and courts generally adhering to deadlines. As of October 13, 113 complaints had been filed, with 32 still pending and only three satisfied. The majority of complaints concerned the functioning of PECs (51), misuse of administrative resources (15), and breaches of campaigning regulations (19). Courts have ruled on around 30 cases, including key decisions on free airtime allocation and voting abroad.

Local observers in Georgia face increasing challenges as the 2024 parliamentary elections approach. While NGOs play a crucial role in election monitoring and voter education, they face legal restrictions, political pressure, and government attempts to limit their impact. The shrinking space for civic engagement is exacerbated by the controversial Law on Transparency of Foreign Influence, which complicates the work of NGOs. Additionally, the government has launched smear campaigns against international observers, including ENEMO, accusing them of bias and undermining their credibility, raising concerns about the integrity of election monitoring efforts.

Background

The parliamentary elections were called on 11 April 2024 and are taking place on 26 October 2024, as part of the regular electoral cycle. Georgia has been having multi-party elections since 1991. Over the last 12 years, its politics have been dominated by the Georgian Dream (GD) party who have been in power since 2012. The last parliamentary election was held in October 2020, when the ruling party (GD) won 90 out of 150 seats in the parliament, under a mixed system that allocated 120 seats through proportional representation and 30 seats through majoritarian election.²

The current election is the first election Georgia will be holding through the system of list proportional representation. In 2017, Georgia introduced a gradual reform of the electoral system by amending the Constitution to prescribe transition to the proportional system, as well as introduction of the 30% quota for representation of the less represented gender in electoral lists. Since then, there have been many significant changes to the electoral system in 2022, 2023 and 2024 that have impacted negatively on the stability of the electoral law in the run up to the election. In addition to changes to campaign finance regulations and oversight, gender quotas for electoral lists were abolished after being implemented in just one electoral cycle, despite not having resulted in expected representation of women in the Parliament. Furthermore, the 26 October election will be the first one where voter identification and vote counting technologies will be used on a large scale.³

The present campaign is taking place in a highly polarized context, following a deep political crisis at the start of the current government's mandate, when the opposition political parties challenged the 2020 parliamentary election result.⁴

The political tensions were fueled by the GD proposal of the Law on Transparency of Foreign Influence, which stipulates that civil society organizations which receive over 20% of their funds from outside of Georgia must register as organizations pursuing the interests of a foreign power, acting for the interest of foreign powers who fund them. Following two attempts at adoption of the Law⁵ Parliament adopted the Law in May 2024 which triggered large anti-government protests, followed by large-scale reports of intimidation and harassment of activists, politicians and their families.⁶ The events around the protests, hardening of anti-western and anti-democratic rhetoric have invoked a strong reaction of the international community. Several Western countries froze

² The remaining 60 seats were split between 8 other parliamentary entities: United National Movement (36), European Georgia (5), Lelo (4), Girchi (4), Alliance of Patriots (4), Strategy Aghmashenebeli bloc (4), Citizens (2), Georgian Labour Party (1).

³ See the *Election technologies* section for more detail on the new technology.

⁴ Following an EU-brokered agreement between the ruling party and the opposition, the so-called Charles Michel Agreement, the opposition agreed to participate in reform work in the Parliament.

⁵ The first attempt in March 2023 resulted in withdrawal, and the second one in April 2024, was vetoed by the President.

⁶ Multiple ENEMO interlocutors reported personally having been targeted or their family members being threatened.

their financial aid to Georgia, de facto halting of Georgia's EU path⁷, and a number of sanctions against Georgian officials were imposed by the US.⁸

LGBT+ rights have been another factor of societal tensions in the run up to the 26 October election. In July 2021, media representatives who were to be covering a Pride march suffered severe physical injuries, one resulting in death, from attacks by violent counter-protesters and a large number of these cases remain unprosecuted. In 2024, the Parliament passed the Government's Law on Protection of Family Values and Minors despite large-scale criticism of its discriminatory purpose⁹.

Most recently, President Salome Zourabichvili has initiated the process of uniting the fragmented opposition political parties into a joint platform which commits them to forming a joint government in the aftermath of elections and a pro-European foreign policy direction. Most opposition political parties have joined the platform.

The 26 October election is framed as a choice between war and peace by the ruling Georgian Dream, and as a choice between Europe and Russia, by the opposition political parties.

Legal Framework and Electoral System

Legal Framework

Elections in Georgia will be held under a significantly revised legal framework, frequently amended, with the most recent changes introduced in May 2024. Despite these frequent amendments, the revisions to the law do not fully reflect the recommendations of key international bodies, such as the Venice Commission, ENEMO and OSCE/ODIHR, as well as local election observation organizations. The full implementation of these recommendations remains a crucial element of Georgia's nine-step plan for EU integration, emphasizing the need for comprehensive electoral reform that adheres to international standards of transparency, fairness, and inclusivity.

While the legal framework has undergone multiple changes, the basic structure of Georgia's election-related legislation has been in place for many years. The Constitution of Georgia (1995) outlines the fundamental principles of governance and the rights of citizens in electoral processes. The Election Code of Georgia (2011) serves as the primary legal framework for conducting

⁷ See [EU Council Conclusions CO EUR 12 CONCL 4](#) from 27 June 2024.

⁸ Most recently, the UK has [announced freezing of the security dialogue](#) with Georgia and raised "concerns about the decline of democracy and anti-Western rhetoric" (Reuters, 15 October 2024)

⁹ Among other things, the Law prohibits the right to adoption or foster care other than for married couples and heterosexual persons, it prohibits medical interventions aimed at change of sex and allows for marriage only between biological males and females. [Venice Commission Opinion CDL-AD\(2024\)021](#) on the Draft Law, published on 25 June 2024.

elections, covering parliamentary, presidential, and local elections, as well as referendums and plebiscites.

Other critical laws supplement this framework, such as the Organic Law on Political Associations of Citizens (1997), which governs political parties, their formation, and political financing. The Law on Broadcasting (2005) provides specific rules to ensure fair access to media for all political parties during election periods. Additionally, the General Administrative Code (1999) and the Criminal Code of Georgia regulate administrative and criminal liabilities related to electoral violations. The legislation is further supported by ordinances issued by the Central Election Commission (CEC), which provide normative guidance to election stakeholders.

Since the 2020 parliamentary elections, Georgia has witnessed a series of sporadic amendments to the Election Code, with 25 implemented changes. While some of these amendments resulted from broader agreements between stakeholders, including the 2022 amendments adopted after comprehensive consultations and cross-party support, many of the changes fell short of comprehensive reform. The 2022 amendments addressed several vital recommendations from international observers, such as ODIHR and ENEMO, including measures to enhance the impartiality of lower-level election bodies, expand citizen observers' roles, add grounds for recounts, and adjust deadlines in the election dispute resolution process.

However, despite these steps, the ruling party initiated more recent reforms with minimal participation from opposition members, raising concerns about transparency and inclusiveness. The latest amendments to the Election Code have primarily focused on changes to the composition and decision-making of the CEC. The 2021 agreement initially required a two-thirds parliamentary majority to elect CEC members, with the deputy chairperson coming from the opposition. However, in 2023, the ruling party lowered the quorum, allowing a simple majority to elect the chairperson and members for five-year terms. The President's role in the selection process was also reduced, and the opposition-appointed deputy chairperson's role was eliminated. Additionally, decision-making at the CEC was altered. Previously, a two-thirds majority was needed to approve decisions, but now, after a first vote, a simple majority can pass decisions, reducing the need for consensus.

These changes have often been adopted in a rushed manner, bypassing the broader consultations necessary for meaningful reform. As a result, key recommendations have been overlooked, particularly those aimed at improving electoral integrity and ensuring a level playing field. This pattern of piecemeal amendments - sometimes forward steps followed by backward steps - highlights the lack of a comprehensive reform agenda, leaving important issues unresolved and further entrenching challenges within the system. Despite repeated calls for comprehensive reform, gaps persist in addressing the recommendations, including those related to appointing election administration members, preventing misuse of administrative resources, strengthening campaign finance oversight, improving media campaign regulations, and enhancing the electoral dispute resolution framework which remains unaddressed.

Electoral System

The upcoming elections in Georgia will be held for the first time using a list proportional system with a closed block list within a single nationwide constituency of 150 seats. Pre-election coalitions are prohibited. To enter the seat allocation process, a list must reach the legal threshold of 5% of valid votes. The gender quota has been removed from the current version of the law. Individual candidacies are not permitted.

While the newly introduced list proportional system was designed to enhance proportionality and representation, the prohibition of pre-election coalitions and a relatively high legal threshold may hinder the realization of these objectives. These provisions have substantially diminished the overall competitiveness of the electoral process and imposed significant barriers for smaller political parties, potentially marginalizing their participation in the allocation of seats.

In response to these constraints, political entities have sought alternative mechanisms to circumvent the formal restrictions, frequently by forming de facto coalitions. In such instances, parties that would have traditionally created formal blocs instead registered as a single party under a unified electoral list.

The formation of these de facto coalitions, where several smaller parties consolidated without complete ideological coherence, has complicated pre-election strategies for these groups. The legal prohibitions on formal coalitions have also generated confusion within the campaign process. Parties that formally obtained the status of a single qualified electoral subject function in practice as alliance members, leading to a disconnect between their legal standing and their actual campaign strategies.

These so-called "unified" parties are essentially campaigning as coalitions, yet the legal framework remains tailored to individual entities, creating a regulatory grey area.

This misalignment between the legal framework and political practice has forced political actors and regulatory bodies to navigate an ambiguous legal environment, further complicating the overall electoral landscape.

Party representatives have pointed out that this has diluted party identity, as they now represent a broader, often inconsistent range of political views within a single party structure. Additionally, the necessity to comply with the legal framework¹⁰ has stifled party development, as traditional party leaders have had to make difficult decisions, including resigning¹¹ or deregistering with their original parties to conform with the law.

¹⁰ Recent legislative amendments have imposed stricter rules on party registration and candidate lists, restricting parties from including candidates affiliated with other political parties and limiting flexibility in party branding.

¹¹ The leaders of several political parties, including the "Christian-Democratic Movement," "Conservative Party of Georgia," "People's Power," "Republican Party of Georgia," "Aleko Elisashvili – Citizens," "Yes Europe – Strategy Aghmashenebeli," "Elene Khoshtaria – Droa," "Ana Dolidze – For the People," and "Girchi – More Freedom," formally resigned from their positions as chairmen and party membership.

Election Administration

The election process in Georgia is managed by a three-level election administration composed of the Central Election Commission (CEC), 73 District Election Commissions (DECs)¹², and 3,031 Precinct Election Commissions (PECs).

A comprehensive electoral reforms package was adopted in December 2022, which foresaw changes in the composition and appointment mechanisms of the election administration and the introduction of new election technologies, with the aim of increasing the level of professionalism and public confidence in the election administration. All commissions are now composed of 17 members: eight non-partisan members, selected based on their professional experience, and nine members nominated by the political parties with parliamentary representation.

Central Election Commission (CEC)

The Central Election Commission (CEC) is designed to be a permanent and independent body whose 17 members are appointed for a five-year term. Controversial amendments to the Election Code, adopted in 2024, have altered the composition and appointment mechanism of CEC members and its decision-making process. The nomination power for its professional members, which was previously vested in the President of Georgia, has been transferred to the Chairman of the Parliament, and the position of Deputy Chairman, previously nominated by the opposition, has been abolished. The amendments also allow CEC non-partisan members to be appointed by a simple majority if the required qualified majority ($\frac{3}{5}$) cannot be reached, undermining the consensus-based nomination process. Furthermore, the amendments permit a CEC decree to be adopted by a simple majority if a two-thirds majority cannot be attained, weakening the culture of collegiality within the institution.

These changes have increased the ruling party's influence over the appointment process of CEC members and represent a step backwards in ensuring greater professionalism and impartiality in the decision-making process.

ENEMO interlocutors from opposition political parties and civil society have emphasized that these recent changes have diminished overall confidence in the CEC's independence and impartiality.

The CEC holds regular sessions, which are announced in a timely manner on the institution's website. The sessions are broadcast live and are open to accredited observers, party representatives, and the media. Summaries of the sessions and the decisions adopted are published promptly on the institution's website.¹³ ENEMO notes that election preparatory activities are being conducted diligently, with the CEC operating efficiently and meeting all legal deadlines.

¹² 76 DECs are established throughout Georgia, including 3 DECs located on the occupied territories of Abkhazia and South Ossetia. Elections will not be organized in the occupied territories.

¹³ All decrees and ordinances adopted by the CEC are published in Georgian upon adoption, while those adopted until 2023 are also translated to English.

District Election Commissions (DEC)

District Election Commissions (DECs) are permanent bodies of five non-partisan members. During election periods, they are supplemented by three additional non-partisan members selected by the CEC and nine members nominated by political parties with parliamentary representation. The CEC completed this selection process on 31 August, adhering to the legal deadlines. The selection process was conducted transparently, with live broadcasts of candidate interviews. However, the limited number of applications received did not allow a fully competitive selection process.¹⁴

Political parties nominated their members on 3 September. A new provision, aimed at enhancing the stability and efficiency of the commissions, prohibits the replacement of political party nominees after 5 October (three weeks before election day).

ENEMO observers noted minimal changes among DEC members, which did not negatively affect the commission's work. Observers reported that most DECs function professionally and generally transparently. However, DEC sessions are not always announced to observers in advance, which limits transparency.

Precinct Election Commissions (PEC)

Precinct Election Commissions (PECs) are temporary bodies established 30 days before election day. For this election, 3,031 PECs were established in Georgia, and 67 PECs were established abroad. PECs are composed of up to 17 members: eight members selected by the respective DECs and up to nine members appointed by political parties with parliamentary representation.

The DECs completed the selection of non-partisan PEC members on 10 September, in line with legal deadlines. However, the number of applications submitted to DECs was low, requiring several calls to be re-issued.¹⁵ While the CEC attributed the low number of applications to the extensive restrictions placed on non-partisan PEC members,¹⁶ ENEMO interlocutors viewed the low turnout as a direct consequence of the prevailing climate of intimidation in the country.

Although most political parties entitled to nominate PEC members did so within the established deadline, some reported difficulties in finding enough members for all commissions.¹⁷ A recently adopted CEC decree established a discrepancy in the salaries paid to professional PEC members

¹⁴ Overall, the CEC received a total of 261 applications, for 219 vacant positions. In 41 DECs (56%), only 3 applications were received, for the 3 vacant positions.

¹⁵ A total of 24,425 applications were received, for 24,240 vacant positions. This includes 9,111 applications for 9,090 head positions, and 15,314 applications for 15,150 commission member positions. After the first call, 193 positions remained vacant.

¹⁶ The Election Code specifies that non-partisan PEC members cannot be: members of the state administration, the military, the government or the parliament; a candidate or candidate's representative; an observer; a media representative; have served as party representative during the two previous elections process, or have sponsored a party during the two years preceding the elections. Additionally, all professional PEC members must pass certifying exams.

¹⁷ Georgian Dream is the only political party that appointed members to all PECs (3,031), followed by UNM (3,024) and Strong Georgia (3,015). Girchy only appointed members in 1,295 PECs.

and those appointed by political parties, undermining equality among commission members and further complicating political parties' efforts to find sufficient candidates.¹⁸

ENEMO observers reported that many political party nominees often refrained from participating in PEC activities, and a significant number of resignations were due to political pressure and threats, which raises concerns.¹⁹

The CEC Training Center has organized a five-stage training program for PEC members. The first and second phases were held between 14 September and 2 October.²⁰ While non-partisan PEC members largely attended the training, the attendance of political party nominees varied considerably.²¹ The third stage, currently ongoing, provides an opportunity for members who missed the earlier phases to receive training. ENEMO observers have assessed the training sessions as well-organized and comprehensive.

Election Technologies

Amendments to the Election Code in 2022 introduced election technologies to increase public trust in the election process and reduce the possibility of human errors.

Electronic Voter Identification

Voter identification devices will verify voters' identities and register them for voting, using their electronic identification documents.

In order to vote, a voter must first be identified by the Precinct Election Commission (PEC). Voter identification may be conducted using the voter's electronic ID card, which is swiped through the electronic identification device to verify the voter's identity. Voters who do not possess an electronic ID card will be able to vote with their passport or a non-electronic ID card. In this case, the data will be entered manually into the voter identification device. If the data corresponds, the voter proceeds with the inking process and is subsequently considered a verified voter.

Electronic Counting Devices

¹⁸ The decree adopted by the CEC establishes that the salary for professional members is 390 GEL per month, and 260 GEL for party-appointed members. UNM filed an appeal against this decree, which was rejected by Tbilisi City Court.

¹⁹ For instance, ENEMO observers noted that in Ambrolauri, 29 of the 36 PEC representatives from European Georgia and Strategy Agmashenebeli resigned, allegedly due to such pressure.

²⁰ The first stage was dedicated to the Head Officials (Chairperson, Deputy Chairperson, Secretary), while the second phase was dedicated to the non-partisan members and political party representatives.

²¹ According to the statistics shared by the Training Center, the first phase of the training (designed for Head Officials) had an attendance rate of 85% to 90%. During the second phase (designed for non-partisan members and political party representatives), the attendance rate of non-partisan members was 82%, while the average of political party representatives' attendance rates was 46%. The political parties with the lowest attendance rates were Girchi (15%), Citizens (28%) and Strong Georgia (36%), contrasting with the high attendance rate of Georgian Dream's representatives (77%), or European Socialists (71%).

A Precinct Count Optical Scanner (PCOS) is a device into which voters insert their ballot papers at the polling station. The device is placed on the ballot box. It counts and categorizes valid and invalid ballots, allowing preliminary results to be available shortly after the voting process concludes. PCOS devices are not connected online to transmit data in real time; they operate in offline mode. Once the voting process has concluded, the Precinct Election Commission (PEC) will transfer the data to another electronic device that operates online, allowing the data to be transmitted to the Central Election Commission (CEC) to generate preliminary election results. However, PEC members will still manually count the ballots, and only the results of the manual count will be legally binding.

Voter identification devices and PCOS will be used in 2,263 PECs nationwide (75% of PECs), representing approximately 90% of voters.²² Adopting election technologies increased the maximum number of voters per PEC from 1,500 to 3,000. Consequently, the number of PECs established in Georgia decreased by nearly 20% compared to the previous election process.²³ ENEMO interlocutors expressed concerns about possible delays on election day, long queues of voters, and overcrowding of polling stations.

The CEC has conducted large-scale voter information campaigns, starting in June 2023, and claims that over 500,000 voters have had the opportunity to familiarize themselves with the new voting devices. On 11 September, mock elections were organized in 598 polling stations, allowing 122,864 voters to familiarize themselves with the new devices.

Most ENEMO interlocutors welcomed the introduction of new voting technologies. However, despite the CEC efforts to educate voters, most stakeholders still expect confusion about the new ballot format introduced with the PCOS, possibly leading to many invalid votes.²⁴ ENEMO interlocutors also expressed concerns regarding rumors according to which the PCOS will not guarantee the secrecy of their vote.

²² New voting technologies will not be used in polling stations with less than 300 voters and/or located more than 20 km from the DEC premises (768 polling stations).

²³ A total of 3,664 PECs had been established for the 2021 local elections, with a minimum number of 1,500 voters per PEC.

²⁴ Ballot papers used in polling stations equipped with optical ballot scanners will differ from the ones used in polling stations without election technologies. In polling stations using optical ballot scanners, voters will mark their ballot by filling a circle in front of the electoral subject of their choice, which caused discussions on how to interpret spoiled and invalid ballots. In polling stations without election technologies, they will circle the number corresponding to the electoral subject.

Voter Registration

The right to vote is granted to all citizens over 18 years old, with the exception of those serving a sentence for a particularly grave crime²⁵, and those who have been declared legally incapacitated by a court decision and placed in a medical facility. ENEMO notes that the deprivation of voting rights on the basis of intellectual disability is contrary to international standards.²⁶

Voter registration is passive, centralized, and continuous. The CEC is in charge of compiling the unified list of voters, based on information provided by the Public Service Development Agency (PSDA), and several state agencies. The voters' list is updated four times per year and before elections.²⁷ As of September 2024, there were 3,426,250 voters on the voters' list.

Voters have several ways to check for their proper inclusion on the voters list²⁸, and request corrections, if necessary. Voters lists were transmitted to the PECs on 26 September, and published for public scrutiny. Corrections could be requested at the DEC and PEC level until 8 October. ENEMO interlocutors did not express major concerns regarding the accuracy of the voters' list.

Voters residing abroad had the possibility to register until 7 October 2024 to vote in diplomatic representations or consulates. A total of 95,834 voters registered, which represents a 45% increase compared to the previous parliamentary elections.²⁹ The CEC decided on the creation of 67 PECs in 42 countries, including 5 countries where elections will be held for the first time.³⁰ This decision was strongly criticized by opposition parties and civil society organizations, who advocated for the opening of PECs in additional cities, where a high number of voters are currently registered.³¹

²⁵ Particularly serious crime refers to those convicted to 10 years or more, and life sentences.

²⁶ The 2006 UN Convention on the Rights of Persons with Disabilities, Article 29, states that steps should be undertaken to “*ensure that persons with disabilities can effectively and fully participate in political and public life on an equal basis with others, directly or through freely chosen representatives, including the right and opportunity for persons with disabilities to vote and be elected*”. Furthermore, the 2013 CRPD Committee Communication No. 4/2011, par. 9.4, emphasizes that “*an exclusion of the right to vote on the basis of a perceived or actual psychosocial or intellectual disability, including a restriction pursuant to an individualized assessment, constitutes discrimination on the basis of disability, within the meaning of article 2 of the Convention*”.

²⁷ The deadline to amend the voters' list is 12 days before election day. The final number of voters will be published five days before election day.

²⁸ Voters can check for their inclusion on the voters' list on the CEC website, on a mobile application created by the CEC, as well as at DEC and PEC level.

²⁹ A total of 66,217 voters had registered for the 2020 parliamentary elections. 50 PECs were opened in 38 countries.

³⁰ PECs will be opened in the United Arab Emirates, Finland, South Korea, Japan and Australia for the first time.

³¹ This includes, most notable, the cities of Chigaco, Arnedo, Valencia, Ostuni and Strasbourg. Three appeals were filed against the CEC's decision, but were considered inadmissible by Tbilisi City Court.

Candidate Registration

The right to stand as a candidate is granted to Georgian citizens over 25 who have lived in Georgia for at least 10 years, unless they have been deprived of their voting rights or sentenced to imprisonment. These limitations are at odds with international standards and good practice.³²

The current electoral system does not permit candidates to stand independently, what is in contradiction to paragraph 7.5 of the 1990 OSCE Copenhagen Document³³, as well as other international obligations and standards for democratic elections.³⁴ This restriction represents a departure from established international norms, that emphasize enabling individual candidacies as a key element of a fully representative and inclusive electoral process.

Different conditions apply for registering political parties with and without parliamentary representation. Political parties without parliamentary representation had to apply to the CEC before 15 July, and present 25,000 signatures supporting their application.³⁵ A total of 30 political parties submitted their applications, of which the CEC registered 17. The CEC dismissed two applications³⁶ and rejected 11 lists because they did not meet the legal requirements.³⁷

Political parties with parliamentary representation could submit their applications to the CEC until 30 August without needing to present signatures. Ten political parties applied and were registered by the CEC. Nineteen electoral subjects submitted party lists before the legal deadline on 26 September 2024. Contrary to the previous election process, political alliances are not allowed under the fully proportional system.

On 26 August, the CEC clarified that candidates cannot run on another party's list without formally changing party membership beforehand. They have to be registered on the list as either party members or non-partisan candidates.

³² ICCPR, GC 25: "Persons who are otherwise eligible to stand for election should not be excluded by unreasonable or discriminatory requirements such as education, residence or descent, or by reason of political affiliation."

³³ Paragraph 7.5 of the 1990 OSCE Copenhagen Document states that the participating States will "respect the right of citizens to seek political or public office, individually or as representatives of political parties or organizations, without discrimination." See also section I.1.6.c of the Council of Europe's Commission for Democracy through Law (Venice Commission) Code of Good Practice in Electoral Matters.

³⁴ ICCPR, GC 25: "The right of persons to stand for election should not be limited unreasonably by requiring candidates to be members of parties or of specific parties."

³⁵ Which represents less than 1% of voters, in line with good practices.

³⁶ In one case, due to the cancellation of the political party's registration; in the second, due to the termination of powers of the party's chairperson.

³⁷ Four political parties had not submitted the required 25,000 signatures, and five political parties had submitted supporter's lists containing errors. While the law foresees a three-day period for corrections and adjustments, none of the political parties submitted corrected documents within the established deadline. In two cases, the powers of the political parties' Chairperson were terminated at the time of submitting the applications.

Electoral Campaign and Campaign Finance

Electoral Campaign

According to the Election Code, the campaign officially starts 60 days before the polling day. The 26 October election campaign officially started on 27 August 2024. Political contestants are allowed to use a wide range of campaigning tools, however the content of their campaigning is subject to several legal restrictions³⁸, including the use of hate speech and inciting violence or inter-ethnic hatred during elections. The Law on Political Unions of Citizens prohibits campaigning for another political subject, bribery of voters, as well as use of administrative resources for campaigning purposes.

The main tools of campaigning have been door-to-door activities, rallies and billboards. Billboards have been used disproportionately by the ruling party, with examples of the main billboard company disputing content of opposition political parties' ads³⁹. Most of the campaigning activities are taking place in the regions.

The campaign has been highly polarized. It has been dominated by geopolitical topics, most notably Georgia's relationship with Russia and the European Union, framed as a choice between war or peace by the ruling party, and as a choice between a future inside or outside the EU by most of the opposition parties. Russian invasion of Ukraine, civic activism and LGBT+ rights have been instrumentalized for campaigning purposes⁴⁰, significantly fueling the tensions in an already fragile environment. Disinformation narratives developed before the election campaign period continued to feature during the campaign. The most common narrative has been the existence of a "Global Party of War", which has been used by state officials to support the *war vs. peace* narrative of the ruling party⁴¹.

ENEMO deems that this narrative has distorted the information landscape and risks instigating fear that could impact voters' choice on Election Day.

While the campaign has been largely peaceful, there have been multiple reports of incidents of harassment of political parties' campaign activists, disruptions of rallies, as well as attacks on

³⁸ The Law prohibits the campaigning by public officials, civil servants, foreign organizations and individuals, religious or charitable institutions, judges, members of electoral administration, employees of national companies or regulators, as well as members of any legal entities set up by the state; as well as use of premises of state bodies for campaign purposes.

³⁹ UNM informed ENEMO that their political advertisement saying 'Get rid of Bidzina Ivanishvili' was initially declined by the billboard company "Alma" over alleged hate speech against the GD leader. UNM has since reached an agreement with "Alma" and the ads were advertised on the billboards.

⁴⁰ The ruling political party has used posters contrasting devastation of Ukrainian schools, religious sights and road infrastructure from the Russian invasion with pictures of Georgian cities. Furthermore, the ruling party disseminated a video which represented civil society leaders and activists as examples of moral degradation of a society, contrasting it with traditional values. Three media outlets, Formula TV, Mtavari TV and TV Pirveli refused to air the ads, however ComCom found them in breach of free airtime regulations twice and they were fined twice before the court decisions came into force.

⁴¹ In one of his [statements](#) during the election campaign period, the Prime Minister Irakli Kobakidze has said: "The October 26 election is a referendum where it will be decided whether the war party will be able to open a second front in Georgia or whether the country will maintain peace. Both for the Global Party of War and for the Georgian government and Georgian people, there are so many important things at stake that, in this background, the risks are naturally increased tenfold."

political parties' premises, reported to ENEMO by the opposition. For example, UNM have flagged incidents of attacks on their premises, Gakharia - For Georgia⁴² have reported campaign obstructions, while the Coalition for Change reported attacks against their campaign activists. A significant number of ENEMO interlocutors cite no confidence in the law enforcement and therefore either do not report violent incidents or do not expect a thorough investigation. Furthermore, most of ENEMO interlocutors perceive there to be widespread surveillance of the general population⁴³, activists and political leaders and report continuing to receive phone calls from abroad during the election campaign, which was an intimidation tactic used to threaten activists and politicians during the protests against the Law on Transparency of Foreign Influence⁴⁴. ENEMO notes that lack of accountability for harassment during the campaign, coupled with targeting of individuals through the ruling party campaign, creates an enabling environment for violence against opposition and civil society activists.

Several qualified political parties whose political advertisement criticized the government have had their access to free airtime restricted on the grounds of *de facto* campaigning for the electoral list they announced they would be joining. The interpretation⁴⁵ of this legal provision did not take into account the ban on alliances, which prohibits any political party from forming a coalition, thereby disregarding the stand-alone legal status of the parties in question prior to submission of electoral lists. ENEMO interlocutors perceive this wide application of the law as restricting space for opposition parties' criticism of the government during the elections. ENEMO notes that there is an inconsistency between law and practice in this case, which disproportionately restricts campaigning opportunities for smaller political parties and suppresses criticism of the government.

Local NGOs have recorded examples of abuse of state resources which, according to many of the ENEMO interlocutors, predominantly concerns the use of the education sector to organize and exert pressure on voters. The Public Defender has also investigated several cases related to discrimination in the education sector on a political basis, as well as using the education sector to pressure voters to attend the campaign events of the ruling party.⁴⁶ ENEMO observers report individual cases of pressure exerted on employees working in local-level companies and local administration to support the ruling party⁴⁷ and attend ruling party events.

Concerns have also been raised in relation to the Amnesty Law adopted on 17 September 2024.⁴⁸ ENEMO interlocutors consider it provides an opportunity for the government to offer legal incentives to a large number of citizens who are eligible for amnesty under the new legislation.

⁴² Representatives of Gakharia - For Georgia said to ENEMO there was no thorough follow up on the reports of incidents they submitted to the police.

⁴³ Several media representatives suggested to ENEMO that they had been personally subjected to surveillance.

⁴⁴ ENEMO interlocutors have provided extensive examples of the calls they received from abroad during the protests against adoption of the Law on Transparency of Foreign Influence, in which they and their family members received threats, including death threats.

⁴⁵ See the *Complaints and Appeals* section.

⁴⁶ The Public Defender has [published an overview of cases investigated](#) by 7 October, however it concluded it had no legal remit in the cases of discrimination, since they have been referred to the courts.

⁴⁷ Several cases have been flagged to the ENEMO team in Vani.

⁴⁸ The Law provides for amnesty of prisoners serving sentencing under over 200 articles of the Criminal Code.

Campaign Finance

The Election Code of Georgia allows for private and public financing of election campaigns. Amendments to the campaign finance regulations in 2024, prohibited donations from legal entities. Additionally, the LPU sets out a wide range of restrictions to campaign financing sources, including a cap on loans, expenditures and donations from the citizens.⁴⁹ State financing is available to qualified⁵⁰ political parties, unless half of their MPs lose parliamentary mandate. While the legislation is rather aligned with international standards, third-party financing is still underregulated and access to finance is limited for emerging political parties.

Following amendments to the Election Code, the Anti-Corruption Bureau (ACB) was established as the main regulatory body in charge of campaign finance oversight. It has the powers to investigate party finance, summon individuals before the court and freeze assets before court decisions, as well as an obligation to ensure transparency of campaign financing. All political parties submitted their reports on campaign expenses by 16 September. The ruling GD has reported the highest amount of donations. Girchi – More Freedom have not submitted the report requested by the ACB on an ex-officio basis, for the period of 1 January – August 2024. This ACB request was partly outside of the election campaign period.

For the first time, the ACB has used the legal provision which allows for non-electoral contestants to be recognized as ‘subjects with a declared electoral goal’ and therefore accountable for campaign expenses in the same way as political parties⁵¹. Transparency International - Georgia, its Executive Director, “Vote for Europe”, its Executive Director and all Board members were declared “subjects with a declared *political* goal” on the basis of statements and events promoting Europe or high turnout in elections.⁵² Even though the law requires subjects to declare *an intention* to take part in the elections, ACB concluded that these movements and organizations were campaigning for opposition political parties.

ACB revoked the Decision on declaring TI - Georgia and Vote for Europe, and associated individuals⁵³, subjects with a declared electoral goal following a statement from the Prime Minister⁵⁴, reinforcing the concerns raised by ENEMO interlocutors that ACB does not operate independently from the Government.

⁴⁹ According to the Law on Citizens’ Political Unions, the donations from individuals are restricted to 60,000 GEL per year; the bank loans are limited to 1mil. GEL per year; while expenditures of political parties on election campaign activities must not exceed 0.04% of Georgia’s GDP in the year preceding the election.

⁵⁰ Article 30 of the Law on Citizens’ Political Unions provides for state financing to those political parties that have acquired at least 1% of the vote. Funding allocation is proportional to the election result, with 15 GEL for each of the first 50,000 votes, and 5 GEL per every subsequent vote.

⁵¹ The ACB first implemented this legal provision on 27 August 2024, in the case of NGO “Freedom Square-Georgia”, 24 members of the Freedom Square Movement, as well as the Eastern European Center for Multi-Party Democracy and its Director.

⁵² The ACB made this decision on 24 September 2024. Transparency International-Georgia subsequently informed the observers that they would not be able to organize election observation, as it was being financed from foreign sources, ineligible under campaign finance regulations.

⁵³ The ACB announced revoking of the Decision on 2 October 2024. Transparency International-Georgia has since resumed election observation activities.

⁵⁴ The Prime Minister Irakli Kobakhidze [urged the ACB to revoke its decision](#) to protect ‘the interests of the state’, while reinforcing the notion that the Decision was fully legal.

Several ENEMO interlocutors from the civil society organizations reported self-censoring in the aftermath of this case to avoid being declared subjects with a declared electoral goal themselves. ENEMO deems this practice has negatively impacted freedom of expression and potentially freedom of association⁵⁵ during the election campaign.

Furthermore, the ACB did not provide clarity around whether the Foreign Influence Law would be applied to the organizations declared subjects with a declared electoral goal if they had been funded by entities outside of Georgia, which contributed to legal uncertainty for local organizations⁵⁶.

Media

The media landscape is diverse, but not independent from political influence, with owners and shareholders of the private media often also the main donors of political parties.

TV media remains the main source of information for the majority of the citizens, followed by social media which is the primary source of information for the youth. Facebook is the most used social media network, while TV Imedi and TV Rustavi, perceived as aligned with the ruling GD, are the most watched TV stations, followed by Mtvari Arkhi, TV Pirveli and Formula TV, perceived as aligned with the opposition.

Online media portals are perceived as less politically biased, however several ENEMO interlocutors raised concerns about the negative impact of enforcement of the recently adopted Foreign Influence Law to online portals on independent reporting. All ENEMO interlocutors from the media outlets aligned with the opposition reported fearing for safety of their journalists, due to lack of institutional response in most of the cases of attacks against journalists during the 5 July 2021 events.

The Election Code requires all general broadcasters to allocate free airtime to qualified political parties. Additionally, according to Article 51 of the Law on Broadcasting, broadcasters can give a qualified status to a non-parliamentary political party if it has over 4% in polls that meet the legal conditions.⁵⁷ The party is then eligible to free airtime. All broadcasters are required to arrange

⁵⁵ Multiple NGOs also report difficulties in grassroots engagement and recruiting of observers due to the impact of negative campaigning against CSOs and citizens' subsequent unwillingness to be linked with activism.

⁵⁶ Under the campaign finance regulations, NGOs who receive funding from abroad and from legal entities, but were declared subject with a declared electoral goal, would be in breach of the Law on Citizens' Political Unions, exposing them to a fine of double the amount of expenditure that would need to be returned to the state budget. Designated movements and organizations could also face sanctions from the *Law on Transparency of Foreign Influence* if they were found to have received over 20% of their funding from outside of Georgia.

⁵⁷ The Election Code prescribes that the broadcasters have the responsibility to ensure the methodology of the polls is based on a random sample, has 95% reliability and less than 3% margin of error; verify reliability of opinion polls; provide scientific explanation where the discrepancy from other published polls is significant; ensure transparency of the methodology that allows independent verification of results; and provide detail specified in Article 51. par. 17(f).

electoral debates. Publicly-funded broadcasters have an additional obligation to ensure all election-related programs are translated to sign language.

Electronic media is supervised by the Communications Commission (ComCom) which has a legal mandate and an obligation to implement monitoring of general broadcasters, in relation to distribution of free airtime and organization of debates. ComCom also has to proactively check if the public opinion polls published in electronic media, including online portals, meet the legal conditions.

Since the start of the election campaign, ComCom has been implementing quantitative and qualitative monitoring of 55 general broadcasters. As of 13 October, it initiated cases⁵⁸ against media outlets for 14 violations, mostly related to breaches of free airtime, whereby media outlets were sanctioned for providing free airtime outside campaign period; providing free airtime even though they are not obliged; providing free airtime to parties who acquired qualified status on the basis of polls and providing free airtime to parties who announced they would be running in elections jointly with other parties.

In one of these cases, ComCom sanctioned Formula TV for allocating free time to the political party Gakharia – For Georgia on the basis of it having over 4% of support in the polls⁵⁹ during the election year and in the month ahead of the election campaign. ComCom has argued the decision was based on having established that the media did not look into the methodology of the poll adequately.

ENEMO notes that, due to the fact that ComCom had not questioned the opinion poll at the time of publishing, under its legal obligation to proactively check opinion polls' compliance with the legislation, Gakharia – For Georgia have had access to free airtime unjustifiably restricted.

ComCom also has a positive obligation to regulate use of hate speech, inciting of violence and inter-ethnic hatred in the campaign, however, it has made a decision not to proactively regulate this field. Instead, ComCom has decided to act only *upon complaints* in these cases. In practice, this has resulted in media outlets having to rely on their internal regulatory mechanisms and legal expertise to assess the extent to which political advertisement violates prohibition of hatred in campaigning. Several media outlets aligned with the opposition have been fined for refusing to air GD ads having assessed that the ads contain hate speech.

ENEMO deems that ComCom's decision to not look into hate speech violations proactively has exposed the media outlets to an increased risk of being fined.

⁵⁸ ComCom explained it can only draft administrative protocols while final decisions must be made by the courts to be enforced. Court decisions have not deviated from the ComCom assessments.

⁵⁹ Gakharia - For Georgia informed ENEMO they were basing their claim on Edison polls commissioned by Formula TV, and the Gorbi polls commissioned by the Imedi TV, both of which have met the legal conditions for recognising a political party as qualified. ComCom have raised concerns with ENEMO that providing For Georgia with a qualified status, would reduce free airtime available to other parties who qualified on the basis of their parliamentary status.

As of 13 October, no debates have taken place and some media outlets questioned the purpose of the debates if the ruling GD does not attend.⁶⁰ ComCom can only sanction the electronic media for failing to organize debates in the aftermath of elections, with a *warning* as a first sanction. ENEMO deems there is not enough legal incentive for media outlets to arrange debates, which is further exacerbated by lack of responsiveness of the ruling party to partake in a debate.

Most political parties use social media for campaigning, most notably smaller non-qualified parties which do not have access to state financing. Social media is being used in combination with the traditional media to spread disinformation narratives, developed before and during the election campaign. The ruling GD is consistently reinforcing the narrative of the existence of a *Global Party of War*, whose objective is supposedly to put Georgia at war with Russia. This narrative was developed before the election campaign, but it continues to support the GD campaigning messaging on the 26 October election being a choice between war and peace. Since the start of the election campaign, there was an attempt to develop another narrative to undermine the credibility of international election observation missions, in which state officials⁶¹ and Russian Foreign Intelligence Service⁶² targeted ENEMO⁶³ and ODIHR missions respectively.

ENEMO believes that certain high-ranking officials, political parties, and media outlets' actions against international and domestic observers are damaging to the electoral process. ENEMO reminds that independent election observation remains a cornerstone of electoral legitimacy.

While activity on social media remains unregulated, local NGOs have used Meta's threat response to protect the online information space. Local NGO ISFED reported a network posting coordinated posts about politics in Georgia, which resulted in Meta's investigation confirming coordinated inauthentic behavior of a network of social media accounts operating from Russia⁶⁴. In August, Meta confirmed having removed this network of 76 accounts, 30 pages and 11 Instagram accounts.

⁶⁰ Several media outlets have informed ENEMO that the ruling Georgian Dream repeatedly refused their invitations to attend their TV programs. One media outlet suggested that it would not be fair for the ruling party to debate against multiple opposition electoral contestants.

⁶¹ See more in the *Observers* section.

⁶² See more at: <https://civil.ge/archives/623606>

⁶³ There is an ongoing smear campaign by the government and the ruling party against international observers, including ENEMO. For instance, the Speaker of Parliament Shalva Papuashvili accused ENEMO of questionable practices and cast doubt on the EOM's credibility using false information about the organization. Similarly, Givi Mikanadze of Georgian Dream raised concerns about the impartiality of election monitoring organizations. He claimed that 26 of the 49 registered local monitoring groups were affiliated with political parties. He further accused ENEMO members for public opposition to the ruling party, Georgian Dream, and "urged" international missions to rely on objective, evidence-based reports rather than biased sources.

⁶⁴ Meta has [confirmed the existence and operation of the network](#) aiming to influence political events in Georgia, Armenia and Azerbaijan. In Georgia specifically, the network focused on criticizing protesters against the Law on Transparency of Foreign Influence and support for the government.

Gender Representation

In Georgia, men hold a dominant role across many aspects of social, economic, and political life. Women's political participation is also low, with only 19% of parliamentary seats held by women at the national and local levels⁶⁵. Additionally, violence against women and girls, including femicide⁶⁶, is a recognized issue of public concern in the country. The narrative against women politicians is strong and often includes sexist statements. Women politicians are targeted by both ruling and opposition parties.⁶⁷

Women's participation in Georgian politics has historically been limited, though gender quotas have aimed to improve this imbalance. By 2020, women held just 20% of seats in the Georgian Parliament, a number that rose slightly to 27% in local councils during the 2021 municipal elections. To address this issue, the 2020 amendments to the Election Code of Georgia established a gender quota system for proportional representation. Specifically, a 1/2 gender quota ("one in two of different genders") was mandated for proportional lists in local council elections, and a 1/4 gender quota ("one in four of different genders") was introduced for proportional lists in parliamentary elections.⁶⁸ In 2021, the gender quota for local self-government elections was revised to 1/3 ("one in three of different genders") for proportional lists. The previous legislation also included a detailed procedure that anticipated the replacement of MPs during a parliamentary term with another person of the same sex, to ensure the maintenance of the gender quota in such cases.

However, amendments to the Election Code in 2023 proposed the removal of these quotas, generating significant backlash from women's rights advocates and international observers. President Salome Zourabichvili vetoed the amendments, emphasizing that abolishing quotas would undermine progress in increasing women's participation. Despite her intervention, the Georgian Parliament overrode the veto in May 2024, effectively eliminating the gender quotas. The impact of this legislative change is already evident. For instance, in the Georgian Dream's proportional list, the number of women candidates among the top 60 dropped from 15 (25%) in 2020 to just eight (13.3%) in 2024. This decline reflects a broader trend across various parties, indicating a persistent reluctance to nominate women for prominent positions.⁶⁹

⁶⁵ According to data from [UNDP](#).

⁶⁶ From 2018 to 2022, 183 cases of murder and attempted murder of women were identified, out of which 66 were qualified as femicide, according to [Civil.ge](#).

⁶⁷ For example, in September, the Director of the State Museum of Georgian Literature (a member of UNM) was removed from his position after stating that Georgian Dream women politicians are „worn out“, while the Minister of culture published a statement only two weeks prior against a number of opposition women, calling them „ungrateful“, „untalented“, „withered“ and „losers“. She also wrote that opposition women politicians discourage voters from voting from women.

⁶⁸ In 2020, alongside the amendments to the Election Code, a new provision was added to the Law on Political Associations of Citizens. Political parties eligible for public funding could receive a 30% increase if they included at least three candidates of each gender within every 10 candidates on their lists. This additional funding was designated for the activities of women's organizations within the parties. The same rule was reflected in the Election Code regarding the submission of party lists for parliamentary and local council elections.

⁶⁹ Some opposition parties show a relatively stronger, though not ideal, commitment to gender representation compared to the ruling party. For example, "Strong Georgia - Lelo, for the people, for freedom!" and "Coalition for Changes, Gvaramia, Melia, Girchi, It's Time" include 9 and 8 women, respectively, in their top 20 candidates (45% and 40%). "Gakharia for Georgia" and

ENEMO notes that removing gender quotas presents a serious setback for gender equality in Georgia. The absence of quotas now allows parties to disregard a minimum threshold for female candidates, potentially reducing women's representation in future elections. Moreover, it raises concerns that the hard-won progress toward greater gender balance in Georgian politics may be reversed in the coming years. The abolition of gender quotas is in contrast with the Constitution of Georgia which foresees special measures to ensure gender equality⁷⁰ and is against the Council of Europe's recommendations.⁷¹

On the other hand, ENEMO recognizes the CEC's efforts to promote the active involvement of women in electoral processes. For instance, training sessions for female representatives of political parties were organized to explore ways to increase women's participation in elections and to raise awareness of their electoral rights and opportunities.⁷²

National Minorities

The Constitution of Georgia ensures minority rights, including political participation, supported by laws such as the Law on General Education⁷³, which provides education in minority languages, and the State Strategy on Civic Equality, which nominally fosters inclusivity⁷⁴.

Georgia has never had any specific positive mechanisms to guarantee the adequate representation of national minorities in legislative or representative bodies. Furthermore, the country's political system lacks consultative bodies at the constitutional level to address the needs and perspectives of ethnic minorities during decision-making processes. There are no formal quotas for minority representation in parliament, which means that political parties are not legally required to ensure a minimum number of minority candidates. As a result, the inclusion of minority representatives often depends more on political strategies rather than legislative

"Unity - National Movement" each have 6 women in their top 20 (30%). However, the latter party has only 7 women in the top 40 (17.5%), showing a slight decrease from 2020.

⁷⁰ Article 11(3) of the Constitution of Georgia states, that "the State shall provide equal rights and opportunities for men and women. The State shall take special measures to ensure the essential equality of men and women and to eliminate inequality."

⁷¹ The Council of Europe's Recommendation Rec(2003)3 on balanced participation of women and men in political and public decision-making urges member States, including Georgia, to implement effective mechanisms to ensure equal access to political, economic, social, and cultural resources for both women and men, in order to address persistent gender inequality. According to the Recommendation, balanced participation is defined as ensuring that the representation of either gender in any political or public decision-making body does not drop below 40%.

⁷² For example, on 4 October, one such [event](#) was held in Batumi.

⁷³ [Law of Georgia on General Education](#)

⁷⁴ [State Strategy on Civic Equality](#) is [criticized](#) for its vague and general approach to implementation, lacking clear, actionable plans for ethnic minority education and integration policies. This lack of specificity makes it difficult to evaluate the strategy's potential effectiveness and raises concerns, particularly given the long-standing efforts in this area.

mandates. Parties may include minority candidates to attract votes from diverse communities, but this approach remains inconsistent.⁷⁵

Ethnic minorities make up 13.2% of the population of Georgia. To facilitate accessibility, electoral materials, including ballots, are translated into Azerbaijani and Armenian, with bilingual polling staff available. Only 2% of the DEC members are minorities⁷⁶. Since October 2023, the CEC has led an extensive information campaign targeting minorities, including practical demonstrations and broadcasts in minority languages such as Azerbaijani and Armenian, to improve awareness and engagement in electoral processes. This effort extends to regions such as Samtskhe-Javakheti and Kvemo Kartli, where ballots are provided in local languages to enhance minority participation in elections.

ENEMO notes that the absence of ethnic minority quotas contributes to the persistently low levels of minority representation in national politics, making it challenging to ensure that minority voices are adequately represented in legislative processes.

Inclusion of Persons with Disabilities

Georgia has made notable strides in enhancing the political participation of persons with disabilities through progressive legal frameworks. The Election Code mandates that polling stations must be accessible to individuals with disabilities and allows for accommodations such as accessibility ramps, sign language translations for political advertisements⁷⁷ and re-registering to vote in an accessible polling station⁷⁸. Moreover, tactile ballot guides and magnifying sheets are introduced to further support voters with vision impairments.⁷⁹ These provisions aim to ensure that persons with a disability can access political campaigns, and vote independently and with dignity. In addition, the CEC held a series of informational meetings with visually impaired voters⁸⁰ and trained signed interpreters for assisting hearing impaired voters at polling stations⁸¹.

⁷⁵ Following the 2020 elections, the number of ethnic minority representatives in parliament dropped to six. In contrast, there were 11 in 2016. Even in 2016, when ethnic minority representation in parliament was at its highest in recent years (7.3%), it was still half the proportion of ethnic minorities in the overall population, which stood at 13.2%.

⁷⁶ Twenty-four are Armenian and one Azerbaijani, out of 1,241 total DEC members.

⁷⁷ Article 50 of the Law of Georgia on Broadcasting: “When broadcasting a political/pre-election advertisement, the screen corner shall display the inscription ‘paid political advertising’ or ‘free political advertising’. Such advertisements shall have to be accompanied by the sign language translation which shall be arranged for by the electoral subject presenting the advertisement.”

⁷⁸ Article 200 of the Election Code of Georgia: “A wheelchair user voter may participate in the parliamentary elections of Georgia as well as elections of the municipality bodies at any adapted electoral precinct within the territory of a respective local majoritarian electoral district, for which purpose, he/she must apply to a respective DEC or PEC not later than the 11th day before the polling day.”

⁷⁹ Article 63.2 of the Election Law of Georgia: “For electoral precincts, the CEC shall ensure the use of technologies (tactile ballot guide, magnifying sheets) that allow voters with vision impairment to complete a ballot paper independently.”

⁸⁰ [Meetings](#) were organized in cooperation with IFES and the Union of the Blind of Georgia.

⁸¹ [The training](#) was carried out on 17-19 September in cooperation with the Union of the Deaf of Georgia and with the financial support of IFES.

However, the practical implementation of these legal advancements remains inconsistent, particularly in rural areas where polling stations often lack the necessary infrastructure to accommodate persons with disabilities. Many polling stations still fail to meet basic accessibility requirements, creating barriers which discourage persons with disabilities from participating in the electoral process. ENEMO notes that this gap between the law and its enforcement highlights systemic challenges, including limited resources and oversight in regions outside of urban centers. While efforts to provide accessible voting options and election materials are crucial, they are not yet sufficient to ensure full electoral inclusion for all citizens with disabilities.

ENEMO observers note that while there have been improvements in accessibility at polling stations⁸², accessibility for persons with disabilities remains inconsistent. Additionally, the involvement of PWDs in election bodies remains limited, with no PWDs observed as members of DEC or PEC in some areas, such as Zugdidi. ENEMO notes that misconceptions about the capabilities of PWDs to work within election management bodies persist, underscoring the need for further efforts to ensure inclusivity in both accessibility and participation.

Complaints and Appeals

Electoral parties, initiative groups, their representatives, and observer organizations may submit complaints on electoral disputes. Voters may only file complaints when their personal rights are infringed.⁸³ Most election disputes follow expedited procedures, with decisions made by election commissions subject to appeals at higher levels, including district or city courts, and ultimately to the Court of Appeals. Parallel jurisdiction is effectively removed from the legislation.

The expedited timelines for resolving electoral disputes are intended to ensure swift resolution, which is crucial for maintaining the momentum of the election process and preventing delays in the announcement of results. However, some short deadlines, particularly for the Court of Appeals, were also highlighted as a concern in ODIHR and Venice Commission recommendations,⁸⁴ as they may limit the ability to gather sufficient evidence and prepare comprehensive cases. The timeframes for filing and reviewing court appeals are still too short. The law sets a two-day deadline for submitting and hearing appeals in courts, with an additional one-day period for submitting any further appeal to the Court of Appeals, and two days for its consideration. ENEMO notes that this could potentially affect the thoroughness and fairness of the decision-making process, especially for more complex court disputes and for parties with limited legal resources.

ENEMO notes that an online registry for election-related complaints is available, providing public access to both complaints and the corresponding decisions. Additionally, all reviewing bodies,

⁸² For instance, in schools and kindergartens in areas around Gori and Kareli.

⁸³ Article 78 of the Election Code of Georgia

⁸⁴ Joint Opinion on Draft Amendments to the Election Code, Venice Commission, 127th Plenary Session, 2-3 July 2021; Joint Opinion of the Venice Commission and OSCE/ODIHR on Amendments to the Election Code and Law on Political Associations, 133rd Plenary Session, December 2022.

including election commissions and courts, generally adhere to the prescribed deadlines for resolving these disputes, ensuring timely legal recourse.

As of October 13, the Election Administration had received a total of 113 complaints. Out of these, 32 complaints remain pending, while only three have been satisfied. The remaining complaints were either dismissed or rejected. The majority of objections were related to the functioning of Precinct Election Commissions - 51 (including the opening, closing, selection of members, and remuneration of the commission), misuse of administrative resources -15, and breaches of campaigning regulations - 19. Courts have adjudicated approximately 30 election-related cases, including important rulings on free airtime allocation, the right of broadcasters to recognize parties as qualified electoral subjects, voting abroad, and recognizing subjects with declared electoral goals. Without delving into the merits of judicial decisions, our analysts, based on the review of designated cases, observe that the courts tend to apply broad interpretations when imposing restrictions, while adopting narrow and formalistic approaches when the expansion or protection of rights is concerned. Consequently, rather than functioning as a check on executive authority, the judiciary often assumes the role of facilitating such decisions.

Observers

Local observers

The legislative framework governing local observers in Georgia is outlined in the Election Code of Georgia. A local observer organization must be a non-profit, non-commercial legal entity registered in Georgia at least one year prior to the election day. To officially observe elections, NGOs must undergo a formal accreditation process through the CEC to observe elections, with the criteria of neutrality, nonpartisanship, and a track record in democracy and human rights work.⁸⁵

In Georgia, NGOs have long played a crucial role in ensuring the integrity of the electoral process, acting as independent observers to uphold democratic standards. As the 2024 parliamentary elections approach, their work is more critical than ever, given the escalating tensions between civil society and the ruling Georgian Dream party. Georgian NGOs traditionally engage in election monitoring, voter education, and recommending electoral improvements. However, under the current political climate, they face increasing challenges, including legal restrictions and political pressure from the government.

Until 13 October, 2,496 local observers representing 87 local organizations were registered by the CEC for observing the 2024 Parliamentary elections in Georgia. Several prominent NGOs have been monitoring the 2024 elections, with TI Georgia⁸⁶, ISFED⁸⁷, PMMG⁸⁸, and GYLA⁸⁹ being particularly influential. Despite their extensive experience and credibility, these organizations face growing pressure from the government, which may use legal and extralegal measures to limit the impact of independent observers as the elections approach.

The broader environment for civil society organizations (CSOs) in Georgia is also concerning. Of the 30,258 CSOs registered in 2024, only 4.3% are active, reflecting a shrinking space for civic engagement. The controversial Law on Transparency of Foreign Influence which mandates NGOs and media outlets receiving more than 20% of their funding from abroad to register as “foreign agents,” has been heavily criticized for its resemblance to similar laws in Russia. In protest, approximately 200 Georgian NGOs have vowed to defy the law, citing concerns over its impact on civil society and democratic freedoms. On September 24, the ACB designated Transparency International Georgia as a ‘subject with a declared electoral goal,’ prompting the organization to suspend its election observation activities. These activities resumed on October 2 after the prime minister intervened, leading the ACB to revoke the designation.⁹⁰ ENEMO notes that the law and the government's crackdown on peaceful protests further strain the already

⁸⁵ The organization’s founding documents must indicate its commitment to election monitoring and/or the protection of human rights.

⁸⁶ At the time of this report, [Transparency International Georgia](#) registered 35 observers.

⁸⁷ At the time of this report, [International Society for Fair Elections and Democracy](#) registered 827 observers.

⁸⁸ At the time of this report, [Public Movement “Multinational Georgia”](#) registered 533 observers.

⁸⁹ At the time of this report, [Georgian Young Lawyers’ Association](#) registered 323 observers.

⁹⁰ See more in the *Political campaign and campaign finance* section.

tense political climate leading up to the elections, with local NGOs being labeled as radical forces and their credibility being questioned.

International observers

Until 13 October, 580 international observers representing 60 international organizations or entities were registered by the CEC for observing the 2024 Parliamentary elections in Georgia.

The CEC and DEC's provide international observers with timely information on the upcoming sessions and enable full observation, while the CEC regularly provides updates and relevant information, and is generally cooperative with international observers.

About ENEMO

The European Network of Election Monitoring Organizations (ENEMO) is an international non-governmental organization that represents a network of national non-governmental civic organizations founded on September 29, 2001, in Opatija, Croatia. It consists of 21 leading domestic monitoring organizations from 17 countries of Central and Eastern Europe and Central Asia, including three European Union countries.

ENEMO seeks to support the international community's interest in promoting democracy in the region by assessing electoral processes and the political environment and offering accurate and impartial observation reports. ENEMO's international observation missions use international benchmarks and standards for democratic elections to evaluate the electoral process and the host country's legal framework. ENEMO and all its member organizations have endorsed the 2005 Declaration of Principles for International Election Observation and the Declaration of Global Principles for Nonpartisan Election Observation and Monitoring by Citizen Organizations. Each ENEMO observer signed the Code of Conduct for International Election Observers.

ENEMO member organizations have monitored more than 250 national elections and trained more than 250,000 observers.

To date, ENEMO has organized 43 international election observation missions to 11 countries: Georgia 2024, Parliamentary Elections; Moldova 2024, Presidential Elections; Hungary 2024, Municipal Elections; Moldova 2023, Local Elections; Serbia 2022, Presidential and Early Parliamentary Elections; Hungary 2022, Parliamentary Elections; Kosovo 2021, Local Elections; Georgia 2021, Local Elections; Moldova 2021, Parliamentary Elections; Albania 2021, Parliamentary Elections; Moldova 2020, Presidential Elections; Montenegro 2020, Parliamentary Elections; Serbia 2020, Parliamentary Elections; Ukraine 2020, Local Elections; Moldova 2019, Local Elections; Ukraine 2019, Early Parliamentary Elections; Ukraine 2019, Presidential Elections; Moldova 2018-19, Parliamentary Elections; Armenia 2018, Early Parliamentary Elections; Moldova 2016, Presidential Elections; Ukraine 2015, Regular Local Elections; Ukraine 2014, Parliamentary Elections; Ukraine 2014, Presidential Elections; Ukraine 2013 – re-run of Parliamentary Elections 2012 in 5 MECs; Kosovo 2013, Local Elections, first round; Ukraine 2012, Parliamentary Elections; Kosovo 2011, Re – run of Parliamentary Elections; Kosovo 2010, Parliamentary Elections; Kyrgyzstan 2010, Parliamentary Elections; Ukraine 2010, Presidential Elections, second round; Ukraine 2010, Presidential Elections, first round; Kosovo 2009, Local Elections; Moldova 2009, Parliamentary Elections; Georgia 2008, Presidential Elections; Kyrgyzstan 2007, Parliamentary Elections; Ukraine 2007, Parliamentary Elections; Ukraine 2006, Local Elections in Poltava, Kirovograd and Chernihiv; Ukraine 2006, Parliamentary Elections; Kazakhstan 2005, Presidential Elections; Albania 2005, Parliamentary Elections; Kyrgyzstan 2005, Presidential Elections; Kyrgyzstan 2005, Parliamentary Elections; Ukraine 2004, Presidential Elections, second round re-run; Ukraine 2004, Presidential Elections.

ENEMO member organizations are: Center for Democratic Transition – CDT, Montenegro; Centre for Monitoring and Research – CeMI, Montenegro; Center for Free Elections and Democracy – CeSID, Serbia; Center for Civic Initiatives CCI, Bosnia and Herzegovina; Gong, Croatia; International Society for Fair Elections and Democracy – ISFED, Georgia; KRIIK Association, Albania; Citizens Association MOST, Macedonia; Promo-LEX, Moldova; OPORA, Ukraine; Society for Democratic Culture SDC, Albania; Transparency International Anti-Corruption Center (TIAC), Armenia; Election Monitoring and Democratic Studies Center (EMDS), Azerbaijan; Belarussian Helsinki Committee (BHC), Belarus; FSCI, Kazakhstan; Kosovo Democratic Institute (KDI), Kosovo; Coalition for Democracy and Civil Society, Kyrgyzstan; Center for Research, Transparency and Accountability (CRTA), Serbia; Obcianske OKO (OKO), Slovakia; Committee of Voters of Ukraine (CVU), Ukraine; and Political Accountability Foundation (PAF), Poland.