



ENEMO International Election Observation Mission

GEORGIA PARLIAMENTARY ELECTIONS, 26 OCTOBER 2024

STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS

Tbilisi, 27 October 2024

The 2024 parliamentary elections occurred in a polarized and restrictive environment, which undermined inclusivity, transparency and fairness. Critical violations included violence against opposition members, voter intimidation, smear campaigns against observers, and extensive misuse of administrative resources. Restrictive implementation of campaign regulations limited competition, placed significant pressure on civil society and the media, and effectively reduced space for criticism of the government. Even though the election administration generally conducted the process professionally and efficiently, ENEMO raises concerns about the CEC's independence and impartiality. The cumulative impact of observed shortcomings significantly compromised the democratic integrity of the election process.

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

ENEMO has deployed a total of seven Core Team (CT) experts based in Tbilisi. The Mission is headed by Dr. Zlatko Vujovic. ENEMO has additionally deployed eight Long-term observers (LTOs) in four multinational teams throughout the country, based in Tbilisi, Gori, Kutaisi and Zugdidi.

On election day, ENEMO deployed 44 multinational teams of observers to follow the process of preparation and opening of polling stations, the voting and counting process, as well as the transfer and intake of election materials by DEC. Observation teams, composed of the eight LTOs and 80 STOs, monitored the opening procedures in 44 polling stations, voting in 482

polling stations, and closing and counting in 44 polling stations. Additionally, ENEMO observed the intake of election materials and tabulation of results in 44 DECs.

Additionally, up until 26 October 2024, the ENEMO CT experts and LTOs have conducted 366 meetings, out of which 131 with election management bodies, 59 with political parties and candidates, three with state officials, 23 with media, 43 with domestic civil society organizations, 31 with other domestic and international election observation missions, in addition to observing over 40 election management bodies sessions and trainings, 14 campaign activities (meetings or rallies) and 25 other meetings with voters various interlocutors.

The mission has been monitoring and assessing the overall political and electoral environment, respect for the rights to elect and stand for election, conduct of election management bodies, campaigning, gender equity, voting and tabulation processes, electoral dispute resolutions and other crucial aspects of the process, based on international standards for democratic elections and the Georgian legal framework.

This Preliminary Statement is based on ENEMO's findings from the pre-election period and the Election Day. The Statement should be considered in conjunction with the Interim Report of the mission. The Mission will stay in the country until the conclusion of the electoral process to follow post-election developments. A final report, including a full assessment, which will depend in part on the conduct of the remaining stages of the elections, detailed findings, and recommendations will be issued within sixty days from the certification of results.

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

Preliminary Conclusions

On 26 October 2024, Georgia held parliamentary elections under a new list proportional system. The elections occurred in a highly polarized political context, heightened by legislative controversies, particularly the adoption of the Law on Transparency of Foreign Influence in July 2024, which incited large-scale protests and backlash against the government. Reports of mistreatment and harassment of protesters, combined with allegations of mass surveillance, significantly impacted public trust in institutions and led to instances of self-censorship during the elections. This environment, compounded by disinformation campaigns and alleged misuse of administrative resources, hindered inclusivity and fairness in the electoral process.

While Georgia's Constitution and Election Code provide a foundational structure for conducting elections, recent fragmented amendments raised concerns over stability and consistency. Key legislative actions included banning pre-electoral coalitions, raising the electoral threshold from 1% to 5%, banning donations from legal entities, and abolishing gender quotas. These changes negatively impacted the ability of smaller parties, emerging political entities, and female candidates to compete effectively. Additionally, amendments affecting the composition and decision-making of the Central Election Commission (CEC) were adopted without broad consensus or meaningful public consultation, undermining confidence in the reform process and the election administration's independence and impartiality.

ENEMO assesses that the election administration, including the CEC, District Election Commissions (DECs), and Precinct Election Commissions (PECs), operated in a professional and efficient manner but with notable transparency shortcomings. The last-minute CEC decision setting the date for the distribution of functions between PEC members was not publicly communicated, limiting observer access. Opposition-nominated CEC members cited unequal treatment and difficulties in accessing information.

New election technologies, including voter identification devices and optical ballot scanners, were introduced in 75% of precincts, covering approximately 90% of voters.

ENEMO interlocutors did not express any major concerns regarding the accuracy and inclusiveness of the voters' list. Voters had several ways to verify their correct inclusion, and request corrections. The preliminary voter lists were published at the PEC level for public scrutiny. The current electoral system does not permit candidates to stand independently, which is in contradiction with international obligations and standards for democratic elections.

A total of 18 electoral subjects were registered by the CEC, providing voters with a wide range of political alternatives. However, candidates were not allowed to run on another party's list, without formally changing or suspending their party membership beforehand. ENEMO notes that while the party and candidate registration process was transparent and inclusive, this last regulation hinders freedom of association.

Allegations of undue pressure on public sector employees, selective media access, and misuse of administrative resources marred the campaign. Some opposition political parties had their access

to media restricted, negatively impacting voters' exposure to diverse viewpoints. Geopolitical issues dominated the campaign, framed as the ruling party's choice between war and peace, while the opposition portrayed it as a choice between Europe and Russia. ENEMO notes that disinformation narratives promoted by the ruling party and foreign actors compromised the integrity of the information space and distorted public perception.

There have been numerous reports of abuse of public resources for organizing and intimidating voters. This included reports of confiscating citizens' IDs, reports of use of social services to pressure socially vulnerable groups, as well as extensive reports of the use of the education sector to ensure its employees attend ruling party events and vote for the ruling party. ENEMO raises strong concerns about the impact of these practices on preserving trust in elections and the legitimacy of election results.

The media scene is highly polarized. Access to free airtime and paid political advertisement was only partially respected. The media did not have a legal route to obtain clarifications on whether political party ads violated prohibitions on hate speech, inciting violence, and inter-ethnic hatred.

The Anti-Corruption Bureau interpreted the definition of a subject with a declared electoral goal too widely when applying it to non-governmental organizations and related individuals. ComCom's interpretation that political entities whose leaders announced they would join other electoral lists granted qualified political parties ineligible to free airtime. ENEMO deems these actions of the two regulatory bodies negatively impacted freedom of expression and the ability of opposition political parties to run election campaigns, reducing space for criticism of the government.

Women's political representation in Georgia remains starkly unequal, with political participation heavily male-dominated at both national and local levels. Despite the introduction of gender quotas in 2020 to address this disparity, the removal of these quotas in 2023 resulted in a sharp decline in female candidates, particularly on the lists of the ruling Georgian Dream party. ENEMO assesses this removal as a significant regression, risking the entrenchment of gender disparities. While the CEC initiated training programs for female political representatives to foster greater involvement, these efforts were insufficient to counteract the negative impact of eliminating structural safeguards like quotas.

Minority groups' representation and engagement in the electoral process were limited, with overall insufficient legislative and administrative efforts to encourage minority inclusivity in candidate lists and voter outreach.

Ahead of Georgia's 2024 parliamentary elections, domestic observers faced significant challenges within an increasingly restricted civil society space. The CEC registered 23,153 local observers from 101 local organizations, including Transparency International Georgia, ISFED, GYLA, and PMMG. Mounting pressure from government actions—such as legal obstacles and intensified scrutiny under the Law on Transparency of Foreign Influence—limited their ability to operate, raising concerns about the transparency of the electoral process. Direct interference, such as temporarily suspending Transparency International Georgia's observation activities, exemplified the strained relationship between civil society and the ruling party, exacerbating the tense political climate.

International observation efforts included 1,713 observers from 76 organizations. Some international organizations became targets of smear campaigns by ruling party leaders and affiliated media, further complicating the observation environment and detracting from impartial oversight. Such pressures on domestic and international observers highlight a restrictive climate for effective monitoring, challenging efforts to ensure a fair and transparent electoral process.

Election Day in Georgia saw numerous serious issues affecting the integrity of the process. ENEMO observers reported multiple acts of violence and intimidation, including assaults on opposition figures, supporters, and journalists, particularly in Marneuli, Tbilisi, and Kakheti, allegedly by Georgian Dream affiliates. The tense atmosphere around polling stations included voter intimidation, unauthorized individuals, and organized transportation, with Georgian Dream agitators repeatedly influencing voters. Additionally, the installation of cameras in polling stations by Georgian Dream representatives raised concerns about voter privacy. While procedures were generally followed, these cumulative issues significantly compromised the fairness of Election Day.

ENEMO reported that polling station opening procedures were affected by minor issues, including delays in nearly a third of locations due to technical malfunctions and disorganization. In 28.6% of observed polling stations, voters required assistance with PCOS devices. ENEMO negatively assessed the overall conduct of 4.8% polling stations, with voter privacy violations remaining a key concern.

All observed polling stations closed on time, with 81.8% using counting technologies. Unauthorized individuals were present in 4.5% of observed polling stations, but pre-counting procedures were followed, and no queues were reported at closing. Minor procedural issues affected 18.2% of stations, and technical problems occurred in 11.4% during protocol transmission. Overall, ENEMO positively assessed closing and counting in 95.4% of polling stations, noting only 4.6% as poorly organized. During the transfer of materials to DEC, 9.0% of DEC premises were inadequate, and 11.4% were overcrowded, leading to a 4.6% negative rating of DEC operations.

By 26 October, a total of 216 complaints had been submitted to election management bodies, primarily concerning PEC operations (78), misuse of administrative resources (28), and campaigning violations (75). Of these, 40 complaints remain pending, while only 17 were satisfied, with the rest dismissed or rejected. Additionally, approximately 35 election-related cases have been adjudicated in court, addressing issues such as recognizing subjects with declared electoral goals, free airtime allocation, voting abroad and right of broadcasters to recognize parties as qualified electoral subjects.

ENEMO notes a tendency among the courts to apply broad interpretations when upholding restrictions, while adopting narrow and rigid approaches when the expansion or protection of rights is concerned. Procedural requirements and short deadlines—particularly a two-day limit for appeals and decisions—potentially restrict the development of comprehensive cases, especially for complex disputes.

Election-related complaints and decisions were generally accessible through an online registry, allowing transparency, and election commissions and courts largely adhered to prescribed deadlines, supporting timely recourse.

Background

The parliamentary elections were held on 26 October 2024. These were the first elections in Georgia held under the list proportional system, used for allocation of all 150 seats in the Parliament. The election saw large-scale introduction of voter identification and vote counting technology, which was used in 74% of all polling stations.

The election took place against a backdrop of a prolonged political crisis and deep political polarization, additionally fueled by the adoption of the Law on Transparency of Foreign Influence. Adoption of the Law at the third attempt in July 2024 triggered large-scale protests and backlash against the government. It followed the EU granting Georgia a candidate status and subsequently led to Western partners freezing aid¹, EU warning of halting of Georgia's EU accession process² and US issuing sanctions³.

The campaign was dominated by geopolitical topics, framed as a choice between war and peace by the government, and as a choice between Europe and Russia by the opposition. Traditional values featured heavily in the ruling party campaign, culminating in the adoption of the Law on Protection of Family Values against Venice Commission opinion⁴ and EU advice.

The turnout in the elections was 58.94%. The CEC started publishing results from the polling stations in real time and delivered its first announcement of the preliminary results 22:00h⁵, two hours after closing of the polling stations. Preliminary results indicate that the Georgian Dream won a clear majority of votes (54.23%) in contrast to the opposition parties who reached 37.44%. UNM, Coalition for Change and Strong Georgia leaders separately announced that they are not recognizing the official preliminary results announced by the CEC.

¹ Britain freezes security dialogue with Georgia, [Reuters](#).

² EU Accession Process Halted, Civil.ge <https://civil.ge/archives/615670>

³ [Treasury Sanctions Georgian Officials and Extremists for Serious Human Rights Abuse](#)

⁴ See [Venice Commission opinion](#) CDL-AD(2024)021-e

⁵ The preliminary results were based on 97% of the polling stations which used election technology.

Legal framework and electoral system

Legal Framework

The legal framework for Georgia’s 2024 parliamentary elections was shaped by a series of amendments, many of which were implemented close to the election date. While Georgia’s legal framework, including the Constitution and the Election Code, provide a solid foundation for the conduct of elections,⁶ ENEMO notes that the reform agenda for this cycle was characterized by its fragmentary and reactive nature.

Over recent years, the legal framework has been subject to frequent revisions reflecting ongoing political debates and Georgia’s commitment to its EU integration agenda. These revisions have often been central to political negotiations and recent political agreements⁷ culminating in the latest amendments⁸ introduced in May 2024. These changes were part of over 20 legislative amendments since the 2020 parliamentary elections.

While certain positive changes were implemented—such as measures to enhance the impartiality of lower-level election bodies, expand the role of citizen observers, add grounds for recounts, and adjust timelines for dispute resolution—the overall reform approach remains fragmented and inconsistent. Despite implementing some recommendations from international observers, including ODIHR and ENEMO, the broader reform agenda lacked coherence and did not fully address critical systemic issues.

Among the recent amendments, several negatively impacted the composition and decision-making processes of the Central Election Commission (CEC). ENEMO has emphasized that many of these reforms were adopted without broad political consensus or substantial public consultation, raising questions about their legitimacy and the motivations behind them. The expedited adoption of these changes are more favoring the ruling party rather than enhancing the integrity of the electoral process.

Additionally, key recommendations from international organizations such as the Venice Commission, OSCE/ODIHR, and local observers—particularly those concerning gaps in the appointment process of election administration members, the prevention of administrative

⁶ The Constitution of Georgia (1995) provides the foundational principles; The Election Code of Georgia (2011) serves as the primary legal instrument governing the conduct of elections. Supplementary laws such as the Organic Law on Political Associations of Citizens (1997), which regulates political party activities, and the Law on Broadcasting (2005), which ensures fair media access during election periods, further support this framework. Ordinances issued by the Central Election Commission (CEC) offer additional regulatory guidance to election stakeholders.

⁷ Some of the amendments to the Election Code have often emerged from high-stakes political negotiations and agreements, such as the Charles Michel Agreement of 19 April 2021, which sought to address political polarization and set the stage for reforms to strengthen Georgia’s electoral framework.

⁸ On 29 May 2024 the parliamentary majority introduced additional reforms, proposing the establishment of Delegates. Under these amendments, a party can nominate a candidate as a delegate for one of the 30 districts, whose geographical mandate aligns with the same majoritarian districts that were used in the 2020 parliamentary elections.

resource misuse, campaign finance oversight, media campaign regulations, and the electoral dispute resolution framework—were either only partially implemented or disregarded altogether.

ENEMO assesses that the absence of a systematic, comprehensive reform agenda, alongside a lack of inclusive and participatory processes, resulted in a series of unilateral amendments. While some of these amendments brought positive changes, their impact was often inconsistent and incomplete, contributing to ongoing challenges in the electoral process, many of which were apparent in the current election cycle.

Electoral System

The 2024 parliamentary elections in Georgia marked the inaugural use of a list proportional system. This system features a closed-party list within a nationwide constituency encompassing 150 seats. Under this framework, pre-election coalitions are disallowed, and parties must achieve a 5% threshold of valid votes to qualify for seat allocation. Individual candidacies are also not permitted.

While the reformed system was intended to enhance proportionality and inclusivity in representation, ENEMO observes that the ban on pre-election coalitions, combined with the relatively high legal electoral threshold, may have impeded the full realization of these objectives.

Election Administration

The election process in Georgia is managed by a three-level election administration composed of the CEC, 73 DEC⁹, and 3,111 PECs.¹⁰ 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, and up to nine members nominated by the political parties with parliamentary representation.

Central Election Commission (CEC)

The 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, undermining the

⁹ 76 DEC^s are established throughout Georgia, including three DEC^s covering on the occupied territories of Abkhazia and Tskhinvali Region. Elections will not be organized in the occupied territories.

¹⁰ 3,044 PEC^s located in Georgia, including 13 special polling stations (12 located in penitentiary institutions and one in a mental health center). 67 polling stations have been established abroad, across 53 cities in 42 countries.

consensus-based nomination process.¹¹ These changes have increased the ruling party's influence over the appointment process of CEC members. Furthermore, amendments to the Election Code modified the decision-making process within the CEC, weakening the culture of collegiality within the institution.¹² ENEMO interlocutors from political parties and civil society emphasized that these recent changes have diminished the overall confidence in the CEC's independence and impartiality.

Overall, the election process was well-administered. The CEC operated efficiently and met all legal deadlines. It held regular sessions, which were announced in a timely manner on the institution's website, broadcasted live, and open to accredited observers, party representatives, and the media. Summaries of the sessions and the decisions adopted were published promptly on the institution's website. However, the CEC's actions were not consistently transparent, with some key information not being made public in a timely manner, despite repeated requests from stakeholders.¹³ CEC members appointed by opposition political parties reported not being granted equal access to information.

District Electoral Commissions (DEC)

DECs are permanent bodies of five non-partisan members. During elections, they are supplemented by three additional non-partisan members selected by the CEC, and nine members nominated by political parties with parliamentary representation. The selection process was conducted transparently, with live broadcasts of candidate interviews. However, ENEMO notes that the limited number of applications hindered the competitiveness of the selection process.¹⁴

Concerns regarding the impartiality of DECs were raised by the vast majority of ENEMO interlocutors, alleging that non-professional members were closely tied to the ruling party. Several members appointed by opposition parties reported a negative, hostile, working environment. DEC sessions were usually not announced to observers in advance, limiting transparency. ENEMO observers were not always granted easy access to DEC premises and, in some cases, faced a lack of cooperation.

Overall, DECs conducted their tasks in a professional and well-organized manner, adhering to all legal deadlines. ENEMO observers noted that the process of distribution of sensitive and non-sensitive election materials to PECs was highly organized, and proceeded smoothly.

¹¹ 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. Furthermore, the professional members can be elected by a simple majority, if a three-fifths majority cannot be reached in the first vote.

¹² The amendments permit a CEC decree to be adopted by a simple majority if a two-thirds majority cannot be attained.

¹³ Most notably, the decision to organize the distribution of functions between PEC members on 18 October was not publicly announced, limiting the ability of observers to monitor the process. The number of voters registered abroad was not communicated in a timely manner, despite repeated requests from CEC members and political parties.

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.

Precinct Electoral Commissions (PEC)

PECs are temporary bodies composed of up to 17 members¹⁵ established 30 days before election day. For this election, 3,044 PECs were established in Georgia¹⁶, and 67 PECs were established abroad.

The DEC completed the selection of non-partisan PEC members on 10 September, in line with legal deadlines. However, the number of applications submitted to the DEC was low, requiring several calls to be re-issued, which negatively impacted the competitiveness of the process.¹⁷ While the CEC attributed the low number of applications to the extensive restrictions placed on non-partisan members¹⁸, ENEMO interlocutors noted that the lack of trust in the impartiality of the commissions, combined with the climate of intimidation prevailing in the country, acted as a strong deterrent.

ENEMO observers reported that many political party nominees refrained from participating in PEC activities. The low remuneration received by party-appointees, impacting the equality between commission members, acted as a disincentive.¹⁹ ENEMO observers were informed that intimidation and threats on PEC members nominated by opposition political parties led to a significant number of resignations during the weeks leading up to election day.

The process of distribution of key functions between PEC members²⁰, which was previously organized on election day, took place on 18 October, as a consequence of a controversial CEC decree which contradicts the Election Code.²¹ The date was not announced publicly, considerably hindering the transparency of the process. ENEMO observers reported that the lotteries were not always carried out according to the regulations.²²

A five-stage training programme was organized by the CEC Training Center. ENEMO observers assessed the training sessions as comprehensive, and conducted in a professional manner.

¹⁵ Eight members selected by the respective DEC and up to nine members appointed by political parties with parliamentary representation.

¹⁶ Including 12 PECs established in penitentiary institutions, and one is in a mental health center.

¹⁷ 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.

¹⁸ 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

¹⁹ A 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.

²⁰ Registrars, members responsible for regulating the flow of voters, members responsible for the mobile ballot box.

²¹ Article 61 of the Election Code stipulates that the distribution of functions between PEC members should take place on election day. In August 2024, the CEC adopted a resolution (32/2024) stipulating that this process would be organized no later than 7 days before election day. This appeal presented by the political union "Lelo for Georgia" in front of the Tbilisi City Court, was rejected.

²² The CEC resolution 32/2024 stipulates that all PEC members should participate in the lottery, whether they are present or not when the process is organized. In 50% of cases observed by ENEMO, only the PEC members present were included in the lottery process.

However, the level of attendance between professional and party-appointed members varied greatly.²³

Election Technologies

Amendments to the Election Code in 2022 introduced the use of election technologies, with the aim of increasing public trust in the election process and reducing the possibility of human errors. 7,526 non-biometric voter identification devices were purchased to verify voters' identities and register them for voting, as well as 4,865 optical ballot scanner (*Precinct Count Optical Scans*, or PCOS), to count and categorizes valid and invalid ballots, allowing preliminary results to be available shortly after the voting process concludes. Voter identification devices and PCOS were used in 2,263 PECs nationwide (74,6% of PECs), covering approximately 89% of voters.²⁴

Most ENEMO interlocutors welcomed the introduction of new technologies and expressed trust in the devices, which had already been piloted during several local and by-elections since 2018. The CEC conducted large-scale information voter campaigns, starting in June 2023.²⁵ However, ENEMO observers reported some persistent misconceptions about the new devices, notably that the optical ballot scanners could compromise the secrecy of the vote.

Registration of voters

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 crime, 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 an 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

²³ 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%).

²⁴ Election technologies were not used in polling stations with less than 300 voters and/or located more than 20 km from the DEC premises (768 polling stations).

²⁵ The CEC conducted large-scale voter information campaigns, starting in June 2023, and claimed that over 500,000 voters had 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.

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".

elections. The final number of voters on the voters' list 3,508,294. ENEMO interlocutors did not express any major concerns regarding the accuracy and inclusiveness of the voters' list.

Voters had several ways to verify their correct inclusion in the voters list and request corrections, including on the CEC's website, through a dedicated mobile application and quick payment machines.²⁷ The preliminary voter lists were published at PEC level on 26 September for public scrutiny, and voters could request corrections until 8 October. The unified voter lists were also made available to registered political parties and monitoring organizations.²⁸

Valid documents for voting are valid (non-expired) electronic or non-electronic ID cards and passports. In December 2023, the Parliament of Georgia adopted a law canceling the validity of the so-called "laminated" identity cards issued before July 2011, prone to falsification, as of July 2024.²⁹ Following this decision, the Ministry of Justice provided free replacement of identification documents.³⁰ However, according to PSDA, a total of 199,109 voters did not possess valid ID documents as of 30 September 2024, and were thereby disenfranchised.

Voters residing abroad had the possibility to register until 7 October 2024 in diplomatic representations or consulates. A total of 95,910 voters registered, which represents a 45% increase compared to the previous parliamentary elections.³¹ The CEC efficiently reacted to the issue faced by citizens from the occupied territories residing abroad, enabling them to be included in the special voters' lists.³² The CEC decided on the establishment of 67 PECs in 42 countries, including 5 countries where elections will be held for the first time, complying with its legal obligations.³³ This decision was however strongly criticized by opposition parties and civil society organizations, who advocated for the establishment of polling stations in additional cities, instead of limiting their opening to Embassies and consulates premises.

²⁷ According to the CEC, voters have checked their information in the unified voter list 1 311 773 times via the CEC website and mobile app, and 29 277 times through quick payment machines.

²⁸ Throughout the election year, four political parties and **two** non-governmental organizations requested the unified voter list from the election administration.

²⁹ As of 15 December 2023, 266,915 citizens of Georgia possessed the so-called "laminated" ID cards.

³⁰ According to the data provided by the Public Services Development Agency, 100,464 people applied to the agency to change their active non-electronic identity card from December 15, 2023 to June 10, 2024.

³¹ A total of 66,217 voters had registered for the 2020 parliamentary elections. 50 PECs were opened in 38 countries.

³² Voters living abroad, whose registration address is in the occupied territories or unknown according to the PSDA database, were not included on the voters' list. The CEC adopted a decree on 07/10, allowing to add such voters in the Embassies and consulate's special voters' list.

³³ Article 27.7 of the Election Code :Electoral precincts abroad shall be set up by the CEC [...] for not less than 50 and not more than 3 000 voters.

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. The residency requirement is at odds with international standards and good practice.³⁴ The current electoral system does not permit candidates to stand independently, which also contradicts international obligations and standards for democratic elections.³⁵

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.³⁶ A total of 30 political parties submitted their applications, of which the CEC registered 17. The CEC dismissed two applications³⁷ and rejected 11 lists which did not meet the legal requirements.³⁸ Political parties with parliamentary representation could submit their applications to the CEC until 30 August, and were not required to present signatures. Ten political parties applied and were registered by the CEC.

Out of the 27 registered electoral subjects, 19 submitted party lists before the legal deadline (26 September), and 18 lists were registered by the CEC.³⁹ Candidates were not allowed to run on another party's list, without formally changing or suspending their party membership beforehand. ENEMO notes that while the party and candidate registration process was transparent and inclusive, this restriction hinders freedom of association.

³⁴ 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." ; Venice Commission Code of Good Practice in Electoral Matters, I.1.1 c. iii : "a length of residence requirement may be imposed on nationals solely for local or regional elections".

³⁵ Paragraph 7.5 of the 1990 OSCE Copenhagen Document ; 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."

³⁶ Which represents less than 1% of voters, in line with good practices.

³⁷ 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.

³⁸ 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.

³⁹ The list submitted by Social-democratic party of Georgia contained deficiencies, which were not corrected within the legal deadline.

Electoral Campaign and Campaign Finance

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 and ended on 26 October 2024. While the legislative framework regulating election campaigning provides for equal campaigning opportunities for parties with a parliamentary status, regulatory bodies interpreted campaign restrictions widely in case of opposition political parties.

The main tools of campaign for all political parties have been door-to-door activities, rallies and billboards, while smaller parties relied almost exclusively on social media. Billboards have been used disproportionately by the ruling party, with examples of the main billboard company disputing content of opposition political parties' ads⁴⁰. Campaign activities predominantly took place in the regions, while the campaign intensified in Tbilisi in the week ahead of elections. Large scale rallies were organized by the ruling party and NGOs⁴¹. There have been substantive reports⁴² of organized attendance by civil servants at the Georgian Dream's rally on 23 October, as well large-scale presence and visibility of the opposition political parties at the rally organized by the civil society on 20 October.

The election campaign was highly polarized. Geopolitical topics were central to both opposition and ruling party's messaging, with opposition framing the election as a choice between Russia and the European Union, and the ruling party framing it as a choice between war or peace. The Russian invasion of Ukraine⁴³, activities of civil society organizations⁴⁴ and LGBT+ rights⁴⁵ were instrumentalized to support anti-Western rhetoric of the ruling party, alongside the threat of banning the leading opposition political party after the election.⁴⁶ ENEMO deems this rhetoric fueled the existing societal tensions and increased stakes for opposition political parties, as well as civil society leaders during the campaign.

While the campaign was largely peaceful, there were records of multiple incidents of harassment of political parties' campaign activists, as well as attacks on political parties' premises. ENEMO

⁴⁰ The United National Movement reported to ENEMO that the billboard company Alma initially refused to put UNM billboards saying "Get rid of Bidzina Ivanishvili" up. UNM subsequently informed ENEMO the issue was overcome.

⁴¹ The rally held on 20 October 2024 was organized by NGOs My vote for EU, Sapari, Georgia's European Orbit, Institute for Development of Freedom of Information, Civil Society Foundation, Georgia's Future Academy, EuroClub Kvareli, Transparency International Georgia, Civic Movement for Freedom, Democracy Defenders and the Georgian Court Watch.

⁴² ENEMO observed organized transport of the civil servants from the municipal building in Gori to the GD campaign rally during working hours.

⁴³ Georgian Dream's billboard ads contrasted images of destruction of infrastructure, religious sights and schools from the Russian invasion of Ukraine, with images of Georgian infrastructure, religious sights and schools.

⁴⁴ Georgian Dream's video ad portrayed photos of civil society leaders and activists as examples of 'moral degradation' of Georgian society.

⁴⁵ The Law on Protection of Family Values and Minors was adopted on September 17, in spite of negative opinion provided by the Venice Commission. 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. See [Venice Commission Opinion CDL-AD\(2024\)021](#) on the Draft Law, published on 25 June 2024.

⁴⁶ In his latest interview with TV Imedi, Bidzina Ivanishvili reiterated he intends to ban the "collective UNM" if GD secures a constitutional majority. See more at: [Civil.ge](#)

raises concerns about widespread allegations of confiscating of citizens' IDs, a practice which would directly contravene international standards⁴⁷ and violate citizens' voting rights.

ENEMO raises concerns about the worrying amount of reports of misuse of administrative resources for campaigning purposes by the ruling political party. ENEMO observed cases of pressuring civil servants to attend ruling party campaign rallies, along with reports of extensive use of the education sector to organize and pressure voters.⁴⁸ Announcements of new infrastructure projects and the involvement of local administration in ruling party campaigns was prevalent, most notably the transport sector⁴⁹. Furthermore, the use of social services for exerting pressure on voters⁵⁰ was reported to the mission, which raises significant concerns about the exploitation of vulnerable groups for electoral purposes.

ENEMO also expresses strong concerns that three qualified political parties, Citizens, European Georgia and Strategy Aghmashenebeli, had their access to campaigning through free airtime restricted. The three political parties were found to be campaigning for another electoral subject⁵¹ for videos criticizing the ruling party, after they announced they would be joining other electoral lists. However, due to the ban on pre-election coalitions, they were not recognized as an entity within the electoral lists either, effectively losing their access to free airtime acquired on the basis of their parliamentary status. Since the legal status of these parties had not changed and they were still in a position to submit an electoral list at the time their free airtime was restricted, ENEMO deems that the restriction was unjustified and had the effect of suppressing criticism of the government.

Another political party, For Georgia, had their access to free airtime denied in spite of having met legal conditions to obtain qualified status.⁵² ENEMO deems that, in this case as well, the practice of disregarding the rights of electoral contestants was both disproportionately applied to opposition political parties and had the impact of reducing space for criticism of the ruling party.

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. All political parties that acquired parliamentary status in the 2020 elections, apart from Lelo and

⁴⁷ See Venice Commission [Code of Good Practice in Electoral Matters](#)

⁴⁸The Public Defender has [published an overview of cases investigated](#) by 7 October 2024, that included numerous reports of abuses in the education sector. This was also raised by multiple ENEMO interlocutors across all areas of deployment of ENEMO long-term observers.

⁴⁹Among other examples, ENEMO observed attendance of GD representatives at the opening of the a cable car by the Mayor of Tbilisi and distribution of free transport tickets in Zestafoni.

⁵⁰ ENEMO observed examples of this practice in Kharagauli.

⁵¹ Article 186(6) of the Election Code prohibits subjects from placing an advertisement on the broadcaster that serves the agitation goals of another electoral subject within the advertising time.

⁵² According to the Article 186(9) of the Election Code, the broadcaster shall be authorized to recognise a political party as a qualified electoral subject, if according to public opinion polls, the party enjoys the support of at least 4% of voters in at least five polls in the election year or a poll conducted within one month before the Election Day.

the Labour Party⁵³, enjoyed access to state financing. New political parties reported difficulty raising campaign funds and relied on donations from individuals, capped at 60,000 GEL. While the legislation is mostly aligned with international standards, third-party financing remains underregulated.

Following amendments to the Election Code, the ACB was established as the main regulatory body in charge of campaign finance oversight. All political parties submitted their reports on campaign costs to the ACB, who published the reports in a timely manner.⁵⁴ The ACB carried out extensive in-house monitoring of expenditures of electoral contestants and requested a large volume of data, including a report on financing of political parties from 1 January – August 2024, which was partly outside the campaign period. Girchi – More Freedom did not submit the report and were fined for it.

For the first time, the ACB used the legal provision which allows for non-electoral contestants to be recognized as ‘subjects with a declared electoral goal’⁵⁵ and therefore accountable for campaign expenses in the same way as political parties. Transparency International, its Executive Director, “Vote for Europe”, its Executive Director and all Board members were declared “subjects with a declared *political* goal”⁵⁶ on the basis of statements and events promoting Europe or encouraging citizens to vote. Even though the law requires subjects to declare *an intention*⁵⁷ to take part in the elections, the ACB concluded that these movements and organizations were campaigning for opposition political parties. ENEMO notes that the wide interpretation of the law, subjected CSOs to excessive scrutiny and undue legal liability.

The ACB later revoked the Decision⁵⁸ on declaring TI Georgia and Vote for Europe along with associated individuals, subjects with a declared electoral goal following a statement from the Prime Minister⁵⁹, reinforcing the concerns raised by ENEMO interlocutors that the ACB does not operate independently from the Government.

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. ENEMO raises concerns that this creates significant legal

⁵³ Lelo and the Labour Party lost state funding in 2022 as a result of a 2020 legislative change which introduced the rule that political parties should be ineligible to state financing if their representatives had not taken part in at least half of the plenaries of the previous session of the Parliament (Article 30 of the Law on Political Associations). Lelo lost access to state financing as a result of one of its MPs being convicted in a criminal case and another MP terminating their MP status through a personal appeal, while the Labour Party’s MP boycotted the work of the Parliament.

⁵⁴ The ruling GD has reported the highest amount of donations as of October 7, at 6.5m GEL, followed by Coalition for Change at 5.6m GEL, Strong Georgia at 5.1m GEL, Unity at 1.1m GEL and For Georgia at 185,845 GEL.

⁵⁵ Pursuant to Article 261(1) of the Political Associations Law, “the restrictions determined under this Chapter with respect to a party shall also apply to persons who have declared electoral goals and who use relevant financial and other tangible resources to achieve such goals.”

⁵⁶ See Decision 03/028-24 adopted by the Anti-Corruption Bureau on 24 September 2024, available here: <https://acb.gov.ge/ka/news/antikoruftsiuli-biuros-ufrosis-2024-tslis-24-sektembris-gadatsqvetileba>

⁵⁷ Article 71 of the Law provides the following definition of the “declared electoral goal”: *A declared electoral goal is a factual situation where a specific subject has an evident desire to come to power by taking part in elections. Such a declaration shall be made publicly and be directed towards the formation of public opinion.*

⁵⁸ ACB announced revoking of its Decision on 2 October 2024.

⁵⁹ 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.

uncertainty for civic activism in Georgia, with a potential to negatively impact on freedom of association.

Media

The Georgian 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 parties⁶⁰. The environment is not conducive to financial sustainability of privately owned media outlets who have all reported having experienced significant reduction in commercial income following rapid legislative reforms⁶¹ over the last few years. The pre-election media environment was heavily influenced by political developments preceding the election, including reports of harassment of journalists⁶² and limited track record on prosecuting cases of violence against journalists⁶³.

Respect for free airtime for political advertisement of political parties was partially respected. Several media outlets refused to air the Georgian Dream ad⁶⁴, after their legal teams assessed it contained hate speech. Some media proactively sought clarification from the regulator as to whether the ads contained hate speech. In the first case, the media outlets were fined twice for refusing to air the ads, while in the second case⁶⁵ the regulator took a stance it does not have a mandate to proactively assess compliance of individual ads with campaign regulations.⁶⁶ ENEMO notes this position of the regulator increased the risk of financial costs for media outlets, and put a disproportionate burden on the media to carry out hate speech assessments.

Political parties who had legal grounds to request a qualified status necessary for free airtime based on polling results, were prevented from exercising this right. Namely, ComCom issued an administrative protocol against 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 polls⁶⁷ during the election year

⁶⁰ Examples include Mtavari TV, Formula TV, PosTV and TV Imedi, whose owners are also known to have donated to political parties. More information about the ownership structures of the privately owned media is available on the [Public Registry website](#).

⁶¹ Ban on commercial ads involving gambling, that were introduced over a month instead of gradual implementation to allow time for media to adapt their financial models.

⁶² See [the statement](#) made by the fact-finding mission of the Media Freedom Rapid Response (MFRR) consortium.

⁶³ See more in the Human Rights Watch reporting, available here: <https://www.hrw.org/news/2024/08/20/georgia-violent-attacks-government-critics>

⁶⁴ Mtavari TV, TV Pirveli and Formula TV refused to air the Georgian Dream ad. They informed ENEMO that this decision was based on the legal analysis of the GD ad by their in-house legal teams, who found the ad to be in breach of hate speech regulations.

⁶⁵ Formula TV, Mtavari TV and TV Pirveli [sought clarification from ComCom](#) as to whether the ads GD was requesting them to air contained hate speech or inciting violence or inter-ethnic hatred.

⁶⁶ ComCom informed ENEMO that, even though they have a legal obligation to regulate use of hate speech in election campaign, they had made a decision not to proactively act in these cases until they had received feedback from the EU Commission on the Guidelines they produced for this purpose.

⁶⁷ Gakharia - For Georgia informed ENEMO they were basing their claim on the Edison Research polls commissioned by Formula TV, and the Gorbi polls commissioned by the Imedi TV, both of which had met the legal conditions for recognising a

and in the month ahead of the election campaign. ComCom argued the protocol 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 had access to free airtime unjustifiably restricted⁶⁸.

Access to paid advertisement was only partially respected. Imedi and Rustavi 2 TV deprived all political parties from access to paid advertisement, in an attempt to balance the variety of political advertisement on their TV channel and across the board. ENEMO raises concerns about the political influence over editorial policy in relation to paid political advertisement and notes that ensuring fair distribution of political advertisement is the competence of the regulator, not of individual media outlets.

All required media outlets but the National Broadcaster failed to organize pre-election debates. The regulator, Communications Commission (ComCom), does not have effective legal means of incentivising organization of debates, as the law only prescribes for the first warning to be issued in the aftermath of the election. ENEMO emphasizes the essential importance of debates between electoral contestants for an informed decision of voters on Election Day.

Since the start of the election campaign, ComCom implemented quantitative and qualitative monitoring of 55 general broadcasters. It initiated protocols⁶⁹ upon ten complaints from political parties and in sixteen cases based on internal monitoring, mostly related to breaches of free airtime and refusal of media outlets to air paid political advertisement. While the work of ComCom has been transparent, ENEMO concludes that the decisions to deprive qualified parties from free airtime and restrict non-qualified parties from obtaining qualified status, resulted in disproportionate restrictions on opposition parties, raising questions about ComCom's independence.

Social media

Most electoral contestants used social media in their campaign. The spending of political parties on political advertisement on social media reached 671,009.00 USD in the last 90 days, with 518,286.00 USD spent only in the last 30 days of campaign⁷⁰. Georgian Dream and the Coalition for Change spent the most on social media advertising, however smaller political parties such as Labour Party and Gakharia – For Georgia, reported relying entirely on social media for their

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.

⁶⁸ Labour Party informed ENEMO they had also requested Formula TV to grant them qualified status on the basis of opinion poll results, however Formula found that the party had not met the legal conditions.

⁶⁹ 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.

⁷⁰ The data includes social media spending reports available on the [Meta Ad Library](#), for the following electoral contestants: Coalition for Change, Georgian Dream, Strong Georgia, Unity, Girchi, Gakharia - For Georgia and the Labour Party

campaigns, due to lack of financing. Facebook was the most dominantly used social media channel, followed by TikTok which was used for reaching out to younger population⁷¹.

In addition to political actors, social media boosting was used by media outlets as well. Post TV and TV Imedi spent a total of 74,770.00 USD⁷² on social media posts predominantly related to statements of GD members, anti-Western rhetoric, anti-opposition posts and conservative content. The activity on social media remains unregulated, however local actors have established cooperation with Meta to tackle disinformation. Local NGO ISFED flagged coordinated inauthentic behavior to Meta, whose Threat Report⁷³ confirmed the existence of a network of 76 accounts, 30 pages and 11 Instagram accounts operating from Russia, attempting to influence political views of Georgian social media users. The network was taken down in August 2024. During the Election Day, MythDetector flagged four social media posts for containing false information and five social media posts for instances of manipulation of information.⁷⁴

Disinformation was prevalent during the elections and predominantly locally driven, with several stark examples of disinformation originating from Russia. There were several local disinformation narratives, the most dominant one being the existence of a Global Party of War, designed to reinforce Georgian citizens' fear of war as part of the ruling party's campaign strategy. Other significant narratives included attempts to discredit local and international election observation, through statements of representatives of the ruling party⁷⁵ and Russian Foreign Intelligence Service⁷⁶. Finally, there have been reports of widespread rumors that secrecy of vote would not be respected due to use of technology in elections. ENEMO expresses strong concerns about deliberate use of dis and misinformation to distort citizens' perceptions of the electoral process.

⁷¹ For example by the Labour Party, Gakharia - For Georgia and the Coalition for Change.

⁷² The data includes social media spending reports available on the [Meta Ad Library](#), for the last 90 days.

⁷³ Meta [confirmed existence and operation of the network](#) aiming to influence political events in Georgia, Armenia and Azerbaijan. In Georgia specifically, the network focused on criticizing protests against the Law on Transparency of Foreign Influence and expressed support for the government.

⁷⁴ Most cases were related to falsification of quotes, manipulation of videos, as well as misinformation on ballots and opinion polls.

⁷⁵ For instance, the [Speaker of Parliament Shalva Papuashvili questioned ENEMO'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.

⁷⁶ See more at: <https://civil.ge/archives/623606>

Gender Representation

Women's political representation in Georgia is starkly unequal, with men dominating the political sphere across national and local levels.⁷⁷ Female politicians are routinely targeted with sexist rhetoric from both ruling and opposition parties, discouraging active participation and undermining the legitimacy of women's roles in politics.

The introduction of gender quotas in the 2020 amendments to the Election Code sought to address this gender imbalance, mandating quotas for proportional representation in both local councils and the national parliament.⁷⁸ The 2023 legislative amendments, which took effect in 2024⁷⁹, led to the removal of gender quotas and a noticeable decline in female candidates, particularly within the Georgian Dream party's proportional list.

The removal of gender quotas signals a significant regression in Georgia's efforts toward gender equality. It not only violates the Constitution's provisions⁸⁰ for ensuring gender equality but also disregards the Council of Europe's recommendations⁸¹. ENEMO warns that the absence of quotas further marginalizes women in politics, allowing parties to ignore previously established minimum thresholds for female candidates. This setback jeopardizes years of progress and raises the risk of entrenching existing gender disparities in political representation.

Despite these challenges, the CEC has attempted to foster greater women's involvement in the electoral process. Initiatives such as training sessions for female political representatives aimed to increase awareness of electoral rights and encourage women's participation. However, these efforts appear insufficient to counteract the broader decline in women's political engagement, especially following the removal of structural safeguards such as quotas. ENEMO negatively assesses the lack of measures that actively promote women's political representation and ensure compliance with international standards.

⁷⁷ Despite ongoing efforts, only 19% of parliamentary seats are held by women, reflecting a broader societal environment where women face systemic barriers, including sexism and violence.

⁷⁸ Initial outcomes were promising, with women securing 27% of seats in the 2021 municipal elections.

⁷⁹ This triggered strong criticism from women's rights advocates and international observers. While President Salome Zourabichvili attempted to veto the decision, the Parliament overrode it in 2024.

⁸⁰ 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."

⁸¹ 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%.

National Minorities

Ethnic minorities in Georgia continue to face significant barriers to political participation, as existing frameworks often fail to translate into consistent and effective representation within legislative and decision-making bodies.⁸² There are no formal quotas or consultative bodies at the constitutional level to address minority needs during decision-making processes. As a result, the inclusion of minorities in politics often depends on strategic interests of political parties rather than on mandated representation, which remains inconsistent and ad hoc.

Ethnic minorities constitute 13.2% of Georgia's population, yet their representation in politics is limited. Although measures such as bilingual electoral materials⁸³ and staff were introduced, as well as targeted information campaigns, only 2% of DEC members are from minority communities. The CEC initiated an awareness campaign in October 2023, including demonstrations and broadcasts in minority languages⁸⁴. However, challenges persist in terms of inclusion of national minorities.

ENEMO notes that the training for national minority PEC members revealed gaps, such as materials being only available in Georgian, which led to confusion among participants in Dmanisi and Ninotsminda. This oversight indicates a lack of preparedness and undermines the inclusivity of the electoral process, despite claims of a year-long preparation phase.

Pro-government media exacerbated this issue by employing ethnically discriminatory rhetoric against the opposition ahead of the October 26 elections.⁸⁵ This Armenophobic attack highlights a nationalist strategy used by pro-government outlets to discredit opposition figures. The use of ethnic identity as a tool in political campaigns not only undermines efforts toward civic equality but also fosters divisiveness and intolerance.

Local media have criticized the CEC for failing to adequately inform ethnic minorities about elections⁸⁶. They have urged the CEC to disseminate election-related information in minority languages and collaborate with local media to prevent discriminatory practices. Although

⁸² The Constitution of Georgia recognizes minority rights, including political participation, with supportive laws such as the Law on General Education and the State Strategy on Civic Equality, which aim to promote inclusivity. However, the implementation of these rights is often inconsistent. Despite the presence of these frameworks, Georgia has no explicit mechanisms to ensure adequate representation of national minorities in political and legislative bodies.

⁸³ The CEC translated informational videos into Armenian and Azerbaijani to educate ethnic minority voters. These videos addressed a range of topics, including audit reports on election technologies, the use of verification devices, vote-counting machines, and tablets, as well as electronic voter verification processes. Additionally, the videos provided guidance on the "Color it, don't circle it" campaign, correct ballot insertion into vote-counting machines, voting procedures for persons with disabilities using electronic technologies, and certification exams for heads of the PECs.

⁸⁴ Mainly Azerbaijani and Armenian minorities, particularly in regions like Samtskhe-Javakheti, Kvemo Kartli, and Kakheti.

⁸⁵ For instance, a [PosTV reporter targeted Mamuka Khazaradze](#) of the opposition coalition Strong Georgia, questioning his Armenian heritage.

⁸⁶ Aktual.ge, 24News.ge, and InterPress.ge [called on the CEC to collaborate](#) with them to prevent discriminatory practices.

innovations such as youth-oriented electoral programs for minorities⁸⁷ have been introduced, the lack of communication in minority languages remains a critical barrier.

Inclusion of Persons with Disabilities

Georgia has taken significant steps toward improving the political participation of persons with disabilities through progressive legislation. The Election Code requires polling stations to be accessible, introducing measures such as ramps, sign language translations for political advertisements, and provisions for re-registering to vote at accessible locations. Additional accommodations include tactile ballot guides and magnifying sheets to aid voters with vision impairments, ensuring that people with disabilities can engage with political campaigns and vote independently.

However, practical implementation of these measures remains uneven, particularly in rural areas where infrastructure is often inadequate.⁸⁸ On Election day, ENEMO assessed that 48.6% of observed polling stations were fully accessible, 23.2% required minor assistance and 28.2% were not suitable for persons with disabilities. In addition, 9.5% of observed polling stations were not equipped with tactile ballots⁸⁹, while only 25 wheelchair users registered to vote in an accessible polling station.⁹⁰ Additionally, the CEC organized informational sessions for visually impaired voters and trained a number of sign language interpreters to assist hearing-impaired voters at polling stations.

ENEMO observers noted that this gap between legislation and enforcement stems from limited resources and oversight outside urban centers, which hampers full electoral inclusion for persons with disabilities. Political parties show a noticeable lack of attention and meaningful engagement when it comes to addressing the needs and concerns of persons with disabilities.⁹¹

Moreover, the involvement of persons with disabilities in election administration is minimal. ENEMO observers reported no persons with disabilities working in many election bodies, reflecting persistent misconceptions about their capabilities in such roles. This indicates a broader need for initiatives that not only improve physical accessibility but also actively encourage the

⁸⁷ One such [event](#) was held on 22 October in Marneuli.

⁸⁸ While most polling stations are in generally accessible schools or kindergartens, smaller towns face challenges in finding suitable locations. Many DEC locations are located on higher floors without elevators, creating further barriers.

⁸⁹ In contrast, the CEC notified ENEMO that all polling stations were issued tactile ballots for visually impaired voters.

⁹⁰ Deadline for registration of persons with disabilities to vote in an accessible polling station was 11 days before elections, on 15 October.

⁹¹ The only significant event addressing marginalized groups was organized by the Strong Georgia coalition in Kutaisi. During a small meeting at their headquarters, coalition leaders, including a member with a disability, discussed challenges faced by the approximately 114,000 PWDs in Georgia, focusing on limited state support, economic hardships, and the need for accessible polling stations. The coalition pledged to improve conditions for PWDs if elected, and the event was covered by several national TV stations.

participation of PWDs within election management, aiming for true inclusivity in Georgia's electoral processes.

Complaints and Appeals

The legal framework governing election dispute resolution is designed to ensure a clear and hierarchical process, excluding the possibility of parallel jurisdiction. If a lawsuit/complaint is lodged with the court, the court immediately informs a DEC/CEC about receipt of the lawsuit/complaint and about the decision once it is delivered. Violations of electoral legislation may be appealed to the respective election commission or courts. Decisions made by an election commission can be challenged only before a higher election commission or a court, as per the legal framework and timelines defined by the Election Code.

Electoral parties, initiative groups, their representatives, and observer organizations have the right to file complaints related to electoral disputes. However, voters are limited to submitting complaints only when their personal rights are directly affected.

Provisions of the election code regulating dispute resolution are quite complex. The preconditions for submitting complaints include many formalities and procedural requirements, which can render the process quite demanding. Most election disputes are subject to expedited procedures. The purpose of expedited timelines is to ensure prompt resolutions and maintain the pace of the election process, preventing delays in result announcements. Nevertheless, concerns regarding the short deadlines, especially for appeals at the Court of Appeals, have been raised among previous ODIHR and Venice Commission recommendations.⁹² These tight deadlines risk hindering the ability to gather evidence and build comprehensive cases, particularly for more complex disputes. The law currently provides a two-day window for submitting and hearing appeals in courts, with an additional one day to file appeals to the Court of Appeals, which must then be considered within two days.

Election-related complaints and their corresponding decisions were publicly accessible in the online registry. Reviewing bodies, including election commissions and courts, generally complied with the prescribed deadlines, ensuring timely legal recourse.

As of 26 October, a total of 216 complaints were submitted to the election management bodies. Out of these, 40 complaints remain pending, while only 17 have been satisfied. The remaining complaints were either dismissed or rejected. The majority of objections were related to the functioning of PECs - 78 (including the opening, closing, selection of members, and remuneration

⁹² 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.

of the commission), misuse of administrative resources - 28, and breaches of campaigning regulations - 75.

Courts adjudicated approximately 35 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, ENEMO observed that the courts tend to apply broad interpretations when imposing restrictions, while adopting narrow and formalist 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.

The mission will continue to analyze election day and post-election complaints and appeals.

Election Day

Election day in Georgia saw numerous violent incidents targeting opposition members, supporters, and journalists. In Marneuli, Azad Karimov, head of UNM's regional branch, was assaulted, while in Tbilisi's Gldani district, Georgian Dream-affiliated activists reportedly attacked opposition supporters. Additionally, journalists from Mtavari TV were attacked near a polling station in Kakheti by individuals allegedly linked to Georgian Dream. ENEMO notes that such acts of violence and intimidation raise serious concerns about the integrity of the electoral process and the safeguarding of democratic freedoms.

The environment around polling stations was assessed as tense and occasionally disorganized, with multiple incidents of voter intimidation, presence of unauthorized individuals, and procedural irregularities. Instances of direct voter influence were observed, especially from Georgian Dream representatives, who guided voters to stations and monitored the flow of individuals from outside of the polling stations. Organized transportation efforts, using minivans and personal vehicles, brought groups of voters to stations, and Georgian Dream supporters repeatedly approached voters until intervention by local observers, only for replacements to appear.

Additionally, ENEMO observers reported gatherings of male adults near polling stations outside city centers, raising concerns about intimidation, though these individuals were not actively interfering with the voting process. Cameras installed by Georgian Dream representatives in nearly all observed polling stations heightened concerns over the voters' ability to cast their vote freely. Claims about the cameras varied, with some representatives justifying their use for incident documentation while others provided ambiguous or shifting explanations about ownership, pointing to potential partisan surveillance. Additionally, video footage circulating on social media showed mass ballot-stuffing in Marneuli, which is now under criminal investigation.

ENEMO observers assessed that voter privacy may have been compromised, as the ballot cover paper did not fully conceal the first few entries on the ballot, making markings on these initial electoral lists visible to polling staff.

ENEMO assesses that, while most polling stations adhered to procedures, the cumulative issues in setup, observer accessibility, and intimidation tactics undermined the fairness of the election day environment.

Opening procedures

ENEMO notes that the opening procedures of polling stations were marred by mostly minor issues. Notably, 27.3% of observed polling stations experienced delays of up to 15 minutes due to technical issues, electronic device malfunctions, or general disorganization. Additionally, 13.6% of observed polling stations had late starts caused by members arriving late, difficulties in setting up, or the delay of qualitative data announcements. Technical problems were evident in 6.8% of observed polling stations, ranging from malfunctioning election devices to forgotten passwords. Furthermore, there were concerns about transparency, as 4.5% of complaints filed in observed polling stations were related to ballot boxes not being shown empty before sealing, while 4.6% of mobile ballot boxes were improperly sealed or not sealed at all.

ENEMO observers positively evaluated the conduct of 93.2% observed PECs, while 6.8% received negative assessments for negligence, overcrowding, disorganized setups, rushed processes, and commencing voting before finalizing opening protocols. Additionally, the presence of police or security guards at some polling stations during the opening process was noted, with one station's setup deemed unacceptable, further indicating inconsistencies in protocol adherence.

Voting process

ENEMO observed voting in 482 polling stations out of 3,044 (15.8%). Overall, 88.2% of observed polling stations were equipped with voting technologies, while 11.8% were traditional polling stations.

Observed polling stations generally met the minimum legal staffing requirements, and women were well represented among PEC managerial positions, with women comprising 73.0% of chairpersons, 78.2% of deputies, and 94.0% of secretaries. Local observers were present in 73.9% of observed polling stations, and international observers in 22.2%. However, issues persisted: 2.5% of observed polling stations had inadequate setups that limited space, compromised secrecy of the vote, or restricted observer visibility. Regarding accessibility, only 48.6% of observed polling stations were fully suitable for individuals with mobility disabilities, with others requiring minor assistance or being altogether unsuitable. Essential voting materials were present across all observed polling stations, although 2.1% had lapses in checking for ink, and 1.2% did not verify ID documents.

Voting processes generally adhered to guidelines, with registrars effectively explaining ballot marking in 95.4% of observed polling stations. However, serious violations were reported at 4.1% of polling stations observed, often due to violence, pressure, group voting, revealing ballots, or booths set up near windows, which compromised privacy. In 28.6% of observed polling stations, voters required assistance with PCOS devices, and in 1.4% of the observed polling stations there were cases where the ballots were spoiled after being twice rejected by the device.

While 84.4% of observed polling stations were managed effectively, 11.2% were crowded but functioned well, and 2.9% faced disorganization due to overcrowding, technical malfunctions, and disputes between PEC staff and voters.

Although 97.1% of observed PECs generally followed procedures, 8.9% of polling stations saw formal complaints, with 2.1% considered substantial. Observational challenges were noted in 4.6% of polling stations due to overcrowding, with unauthorized individuals, such as police and local officials, present in 3.3%. ENEMO observers negatively assessed the conduct of 4.8% of polling stations, primarily due to negligence (82.6%) but also instances of fraud (17.4%), with secrecy violations being a major concern.

Counting process

All observed polling stations closed on time. Overall, 81.8% of monitored polling stations by ENEMO were using counting technologies. Unauthorized individuals, including police and civilians, were present in 4.5% of these locations. ENEMO noted that there were no queues at closing time, and all pre-counting procedures were adhered to.

Some procedural issues were observed in 18.2% of polling stations with voting technologies during the counting process. These included minor problems such as failing to announce the number of votes for each electoral subject, misclassifying a low number of invalid ballots as valid, and improperly following the sealing procedure. Minor technical issues also arose during protocol transmission to the CEC in 11.4% of observed stations.

Overall, ENEMO observers positively evaluated the closing and counting processes in 95.4% of polling stations, while 4.6% were rated negatively due to negligence, citing chaotic recounts, poor organization, insufficient procedural knowledge, and significant delays.

Transfer of materials to district election commissions (DEC) and DEC activity

ENEMO observers monitored the transfer of materials to 44 DEC. In 9.0% of observed DEC, the premises were inadequate for receiving materials. Additionally, 11.4% of observed DEC were overcrowded with long lines, which hindered their operations and 6.8% of DEC were assessed as disorganized, confusing and chaotic. Overall, ENEMO observers gave a negative assessment of DEC performance in 4.6% of the observed DEC.

Observers

Domestic Observers

The Election Code of Georgia establishes the legal framework for local observer organizations, requiring them to be non-profit, non-commercial entities registered in Georgia at least one year before election day. NGOs must go through an accreditation process with the CEC, adhering to principles of neutrality, nonpartisanship, and experience in democracy and human rights work to participate as official observers. While local NGOs have traditionally played a crucial role in monitoring elections, voter education, and recommending reforms, their efforts have become increasingly constrained. Ahead of the 2024 parliamentary elections, the heightened tensions between civil society and the ruling Georgian Dream party created a more challenging environment for independent observation.

The CEC had registered over 23,153 local observers from 101 organizations to oversee the 2024 elections, including prominent groups such as Transparency International Georgia (TI Georgia), ISFED, GYLA, and PMMG. Despite their credibility and extensive experience, these organizations encountered mounting pressure from the government, using legal and extralegal tactics to limit their influence. This raises concerns about the government's commitment to transparency and fair elections, as observers face not only political pressure but also legal hurdles designed to reduce the impact of civil society monitoring.

The broader climate for civil society organizations (CSOs) is concerning, with only 4.3% of the 30,258 registered CSOs remaining active in 2024, indicating a diminishing space for civic engagement. The controversial Law on Transparency of Foreign Influence, which requires NGOs and media receiving over 20% of their funding from abroad to register as organizations pursuing the interests of a foreign power has drawn criticism for its resemblance to "Russian laws". In protest, approximately 200 NGOs pledged to defy the law, warning of its damaging effects on democracy.

Transparency International Georgia was designated by the ACB as having an "electoral goal" on 24 September, forcing it to temporarily suspend its election observation activities until 2 October, when the prime minister intervened and the ACB revoked the designation. ENEMO notes that such measures, coupled with a crackdown on peaceful protests, exacerbated the tense political climate ahead of the elections, with NGOs being labeled as radical actors and their legitimacy increasingly questioned.

International Observers

The CEC had registered 1,713 international observers from 76 organizations to monitor the 2024 parliamentary elections in Georgia. While the CEC and DEC generally provided timely information, updates, and access to international observers, ensuring transparency, concerns remain about the consistency of this cooperation amid a politically charged atmosphere.

About ENEMO

The European Network of Election Monitoring Organizations (ENEMO) is an international nongovernmental organization that represents a network of national nongovernmental 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 two 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 240,000 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.