

A nighttime photograph of a large crowd gathered for a protest or demonstration. The crowd is dense, filling the lower half of the frame, and many people are holding umbrellas. In the background, a river reflects the city lights, and a tall, illuminated tower is visible in the distance. The overall atmosphere is one of a significant public gathering.

GEORGIAN CIVIL SOCIETY ORGANIZATIONS
UNDER THE PRESSURE OF AUTHORITARIANISM:
REPRESSION, RESISTANCE, AND THE STRUGGLE FOR SURVIVAL



SOCIAL
JUSTICE
CENTER

**Georgian Civil Society Organizations
Under the Pressure of Authoritarianism:
Repression, Resistance, and the Struggle
for Survival**

Social Justice Center

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1. Introduction

For the first time in their existence, Georgian civil society organizations (hereinafter: CSOs) are facing existential challenges. The process of democratic backsliding and the consolidation of authoritarianism in Georgia, occurring in parallel with the rapid and irreversible erosion of democratic institutions, the rule of law, and the normative framework protecting human rights, has also encompassed a deliberate and sustained effort by the authorities to persecute and silence these organizations. The policy of "Georgian Dream," aimed at the destruction of independent and autonomous civic and media organizations, occupies a significant place in the country's autocratization process. Consequently, years of efforts to restrict and repress the civic space have severely impacted the operating environment of CSOs. In recent years, and particularly since the spring of 2024, Georgian CSOs have been operating in a mode of resistance against the government's destructive policies, focusing on the survival of civic activity and organizational adaptation.

Clear signs of a democratic crisis in Georgia have been emerging since 2020, linked to the profound political crisis and polarization that followed the third parliamentary election results since the Georgian Dream party came to power. One of the first explicit mentions of Georgia's democratic backsliding appears in the 2022 European Parliament report, which points to dangerous trends – observed since 2020 – of eroding democratic principles, heightened political polarization, the degradation of democratic institutions, the consolidation of power by the ruling party, and a significant retreat in the country's democratic trajectory.¹

In the context of the war in Ukraine, Georgia submitted its application for European Union membership in March 2022. Despite significant challenges, Georgia was granted candidate country status in December 2023.² The European Council's decision included a requirement for the country to fulfill nine recommendations, which encompassed improving electoral legislation, taking concrete steps toward judicial independence, reducing political polarization, and achieving progress in other critical areas. These recommendations have largely remained unfulfilled by

1 European Parliament, Association agreement between the EU and Georgia European implementation assessment (update), 2022.

2 European Council meeting (14 and 15 December 2023) – Conclusions, pr.16.

the Georgian authorities,³ a process accompanied by increasing hostile rhetoric from the government directed at the European Union and its member states.⁴

One month after the manipulated parliamentary elections of October 26, 2024,⁵ on November 28, 2024, Georgian Prime Minister Irakli Kobakhidze publicly announced the government's decision to remove the issue of opening accession negotiations with the European Union from the national agenda.⁶ This announcement and the subsequent events – which constituted a deliberate sabotage of the country's stated European integration path – plunged the nation into a severe political crisis, triggering a peaceful and sustained resistance by Georgian citizens that has persisted for over a year.⁷ To suppress the massive public demonstrations that took place in November and December 2024, the government resorted to extreme violence, which must be considered a turning point in the country's process of authoritarian reversal. The Public Defender of Georgia, along with local and international organizations, has documented a systematic pattern of unprecedented violence against citizens, which remains uninvestigated to this day. According to the Public Defender,⁸ "during the unlawful dispersal of peaceful protests from November 28, 2024, through the night of December 3-4, and the night of December 6-7, as well as on February 2, 2025, almost all detainees were subjected to alleged torture, inhuman, and degrading treatment by members of the Special Tasks Department."⁹ A joint report prepared by local human rights

3 Open Society Georgia Foundation, Statusmeter 2.0 – How Georgia is progressing towards fulfilling the 9 steps of the European Union, 2024.

4 Media Development Foundation (MDF), Anti-Western Propaganda and Disinformation During the 2024 Parliamentary Elections, 2024.

5 Gutbrod, H. A Dozen Daggers: How Georgia's 2024 Elections Were Systematically Rigged, 2024.

6 Civil Georgia, "Georgian Dream" removes the issue of EU accession from the agenda, 2024.

7 Zviadadze, S. "This resistance begins with victory" – Field notes from the study of the endless protests; Social Justice Center, 2025.

8 According to the Public Defender's report, among the individuals detained during the April-May 2024 protests and subsequently visited by the Public Defender's representatives, 51.1% reported instances of ill-treatment. Furthermore, "of the individuals visited by the Public Defender's representatives between November 28, 2024, and March 1, 2025, 60% indicated having been subjected to ill-treatment; moreover, during the first days of the dispersal of the winter protests – in the period from November 29, 2024, to December 2 – 79.5% of those visited reported ill-treatment, while during the meetings held on February 2-3, 2025, 22 out of 25 individuals – i.e., 88% – stated that they had been subjected to ill-treatment." Source: Public Defender of Georgia, Report on the Situation of Human Rights and Freedoms in Georgia, 2024, p. 77.

9 Public Defender of Georgia, Report on the Situation of Human Rights and Freedoms in Georgia, 2024, p. 89.

organizations also points to the mass practice of violence and ill-treatment by the police.¹⁰

In response to the irreversible process of democratic backsliding initiated by the Georgian authorities, the European Council announced the de facto suspension of Georgia's European Union accession process in June 2024.¹¹ Subsequently, the European Council's 2025 Enlargement Report – a foundational document in the EU accession process – provided an extremely critical assessment of Georgia's situation, citing a significant deterioration in democracy and human rights. Among numerous critical issues, the report detailed legislative amendments aimed at restricting civil society organizations, as well as the hostile environment characterized by the repression, persecution, and harassment of these organizations.¹² Consequently, Georgia's EU accession process is not merely compromised; it is, in effect, halted.

Numerous authoritative international indices point to Georgia's unprecedentedly rapid regression and the accelerated process of autocratization. For instance, Freedom House, which previously categorized Georgia as a hybrid regime, has reported a significant deterioration in the state of democracy, human rights, and fundamental freedoms since 2022, noting a dramatic decline in Georgia's performance across a range of core indicators;¹³ according to the 2025 report, these metrics have approached a critically dangerous threshold.¹⁴ Furthermore, according to the 2024 Democracy Report, in light of the recently accelerated process of autocratization, Georgia has transitioned from the category of electoral democracies to that of electoral autocracies.¹⁵

10 Georgian Young Lawyers' Association (GYLA), *The Human Rights Crisis in Georgia Following the 2024 Parliamentary Elections*: November 28, 2024 – February 28, 2025, 2025, pp. 46–62

11 European Council conclusions, 27 June 2024, pr.36.

12 European Commission, Commission staff working document Georgia 2025 report accompanying the document communication from the commission to the European parliament, the council, the European economic and social committee and the committee of the regions, 2025. Communication on EU enlargement policy, Brussels, 4.11.2025.

13 Freedom House, *NATIONS IN TRANSIT 2022, From Democratic Decline to Authoritarian Aggression*, 2022. pg. 22. Freedom House, *NATIONS IN TRANSIT 2023, War Deepens a Regional Divide*, 2023. pg. 26, 29.

14 Freedom House, *FREEDOM IN THE WORLD 2025, The Uphill Battle to Safeguard Rights*, 2025. pg.4

15 V-DEM Institute, *DEMOCRACY REPORT 2025, 25 Years of Autocratization – Democracy Trumped?*, pg. 16. 21.

Accordingly, the research relies on literature that employs the conceptual framework of electoral authoritarianism. This framework identifies the institutional façade and the conduct of elections as central features of such regimes and as primary instruments of regime legitimation; these mechanisms serve the purpose of maintaining authoritarian rule rather than facilitating democracy. It is precisely this aspect that distinguishes electoral authoritarianism from so-called "closed" authoritarian regimes and competitive democracies.¹⁶ Furthermore, the literature that differentiates between various manifestations of electoral authoritarianism – whether labeled as defective democracy, hybrid regimes, or new authoritarianism – is essential for the research.¹⁷ This literature describes characteristics – such as the quality of electoral freedom, the degree of electoral manipulation, the clarity of regime resilience/stability, and the threats to democratization – that distinguish between the hegemonic and competitive forms of electoral authoritarianism.¹⁸ Finally, the research builds on the literature that attempts to conceptualize the Georgian experience through theoretical frameworks capable of describing democratic backsliding, de-democratization, or various manifestations of electoral authoritarianism. In the case of Georgia, these frameworks point to significant indicators of a drive toward the consolidation of authoritarianism and the emergence of hegemonic electoral authoritarianism.¹⁹

The literature also places significant emphasis on studies that examine strategies employed by such hybrid regimes to limit, shrink, dismantle, or co-opt the civil society space during the process of autocratization – strategies that vary by context and demonstrate significant diversity and complexity. Furthermore, there is an abundance of research that aims to study the response strategies utilized by organized civil society in the wake of the regime-imposed restrictions on the civic field. These strategies are likewise diverse and multifaceted, often involving

16 Schedler, A., ed. *Electoral Authoritarianism: The Dynamics of Unfree Competition*, Lynne Rienner Publishers, 2006. pg. 3-5.

17 Ibid.

18 Levitsky, S. & Lucan A. W. *Competitive Authoritarianism: Hybrid Regimes after the Cold War*. Cambridge University Press, 2010. Bernard M, Edgell A.B., Lindberg S. I. Institutionalising Electoral Uncertainty and Authoritarian Regime Survival, *European Journal of Political Research*, 2019.

19 Ph. Fluri & T. Patariaia, *Democratic Backsliding and De-Democratization: How the Georgian Dream Party Eroded the Rule of Law, Undermined the Integrity of Independent State Institutions, and Consolidated Power*, *Connections* QJ 23, no 4. 2004.,139-158. Torres-Adán, Á., & Buzogány, A. Democratic backsliding in the shadow of crises. How pandemics, war and democratic regression impact attitudes towards democracy in Georgia. *Contemporary Politics*, 2025, 1–16. Zedelashvili, D. Georgia's Democratization in the Deadlock of Authoritarianism. *Gnomon Wise*, 2024

approaches such as adaptation, co-optation, retreat, or resistance. In addition to a varied repertoire of responses, these studies frequently reveal that such actions are determined by diverse structural characteristics.²⁰

In the current challenging context, as Georgia and its society confront unprecedented difficulties, it is crucial to examine the evolving landscape of organized civil society – a sector that, for decades, has played a pivotal role in the country's democratization, the construction of state institutions, and the provision and creation of fundamental public goods. This research is an attempt to address this very question.

20 Chimiak, G., Kravchenko, Z. & Pape, U. Civil Society and the Spread of Authoritarianism: Institutional Pressures and CSO Responses. *Voluntas* 35, 221–225, 2024. Gerő, M., Fejős, A., Kerényi, S., & Szikra, D. From Exclusion to Co-Optation: Political Opportunity Structures and Civil Society Responses in De-Democratising Hungary. *Politics and Governance*, 11(1), 2023. Yabanci, B., Turkey's tamed civil society: Containment and appropriation under a competitive authoritarian regime, *Journal of Civil Society*, 15:4, 285-306, 2019. Chulitskaya T., Belarusian Civil Society Inside and Outside of the Country, *Stocholm Center for Easter European Studies, SCEEUS Guest Commentary*, 2024.

2. Research Subject and Methodology

The objective of this research is to capture the Georgian government's approach toward independent, autonomous, and organized civil society organizations amidst the country's accelerated process of authoritarian reversal and consolidation. Specifically, this study examines the impact of deliberate state policy on the functioning of these organizations and explores their strategies for navigating and responding to the altered political environment.

This research investigates the experiences of civil society organizations operating across the country. By documenting the observations of the research participants, the study aims to describe how the political, social, and discursive landscape has shifted regarding civil society organizations, and to assess the impact of the restrictive legal and operational environment on their existence and functioning. Furthermore, the research examines how these organizations respond to the challenges they face, identifying the factors that determine their strategic decisions, their resilience, and vulnerabilities.

This research is based on an analysis of both primary and secondary sources. For the purposes of this study, primary sources consist of interviews conducted within the framework of the research, while secondary sources include assessments, feedback, studies, and reports from local and international organizations, as well as publicly available media materials.

An essential component of the study is the field research, which was conducted using qualitative methods. Specifically, the research utilized a format of in-depth, semi-structured interviews. The field research comprised 30 in-depth interviews (involving 31 respondents in total),²¹ of which 22 were women and 9 were men. Within the scope of the research, 5 expert interviews, were conducted with respondents²² who, in addition to their expertise in issues related to the civil sector, had also directly participated in the ongoing processes and discussions. The remaining 25 interviews were conducted with representatives of civil society organizations – in most cases, these were organization heads, with exceptions includ-

21 In one instance, the interviewer's questions were answered by two heads of a civil society organization. Furthermore, within the framework of the research, two respondents shared information regarding the two civil society organizations they represented.

22 In one of these cases, the expert interview also encompassed the respondent's experience as an organization head, in addition to their expert background.

ing deputy heads or members of the organizations' collegial governing bodies. In all instances, the respondents were directly involved in the ongoing processes and were responsible for, or participated in, the organizational decision-making process.

Within the framework of the research, we gathered information regarding the experiences of 28 civil society organizations.²³ Several concurrent criteria were employed in the selection of respondents/organizations, including the organization's activity profile, organizational scale, and geographic scope of operations (capital city/regions). As a result, the research encompasses civil society organizations with diverse activity profiles. In many instances, an organization simultaneously engaged in multiple types of public activity; consequently, the profiles of several organizations surveyed in this study are mixed, combining several of the directions listed below. In certain cases, the respondent was able to identify a primary activity profile for their organization. In addition to organizations with mixed profiles, the study included watchdog organizations focused on democracy and human rights, think tanks, community-based organizations, local foundations, service-provider organizations, trade unions, professional associations, as well as research, sectoral, infrastructure, and bridging organizations.²⁴

The size of the organizations was determined by the respondents themselves, who categorized their organizations as small, medium, or large. In doing so, we requested that they consider their organization's revenue, number of employees, the scale of their activities, and their size relative to other civil society organizations operating in Georgia. Based on this size classification, the study included 8 large-sized, 10 medium-sized, and 10 small-sized organizations. Regarding geographic

23 Within the framework of the research, two respondents shared information regarding the two civil society organizations they represented.

24 While there are numerous definitions of the terms used within academic literature, for the purposes of this research, we adopt the following operational definitions (which also account for the self-perception of those organizations that identify with these specific types): Watchdog refers to a type of civil society organization focused on scrutinizing and monitoring the activities of public institutions and other influential actors, primarily serving the goals of transparency and public accountability. Think tank refers to a type of civil society organization focused on researching various aspects of public policy, facilitating changes in public policy through such research, and providing decision-makers with evidence-based expertise. Bridging organization refers to a type of civil society organization that serves a connective role between the public/social groups, the sector responsible for policy determination, and the academic sector, thereby ensuring knowledge transfer and coordination.

scope, the research identified three categories of organizations: those functioning in Tbilisi; those with a central office in the capital but maintaining a regional presence through local offices and representatives; and those operating exclusively within the region(s). Consequently, the study encompassed 17 organizations functioning in the capital (although the vast majority of these organizations actively work in the regions on both sectoral and community-based issues, effectively covering topics and beneficiaries nationwide); 6 organizations functioning simultaneously in the capital and the regions through offices and representatives; and 5 organizations functioning solely in the region(s), representing regional or local entities.

Within the framework of this research, we gathered comprehensive information regarding the experiences of 28 civil society organizations. Furthermore, the questionnaire included a dedicated section for respondents to provide information on the experiences of their partner organizations, which allowed us to collect significant data on dozens of additional organizations operating in the capital and the regions.

The interviews were conducted between August and September 2025, with only two conducted in late July. Consequently, this study describes the status of civil society organizations as of early October 2025, thereby providing the opportunity to assess the impact of all significant legislative changes and events concerning civil society that occurred throughout 2024 – 2025.

The interviews were conducted using both in-person meetings and online platforms. In total, 17 interviews were held in person, while 13 were conducted via online formats. The average duration of the interviews was 90 minutes. To ensure the safety and anonymity of the participants, this research does not disclose the names or surnames of the respondents, the names of their organizations, or any characteristics that could potentially reveal their identities. The list of interviews appended to the study provides data only in a generalized form. When using citations throughout the research, the respondents' narrative styles have been largely preserved. Furthermore, quotes have been selected in a manner that does not reveal any identifying information regarding the individual respondent or their organization.

Following the data collection process, we employed methods of transcription and thematic coding to process and analyze the interview transcripts. Additionally,

the analysis incorporated information derived from the synthesis of secondary sources.

Research Limitations

This study aims to examine the experience and conditions of formally organized civil society organizations. Consequently, due to limited resources, the research does not entail informal or unorganized initiative groups, nor does it include broader civil and social movements, despite their significance as a major component of civil society and as primary targets of restrictive policies. Furthermore, the study does not evaluate the impact of these policies on media organizations. While the altered legal, political, and discursive landscape has profoundly affected the existence and operations of media entities, the scale and complexity of this topic necessitate an independent and dedicated analysis.

3. Context Overview

In recent years, Georgia's democratic backsliding, characterized not only by symptoms of an authoritarian turn²⁵ but also by clear trends toward the consolidation of authoritarianism,²⁶ has been marked by a growing tendency to restrict and repress the organized civic space. The government's initial actions, aimed at the discrediting and marginalization of civil society organizations, have subsequently been replaced by objectives directed at the institutional weakening and practical dismantling of an independent and autonomous civic space. As a result of legislative changes implemented in 2024-2025, this has manifested in the creation of an extremely hostile and restrictive legal, financial, and administrative environment for public activity.

For this overview, it is essential to briefly describe the starting point of the shrinking and subsequent significant degradation of the enabling environment for Georgian civil society organizations. During the initial years of the "Georgian Dream" government, the organized civil space was characterized as a diverse, active, and influential sector. In these years, the public sector developed freely within a relatively liberal legislative framework and without government restrictions.²⁷ It actively participated in the country's democratization process, frequently played a leading role in reforming various fields, and engaged in public policy formulation through participation in public discussions and consultations.²⁸ Moreover, until 2016, the "Georgian Dream" government established legislative guarantees and institutional formats for public participation at both central and local levels, which further strengthened the mechanisms for civil society organization involvement in public policy-making.²⁹ During the period leading up to 2016, the main challenges identified within the sector were a low degree of public accountability, weaknesses in internal democracy and governance, uneven distribution of resources within

25 L. Fix and C. Kapp, *The Dangers of Democratic Backsliding in Georgia*, Council on Foreign Relations, 2023.

26 S. Schiffrers, *The 2024 Elections in Georgia: descent into hegemonic authoritarianism*, Heinrich Boell Foundation, South Caucasus Region, Tbilisi, 2024.

27 Europe Foundation, *Situational Analysis of Civil Society in Georgia (Short Overview of the Report)*, 2016, pp. 1-3.

28 Europe Foundation, *Situation Analysis of Civic Space in Georgia*, 2023. pg.4.

29 Europe Foundation, *Situational Analysis of Civil Society in Georgia (Short Overview of the Report)*, 2016, p.5

the sector (between the center and the regions), and a high dependency on international development assistance.³⁰

Research shows that the first signs of a shift in the government's approach toward civil society organizations and their representatives began as early as 2016. During this period, the changing attitude was characterized by its episodic nature, manifesting in targeted discrediting of individual human rights defenders on social networks, illegal control of their communication and movement by security services, and, subsequently, verbal attacks and other relatively individual, targeted actions against specific organizations and activists.³¹ These approaches later took on more organized forms, manifesting in total illegal control³² of the communications of civil society representatives by security services, and the dissemination of negative opinions about civil society organizations via social media – a process carried out through coordinated and simulated/inauthentic massive actions by entities affiliated with the government.³³ The year 2022 serves as a pivotal period in terms of the government's intensification of the marginalization of and targeted verbal attacks against civil society organizations.³⁴ This involved the intensive production and dissemination of discrediting information narratives, which established a clearly hostile and exclusionary attitude toward civil society organizations. This turning point coincided with the onset of the government's deliberate and overt process of undermining the country's path towards European integration, as well as an increase in hostile rhetoric directed at the country's Western partner states and organizations.³⁵ However, it is important to note that this shift in the government's approach toward civil society organizations, described from 2022 onwards, was preceded by grave incidents involving in-

30 Ibid, pp. 2-3.

31 Europe Foundation, Situation Analysis of Civic Space in Georgia, 2023. pg.30.

32 Human Rights Center, Legal Assessment of Large-Scale Illegal Wiretapping and Surveillance by the State Security Service, 2021, p. 4. <https://hrc.ge/files/176mosmenebi-geo.pdf> (Last accessed December 28, 2025).

33 Civil Georgia, Facebook Removes Hundreds of Georgia Govt Linked Pages for 'Coordinated Inauthentic Behavior', 2019, <https://civil.ge/archives/332443>. (Accessed 28.12.2025).

34 Samkharadze, N. (2025). *Scylla and Charybdis: Georgian Civil Society Between Authoritarianism and Geopolitical Shifts*. Georgian Institute of Politics.

35 Social Justice Center, *Reflecting the Shift in Foreign Policy Course in the Ruling Party's Discourse*, 2024, <https://socialjustice.org.ge/ka/products/sagareo-politikuri-kursis-tsvlilebis-asakhva-mmartveli-partiis-diskurshi>. Accessed December 28, 2025.)

dividual civil society organizations and movements – specifically, instances of encouraging organized violence against them or mass information campaigns conducted for the purpose of discrediting them. For example, on July 5, 2021, a violent demonstration organized by ultraconservative and radical groups against the March for Dignity, planned within the framework of the week organized by Tbilisi Pride, was encouraged by the incumbent Prime Minister, Irakli Gharibashvili. This escalated into several hours of violent action, which resulted in the storming and ransacking of the offices of the organization “Tbilisi Pride” and the “Shame” movement.³⁶

The sustained and massive wave of targeted discrediting of individual representatives of the public sector and organizations working on democracy and human rights issues paved the way for the initiation of the law “on Transparency of Foreign Influence” – the so-called first “Russian Law” (hereinafter the Law “on Transparency of Foreign Influence” or the so-called “Russian Law”) – in March 2023.

“Georgian Dream” attempted to create a restrictive legislative and institutional environment for civil society organizations in March 2023 by initiating the law “on Transparency of Foreign Influence,” the so-called “Russian Law,” which was met with collective resistance from civil society organizations.³⁷ The spontaneous and massive civic opposition that accompanied the initiation of the draft law led to the government’s retreat within a few days.³⁸ The attempt to adopt the law “on Transparency of Foreign Influence” failed; however, the events of 2023 and the government’s sustained hostile rhetoric negatively impacted the activities of civil society organizations and, to some extent, altered their enabling environment.³⁹

One year after the initial attempt to adopt the law “on Transparency of Foreign Influence,” in April 2024, the government re-initiated the draft law “on Transparency

36 Tabula, The Prime Minister on July 5: We know who the organizer was – the director of an LGBT organization and Shame [movement], 2022. *Formula*, Garibashvili encouraged the violence on July 5, while today he still blames activists for the provocation, 2022.

37 Georgian Young Lawyers’ Association, *The Russian Law is Not Georgia’s Choice (Joint Statement of up to 400 Civil Society Organizations)*. 2023. <https://www.gyla.ge/post/rusuli-kanoni-ar-aris-saqartvelos-archevani>; Accessed December 28, 2025.)

38 *Publika*, How They Failed to Pass the Russian Law, Chronicle of the Protest, 2023.. <https://publika.ge/photo/rogor-ver-miighes-rusuli-kanoni-protestis-qronika/> Accessed December 28, 2025.)

39 C.Pruth and E. Zillén, Hope and Resistance Go Together, The State of Woman Human Rights Defenders, The Kvinna till Kvinna Foundation, November 2023, pg.11.

of Foreign Influence,” which was met with severe criticism from both local⁴⁰ and international communities.⁴¹ Despite continuous civic protests and critical legal assessments of the draft law by authoritative international organizations, “Georgian Dream” adopted the law “on Transparency of Foreign Influence,” marking a turning point in the erosion process of organized civil society.

The years 2024 – 2025 were characterized by a sustained process and series of events involving the weakening and dismantling⁴² of democratic institutions and human rights protection standards, which significantly defined the trajectory of democratic backsliding and the strengthening of authoritarian tendencies.⁴³ Specifically, 2024–2025 are linked to a combination of legislative and institutional changes adopted by the government with the aim of neutralizing and eliminating the civic space. In a short period, these measures completely transformed the rights-based and enabling environment for the functioning of civic organizations, effectively rendering the activities of independent and autonomous civil society organizations impossible – a critical indicator in gauging the authoritarian turn. For the purposes of this research, we will briefly review only those legislative changes and events that were directly aimed at the neutralization and repression of organized civil society.

The adoption of the 2024 law “on Transparency of Foreign Influence” – the so-called “Russian Law” – initiated the process of dismantling the normative en-

40 *Georgia News*, We will not allow the passage of the Russian law – media outlets on the so-called agents’ law; 2024; <https://sakartvelosambebi.ge/ge/akhali-ambebi/ar-davushvebt-rusulikanonis-mighebas-damoukidebeli-media>; (Accessed December 28, 2025.); Georgian Young Lawyers’ Association, Until the Russian Law is Defeated, Civil Society and Media Organizations are Suspending Cooperation with the Government, 2024.<https://www.gyla.ge/post/the-non-governmental-and-media-organizations-suspend-cooperation-formats-with-the-government-until-the-russian-law-is-dropped>; (Accessed December 28, 2025.); Amnesty International, Georgia: Stop the bill “On transparency of foreign influence” that threatens civil society; 2024, <https://www.amnesty.org/en/latest/news/2024/04/georgia-stop-the-bill-on-transparency-of-foreign-influence-that-threatens-civil-society/>; (Accessed 28.12.2025).

41 European Parliament resolution of 25 April 2024 on attempts to reintroduce a foreign agent law in Georgia and its restrictions on civil society (2024/2703(RSP)), 2024, https://www.europarl.europa.eu/doceo/document/TA-9-2024-0381_EN.html; (Accessed 28.12.2025).

42 Transparency International, Repressive rules aimed at abolishing freedom of assembly and expression. 2025. <https://transparency.ge/ge/post/shekrebis-da-gamoxatvis-tavisuplebis-gaukmebisen-mimartuli-represiuli-cesebi>; (Last accessed 28.12.2025.);

43 European Parliament, 2023 and 2024 reports on Georgia European Parliament resolution of 9 July 2025 on the 2023 and 2024 Commission reports on Georgia (2025/2024(INI)), P10_TA(2025)0158. https://www.europarl.europa.eu/doceo/document/TA-10-2025-0158_EN.pdf; (Accessed 28.12.2025).

vironment of the organized civic space, a process which continued through subsequent regressive legislative changes. The law “on Transparency of Foreign Influence” defined the concept of an “organization pursuing the interests of a foreign power,” classifying any non-commercial legal entity as such if more than 20% of its total annual income is sourced from a foreign power. The law established an obligation for the subject to register as an organization pursuing the interests of a foreign power and empowered the relevant authority to conduct monitoring for the purpose of enforcing the law, including the potential for liability in the event of non-compliance.⁴⁴ The content and objectives of the law “on Transparency of Foreign Influence,” which replicate laws with similar aims adopted in Russia and later in other countries, including Hungary, were sharply criticized by both local⁴⁵ and international⁴⁶ organizations. This criticism stemmed from the risks inherent in the law, specifically the threat of stigmatizing, silencing, and eliminating the targeted civil society and media organizations. The law adopted by “Georgian Dream” essentially contradicts international human rights standards; it aims to stigmatize civil society organizations, fuels public distrust and hostility toward them, and provides the government with levers to oversee and control these organizations. It is important to note that out of 3,878⁴⁷ organizations⁴⁸ with the status of active subjects in Georgia, as of December 2025, only 383 non-entrepreneurial (non-commercial) legal entities are registered⁴⁹ in the “Register of Organizations Pursuing the Interests of a Foreign Power,” maintained by the National Agency of Public Registry in accordance with the requirements of the law “on Transparency of Foreign Influence,” the so-called “Russian Law.” On September 17 of the same

44 Law of Georgia “On Transparency of Foreign Influence”, 03/06/2024.

45 Social Justice Center, *Why the Russian Law contradicts the European Convention on Human Rights and the principles of the Rule of Law?* 2024;

46 European Commission for Democracy through Law (Venice Commission), Georgia, urgent opinion on the law on transparency of foreign influence, CDL-PI(2024)013, 2024, pr. 96-99; Expert Council on NGO Law of the Conference of INGOs of the Council of Europe, Opinion on the law of Georgia on transparency of foreign influence, CONF/EXP (2024), pr. 152-164. Available at: <https://rm.coe.int/conf-exp-2024-2-en-opinion-on-georgian-transparency-law-/1680afb1d5>; (Accessed 28.12.2025).

47 As of October 1, 2025;

48 National Statistics Office of Georgia, *Number of Registered and Active Entities in Georgia by Organizational-Legal Forms and Sizes*, 2025. <https://www.geostat.ge/ka/modules/categories/67/organizatsiul-samartlebrivi-formebis-mikhedvit>. (Accessed December 28, 2025.);

49 Official Website of the National Agency of Public Registry, *Registry of Organizations Pursuing the Interests of a Foreign Power*, 2025. <https://fitreg.napr.gov.ge/fitr/fitr-pub> (Accessed December 28, 2025.);

year, the Parliament of Georgia adopted the law “On Family Values and Protection of Minors,” the so-called “anti-LGBT law”⁵⁰ (hereinafter the law “On Family Values and Protection of Minors” or the so-called “anti-LGBT law”), which, under the guise of protecting family values and minors, politically instrumentalizes the issue of LGBTIQ+ human rights, effectively abolishes their fundamental rights and freedoms, and attacks the ideals of equality and democracy.⁵¹ Along with abolishing the basic rights of LGBTIQ+ individuals, the law “On Family Values and Protection of Minors” also aims to impose censorship in numerous areas of public life, which directly restricts various spheres of public life and activity, as well as the possibilities for the protection of human rights.⁵²

The next wave of attacks on independent civil society organizations is linked to March and April 2025, when, within a two-month period, “Georgian Dream” adopted four legislative changes aimed at restricting civil society, mostly through an expedited procedure and the total exclusion of public participation.

On February 24, 2025, the “Foreign Agents Registration Act,” the so-called “Agents’ Law” (hereinafter the “Foreign Agents Registration Act” or the so-called “Agents’ Law”), was initiated in the Parliament of Georgia. According to “Georgian Dream,” this step aimed to replicate the American Foreign Agents Registration Act (FARA). However, contrary to the context, objectives, and implementation practice of the American law, the government viewed the adoption of the “Foreign Agents Registration Act” explicitly in the context of extending the law to and controlling civil society and media organizations. It was clear that the law aimed to become an instrument for the arbitrary use and control, repression, and punishment of these organizations.⁵³ The law establishes that any person par-

50 Radio Free Europe/Radio Liberty, *Parliament Adopted the Bill Restricting LGBT Rights in the Third and Final Reading*, 2024, <https://www.radiotavisupleba.ge/a/33123114.html>; (Accessed December 28, 2025.);

51 Women’s Initiatives Supportive Group, *Once Again Regarding the Real Goals of the Fascist, Anti-LGBT Law*, 2024, <https://wisg.org/ka/news/detail/445>; (Accessed December 28, 2025.);

52 Social Justice Center, *Solidarity to the Queer Community – The Fascist Law Must Be Unconditionally Repealed!*, 2024, <https://socialjustice.org.ge/ka/products/solidaroba-kviar-tems-fashisturi-kanoni-upirobod-unda-gaukmdes>; (Accessed December 28, 2025.); Social Justice Center, *The Government Against Equality and Freedom of Expression: An Extensive Legal Analysis of Homophobic Legislative Changes*, 2024.

53 Social Justice Center, *FARA Does Not Apply to Civil Society and Media Organizations: The Practice of FARA’s Application in the US and Its Safeguarding Constitutional-Legal Standards*, 2025. <https://socialjustice.org.ge/ka/products/ratom-ar-vrtseldeba-fara-sinamdvileshi-samokalako-da-media-organizatsiebbe-ashsh-shi> (Accessed December 28, 2025.);

ticipating in “political activities” in Georgia on behalf of or in the interest of a “foreign principal” has an obligation to register as an “agent of a foreign principal” and satisfy other legislative requirements. The law provided the government with the possibility of even higher and arbitrary control over public and media organizations and defined the possibility of criminal prosecution of civil society organization representatives in case of violation of the law’s requirements.⁵⁴ Despite the acute criticism of the draft law, which relates to the law’s vague objectives and unpredictable scope of action, and which unjustifiably restricts the freedom of association and expression of people involved in civil society organizations,⁵⁵ “Georgian Dream” adopted the “Foreign Agents Registration Act” on April 1, 2025 (the law entered into force on May 31). According to the official website of the Anti-Corruption Bureau, 12 active foreign principals are registered in accordance with the requirements of the “Foreign Agents Registration Act,” the so-called “Agents’ Law”.⁵⁶

On April 1, 2025, the Parliament of Georgia also adopted a package of legislative amendments consisting of 14 changes, which abolished the mandatory participation of civil society organizations in the processes of governance and public decision-making. The legislative package included a series of amendments aimed at (1) restricting participation in the governance process and weakening the government’s public accountability, (2) abolishing the mandatory participation of civil society representatives in the election process of specific officials, and (3) eliminating the possibilities for civil society organizations’ involvement and participation in consultative processes. For example, the possibility for civil society organizations to participate was abolished in the process of electing officials such as two members of the Prosecutorial Council, two members of the Disciplinary Board of Judges, and five members of the High Council of Justice, as well as in the staffing of bodies or commissions such as the Legal Aid Service Board and the selection commissions created for the appointment of the Head of the Special Inves-

54 Law of Georgia “Foreign Agents Registration Act” 02/04/2025.

55 Expert Council on NGO Law, Opinion on the law of Georgia “Foreign Agents Registration Act” adopted by the Expert Council on NGO Law of the Conference of INGOs of the Council of Europe, paragraphs 149-154. European Commission for Democracy through Law of the Council of Europe (Venice Commission), Georgia opinion on the law on the registration of foreign agents, the amendments to the law on grants and other laws relating to “foreign influence” adopted by the Venice Commission at its 144th plenary session (Venice, 9-10 October 2025), CDL-AD(2025)034, paragraphs 114-117.

56 Official Website of the Anti-Corruption Bureau, *Foreign Agents Registration Act*, 2025. <https://fara.acb.gov.ge/search/by-principal>, (Accessed December 28, 2025.);

tigation Service, the Head of the Personal Data Protection Service, and the Head of the Anti-Corruption Bureau, among others.⁵⁷ On the same day, an amendment was made to the Law of Georgia “On Gender Equality,” on the basis of which the terms “gender” and “gender identity” were removed from Georgian legislation.⁵⁸

A significant and decisive blow, which effectively completed the formation of a legislative and institutional environment aimed at the weakening and practical destruction of Georgian civil society organizations, is linked to the adoption of amendments to the Law on Grants. On April 16, 2025, just nine days after its initiation, the Parliament of Georgia adopted legislative changes through an expedited procedure, prohibiting the possibility of issuing grants without government consent. This measure subjected the issuance and receipt of grants entirely to the government’s political control. Furthermore, these legislative amendments provided state agencies with levers⁵⁹ of indefinite and unsubstantiated control and influence over civic organizations and individuals for monitoring and responding to violations of grant-receiving procedures, creating the potential for broad, arbitrary, and discriminatory application of the law.⁶⁰ It is important to note that the Law on Transparency of Foreign Influence,⁶¹ the Foreign Agents Registration Act, the Law on Grants,⁶² and the specific actions initiated by relevant agencies against

57 Social Justice Center, “*Georgian Dream*” is Depriving Civil Society even of the Formal Opportunity to Participate in the Decision-Making Process, 2025. <https://socialjustice.org.ge/ka/products/kartuli-otsneba-samokalako-sazogadoebas-gadatsqvilebebis-mighebis-protsesshi-monatsileobis-formalur-shesadzleblobasats-artmevs>; (Accessed 28.12.2025.);

58 Civil Georgia, “*Georgian Dream’s*” Parliament Adopted a Series of Restrictive Legislative Amendments in the Third Reading, 2025. <https://civil.ge/ka/archives/673120>; (Accessed December 28, 2025.);

59 Social Justice Center, *The Aim of the Amendments Made to the Law on Grants is the Destruction of Georgian Civil Society – Assessment*, 2025 <https://socialjustice.org.ge/ka/products/grantebis-shesakheb-kanonshi-gatarebuli-tsvlilebebis-mizania-kartuli-samokalako-sazogadoebis-ganadgureba-shefaseba>; (Accessed 28.12.2025.);

60 EUROPEAN COMMISSION FOR DEMOCRACY THROUGH LAW OF THE COUNCIL OF EUROPE (VENICE COMMISSION) GEORGIA OPINION ON THE LAW ON THE REGISTRATION OF FOREIGN AGENTS, THE AMENDMENTS TO THE LAW ON GRANTS AND OTHER LAWS RELATING TO “FOREIGN INFLUENCE” Adopted by the Venice Commission at its 144th Plenary Session (Venice, 9-10 October 2025), CDL-AD(2025)034. pr.118.

61 Social Justice Center, *The European Court of Human Rights Has Begun Reviewing the Application of NGOs and Media Organizations Regarding the “Russian Law”*, 2025.

62 The Law “on Grants,” the “Foreign Agents Registration Act,” and decisions regarding the freezing of financial accounts of civil society organizations have also been appealed by a group of public organizations (interview with one of the research respondents).

civic organizations based on these laws have been appealed to the European Court of Human Rights (ECHR) by local civil society organizations, media outlets, and individuals.⁶³ Numerous lawsuits regarding the unconstitutionality of these laws have also been filed before the Constitutional Court of Georgia.⁶⁴

The “Foreign Agents Registration Act,” which entered into force at the end of May 2025, established a 10-day registration deadline for organizations. Immediately upon the expiration of this period, the government began utilizing the restrictive legislative framework against eight civil society organizations. On June 17, 19, and 23, 2025, eight civic organizations – including Transparency International Georgia, Sapari, the Civil Society Foundation, the Economic Policy Research Center (EPRC), the Media Development Foundation (MDF), the Social Justice Center, and the International Society for Fair Elections and Democracy (ISFED)⁶⁵ – were served with identical court rulings. These rulings granted the Anti-Corruption Bureau’s motions, mandating that the organizations provide an unlimited volume of legal, personal, financial, and technical information existing from January 1, 2024, to the moment the order was issued, including comprehensive data regarding third parties and beneficiaries.⁶⁶ In justifying the inspection of these organizations’ activities, the Anti-Corruption Bureau’s motions relied on the laws “On the Fight Against Corruption,” “On Grants,” “On Political Associations of Citizens,” and the “Foreign Agents Registration Act.” While the court orders relied on three of these grounds – notably excluding the “Foreign Agents Registration Act” – portions of these legal bases are irrelevant for gaining access to the activities of civic organizations. Furthermore, considering the requested timeframe and scope of information, these demands were characterized as irrelevant, unlawful, and

63 Transparency International Georgia, *Strasbourg Court Registered the Application Against Ivanishvili’s FARA and Repressive Laws*, 2025.

64 „Civil Georgia, *Constitutional Court Reviews the “Foreign Agents” Law, 2024. Batumelebi, GYLA Appeals the “Foreign Agents Act” in the Constitutional Court*, 2025. Georgian Young Lawyers’ Association, *GYLA Urges the Constitutional Court to Timely Review the Constitutional Lawsuits Filed Regarding the Law “on Grants” and to Suspend the Enforcement of the Disputed Norms*, 2025.

65 International Society for Fair Elections and Democracy, *The Anti-Corruption Bureau Requests Information on Beneficiaries from “Fair Elections” as Well*, 2025, <https://www.isfed.ge/geogantskhadebebi/benefitsiarebis-shesakheb-informatsias-antikoruftsiuli-biuro-samartliani-archevnebisganats-itkhovs>; (Accessed December 28, 2025.);

66 Social Justice Center, *“Georgian Dream” Has Already Started Applying Laws Destructive to Civil Society*, 2025, <https://socialjustice.org.ge/ka/products/kartulma-otsnebam-samokalakosazogadoebistvis-damangreveli-kanonebis-gamoqeneba-ukve-daitsqo>; (Accessed December 28, 2025.);

unsubstantiated.⁶⁷ The inspections initiated by the Anti-Corruption Bureau constituted an unjustified interference in the autonomy of these organizations, resulting in the unlawful and arbitrary restriction of the freedom of association and expression of their representatives, as well as the right to privacy of their beneficiaries.⁶⁸ Following the unsuccessful appeal of these court orders to higher instances, the civic organizations granted the Anti-Corruption Bureau access to only a portion of their activities, refusing to disclose sensitive information related to third parties and beneficiaries.⁶⁹

On August 11, 2025, seven civil society organizations – including Sapari, the Civil Society Foundation, Transparency International Georgia, the Media Development Foundation, the Social Justice Center, the Economic Policy Research Center, and the International Society for Fair Elections and Democracy – received a second letter⁷⁰ from the Anti-Corruption Bureau. Within the framework of the inspection initiated under the “Foreign Agents Registration Act,” the Anti-Corruption Bureau requested a written explanation from these organizations regarding their failure to register as agents of a foreign power. The Bureau’s letter included a reference to potential criminal liability, which the civil society organizations perceived as a threat of punishment and a continuation of the persecution against them. On August 22, the organizations submitted their written explanations to the Anti-Corruption Bureau, justifying the inadmissibility of the application of the “Foreign Agents Registration Act” to their activities.⁷¹

Shortly after the response to the Anti-Corruption Bureau, on August 27, 2025, it became known that within the framework of an investigation launched by the Prosecutor’s Office concerning sabotage, attempted sabotage under aggravating circumstances, assistance in hostile activities to foreign organizations and organi-

67 Ibid.

68 Social Justice Center, *We Provide the Public with Updated Information Regarding the Ongoing Process Against the Organization in the Anti-Corruption Bureau*, 2025.

69 Civil Society Foundation, *Statement of Civil Society Organizations*, 2025.

70 Radio Free Europe/Radio Liberty, “We Serve the Interests of Georgian Citizens” – NGOs Responded to the Anti-Corruption Bureau, 2025, <https://www.radiotavisupleba.ge/a/33510314.html>. (Accessed December 28, 2025.);

71 Social Justice Center, “Georgian Dream” Continues the Persecution of Civil Society Organizations – Social Justice Center Publishes the Text of the Written Explanation Sent to the Anti-Corruption Bureau, 2025, <https://socialjustice.org.ge/ka/products/kartuli-otsneba-agrdzelebs-samokalako-sazogadoebis-organizatsiebis-devnas-sotsialuri-samartlianobis-tsentri-antikorufitsiul-biuroshigagzavnili-tserilobiti-ganmartebis-teksts-akveqnebs>; (Accessed December 28, 2025.); Civil Society Foundation, *Civil Society Foundation’s Response to the Anti-Corruption Bureau*, 2025.

zations under foreign control, and the mobilization of funds for activities directed against the constitutional order and national security foundations of Georgia, the City Court, based on a motion from the Prosecutor's Office, seized the bank accounts of seven civic organizations (Civil Society Foundation, International Society for Fair Elections and Democracy (ISFED), Institute for Development of Freedom of Information (IDFI), Defenders of Democracy, Georgian Democracy Initiative (GDI), Sapari, and the Social Justice Center).⁷² Later, the Prosecutor's Office interrogated the heads of these same organizations before the court as witnesses.⁷³ Local civic organizations⁷⁴ and international human rights organizations⁷⁵ evaluated the seizure of these financial accounts and the subjection of their activities to investigation as the criminalization of human rights work and a continuation of the practice of persecuting civil society organizations, which effectively led to the cessation of the seized organizations' activities in their current form. The seized civil society organizations played a significant role in providing legal assistance, court representation, and various forms of essential support to hundreds of individuals injured and detained at universal demonstrations.⁷⁶ Some of them also provided funds for the payment of illegal fines imposed for participating in demonstrations. The statement⁷⁷ published by the Prosecutor's Office and the public assessments⁷⁸ made by representatives of the agency show that the

72 OMCT, Georgia: Tbilisi City Court freezes bank accounts of seven further leading civil society organisations amid unfounded investigations for "sabotage", 2025, <https://www.omct.org/en/resources/urgent-interventions/georgia-tbilisi-city-court-freezes-bank-accounts-of-seven-further-leading-civil-society-organisations-amid-unfounded-investigations-for-sabotage>. (Accessed 28.12.2025).

73 Radio Free Europe/Radio Liberty, *Prosecutor's Office Summons Heads of Seized Civil Organizations for Questioning*, 2025, <https://www.radiotavisupleba.ge/a/33518732.html>. (Accessed December 28, 2025.);

74 Publika, *Despite Seizures and Repression, We Stubbornly Continue Our Work and Struggle – NGOs*, 2025, <https://publika.ge/yadaghebisa-da-represiebis-miukhedavad-jiutad-vagrdzelebt-saqmianobas-da-brdzolas-arasamtavroboebi/>. (Accessed December 28, 2025.);

75 Amnesty International, *The EU and its member states should take urgent, coordinated measures to respond to Georgia's crackdown on civil society and human rights organisations*, 2025, <https://www.amnesty.eu/news/eu-should-respond-to-georgias-crackdown-on-civil-society/>; (Accessed 28.12.2025).

76 FIDH International Federation for Human Rights, *Georgia: Tbilisi City Court freezes bank accounts of seven further leading civil society organisations amid unfounded investigations for "sabotage"*, 2025.

77 Statement of the Prosecutor's Office of Georgia, <https://pog.gov.ge/news/saqartvelos-prokuraturis-gantskhadeba-4982>, 2025. (Accessed December 28, 2025.);

78 *Ipress, Prosecutor: Tamta Mikeladze was Distinguished by Her Activity During the Protests, She Made Appeals and Explicitly Stated That the Struggle Should Have Been Brutal. She Has Also Provided Financial Assistance*, 2025.

organizations' human rights activities – including providing legal assistance to people detained at demonstrations, the publicly expressed positions of the organizations' leaders, and the purchase⁷⁹ of a small amount (twenty to thirty units) of protective equipment to ensure the labor safety of employees while observing demonstrations – formed the basis for the seizure measure. This demonstrates the unsubstantiated nature of its application and turns the justice system into an instrument for punishing and criminalizing human rights activities.

Within the same investigation, several months earlier, in March 2025, the Prosecutor's Office seized the bank accounts of two organizations and three foundations, including the "Nanuka Foundation," "Prosperity," "Fund for Each Other 24/7," "Shame," and the "Tbilisi Human Rights House,"⁸⁰ all of which provided legal, financial, and medical support to participants in peaceful protests. This represented an attempt by the government to criminalize peaceful civic protest.⁸¹ On April 29, 2025, a search was conducted at the residence and person of Aleko Tskitishvili,⁸² the head of the "Human Rights Center." A few days earlier, on April 24, the Ministry of Finance's Investigation Service searched the office of the independent trade union "Labor," which has organized or co-organized nearly 20 workers' strikes in recent years. Searches were also conducted at three additional locations, including the residence of the trade union leader. Given the context and the lack of justification for these searches, this serves as a clear example of the persecution and repression of an independent trade union.⁸³

Starting from September 8, 2025, the Anti-Corruption Bureau initiated a new stage of persecution against civil society organizations, involving requests for information from civic organizations within the framework of monitoring launched under the "Law on Grants." As of September 30, nearly 30 organizations had received

79 Publika, *"The Main Goal of These Processes is to Cover Up the Plan to Destroy Civil Society"* – Mikeladze on the "Face Masks Case", 2025.

80 Publika, *Prosecutor's Office: We Have Frozen the Funds' Accounts Within the Framework of the Ongoing Investigation into "Sabotage"*, 2025, <https://publika.ge/prokuratura-fondebis-angarishebi-davayadaghet-sabotadje-mimdinare-gamodziebis-farglebshi/> (Accessed December 28, 2025.);

81 Social Justice Center, *Freezing Funds is Another Aggressive Attempt to Punish Protest and Persecute Civil Organizations*, 2025.

82 Radio Free Europe/Radio Liberty, *Aleko Tskitishvili Was First Taken Off the Bus, Then His Apartment Was Searched*, 2025.

83 Social Justice Center, *Signatory Organizations Evaluate the Search of the "Labor" Office and Condemn the Persecution of the Independent Trade Union*, 2025

such letters, and the number was growing daily. In response to the organizations' letters explaining the illegality of the Bureau's demands, the Anti-Corruption Bureau began the process of petitioning the courts to gain access to information held by these organizations. Currently, the Anti-Corruption Bureau is conducting illegal and unsubstantiated monitoring of dozens of civic organizations based on the "Law on Grants."⁸⁴

Structural changes, illegal and unsubstantiated monitoring and inspections, and numerous instances of account seizures and searches within the framework of criminal investigations were accompanied throughout 2024-2025 by an intensive information narrative aimed at discrediting and damaging the reputation of civil society organizations. This narrative became entrenched in the rhetoric of central and local government representatives, taking the form of continuous verbal attacks and threats. Particularly over the last two years, individual representatives of civic organizations have constantly been victims of organized insults, harassment,⁸⁵ intimidation, threats, and slander on social networks.⁸⁶ Their work has also been accompanied by experiences of illegal wiretapping, surveillance of their movements, and the receipt of intimidating and threatening calls and messages directed at both them and their family members.⁸⁷

A coordinated attack on civic organizations took place on May 31, 2024, when unidentified organized groups left offensive and defamatory inscriptions on the offices of dozens of civil society and media organizations, as well as on the residences and vehicles of their leaders and their family members. In adjacent areas, photos of the organization leaders were posted with labels such as "Sold" and "Traitor." On the same day, a member of "Georgian Dream," Member of Parliament Dimitri Samkharadze, published a video and a post on social media, confirming his connection to these actions and further disseminating a threatening

84 Georgian Young Lawyers' Association, "Georgian Dream" has launched a new stage of repression against civil society, targeting nearly 30 Georgian non-governmental organizations, 2025.

85 Front Line Defenders, Defamation and Intimidation Attacks against Human Rights Defenders in Georgia must be investigated, 2024.

86 Civil Society Forum, Battered but Resilient, Georgian Civil Society in the Context of the Law on "Transparency of Foreign Influence": an EaP CSF survey, 2024, pg.7-11.

87 The Observatory for the Protection of Human Rights Defenders, Under Siege: How Georgia Is Dismantling Civil Society Findings from the Observatory for the Protection of Human Rights Defenders' Field Mission, pg. 12-16.

message.⁸⁸ Acts of vandalism against civil society office buildings, some of which are cultural heritage monuments, remain uninvestigated to this day.⁸⁹

It is also important to note that 2024 saw a trend of local municipalities canceling usufruct agreements for buildings and spaces previously granted to civic organizations, a tactic used to punish or pressure them by restricting access to municipal property. For example, in 2024, the Gori City Hall demanded the cancellation of the usufruct agreement with the “Gori Photographers’ Club” regarding the building the club used for various activities and exhibitions. This decision followed the appearance of a protest installation titled “A War-torn City Does Not Apologize!”⁹⁰ in their exhibition space. The experience of the Tetrtskaro Youth Center is similar; they had used their building continuously since 2018 based on a usufruct agreement with the municipality, only to receive a notice⁹¹ in 2024 demanding the termination of the agreement and the vacating of the building. Since such agreements with local municipalities were mostly used by regional or community-based organizations, this trend is primarily reflected in their experiences.

Amidst the restriction and virtual destruction of the legal and enabling environment for civil society organizations in 2024–2025, the adaptation and survival capabilities of these organizations were significantly affected by major changes in the international development assistance ecosystem. This process involved significant cuts⁹² in development aid by many states, compounded by the U.S. government’s decision in early 2025 to close the United States Agency for International Development (USAID) mission.⁹³

For decades, a significant challenge for the Georgian civil society sector has been its high dependence on international development assistance. For example, according to

88 Radio Free Europe/Radio Liberty, “*They Might Even Assault Us Physically*” – *Threatening Graffiti Reappeared on NGO Offices*, 2024.

89 The Observatory for the Protection of Human Rights Defenders, Under Siege: How Georgia Is Dismantling Civil Society Findings from the Observatory for the Protection of Human Rights Defenders’ Field Mission, pg. 14.

90 Shida Kartli Information Center, *Gori City Hall Evicts the “Photographers’ Club” from the Building*, 2024.

91 Facebook Social Network Account: თეთრიწყაროს ახალგაზრდული ცენტრი • Tetrtskaro Youth Center, https://www.facebook.com/tycgeorgia/?locale=ka_GE (Accessed December 28, 2025.);

92 Dalan Fund. *Growing Against All Odds: Mapping funding for intersectional organizing in the CEECCNA regions*. 2025. pg.12.

93 New York Times, Trump Calls Directly for Closure of U.S.A.I.D., February, 2025. <https://www.nytimes.com/2025/02/07/us/politics/usa-id-trump.html>. (Accessed 28.12.2025).

2018 data, 95% of the Georgian civil society sector's income consisted of support received in the form of grants from Western international foundations.⁹⁴ This degree of dependence on international aid has remained unchanged for years. This circumstance played a significant role in weakening the sector when avenues for international funding were closed, as the sector was largely dependent on international development support from the U.S. government and the European Union. However, the support received by the civil society sector from these two central sources significantly lags behind the support provided by the same sources to the Government of Georgia. For instance, out of the total U.S. government assistance to Georgia, which amounted to \$143.8 million in 2023, \$15 million was directed toward democratic participation and civil society support.⁹⁵ According to data from the EU Delegation to Georgia, between 2019 and 2024, direct EU support to the Government of Georgia was 11 times higher than the support directed to civil society organizations during the same period. Specifically, according to European Commission data, between 2019 and 2024, the Government of Georgia (ministries and various agencies) received €517 million in support, while assistance to the civil society sector amounted to €46.1 million, distributed among 170 Georgian civic organizations.⁹⁶

These data demonstrate the significant reliance on international financial support not only by Georgian civil society organizations but also by Georgia as a state. A report on external assistance in Georgia was prepared on an annual basis. However, the latest report published by the government dates back to 2022. This document indicates that in 2022, the external assistance received by Georgia amounted to 27.8 billion GEL, of which 21.4 billion GEL (76.85%) consisted of loans, while 4.4 billion GEL (15.87%) was in the form of grants and guarantees.⁹⁷ The report identifies Germany, the United States, France, the Netherlands, and Switzerland as the primary bilateral donors, whereas European Union institutions occupy the leading position among multilateral donors.⁹⁸

94 Civil Society Institute, Civil Society Organizations' State Funding Reform Policy Paper, 2012, pg. 2-3.

95 Jaba Devdariani, As USAID Dies, Many of Georgia's "Vibrant" CSOs Face Extinction, *GEOpolitics*, 2025.

96 Civil Georgia, EU Delegation: Georgian Gov't Received 11 Times More Financial Support from EU than CSOs, 2024.

97 This is followed by technical/expert assistance (6.05%), material/technical assistance (1.22%), and humanitarian assistance (0.01%). (Source: Administration of the Government of Georgia, *Report on Foreign Assistance in Georgia*, 2022, p.14.).

98 Administration of the Government of Georgia, *Report on Foreign Assistance in Georgia*, 2022, pp. 9-14.

4. Key Research Findings

The Impact of a Hostile Legislative Framework and Rhetoric on the Existence and Activities of Civil Society Organizations

- In the process of Georgia's democratic backsliding and the consolidation of authoritarianism, a significant objective of the government was the complete neutralization of Georgian civic organizations; in recent years, particularly since the spring of 2024, Georgian civic organizations have been functioning in a mode of resisting the government's destructive policies, striving for the survival of public activities, and focusing on organizational adaptation.
- The adoption of the so-called "Russian Law" in 2024 initiated the creation of a new legal and institutional environment, which turned punitive approaches toward public or human rights activities into a part of declared state policy. In 2025, with the adoption of the "Foreign Agents Registration Act" (the so-called "Agents' Law") and amendments made to the "Law on Grants," the formation of the new institutional framework designed for the neutralization of the civic space was effectively completed.
- The legislative reality created over a one-year period completely transformed the rights-based and enabling environment for the functioning of civic organizations in a short time. This impacted the organizations' operational capacities, as well as their organizational, operational, financial, and human resources, playing a decisive role in the effective cessation of activities for a large portion of civil society organizations and the weakening of those that survived.
- The activities of civil society organizations were significantly affected by the government's rhetoric designating them as enemies, which preceded the adoption of laws aimed at eliminating public spaces. The practice of labeling civil society organizations as enemies and distancing the state from them extended to organizations of all sizes, types, and scopes of activity; local municipal bodies became closed off and hostile even toward those small community organizations and local initiatives that had exerted significant efforts toward strengthening the municipality over the years.

- Under the conditions of the restriction and virtual destruction of the legal and enabling environment for civic organizations in 2024–2025, the adaptation and survival capabilities of the organizations were significantly impacted by major changes that have taken place in the international development assistance ecosystem in recent years. This also included the decision made by the U.S. government in early 2025 regarding the closure of the United States Agency for International Development (USAID).

* * *

- The adoption of the so-called “Russian Law” in 2024 initiated an irreversible process of damaging the sector, which effectively determined the issue of survival for small and sometimes medium-sized organizations. Moreover, the first somewhat “natural” targets of the new legislative environment turned out to be small regional, mostly community-based organizations and initiatives, a large portion of which ceased to exist or continue their activities minimally and in an altered form.
- The legislative changes effectively and completely restricted the operational capabilities of civic organizations, which also severely impacted medium and large-sized resource organizations. The research shows that the government’s objective, aimed at neutralizing the public sector, was directed at all types of organizations, regardless of their form of activity or size.
- Structural changes failed to completely halt the activities of relatively strong and well-resourced organizations, which was followed, starting in the summer of 2025, by the activation of individual mechanisms of persecution and repression by “Georgian Dream” against specific targeted organizations. This process included monitoring and inspections initiated against organizations, and in individual cases, seizure measures utilized within the framework of criminal investigations (the so-called “sabotage case”) against the organizations, which made it practically impossible for the targeted organizations to work in their existing form.
- The implementation of the so-called “Russian Law” led the most vulnerable, relatively small, regional, and mostly community-based groups and initiatives of the civil sector to a complete cessation of their activities.

- In accordance with the requirements of the so-called “Russian Law,” only a small fraction of civil society organizations made the decision to register, mostly consisting of service-providing organizations and regional organizations. For a portion of them, this decision entailed difficult moral and ethical dilemmas, and it was a forced decision made out of the necessity to protect the vital interests of their beneficiaries.
- The “Law on Agents” did not have the same impact on eliminating organizations from the sector as the so-called “Russian Law” did. However, it affected the group of surviving organizations for whom, along with other accompanying difficulties, the possibility of criminal liability provided by the law proved decisive. Primarily large-sized organizations, including “watchdogs,” as well as mixed and broad-profile organizations, survived this pressure; nevertheless, the impact of the law significantly affected them.
- The amendment to the “Law on Grants” is considered a severe and decisive pressure, as the amendment managed to cause significant damage and effectively blocked the possibilities for organizations with independent and autonomous agendas to survive in this form, regardless of their resources or size.
- A portion of the organizations, despite their temporary suspension, remain in resistance through new collectives, altered working formats, or individual pathways, and are fighting to save public activities. Meanwhile, organizations that were damaged and weakened by the existing environment maintain a portion or a bare minimum of their organizational activities in order to be able to continue their work and prevent the complete cessation of the organizations. Their main challenge remains the adaptation of their activities and infrastructure, as well as the control of potential damage/threats, which requires significant effort from the organizations.

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- The following factors had a substantial impact on the existence and functioning of civic organizations: the complete and bilateral closure of spaces for cooperation with the government, the disappearance of work areas and spaces/working environments, the experience of local societies/communities distancing themselves from the organizations, the formation of a hostile and

fear-inducing environment around the organizations, the reduction of financial resources, and later the impossibility of receiving financial resources and the resulting substantial reduction in activities, the increase in risks of legal (including criminal) liability, the outflow of employees, the loss of physical infrastructure, and a practice of self-restriction and self-censorship within the organizations.

- Experiences of harassment, pressure, intimidation, and retaliation had a significant impact on the functioning of civic organizations. Since 2024, the threats of legal liability against organizations have particularly increased, and the forms of harassment and coercion have become more intensive, which, along with physical security risks, created severe emotional pressure. In isolated cases, risks to physical security or other forms of retaliation had a significant impact on decisions to suspend activities or close the organization.
- The viability trajectories of the organizations differed significantly from one another. Specifically, various structural factors – such as unequal access to resources, the size of the organizations, the geographical area of operation, institutional connections, and others -fundamentally determined the viability and resilience capacities of civic organizations.

The Role of Civil Society and Donor Organizations in the Survival Process of Civil Society Organizations

- In response to the altered legal and political environment, resistance constituted the central strategy employed by Georgian civil society organizations. The resistance of civil society proved strong, indicating the resilience and fighting capacity of the sector.
- The collective decision to refuse registration in the special registry, according to the requirements of the so-called “Russian Law,” represents a significant consensus achieved within Georgian civil society, which also matured as a result of the joint resistance process of civic organizations.
- Following the first attempt to adopt the so-called “Russian Law” in 2023 – which ended with the government backing down as a result of significant efforts by civic organizations – the process of preparing for possible negative

scenarios did not begin within the organizations, either individually or collectively. As a result, civil society met the adoption of the so-called “Russian Law” in 2024 essentially unprepared.

- Similar to the resistance and legal support formats created within civil society organizations, a space for discussion focused on the adaptation and survival of civic organizations was not established, which had a significant impact on the viability of the sector.
- The research describes the delayed process of survival and adaptation of civic organizations, which, in contrast to the resistance experience, reveals the absence of a collective survival/adaptation process and the individualization of the organizations’ pathways to survival.
- The research reveals problems regarding civil society organizations’ accountability to the public, the building of connections with the broader public, and a deficit in representing the interests and needs of broad societal groups in public policy. For years, this caused alienation between a segment of the civil sector and large groups of society, which was later artificially cultivated and utilized for the propaganda objectives of “Georgian Dream.”
- Donor organizations, which are simultaneously international political actors, were unprepared for the acute political situation created in the country, the agenda of which openly included the objectives of destroying civic organizations.
- Even during the one-year continuous process of shrinking civic space, donor organizations failed to respond to the existing situation in a coordinated and adequate manner and make a significant contribution to the survival process of civic organizations as democratic forces.
- In the experiences of individual organizations – mostly large and medium-sized ones – certain donor organizations played a significant role in their survival, demonstrating strong examples of flexibility, genuine support, and the application of tailored approaches.
- The significant and overwhelming resource asymmetry (and not solely financial) between relatively large/medium organizations and small organizations

- which had been a major underlying factor in the unequal development of the civil sector for decades – manifested most acutely during the crisis. This automatically divided the survival paths and capabilities of small and relatively large organizations from one another.
- The development assistance agenda, which did not aim to create the physical infrastructure necessary for the existence of civic organizations, became an insurmountable obstacle for a large portion of these organizations during the crisis. Significant development assistance resources directed toward the development of physical spaces were primarily used to create public infrastructure under the management of local municipalities, from which civic organizations have now been completely evicted.
- The research highlights certain attempts by the government to co-opt civic organizations, which may be reflected in the government's establishment of the State Grant Management Agency in 2025. However, at present, co-optation as a form of adaptation is not a strategy chosen by the vast majority of civic organizations.

5. The Impact of a Hostile Legislative Framework and Rhetoric on the CSOs' Functioning

The law “On Transparency of Foreign Influence,” the so-called “Russian Law,” was adopted by the Parliament in early June 2024.⁹⁹ With the adoption of this law, “Georgian Dream” initiated the creation of a new legal and institutional environment, which consolidated at the legislative level the objectives of restricting the rights-based functioning of non-governmental organizations and their stigmatization, turning punitive approaches toward public or human rights activities into a part of declared state policy.

Later, in 2025, the adoption of the “Foreign Agents Registration Act” (the so-called “Agents’ Law”) – which further increased the risks of stigmatization of civil society organizations, the making of arbitrary decisions against them, and their criminal liability – and the amendments made to the “Law on Grants” – which restricted the possibilities of receiving international financial support without the government’s consent – effectively completed the formation of the new institutional framework designed for the neutralization of civic space.

The legislative reality created over a one-year period fundamentally transformed the institutional, rights-based, operational, and enabling environment for the functioning of civil society organizations. This impacted the organizations’ operational capabilities, as well as their organizational, operational, financial, and human resources, playing a decisive role in the effective cessation of activities for a large portion of civil society organizations and the weakening of those that survived.

The emergence of the legal possibility of penalizing public activities through administrative or criminal procedures linked the continuation of such work to significant organizational and individualized risks. This was additionally accompanied by increased physical security risks, emotional and financial difficulties, and a highly unpredictable and uncertain future, which drastically reduced the possibilities of safely continuing public activities.

⁹⁹ The law came into full effect after 60 days, starting from August 2024.

The immediate impact of the new legislative environment on the everyday life of the organizations was amplified by the information field that had been created against civil society organizations over the years by the so-called pro-government media and high-ranking political officials of the government, which was established in the legislative and discursive field under the labels of “bearer of foreign influence” and “foreign agent.” Specifically, the research confirms that civil society organizations were significantly affected by the government’s rhetoric designating them as enemies, which preceded the adoption of laws aimed at eliminating public spaces by a significant margin. Moreover, the multi-year attempt to delegitimize and stigmatize the organizations, and to generate distrust and fear toward them, was instantly activated upon the formation of the new legislative reality and significantly impacted the everyday activities of the organizations. The demonstrative and immediate exclusion of civil society organizations from institutionalized political processes is linked to the adoption of the so-called “Russian Law.” This also had a significant impact on the functioning of the organizations, particularly regional and community-based organizations, and altered attitudes and approaches toward the organizations and individuals associated with them.

The law “On Transparency of Foreign Influence,” the so-called “Russian Law,” has not yet been proactively enforced by the government against those organizations that did not register in the special registry. Up until June 2025, there had also been no precedents of the Anti-Corruption Bureau enforcing the “Foreign Agents Registration Act,” the so-called “Agents’ Law.” The research shows that for the majority of civil society organizations, the mere fact of the laws coming into force and their accompanying “chilling effect” proved decisive. This dramatically impacted the majority of civil society organizations immediately upon the adoption of the laws, causing significant damage to a large portion of them.

Additionally, the criminal and administrative processes initiated by various agencies, which have targeted dozens of civil society organizations from June 2025 to the present, making their activities the subject of criminal investigations and monitoring, had the objective of neutralizing, silencing, and weakening these organizations. These arbitrary actions by the government also significantly determined the current difficulties faced by the targeted organizations.

Since the fieldwork for the research was conducted during the period of August – September 2025, the impact of these factors was significantly evident in the condition of civil society organizations. This chapter of the present research will

attempt to describe the overall picture of civil society organizations as of the end of September 2025, and to highlight those areas of their functioning and activities where the incurred damage is substantial and tangible. Furthermore, alongside the impact, this subchapter will attempt to demonstrate the strategies and approaches with which organizations responded to the continuous process of their neutralization and its multi-layered effects.

The subsequent chapter of the research will attempt to show how the viability and organizational resilience of civil society organizations were determined by various structural factors – specifically, by conditions such as the differing sizes of the organizations, the type and form of their activities, the geography of their operations, and their varying financial and organizational capabilities.

5.1. The Disappearance of Spaces for Cooperation and Dialogue with the Government and Difficulties in Re-strategizing Activities

The area of activity for civil society organizations was significantly narrowed by the complete disappearance of formats for dialogue and cooperation with central and local authorities, and by the creation of a clearly hostile and antagonistic environment against the organizations. The closure of such spaces for cooperation is linked to the adoption of the so-called “Russian Law” in 2024. The impact of the new environment equally affected the activities of both Tbilisi-based and regional organizations, and forced the vast majority of them to face the necessity of substantially altering their agendas. Organizations managed this challenge in varying ways.

The Complete Disappearance of Spaces for Cooperation

The shrinking of spaces for cooperation with the civil sector by the government and the change in attitudes toward representatives of civil society organizations was a continuous process that manifested in various ways in previous years. The prior experience and stark signs of the intentional damaging of cooperation with the civil sector are mostly linked to the first attempt to initiate and adopt the so-called “Russian Law” in 2023.

After the draft law was dropped as a result of strong civil resistance, working formats were more or less maintained; however, the attitude, approach, and language toward the organizations clearly changed. Concurrently, the government's clearly expressed hostile rhetoric against civil society organizations was maintained in the public sphere.

Numerous research participants spoke of instances prior to 2024 where civil society organizations were delegitimized, humiliated, and insulted in working formats, specific community organizations were excluded from meetings, joint working formats were disrupted, and relationships were damaged. This reality demonstrated from the outset that the government's hostile attitude would escalate again in the near future.

"We stopped cooperating with the public service last year, but do you know how it happened? It happened gradually... Two years ago, [one of the] ministries told us that we could no longer cooperate... We constantly had very good cooperation with the ministry... We truly performed the function of a serious think tank..."

[In 2023] it was the first time when [one of the] ministries... told us 2 days prior that they would no longer let us in [to conduct a joint program]."

(Representative of a civil society organization)

The head of a leading sectoral/industry organization with years of experience in fruitful cooperation with the government recalls the altered working environment prior to the complete disappearance of cooperation in this way:

"In the working processes, [there was] humiliation, [saying] that you are nobody... They cannot use this term ['agent'] face-to-face because they know perfectly well that you are nobody's agent and they themselves realize that they cannot humiliate you with it in that environment. In public, it might be a good argument for the audience... Therefore, in a face-to-face conversation, they rather appeal to the fact that you are ignorant, you know nothing, and that you represent no one, there is nothing legitimate behind you."

(Representative of a civil society organization)

Despite the altered and damaged environment, a certain type of cooperation between the government and civic organizations continued prior to 2024. However, this changed drastically from 2024 and is linked to the re-initiation and adoption of the so-called "Russian Law." The initiation of the so-called "Russian Law" and the openly

hostile rhetoric of the government were followed by a counter-boycott from civil society organizations, who suspended all cooperation with the government demanding the law be dropped.¹⁰⁰ In parallel, representatives of civil society organizations, including community organizations at both the central and local levels, left even those participatory formats – mostly created as a result of their significant efforts, the existence of which played a decisive role in bringing the interests of various social groups before the government and creating a space for public participation – as a sign of resistance and refusal to cooperate. The refusal to cooperate with state agencies, particularly for regional and local organizations, remains the primary form of resistance and disagreement with the government to this day.

“We were in the advisory group of every agency... We were also in the Public Defender’s monitoring group, at all levels, municipal or central. Often they did not like my critical opinions and we had disagreements, but they were professional... Despite this... I always felt a respectful attitude... But after they brought up the ‘Russian Law’ against us for the second time, such psychological pressure started that we left every committee, every council... I even left the committee created through my advocacy in [one of the] ministries... [The ministry] no longer even convenes ‘GONGO’ organizations... Participation has remained [only] on paper...”

(Representative of a civil society organization)

In the wake of the universal boycott by civic organizations, which continues to this day, any possibility of dialogue and cooperation with the government was instantly and virtually completely closed. Thus, since the summer of 2024, the already damaged relations of cooperation between civil society organizations and the government have essentially been completely and bilaterally terminated.

It is notable that the abolition at the legislative level of the mandatory participation of civic organizations in the public decision-making process, and the above-described practice of restricting cooperation with civic organizations, is common to all organizations participating in the research whose activities involved cooperation with state agencies. The practice of labeling civil society organizations as enemies and distancing the state from them extended to organizations of all sizes,

100 Transparency International Georgia, *Until the Russian Law is Dropped, Civil Society and Media Organizations Suspend Cooperation with the Government*, April 2024, <https://transparency.ge/ge/post/rusuli-kanonis-chagdebamde-sazogadoebrivi-da-media-organizaciebi-vacherebt-xelisuplebastan>. (Accessed December 28, 2025.).

types, and scopes of activity that openly criticize government policies and were involved, organizationally or personally, in the multi-layered protest movement spread across the country. An exception to this general reality is the communication related to the legal and other interests and needs of the organizations' beneficiaries with specific responsible agencies or public servants, which continues unhindered in the experience of a small portion of organizations.

"At the level of investigative bodies, [the organization] always actively cooperated with the Ministry of Internal Affairs at the level of [individual] cases [in the organization's proceedings], with the Prosecutor's Office, and with the Special [referring to the Special Investigation Service]. [The organization] is currently in normal communication, and even now I cannot say they are creating a hostile environment for us. On the contrary, now they have a more supportive attitude, I mean the individual prosecutors and investigators, of course. Insofar as we remained in a boycott mode at the institutional level, this has not happened at the personal level so far, because everyone had a good personal relationship with these people... We are waiting to see when they will 'cancel' us and when this hostile environment will turn on us... This cooperation [with these public servants] has been going on for a long time, and probably those joint trainings and workshops yielded results."

(Representative of a civil society organization)

"In 2024, we unanimously suspended relations with the central [government] and the Parliament... It was impossible to continue relations with them... [However,] we must maintain the possibility of dialogue where it is necessary. For example, with [one of the agencies] we cannot suspend relations, because much depends on it for our beneficiaries. We need to submit cases [for the individual cases of beneficiaries], discuss cases, help, etc. This is an important part of our work."

(Representative of a civil society organization)

The experience of restricted cooperation extended not only to the so-called "watchdog" organizations, which for years had been the primary targets of the government's hostile rhetoric, but also to those organizations that served the objectives of directly supporting and strengthening state institutions. Moreover, the research shows that government representatives maintain cooperation with service-providing organizations defined by state programs solely and directly regard-

ing issues of service implementation, and demonstratively show their rejection of and distancing from them regarding other activities aimed at improving state policy.

For example, representatives of an organization implementing a major state program, who even now continue to provide an important state service across the entire country, describe the altered attitude of state agencies regarding cooperation with them:

*“After the adoption of these laws, they keep us completely at a distance. Recently it was *** day. It never used to be held without us, and even now we are involved in the *** program, especially since we are bound by a contract, and the ministry knows that we are one of the main actors... Every year we used to have the floor [at this event]... This year they did not call us, they didn’t invite any NGOs... We are unwanted guests. I have never felt it so clearly. *** is such a topic that, on the contrary, they used to beg us, asking for help... Even last week they called me, saying we will need your support [in a specific case], but cooperating with us publicly is forbidden for them as well.”*

(Representative of a civil society organization)

A large portion of the civil society organizations surveyed in the research mostly links their complete expulsion from cooperative formats to the year 2024. However, those community organizations that work on the rights of religious and ethnic groups, as well as the LGBT community, encountered sharply hostile and antagonistic attitudes much earlier, from both central and local authorities, which closed off their admission to working formats, meetings with them, and possibilities for cooperation well before 2024.

“The organization’s activities began facing problems earlier than the adoption or even the initiation of these laws... Starting in 2022, in 2023, they began restricting us; they no longer met with us, no longer cooperated with us. Already from 2023-24, they started portraying and perceiving us as enemies and opponents. Accordingly, our work with them automatically came to a halt on its own.”

(Representative of a civil society organization)

“We have had hostile relations with the municipality... the kind of relationship everyone talks about now – we have had that for five years. For five years, in their [the local municipality’s] eyes, we have been enemies... Until 2022, meetings and similar activities still took place... after 2022, there was nothing at all.”

(Representative of a civil society organization)

The Disappearance of Spaces for Cooperation at the Municipal Level

It is noteworthy that the effort to completely close spaces for cooperation quickly extended to the local municipal level and was implemented with the same degree of rigidity. Local municipal bodies became closed off and hostile even toward small community organizations and local initiatives that, over many years, had invested significant effort into strengthening municipalities, developing new policies, and enhancing the administrative and human capacities of municipal institutions.

Research participants describe how even previously productive, interconnected, and intensive forms of cooperation were suddenly damaged, and how local community organizations with substantial experience and contributions were pushed out of local policy spaces.

“We had a very good relationship with the City Hall. We never had relations with the central government... we mostly interacted with local municipalities, and the relationship was very good... We were always helping the municipality... We were members of the municipality’s Gender Council, I was an advisor to the mayor... Wherever NGOs were needed, we were there... When they had gaps and needed support, we funded activities and conducted trainings for their staff... [Since last year] our relationship became strained... I left their Gender Council and told them that cooperation with them was no longer worthwhile. In the end, we ourselves left the Gender Council. [Now] they no longer invite us to anything, and of course neither do we – we are in protest.”

(Representative of a civil society organization)

“I was a member of the municipal council for years, and whatever programs existed were implemented with the support of my organization. I was also on the Mayor’s Advisory Council and on the Advisory Council for Persons with Dis-

abilities, and last year I left all of that... Last year, after the discussions around the 'Russian law' began in April, from that very day we started feeling tense and hostile attitudes from the local self-government... [For years] we had quite good relations... They always had a certain openness. Because we were an old and experienced organization, they always listened to us. We never had an initiative that they did not support. This changed after the second 'Russian law' that was adopted."

(Representative of a civil society organization)

"Avoidance has become an ordinary thing after those laws; in their eyes, we are now on opposite sides... they avoid us. Now it is obvious – for practically two years we have not been invited to [budget] discussions, nor have we received any notifications. Previously, they used to send emails. The municipal budget is now planned without asking any of us, because for them we are enemies... They know we are not; they know us, they have cooperated with us before, but they have been given such instructions."

(Representative of a civil society organization)

The Impact of the Closure of Collaborative Spaces on Civil Society Organizations

Immediately after the adoption of the law, most civil society organizations found themselves facing the necessity of radically transforming their working agendas. For many of the organizations interviewed in the study, a significant portion of their activities became either impossible to implement or no longer relevant, insofar as much of their work had involved influencing legislation and public policy, as well as conducting research and advocacy aimed at improving services.

Organizations whose primary focus was the assessment and protection of human rights were comparatively more successful in re-strategizing their agendas. Accordingly, alongside the closure of advocacy spaces vis-à-vis the government, this category of organizations redirected their existing resources entirely toward activities aimed at resisting growing authoritarianism, responding to the damage inflicted on democratic institutions and human rights guarantees, and undertaking other relevant forms of work.

The transformation of the working environment proved particularly damaging for so-called think tank organizations and sectoral policy-oriented organizations, whose primary operational space effectively disappeared. This challenge was difficult to overcome even for experienced and well-resourced organizations. Most struggled to devise new working strategies and formats or to adapt their activities, a process made even more difficult by the rapidly changing, uncertain, and threatening environment. Similar experiences were reported by local foundations and so-called infrastructure organizations, whose primary field of work had involved cooperation with regional and local organizations, while their central mission focused on improving local municipal policies.

*“We had several large programs... I saw that what I hoped we would do, we could no longer do in that way; the advocacy part became complicated, and it was necessary to change the strategy for upcoming projects... In March 2024, everything turned upside down to such an extent that I still don’t know what strategy I should have written for the next three years in the *** field... I don’t know what product I will deliver, what value I will create. I cannot make a ‘commitment’ to anything, we couldn’t figure out [how we should change our work], and then the shattering of the environment proceeded at a geometric progression.”*

(Representative of a civil society organization)

“We no longer have ‘core funding.’ It ended, and we did not request new funds. We did not request them because even if we had the money, what am I doing, what result am I achieving? Whenever I ask [a donor for money], I tell them I have this strategy and give me money for it. I do not have a long-term strategy... How can I ask the donor... when I don’t know what I will be able to do and what I won’t... We can no longer use the same forms [of work], and we haven’t invented new ones yet. This organization always used to issue grants; [now] we essentially no longer issue grants.”

(Representative of a civil society organization)

This challenge affected professional associations, trade unions, scientific/research organizations, service-providing organizations, and social enterprises to a lesser extent, as their work is mostly built around workers and other groups, beneficiaries, professional societies, and research fields.

Changing agendas and adapting to the new environment proved particularly difficult for a large portion of regional community organizations and local initiatives, whose widespread form of work was directed toward improving local policy. The disappearance of the form of activity utilized for years rendered their experiences, skills, and knowledge incompatible with the new challenges and altered working environment, which was simultaneously accompanied by the difficulties of community organizing and working with the community.

“The problem is that you have absolutely no idea what you can do... what you know, you can no longer do... what you can do has also narrowed significantly... [Local organizations] now have to rethink everything... everything you used to do is under question, [you no longer know] what terms to use when talking to people so that it is acceptable and safe for them. And it was true.”

(Expert interview)

A portion of regional and local organizations managed a temporary re-strategization in the initial stage and developed temporary and transitional working forms for their activities. In parallel with the objectives of the organization's survival, the latter included community mobilization and contributing to the fight against authoritarianism, through both organizational and individual efforts. For this segment of organizations, the end of the trend of a shrinking democratic environment was tied to the October 2024 parliamentary elections; therefore, their need for adaptation was also viewed as short-term.

5.2. Shifts in Public Attitudes and Challenges in Community Engagement

The continuation of activities or the search for new content and forms of activity was additionally complicated by significant changes expressed in the public sphere, which had a particularly painful impact on regional community organizations. It also affected Tbilisi-based organizations that, using regional offices, regional representatives, or other forms, actively worked in various regions of Georgia as well.

Research participants describe an altered social field, which was expressed in changed public sentiments and, in many cases, made it completely impossible to continue activities locally. This particularly impacted the possibilities of holding

community meetings, conducting community work, and utilizing public meetings, public events, and other formats.

According to the observation of research participants, the altered environment is linked less to a distrust of civil society organizations and more to the fear and caution of cooperating with or associating with them. Through distancing themselves from the activities of organizations and a sort of self-restriction, citizens severed or reduced their ties with organizations that the government had declared as unwanted and hostile groups. Citizens' fears are typically tied to the risks of losing jobs or social benefits for themselves or their family members, as well as other potential difficulties that may arise in their relations with municipalities. A public engagement expert interviewed within the framework of the research describes their observation as follows:

"The community no longer wants to be affiliated with someone with whom the state has a grievance... They won't stick their neck out for your training to the point of becoming a target for the village's authorized representative within the community. You cannot offer them any benefit equivalent to what the local government offers in terms of security, finances, or protection. Therefore, when an open conflict and confrontation emerge at the local level between the local government and a community organization, the community increasingly sides with the local government, due to their vulnerability and defenselessness... Unlike residents of big cities, they depend on the local self-government... At an individual level, no one might ostracize you, but they will no longer participate in your [events]... and they distance themselves from you."

(Expert interview)

*"For example, when one of our partners, whom we were helping to do a **** in a small town, announced the enrollment of children, parents would tell them, 'The children won't face any problems attending here since you receive foreign funding, will they?' I bring this up as an example. It became clear to many organizations that things were not simple. It became evident that this was the beginning of a systemic fight by these forces, and some portion of the population, especially in the regions, is 'misguided,' so to speak. They have questions, they have fears; they may be irrational, but they exist. I think this also gave a push to many organizations to take a 'timeout' in anticipation, and here came the second blow in the spring [referring to the laws adopted in 2025]."*

(Representative of a civil society organization)

"[Due to the specificity of the community and its dependence on the government] despite the fact that they saw how this [the implementation of the laws] affected us, we did not see any support from them... Even the beneficiaries we worked with and helped did not stand by our side when this legislation changed. I do not know what kind of phenomenon this is..."

(Representative of a civil society organization)

The process of community members distancing themselves is painful and causes significant disappointment among the staff of regional community organizations. This is especially true regarding the segment of the community that had known the organization for years and had even benefited from the significant goods offered by them. These processes occurring at the community level also damage existing social, familial, and personal ties on the ground, and in an already difficult environment, often become a cause of demotivation and alienation from the community on the path to saving community activities.

"On one side is prison, social exclusion, and stigma, and on the other side you have a 500-GEL salary and, to some extent, ingratitude from the community, alongside your strong desire to change something for the better... You also feel resentment; you were doing everything well, and now [in return] prison is awaiting you on the other side... This to a certain extent [pushes you] to stop."

(Expert interview)

"There are people who wrote bad things about us... There are people who attacked us... [These are people who did not know us]. I am resentful of the people who know us very well and have received a lot of help from us over the years... Not only that, they couldn't even take a woman in labor to the maternity hospital without calling me, saying, 'look after us, help us'... I protest the fact that these people are silent... Why are you silent... They want to be with us, but they are afraid their social assistance might be cut."

(Representative of a civil society organization)

“Before that, I had never felt [alienation/being looked at with suspicion]. Already after the law was passed, I felt this in the eyes of many people. No one dared to say anything to me, but one could feel it... Both at the level of public servants and from the society [where we run the community service]... I felt this in the 2000s when we started [the community service] and got on our feet, and I have felt this for the last year and a half. I could feel the same kind of [alienation/distrust] was repeating itself... This narrative works, that these [organizations] were lining their pockets [with grants money], and [the community] started looking at us more [through that lens].”

(Representative of a civil society organization)

According to the respondents, the holding of local and community events has become rare, and the number of people willing to attend has decreased. Additionally, instances of attending events under the condition of secrecy have become more frequent. The research participants also share experiences of how an ordinary event of the organization and citizens’ participation in it supposedly became the object of control and surveillance by the security service, as well as cases where holding an event even became a physical threat to them.

“We had projects with youth [in one of the regions]... The last few times we held them, they set ‘titushkas’ on us. We don’t want to put those people in danger, either.”

(Representative of a civil society organization)

“When we went [to one of the regions] and then came back, [we were told] that after you left, a security guy came and asked about [you], who they were... [Local] organizations tell us that if I host you, I am taking some sort of risk... ‘NGOs’ are already declared enemies, and anyone who cooperates [with you] is then under observation – what did you want, what did you talk about, why did you meet... There is a lot of control, especially [names several regions]... Whatever [activities] have been maintained, it is very limited to conduct activities; it is under control. [For example] there was a film screening and a police car was outside, observing who was going in...”

(Representative of a civil society organization)

Since 2024, public schools and municipal spaces, which previously constituted the main physical and social field for the work of local community organizations, have been closed off, and today access to them is strictly controlled by local municipalities and the Ministry of Education. As a result, civil society organizations are practically no longer able to meet and work with school students, youth, and primary and secondary school teachers.

“You practically have absolutely no access to school students anymore, nor to teachers. [Schools] have been heavily closed off. Almost everyone says this – Racha, Batumi – you practically cannot enter a school anymore. You need permission from the Ministry of Education, and you cannot get this permission.”

(Representative of a civil society organization)

“Kindergarten teachers used to come to the training... Now, if they want to come to the training... they are afraid to come to us lest the kindergarten manager finds out, lest the head of the resource center finds out they are with us... When I ask, ‘Why, are they forbidding you?’... ‘No, they are not forbidding us, but if they find out, they won’t like it’... They hold themselves back.”

(Representative of a civil society organization)

“There were schools that used to beg us, ‘If you have any resources, come to me, to my school, to my children’... Even they no longer let us into the schools.”

(Representative of a civil society organization)

In numerous cases in these regions, the impossibility of working with local communities resulted in the suspension of organizations’ activities at regional levels and even the closure of local offices.

“We had [offices in two regions] but we closed them a while ago... They were no longer needed... We cannot travel because we used to interact with schools... To enter schools, you need [permission] from the Ministry of Education.”

(Representative of a civil society organization)

“We became restricted in youth projects... This year we said let’s continue anyway and see... We went down from 25 communities to 12, and in most of those, the youth could not mobilize their peers... It is no longer worth it for [the youth] to participate... It’s mostly the fear factor... Also, the schools we had cooperated with for years didn’t let us in.”

(Representative of a civil society organization)

The labeling of civil society organizations as “foreign” by “Georgian Dream” was carried out by using the images and profiles of Tbilisi-based, well-resourced human rights organizations and their representatives. Moreover, research participants shared personal experiences where local government representatives would “reassure” them that the label “agent” and other similar designations did not imply local community organizations, and were directed only at a few large “NGOs” and their leaders. However, paradoxically, the campaign to discredit specific civic organizations and the resulting experience of exclusion and isolation most acutely affected small community organizations and initiatives operating in the regions, and manifested most severely in their daily work and in small communities. Nevertheless, a portion of human rights organizations operating in Tbilisi also speaks about altered attitudes toward them, which, on the example of individual organizations, implies instances of emerging distrust and distancing from organizations targeted by the government.

“When the ‘Russian Law’ was adopted, even though it was not enforced and actually remains unenforced to this day, it still had a significant impact on us. It had a ‘chilling effect,’ at the very least on our observers... This was a year when we found it very difficult to recruit observers... [In addition to the increased demand for observers], there was this ‘chilling effect’ – people bluntly stated that they did not want to stick their necks out. Some of the people who cooperated with us backed out... These were the first signs.”

(Representative of a civil society organization)

Those directions of civil society organizations’ activities that involve legal assistance or the provision of various vital services have so far remained the forms of activity where instances of citizens distancing themselves are less evident. According to the assessment of research participants, this is explained by the high trust in the organization among large groups of beneficiaries who are in direct contact

with them, as well as by the vital necessity of accessing the services provided to them. However, there are instances of refusal of services, as well as experiences where citizens wish to continue using the service but avoid publicly associating with the organization.

“Being portrayed as an enemy by the government left a heavy mark on the organization. Toward the end, even during the adoption of the laws, we faced refusals from women regarding social activities such as receiving gynecological services, precisely for this reason – due to negative attitudes toward NGOs.”

(Representative of a civil society organization)

“Those to whom we provide services know very well about our work, trust has not changed, but they did not want to be connected with us [publicly].”

(Representative of a civil society organization)

5.3. Internal Organizational Challenges: Reduction in Financial Resources and Activities, Loss of Organizational Infrastructure and Human Capital

In addition to the rights-based and institutional condition of civil society organizations, the repressive and hostile legislative and physical environment established in 2024 -2025 also impacted the internal resource and infrastructural capabilities of the organizations. The research shows that the organizational difficulties and risks caused by the impact of the altered environment largely determined the resilience, resistance potential, and viability of the organizations. The internal challenges faced by civil society organizations since 2024 mostly involve the reduction and later practical disappearance of financial resources, the resulting reduction in activities, as well as the loss of employees and physical infrastructure.

Financial Difficulties Caused by the Altered Environment

As indicated by the civil society organizations surveyed in the research, their activities depend substantially on international financial support, which the organizations receive primarily in the form of grants from Western development agen-

cies, international or private foreign foundations, and representations of Western states. Generally, a high degree of dependence on development assistance is one of the structural characteristics of the Georgian civil sector. Moreover, a large portion of the resources of service-providing organizations, which deliver vital services to various vulnerable groups within the framework of state programs, also relies on international financial support. This demonstrates the financial dependence on international development assistance not only of the public sector, but also of state-managed social and healthcare services of vital importance.

A small portion of the funding for the organizations surveyed in the research consists of membership fees, donations, and revenues or contributions received through auxiliary commercial activities or cooperation with the business sector, which only in rare cases exceeds 1% of the organizations' total revenues. Therefore, revenues received from additional sources cannot even slightly replace the central role of development assistance, which constitutes nearly 100% of revenues for the majority of organizations.

A portion of civil society organizations faced financial difficulties entering 2024, which, according to their observation, is explained by both internal organizational and external factors, and is linked to a shift in development support priorities in recent years. Organizations of large, medium, and small sizes speak about experiences preceding the financial crisis, regardless of their activity profile. Unsustainable, short-term, and unstable funding schemes mostly constituted a challenge for small and medium-sized organizations. This reality of the redistribution of development support created a difficulty for a significant portion of organizations, as securing funding and maintaining continuity of operations kept organizations in a state of constant search and crisis. Despite these difficulties present in the environment, civil society organizations still managed to overcome crisis periods, adapt to the environment to a certain extent, and continue their activities uninterrupted.

However, the legislative and institutional barriers created by “Georgian Dream” in 2024-2025 confronted organizations with unprecedented financial difficulties. Immediately upon its formation, the new legislative environment impacted and diminished the physical infrastructure, administrative resources, and human capabilities essential for the organizations' survival, which in numerous cases led to the weakening or halting of these organizations. Despite their temporary suspension, a large portion of the surveyed organizations remain in resistance – through

new teams, altered working forms, or individual avenues – and continue to fight to save public activity. Meanwhile, organizations that were damaged and weakened by the existing environment maintain a portion, or a bare minimum, of their organizational activities in order to sustain operations and prevent a complete shutdown.

An analysis of the financial difficulties generated by these legislative and institutional barriers reveals four primary patterns of financial resource loss: 1) The cancellation of activities and refusal to accept funding; 2) The continuation of activities with existing resources and refusal to seek new funding; 3) The difficulty in securing financial resources for the survival of the organizations; and 4) The closing off of funding opportunities through amendments to the Law on Grants and the freezing of financial accounts.

Refusal to Seek New Funding

To mitigate the impact stemming from the so-called “Russian Law,” a certain portion of organizations – mostly small and medium-sized ones – made one of the following decisions immediately upon its enactment:

- (1) They preemptively completed projects before the full enactment of the law and met the law’s enactment with a zero budget, which entailed the complete or temporary suspension of the organization and transitioning into a standby mode;
- (2) A portion of organizations decided from the outset to terminate existing contracts or suspend ongoing grant agreements. As a result, they completely terminated or temporarily suspended organizational work.

These solutions are linked to the organizations’ decision not to register according to the requirements of the so-called “Russian Law,” which, in their assessment, aimed to stigmatize the organization’s activities. Furthermore, the attempt to have no ongoing activities and no financial resources in their accounts by the time the law was enacted, aimed to reduce the risks of the government activating punitive mechanisms against them. With the same objectives and reasoning, a certain group of organizations made an analogous decision not in relation to the so-called “Russian Law,” but later, in 2025, immediately upon the adoption of the so-called “Agents Law.” This time, medium and large-sized organizations also made the de-

cision to suspend activities or a portion of them. During this period, a portion of organizations:

(1) Completely terminated activities, returned unspent financial resources to donor organizations, and refused to sign new grant agreements, including ones they had already won.

(2) Canceled certain directions of the organization's activities and corresponding grant projects, which, in the organization's opinion, created risks of the so-called "Agents Law" extending to them given the arbitrariness and broad interpretation by the Anti-Corruption Bureau.

"We closed the public-political programs ourselves because it was a real threat to us, we didn't want to take this risk and we closed it because of 'FARA'... One we finished early, the second – we simply refused to implement the second stage... Because of 'FARA,' we practically closed two programs."

(Representative of a civil society organization)

"Projects were closed... voluntarily... Now you can't even renew them, you need permission... In 2003 [the year the organization was founded] we had one project in the organization, and now we are like this [we have one project]."

(Representative of a civil society organization)

"When 'FARA' came in, I didn't consider it from a legal perspective. I perceived it as a collapse... We officially terminated all [contracts]."

(Representative of a civil society organization)

The research highlights a group of organizations that continued their activities despite the hostile legislation; however, due to the altered environment, they could not re-strategize, went into standby mode, and temporarily gave up even trying to secure resources. This later proved completely impossible due to the amendments made to the Law on Grants. As a result, organizations met the moment of the amendment to the Law on Grants with significantly reduced financial resources, which diminished their viability.

Based on the type of activity, two categories of organizations belong to this group:

(1) Local foundations and organizations aimed at sector/industry development, which, on the one hand, lost a significant portion of their partner organizations in the form of regional organizations, and on the other hand, had their opportunities to work with central or local governments on improving policies closed off. Against the backdrop of these challenges, they generally failed to alter their working strategies, areas of activity, and forms, and temporarily refused to seek new finances.

“My target group was regional organizations and I would issue grants. Who am I supposed to give a grant to, the organizations are no longer there... No one wants a headache... There is no longer an organized group [locally]. I am exaggerating, but in numerous municipalities, they tell me that there is no one [no local organization] here anymore.”

(Representative of a civil society organization)

(2) The experience of those service-providing organizations surveyed in the research, which implement vital services with resources received through state programs, is similar. Due to the insufficiency of the funding allocated for services, service-providing organizations systematically and continuously received grant support from donors in order to improve existing services and policies, directing it toward the improvement of state policy and the provision of state services. Organizations of this type mostly suspended seeking additional funding temporarily, consequently suspended work aimed at policy improvement or service development, and transitioned into standby mode.

“We have been state service providers since 200. Prior to that, for 6-7 years, it was primarily with European funding – everything, whether it is infrastructure or whatever we arranged, was with European support. Afterwards and up to this day, operational expenses are on grants because the finances we currently receive from the state as service providers are very minimal... For ** GEL [referring to the funding allocated for the voucher], I cannot manage to provide the service...”*

(Representative of a civil society organization)

The Difficulty in Securing Financial Resources for the Survival of Organizations

Despite the enactment of the so-called “Russian Law” and the so-called “Agents Law,” a portion of relatively small Tbilisi-based organizations and regional organizations did not make the decision to freeze ongoing activities and financial resources, return them, or refuse resources. Thus, prior to the enactment of the amendments to the Law on Grants, this group of organizations actively tried to secure financial support for the purpose of maintaining their activities and ensuring the organization’s survival.

According to the organizations, a portion of them practically failed to secure the financial resources necessary to sustainably maintain existing infrastructure and human resources, or the scarcity of the secured resources failed to ensure the creation of a perspective for the organizations’ sustainability and survival. In their opinion, the difficulties that emerged on the path to accessing financial resources were linked to donor organizations’ lack of a crisis management strategy, uncoordinated work, confusion, or internal bureaucratic barriers. This picture was particularly worsened by the decision made by the American government in early 2025 regarding the closure of the United States Agency for International Development (USAID).¹⁰¹ Following the introduction of amendments to the Law on Grants, the viability of organizations became tied to the exhaustion of the already scarce resources secured prior to the enactment of the law.

The head of one of the foundations describes their unsuccessful attempts to mobilize additional resources for relatively small organizations partnered with the foundation:

*“We managed to mobilize very little money. I have been in this field for 15 years, and the resources I invested before that were less than what I invested in that one year, but it still did not have the result... Even those who are **** foundations, work on Georgia, and are involved in emergency assistance, even they came in with the most meager amounts as part of the final sum for us to do ‘re-granting’...”*

(Representative of a civil society organization)

101 New York Times, Trump Calls Directly for Closure of U.S.A.I.D., February, 2025. <https://www.nytimes.com/2025/02/07/us/politics/usaid-trump.html>. (Accessed 28.12.2025).

“Had we had two-year and three-year grants, after the Law on Grants we would have survived for another year or two... The 2-3 month grants they issued were not what would save us... [Donor organizations] should have taken measures to strengthen us very quickly, and this should have primarily been financial stability.”

(Representative of a civil society organization)

The Closing Off of Funding Opportunities through Amendments to the Law on Grants and the Freezing of Financial Accounts

Despite the hostile laws, a small fraction of organizations did not suspend their activities and actively continued to seek new financial resources for the organization. This group primarily includes large and medium-sized organizations working on democracy and human rights issues (“watchdogs”) and relatively well-resourced, broad-profile organizations operating in the regions.

Despite the financial crisis existing in the development sector, relatively large and medium-sized organizations generally received responsive support from donor organizations and mostly overcame the financial difficulties. Among them, the financial crisis was quickly overcome even by those organizations that unexpectedly lost more than half of their budget as a result of the closure of USAID. This may indicate that other international donor organizations made the decision to financially support the large civic organizations damaged by the crisis and directed a significant portion of their resources toward them. The research shows that they managed to almost fully restore their resources, which gave them the ability to continue their activities.

For this group of organizations, which did not change its behavior and largely continued to function even a year after the adoption of the so-called “Russian Law,” the main blow turned out to be the amendments introduced to the Law on Grants in April 2025. Additionally, the functioning of organizations was dramatically impacted by the freezing of the financial accounts of seven organizations, based on a motion by the Prosecutor’s Office within the framework of the ongoing investigation into the so-called “sabotage case.”¹⁰² The latter completely restricted

102 Radio Free Europe/Radio Liberty, *Bank Accounts of Seven Civil Organizations Have Been Frozen*, August, 2025. <https://www.radiotavisupleba.ge/a/33514228.html>. (Accessed December 28, 2025.);

the organizations' access to their own financial resources, making it virtually impossible to continue activities on their previously existing scale and form. The legislative amendment of April 2025, in turn, implies closing off access to resources for organizations with an independent and autonomous agenda and driving them to self-destruction.

The Impact of the Reduction of Financial Resources and the Restriction of Access to Them on the Activities of Organizations

The reduction of financial resources and the restriction of access to them had a particularly severe impact on the activities of organizations, affecting all organizations surveyed in the research, regardless of their size or type of activity. Only a small segment of organizations managed to secure alternative sources of funding through receiving donations from citizens, renting out spaces they owned, or cooperating with business organizations. However, these experiences are exceptional and cover only a small portion of the organizations' necessary expenses.

The De Facto Suspension and Reduction of Activities

Due to difficulties in utilizing, acquiring, or accessing resources, a number of organizations completely and indefinitely suspended their activities. The research also confirms that the amendments introduced to the Law on Grants created an insurmountable obstacle on the path to the survival of organizations' activities. In the opinion of the research participants, there is a real threat that upon the exhaustion of existing resources, the vast majority of civil society organizations will de facto cease their activities in their previously existing form. In the future, the scale and form of these organizations' activities will depend on the individual efforts, personal sacrifice, and volunteer labor of their employees. Even more dramatic is the impact of the repression and arbitrariness stemming from the government on the activities of those organizations which, following August 2025, have had their access to bank accounts completely restricted by a court decision.

"We can no longer issue salaries. Our accounts are frozen."

(Representative of a civil society organization)

"[The organization] is in a reality of financial and institutional destruction, which will very soon be destroyed symbolically as well."

(Representative of a civil society organization)

"What stopped us was the 'Law on Grants'; we were more or less coping with the 'Russian Law' and 'FARA'."

(Representative of a civil society organization)

Organizations that have continued their activities from 2024 to the present day have significantly changed their activity priorities, directing their existing exhaustible resources solely toward the implementation of essential activities. They have primarily maintained activities such as the provision of essential legal and other types of services to citizens; the labor necessary to maintain ties with the broader public, the community, or professional groups; the documentation of mass human rights violations and the legal response to them; the publication of evaluative and analytical opinions on legislative and institutional changes; and the preservation of resources to cover minimal administrative expenses and save infrastructure. For example, one of the organizations surveyed in the research completely halted a substantial part of its activities in the direction of human rights protection, as it failed to secure international support; the provision of a state service, which previously constituted a minor and supplementary part of the organization's activities, has today become the sole form of its work.

Additionally, a subset of organizations describes the problem of reduced work on important goals defined by their organizational mission, rights-based issues, or issues concerning socially, economically, or culturally marginalized groups within the altered context. The working agenda of the organizations is mostly determined by the dramatically worsened rights environment and the altered needs of society, which constantly creates the need to respond to new mass practices of rights violations and the dramatic deterioration of rights standards.

An example of the radical impact on activities is the experience of those organizations surveyed in the research which, despite a long history of observing electoral processes, were unable to observe the municipal elections for the first time in 2025. This reality was primarily determined by the worsened electoral legislative

environment, which practically does not allow for the possibility of conducting observation. However, it is also linked to the lack of financial and human resources necessary for the preparation and implementation of an observation mission.

Loss of Employees

Financial difficulties caused a partial or almost complete reduction of employees within the organizations. In order to delay the process of employee dismissal for as long as possible, research participants describe measures they adopted, such as reducing salaries, distributing the existing payroll fund in solidarity among all employees, having employees perform work fully or partially on a voluntary basis, and others. We also encounter cases where, in order to continue voluntary labor in the organization and contribute to the organization's survival, individuals take up other additional jobs, which, apart from their professional activities, also involves adapting to new professional roles.

"As the situation was deteriorating, we hadn't done any 'fundraising' for the last two or three years... If before 2020 we had 45 people, for the last three or four years we were at 20-23. Now, we are realistically left with three people."

(Representative of a civil society organization)

"We constantly try to cut costs... The painful part is that we are trying not to let anyone go just yet; many are of retirement age... therefore we keep stalling so as not to make these decisions. We haven't let employees go, but salaries have significantly decreased and we made the distribution of salaries based on solidarity."

(Representative of a civil society organization)

"Several of our employees haven't received a salary; we've had these problems since the beginning of 2025. The main thing is to have a lawyer, the main thing is to have a minimal ability to commute, the main thing is to pay membership dues – we had two cars and we sold them to cover our obligations."

(Representative of a civil society organization)

“Today, for example, I am working as a taxi driver. Not because I couldn’t do anything else, but simply to have more independent time, more free space [for community work]... Everyone has their own [other job], we gather periodically, very rarely.”

(Representative of a civil society organization)

Loss of Physical Infrastructure

The ownership of material infrastructure, including office spaces or means of transportation, played a major role in building the resilience of organizations, which remains an important pillar for the survival of organizations in a hostile and destructive environment to this day.

A significant part of the organizations surveyed in the research that rented office spaces lost their physical infrastructure or face such a threat. The loss of office spaces had a severe impact on the activities of the organizations; however, it did not become a reason for the complete cessation of activities. As a rule, organizations continue to operate through non-office forms of activities.

Research participants also describe the practices of regional community organizations sharing office or meeting spaces with one another. This practice of “sheltering” organizations is particularly important for those who also lost access to local public infrastructure, including local spaces organized with international support.

“[After the accounts were frozen] we have already closed them by now, although we had 5 regional offices and we have a central office. The central office, unfortunately, will probably close at the end of October.”

(Representative of a civil society organization)

“[Financial resources] are reduced by 100 percent, heavily, heavily reduced. We have minimal resources... we have an office debt to pay, we are currently maintaining the office on debt.”

(Representative of a civil society organization)

"In the regions, your activities are often built around the office, meaning the space, and consequently, the activity also narrowed. The space is connected because your work was tied to this space... At the same time, spaces were a meeting place, a place to hold an event, a kind of base, so to speak... When these also closed, the citizens who were tied to you suddenly disappeared, the youth as well..."

(Representative of a civil society organization)

"Our survival was tied to our office."

(Representative of a civil society organization)

Over the past year, a firm trend has also emerged where state bodies refuse to extend usufruct or lease agreements signed for state-owned property with civil society organizations, or they delay the contract extension process, which is yet another form of pressuring organizations by the state.

Civil society organizations, especially small community organizations and social enterprises, often utilize the opportunity to use municipally owned property. Research participants recount that they always observed the terms of the agreement, which over the years had never become a subject of question by the municipality. However, since the summer of 2024, local municipalities have been massively refusing to extend usufruct agreements or delaying the issue of their extension, which leads to the loss of infrastructure or puts organizations in danger of such.

One of the research participants is still trying to maintain an important local educational infrastructure created over the years:

"These buildings are on the City Hall's balance sheet; we had leased them, we were paying the fees, and we had contracts. When our term expired in December 202, and I approached the City Hall, they did not extend our contracts... We are still there to this day, functioning; they don't dare evict us. They wouldn't stoop to it, they know that good work is being done and they don't want to irritate the people or us... but they still won't extend the contracts... To this day, it turns out that I am essentially squatting... we pay for utilities privately from my salary so they don't cut off our gas and electricity."*

(Representative of a civil society organization)

“This autumn we received a call from the City Hall; we are in a space belonging to the Tbilisi municipality... They have a 2-year issuance rule for this contract... 4 years passed, they extended it for us twice... the response was that the City Hall does not consider the extension of the usufruct to be expedient and we must switch to a lease ... If it was expedient for 4 years, and now we are doing more and achieving greater results, why are you stopping me? Later they called me and extended it for us.”

(Representative of a civil society organization)

5.4. Legal Liability Risks, Physical Security Challenges, and Growing Emotional Pressure: Employee Outflow, Self-Restriction

Interviews with research participants show that representatives of Georgian civil society organizations, especially human rights defenders, have been targets of unprecedented harassment, pressure, intimidation, and retaliation stemming from the government in recent years. Since 2024, the threats of legal liability against them have particularly increased, and the forms of harassment and influence have become more intensive, which, alongside physical security risks, creates severe emotional pressure. The openly intimidating and threatening rhetoric directed by government representatives at individual organizations and their leaders since 2024 has turned the objective of silencing human rights defenders into a part of declared policy. The laws adopted in 2024 – 2025 further increased the risks of arbitrary, selective punishment and repression of the organizations’ leaders and employees.

The government’s rhetoric of discrediting and stigmatizing the civil sector, coupled with the altered legal environment, constantly confronted organizations with challenges and difficulties. A significant proportion of the organizations and their leaders surveyed in the research have repeatedly become the part of propagandistic television segments and, consequently, the dissemination of false and manipulative information, discreditation, being declared enemies of the country or society, and the targets of hate speech. Becoming the object of organized attacks carried out through statements by government representatives, propagandistic media, and information networks aimed at the objectives of intimidation and self-restriction, and consequently, the weakening and halting of human rights or public activities.

In the opinion of the research participants, these same objectives explain the recurring instances of pre-organized vandalism in 2024 against the offices of Tbilisi-based so-called “watchdog” organizations. During the night, unidentified individuals (repeatedly and serially) vandalized the organizations’ offices (including buildings with cultural heritage monument status), the entrances to the residential homes of their leaders as well as their parents, and vehicles owned by them. These attacks, which also included pasting posters featuring the images of the organizations’ leaders and leaving threatening, insulting, and hateful inscriptions, have not been investigated to this day. Research participants describe instances of threats, intimidation, reputational damage, and stalking directed at the leaders of the organizations on social networks. The head of one organization also shares the experience of the baseless arrest of several of their employees in connection with the protest rallies.

“They wrote in many places on the office facade and stairs that [I am] an enemy of the nation, a traitor, an agent... They pasted my photos with the inscription ‘enemy of the nation.’ They did the same at my residential home, my mother’s residential home, and also on our family-owned vehicle... This was a standard strategy. They approached many people with a similar message to ruin your reputation even in your neighborhood, to attach additional stigma to people... They haven’t even investigated this to this day... We appealed to the investigation several times, to the Public Defender as well, but we received a [superficial] response from every agency, and no response from some.”

(Representative of a civil society organization)

A significant number of the research participants also speak about the widespread and pre-organized intimidating practice during the context of the 2024 civil resistance, which involved calls containing threatening content to them and their family members from unidentified individuals. However, insofar as this practice had a massive character, these threatening messages did not create a sense of a real threat of direct physical retaliation among the organizations’ leaders.

During the continuous civil resistance of 2024, the practice of brutal and massive physical harm, improper treatment, and beating of demonstrators by representatives of law enforcement agencies – accompanied by pre-organized attacks on citizens by unidentified individuals near residential homes or in public spaces – created, according to research participants, risks of physical security and retaliation against them and their employees, especially lawyers.

"The threats of physical violence were very high. I walked around with pepper spray and used to call my parents; I had physical security concerns when leaving the office at night."

(Representative of a civil society organization)

Despite these experiences of intimidation, threats, and harassment, the vast majority of the interviewed individuals do not cite risks of physical retaliation and physical safety as a primary concern at this stage. However, the experience of individual organizations working on issues related to religious and ethnic groups, as well as LGBT and gender issues, is different. The threatening messages sent to them, along with messages containing intimidation and warnings, generated real risks of physical security or other forms of retaliation for them, which further increased the sense of pressure within this group and thoughts about leaving the country. These instances of threats were directed not only at the leaders of the organizations but also at their family members, which ultimately had a significant impact on decisions to suspend activities or close the organization.

"The emotional backdrop was created not only by general threats but also by pressures on organization members and our family members, including through direct communication... Their main strategy toward small and regional organizations like ours is self-censorship, self-restriction, and driving us to self-destruction, closure, or termination... By targeting central organizations, cutting off resources from the center, [and applying] pressure at the individual level locally... The main goal of this strategy is that we stop on our own and ultimately reach self-restriction ourselves. And they actually achieved it. This is not just about our organization. Including in [names region], everyone we communicate with is in such a condition; they have been driven to the point of self-closure and self-termination."

(Representative of a civil society organization)

"It happened very often; activists working in the regions, in particular, would tell us that they faced problems with the municipality, spaces were no longer provided to them, their persecution began, rumors were spread about them, and realistically, it would also extend to their families... This was not a restriction limited merely to their activities, but municipal employees and, let's call them, 'interested parties' at the local level were truly involved in harassing these people."

(Representative of a civil society organization)

Risks to physical security, heavy emotional pressure, and the difficulties of continuing human rights activities since 2024, especially following the adoption of the so-called “Russian Law,” have increased instances of employees of organizations working on queer issues (as well as community members) leaving the country. The same period is linked to the secondary relocation of a significant proportion of exiled activists from neighboring countries who were residing in Georgia. The research does not show a trend of civil society organization leaders leaving their positions, relocating, or going into emigration. However, we recorded interviews with two research respondents – leaders of human rights organizations – during their temporary relocation, which indicates the existence of isolated cases of leaving the country due to the risks of possible criminal liability and physical retaliation.

“My family members told me every day, ‘Maybe you should leave, there is no space for you here anymore’... In recent months, I rarely used public transportation... They called my mother last year and this year too; for months, they used to call her at night.”

(Representative of a civil society organization)

“The risk that ‘NGO’ leaders will end up in prison is above average.”

(Representative of a civil society organization)

“Criminal liability and all other risks exist to some extent... Now it has accelerated and these risks have increased... The perception is that we should expect everything. Risks of physical [harm] and arrest all exist... ‘Georgian Dream’ is capable of anything today. If they need to, they will do it.”

(Representative of a civil society organization)

The hostile and threatening environment, coupled with the legal threats generated by the new legislation, triggered a degree of self-restriction and self-censorship within organizations. The unpredictability of the new laws, their broad and unclear content, and the vagueness surrounding the scope of their enforcement pushed a subset of organizations to alter their language and forms of expression. Research participants, especially organizations working in the fields of women’s rights, the LGBT community, and culture, emphasize the impact of the Law on “Protection of Family Values and Minors,” the so-called “anti-LGBT” law, on the activities of organizations. Respondents recount how they replaced specific terms and words – including the word “gender” – in public or official communication, or began to consider the need to exercise

self-censorship and caution. Isolated instances of self-restriction and caution even led to the termination of healthcare services:

“[Since the enactment of the law], we have not had a single endocrinologist consultation with the trans community because it is criminalized, and the specialist could be punished under criminal law. Even though there are no bylaws yet and no one knows how it will be enforced, specialists said that [the state] might tell them they violated the law.”

(Representative of a civil society organization)

“The ‘gender’ legislation affected us greatly. We replaced our interaction with the Ministry by working with the [names name] union, but there we had to remove the word ‘gender.’ [We wrote] equality between women and men instead of gender equality... in training materials. A [participant] who sees that the word ‘gender’ is mentioned might get scared and not show up.”

(Representative of a civil society organization)

This environment of risks, threats, and universal ambiguity caused significant internal organizational changes. For employees of civil society organizations, the risks of punishment and legal liability became a reality immediately upon the adoption of the so-called “Russian Law” in 2024. These risks, along with other circumstances, played a major role in organizations’ decisions to terminate or temporarily suspend their functioning. In other cases, a trend of employee outflow became evident starting in the summer of 2024, which grew even more pronounced immediately upon the adoption of the so-called “Agents Law” in 2025, which designated criminal liability as a punitive measure.

Numerous organizations faced employee outflow. We also encounter instances of massive employee outflow, which in some cases resulted in the loss of up to 35% of staff and, consequently, the closure of organizations’ regional offices. According to the research participants, instances of employee outflow are a manifestation of the laws’ chilling effect and are linked to employees’ fears regarding the reality of legal liability, as well as a vague, unpredictable future and increasing financial instability. At the same time, according to research participants, the spontaneous departure of individuals from the civil sector represents, on the one hand, a significant loss of professional human resources. However, on the other hand, this

process might also serve as an opportunity for the sector's revitalization, bringing it even closer to the principles of serving the public interest and volunteer labor.

"We lost 1/3 of our employees after 'FARA' was enacted. This especially affected regional employees... When we explained these risks to them, they made the decision to leave their jobs, and after that, we had to temporarily close our regional offices because there were physically no people left there."

(Representative of a civil society organization)

In contrast to this trend, experiences where there were no instances of employee departure despite high risks are equally important. Moreover, in numerous cases, a significant motivation for employees to remain in the organization proved to be the joint decision of the organization's leadership and staff – the decision not to register according to the requirements of the laws adopted in 2024 -2025, and to maintain public activities and the capacity to resist the government's repressive and anti-democratic policies. Leaders of individual organizations speak about unique experiences of internal organizational cohesion, solidarity, support, and mutual care. A significant challenge to the internal dynamics, cohesion, and integrity of organizations was the growing and severe psycho-emotional pressure, which, in addition to the leaders and members of the managerial tiers, also extended to the employees of the organizations. During the interviews, research participants painfully recall this experience, which has been a part of the everyday reality of the organizations' operations from the summer of 2024 to the present day. Emotional pressure, uncertainty, and a sense of fear and danger not only became reasons for employee departures, but also frequently caused the dysfunction and even temporary paralysis of the organizations. The emotional pressure was further amplified by the daily moral and practical dilemmas facing the organizations: which paths to choose to protect and save the organization, what would be the better decision for the social groups or ideas they worked for, how to reduce risks for the organization's members or employees while simultaneously saving the organization, and others.

"This 'Russian Law' was a very strong first blow for our organization, which caused us tremendous psychological and moral damage. What we went through after the adoption of this law was a very difficult process for us... We had the most difficult internal processes, we were in a very heavy state, and it was practically impossible for us to work."

(Representative of a civil society organization)

6. Diverse Experiences of Resilience Among Civil Society Organizations

The adoption of the so-called “Russian Law” in June 2024 is a turning point for the Georgian civil space, as it dealt a significant blow to civil society organizations and altered the legislative, as well as the institutional and factual, existential environment of the organizations’ operations. Despite the fact that the adoption of the law by the government was not followed by enforcement measures against specific organizations in the form of initiating a monitoring process and imposing fines, the “chilling effect” of the law played a decisive role in the erosion process of the civil society sector. The research shows that the experiences for civil society organizations – in terms of the onset of the moment of termination or substantial weakening of activities – are different, which is explained by various structural factors related to the organizations themselves. The research shows that all of the government’s steps, including new legislative regulations with different objectives, had a significantly different impact on organizations with different capacities.

The purpose of this subchapter is to demonstrate the primary sources of damage inflicted upon civil society organizations, the developmental trajectory of this process, and the role that each legislative amendment or repressive government step played in the process of weakening civic organizations. Furthermore, the aim of this chapter is to describe how structural realities determined the viability and resilience potential of different civic organizations. Specifically, how the continuous policy of damaging the civil space impacted the condition of organizations of varying sizes, types of activity, forms of activity, geographical areas, and with different financial or human resources.

6.1. The First Blow: The Enactment of the So-Called “Russian Law” and Its Impact on Civil Society Organizations

The adoption of the so-called “Russian Law” in 2024 put an end to false expectations regarding the reality of the law’s adoption. Such expectations existed among a significant number of organizations, as the two-month process of adopting the law was accompanied by strong resistance. This was manifested in continuous civil protests in front of the legislative body, which provided hope for a second retreat by “Georgian Dream.” The broad civil protest was also accompanied by the unanimous and strong resistance of a significant segment of the civil sector.

The adoption of the law confronted civic organizations with a significant dilemma. Within the three-month period defined by the law (the deadline set for the completion of registration in the registry), organizations had to make a decision whether to register as an “organization pursuing the interests of a foreign power” according to the law’s requirements, or to refuse such registration.

The Decision Regarding Registration in the Special Registry

In accordance with the requirements of the so-called “Russian Law,” only a small fraction of civil society organizations made the decision to register.¹⁰³ These organizations mostly include service-providing organizations and regional organizations. The research shows that a segment of organizations made the decision to register without particular difficulties. However, for a specific subset of organizations, this decision entailed a significant moral dilemma and a forced choice resulting from a difficult process.

The experience of the latter reveals the primary factors underlying the organizations’ decision to register in the special registry. For service-providing organizations, a decisive factor in the deliberation process on this issue was the interest of hundreds or thousands of beneficiaries in continuously receiving vital services, as the refusal to register was considered a decision that would pose a threat to the provision of services and, consequently, to the beneficiaries. Crucial factors in the decision-making process regarding registration also included the organizations’ ownership of real estate, which created the risk of its seizure and loss. Additionally, a significant factor was the lack of expectation of receiving financial support from donor organizations in the event of potential fines. Clearly, among service-provider organizations, there are also contrasting experiences where, despite the existence of the same factors, organizations principally refused to register.

It is interesting that for a significant proportion of organizations, the ownership of office space became an essential factor of viability and resilience, and it continues to play a major role in their survival process to this day. However, in cases where the organization did not even have the potential ability to pay a fine and failed to

103 Out of 3,878 organizations with active subject status (2025 data), as of December 2025, according to the requirements of the so-called “Russian Law,” 383 non-entrepreneurial (non-commercial) legal entities are registered in the “Registry of Organizations Pursuing the Interests of a Foreign Power” maintained by the National Agency of Public Registry.

receive adequate support from partners in this regard, the fact of owning property even became a vulnerability for them.

Thus, the research shows that for a subset of service providers who ultimately made the decision to register, this process involved complex moral and ethical dilemmas and was a forced decision driven by the protection of beneficiaries' vital interests. Below are excerpts from interviews with the leaders of these service-providing organizations, which demonstrate this complex and heavy moral tension.

"Everyone was against it, but when we started assessing the risks, what could be damaged, and considering that we interact with vulnerable groups, we decided to voluntarily submit the application, and in the end, they told us we were not subject to registration... Had we registered... many would have left [the organization], and us too."

(Representative of a civil society organization)

"We found ourselves facing this moral dilemma of what to do. When we assessed the situation and realized that we did not have the physical capacity to pay the fines, we spoke to all the donors, and they all told us they could not pay the fines for us... There was constant discussion about this, how could we call ourselves agents... We have two buildings in our ownership, and it was important for us to protect them... One of the paths to survival could [have been] if we kept our property... Many were saying how can we give this up, there was a lot of clash and friction... A general assembly was held... The decision to register was made by a majority vote. We took it very hard."

(Representative of a civil society organization)

The Decision Regarding the Termination of Activities

The enactment of the so-called "Russian Law" drove many small-sized organizations to terminate their activities. The organizations that initiated the liquidation process and/or practically ceased activities completely are mostly small-sized organizations in both the capital and the regions. The common characteristics of these organizations highlight the structural factors that became decisive on their path to making this decision.

The research shows that immediately upon the enactment of the law, activities were terminated by those organizations: (1) which lacked sufficient financial and human resources, as well as support networks, to cope with such a crisis; (2) for whose founders the activity was not primary, but supplementary alongside being a public school teacher, civil servant, or having another main professional role and activity, which led to deciding this choice in favor of the primary activity and profession; (3) which did not have a long history of work and activity or the kind of labor and practical experience that would create a significant argument in favor of fighting for the organization's survival. Hence, these organizations were characterized by these factors simultaneously.

“Small, vulnerable organizations, etc., for whom liquidation was simple, were destroyed first. They said we found ourselves in such immense bureaucracy, is it even worth it?”

(Representative of a civil society organization)

“There were few people who said we shouldn't be abolished ... Everyone was saying that we still can't do anything anyway, and it's not worth keeping this organization at the cost of posing even a small threat to someone now... Since the organization was 'poor' in its activities and history, being just about a year old... that is why this organization was sacrificed, despite being a very important organization that had not existed before.”

(Representative of a civil society organization)

The Decision Regarding the Temporary Suspension of Activities Leading to Termination

The third most numerous group of organizations – whose weakening and later de facto halting was caused by the so-called “Russian Law” – is the segment of organizations that made the decision to temporarily suspend activities and engage in strategic waiting. To minimize the extension of the so-called “Russian Law” to them, organizations preemptively spent or returned resources by the time the law was enacted, with the expectation that following the 2024 elections, where the defeat of “Georgian Dream” was perceived as inevitable, they would be able to renew their activities and the organization.

This group primarily includes small-sized community and other types of organizations (mostly in the regions) that possess a significant history and experience in civil activity. They made the decision to pause the organization's activities; however, they individually continued to provide voluntary labor through community work while waiting for the moment to restore the organization.

The decision made by this group of organizations was hardly a choice, as the accounts of the research participants show that this decision was determined, on the one hand, by their size and capacities, and on the other hand, by the impossibility of mitigating the risks of being fined. During the decision-making process, organizations attempted to insure themselves against the scenario of being fined, which would have allowed them to continue their activities and avoid making the decision to halt the organization. However, the experience of the organizations surveyed within the research shows that, as a rule, they failed to receive such support from donor organizations, which determined their decision to suspend activities. The research also confirms that in those cases where small-sized and lower-capacity organizations received support from donor organizations to cope with potential fines, as well as other necessary support for adapting to the existing environment, they managed to continue their activities and find ways to exist and adapt in an organizational form.

“Local organizations did not have the resources for this. They pleaded, met with donors [asking], ‘If I am fined, will you be able to help me?’... [Pauses, trying to hold back tears]... [The organizations] reached this decision because they lacked the resources to fight this. They went to these ambassadors, to donors, asking what to do... Everyone told them, ‘We cannot pay your fine money.’... They couldn’t get this support... They realized they were alone. There was so much propaganda too... They couldn’t cope with the propaganda anymore.”

(Representative of a civil society organization)

Following the results of the parliamentary elections on October 26, 2024, it became clear that the possibility of reviving the organizations in the near future was difficult to imagine. The October events were followed by continuous resistance in November and December of 2024, and the government's repressive and brutal reaction to it, making it impossible to think about an organizational future.

The continuous internal crisis was followed in early 2025 by the American government's decision regarding the closure of the United States Agency for International Development (USAID), which immediately impacted the priorities of other development agencies and foundations. When allocating their reduced resources, they appear to have prioritized the financial survival of relatively large and resourced organizations. A few months after this decision, immediately upon the announcement of the American "FARA"-style law and the amendment to the Law on Grants, it became clear that this segment of organizations would find it difficult to both secure resources and make a decision to restore suspended activities. The restoration of activities was tied to a future of improved conditions, which did not arrive. Moreover, starting in 2025, the opportunities for receiving finances worsened even further, as did the legislative environment and the risks of financial and personal liability, which practically determined the future of the relatively vulnerable, small-sized, and mostly regional organizations.

Thus, organizations that had preemptively spent their resources and temporarily suspended their organizational activities to insure themselves against the threats of the enactment of the so-called "Russian Law," were effectively unable to restore their weakened organizational capacities amidst the financial crisis of 2025 and the announcement of two new restrictive laws within a few months. Their state of temporary suspension evolved into a state of prolonged and indefinite suspension.

This effectively delineated the primary impact area of the so-called "Russian Law," which managed to neutralize the most vulnerable segment of the civil sector – relatively small, regional, and mostly community-based civil groups and initiatives – in their previously existing form. However, this group of civil society organizations continues to try and search for new paths, opportunities, and the appropriate moment to restore their activities.

"Almost all [community organizations] stopped after the 'Russian Law,' and 'FARA' completely eliminated even the chance of turning back... 60% of those we worked with simply no longer function physically in any form. The rest simply no longer have grants because the community foundations closed."

(Representative of a civil society organization)

“When it became clear in the summer that [‘Georgian Dream’s’ international accountability] was ‘disconnected,’ when we heard the rhetoric that we were hearing, it was obvious that they have no deterrents left... It was clear that you would no longer have a working environment, you could no longer work the way you used to – openly, calmly, peacefully, planned, consistently. You cannot work because they are destroying the environment, they are destroying the working field, and there is no restraining lever left, it’s over, it’s gone. Neither inside nor outside.”

(Representative of a civil society organization)

“They are halted on the ground and are waiting to see what will happen... It is more of a pause, which, if it continues for a long time, will turn into a death.”

(Expert interview)

“Last year I had communication with 17 active non-governmental organizations, and by August of this year, 16 were no longer functioning.”

(Representative of a civil society organization)

6.2. The Second Blow: The Impact of the So-Called "Law on Agents" on CSOs

By the time the so-called “Law on Agents” (also known as the so-called FARA) was adopted, primarily the large and medium-sized civil society organizations were functioning, in relatively weakened and modified forms. However, at that point, they were still managing to perform significant work and activities.

The research shows that the “Law on Agents” did not have the same impact on eliminating organizations from the sector as the so-called “Russian Law” did. However, it appears that it did have an impact on a specific subset of organizations for whom, alongside other accompanying difficulties, the possibility of criminal liability prescribed by the law proved decisive.

The adoption of the law was read as a decision by “Georgian Dream,” indicating that it genuinely intended to take the objective of neutralizing the civil sector even

further, which meant an even more difficult reality for the organizations that had survived the first legislative blow. The adoption of the law was accompanied by the decision to announce an amendment to the Law on Grants. This moment made it clear that the working field for civil society organizations would be extremely restricted, which caused another segment of organizations (mostly medium and small-sized ones) to de facto halt in their organizational form.

Primarily large organizations, including “watchdogs,” as well as mixed and broad-profile organizations (think tanks, so-called “bridging” and “infrastructural” organizations) survived the second legislative pressure.

6.3. The Third Blow: The Amendment to the “Law on Grants” and Its Impact on CSOs

The adoption of the amendment to the Law on Grants in April 2025 made it practically impossible for civil society organizations to receive grants from donor organizations. This reality practically tied the survival of the organizations in their existing form to the exhaustion of the resources they had secured prior to the law’s enactment. The amendment to the Law on Grants is considered the heaviest pressure by research participants, as the amendment managed to cause the greatest damage through a minor legislative alteration to existing law, effectively cutting off the survival opportunities for organizations with an independent and autonomous agenda in this form, regardless of their resources or size.

The research shows that a substantial number of organizations would exhaust their financial resources by the mid-autumn or the end of 2025, which made their future completely vague. A segment of organizations was also planning to utilize a strategy of reducing activities in order to prolong the organization’s functioning time with their existing resources.

“What will happen in the future is unseen, beyond two months nothing is visible... Nothing is visible, you just look and there is only emptiness, no hope, no expectations. You have to base these expectations on something, right... you have to connect them to something, right... I don’t know, we will probably disappear.”

(Representative of a civil society organization)

“We are not planning to stop completely, but if operations were intensive, we now plan to work with minimal resources, and it will probably be 1/5th.”

(Representative of a civil society organization)

“One thing I can say is that we will not stop until they crush us completely.”

(Representative of a civil society organization)

6.4. The Fourth Blow: Seizure of CSOs’ Financial Accounts

The amendments implemented in the Law on Grants created an insurmountable obstacle for all types of organizations and made it clear that the severe impact of this law would sooner or later reach even the largest and most resourced civic organizations. Following the adoption of the law, the surviving segment of civil society organizations nonetheless continued relatively weakened, yet steady and systematic work, resisting the repressive and punitive policies of “Georgian Dream.”

It was clear that the structural changes, which encompassed three fundamental legislative amendments from May 2024 through April 2025, did not essentially weaken the activities of that segment of civic organizations which represent “watchdog” organizations and work on human rights and democracy issues, despite the impact.

With the aim of neutralizing the surviving segment of civil society organizations, the Anti-Corruption Bureau initiated inspection procedures against civil society organizations starting in June 2025. Through the use of administrative procedures, it attempted to create pressure on the activities of civil society organizations. In August 2025, based on a request from the Prosecutor’s Office of Georgia, the City Court issued a decision regarding the freezing of the financial accounts of seven civil society organizations, which is linked to the ongoing so-called “sabotage” case at the Prosecutor’s Office. The freezing of financial accounts essentially impacts the activities of these organizations, significantly reduces their capacity to continue their operations/work, and makes it largely dependent on voluntary labor.

7. Civil Society Organizations' Resistance and Struggle for Survival

The process of collective organizing by CSOs against the creation of a restrictive legislative environment for civil society began in February 2023, during “Georgian Dream’s” first attempt to adopt the so-called “Russian Law.” At this stage, the collective effort of civic organizations played a significant role in the process of mobilizing public sentiments regarding the anti-democratic goals of the so-called “Russian Law,” which had a substantial impact on the failure of the bill and forced the government to retreat. However, immediately upon the failure of the law, the resistance halted, and the work of civil society organizations regarding these risks stemming from the government also ceased. The research shows that, in relation to the dangerous experience of 2023, the process of preparing for possible negative scenarios – either individually or collectively within the organizations – did not begin. From today’s perspective, research participants view this as a significant mistake by civil society, which considered the threat repelled and did not properly prepare for the moment of the re-initiation of a bill with the exact same objectives, which would inevitably occur.

It appears the experience of leading donor organizations operating in the country is similar; they met the first legislative attack launched against civil society organizations by “Georgian Dream” in 2024 – the adoption of the so-called “Russian Law” – unprepared. Moreover, during the process of forming the restrictive legislative framework for the civil space, which lasted for a year, donor organizations failed to create new and adequate alternative support practices for the civil space, which played a major role in weakening the sector’s viability.

Furthermore, it is important to note that the criticism directed at civil society and donor organizations is tempered by the research participants’ realization that the shrinking of the democratic space – and the shocking pace at which it occurred – objectively left insufficient time and diminished the capacity for proper preparation and response. Thus, the purpose of this subchapter is to gather the reflections existing within civic organizations in order to better perceive the scale of the problems and difficulties, which could serve as significant assistance on the path to overcoming the challenges present today.

7.1. The Collective Search for Resistance and Survival Strategies among CSOs

The undesirable scenario – which had not been the subject of joint thought and preparation among organizations – became the primary issue on the agenda of civil society organizations exactly one year later, following the second initiation of the bill by “Georgian Dream” in 2024. Despite the lack of prior preparation, this step by the government was met very quickly, effectively, and collectively by the vast majority of Georgian civil society organizations. In the wake of the bill’s discussion, alongside the general public protest, an active protest by civil society organizations took place, uniting up to 400 independent CSOs.¹⁰⁴ Through an intensive information campaign and the use of various forms, they attempted to put up resistance to the bill’s adoption process. Showing collective, strong, and continuous resistance from civil society organizations had a significant impact on the sentiments of that segment of society which had never been negatively disposed toward civic organizations. However, in the opinion of the research participants, the resistance processes significantly increased respect and trust toward CSOs within this group of society.

Following the adoption of the so-called “Russian Law,” a large part of the joint work of civic organizations – in addition to continuing the resistance process – also involved organizing an intensive internal consultation process aimed at supporting large groups of civic organizations, including small regional organizations. The process of providing legal consultations proceeded in a more or less coordinated manner and involved the provision of legal advice by numerous large and relatively resourced organizations regarding the goals, content, and requirements of the law, as well as the risks stemming from it. Additionally, a segment of sector-specific organizations also managed to mobilize resources and offer legal support to small organizations/partners operating in their respective sectors.

The collective decision to refuse registration in the special registry in accordance with the requirements of the so-called “Russian Law” is a significant consensus reached within Georgian civil society, which also matured as a result of the joint resistance process of civic organizations. The total number of organizations regis-

104 Radio Free Europe/Radio Liberty, *More than 400 NGOs and Media Outlets: Adoption of the So-called Agents Law Will Make it Impossible to Open Negotiations with the EU*, April, 2024. <https://www.radiotavisupleba.ge/a/32895749.html> (Accessed December 28, 2025.);

tered according to the requirements of both the so-called “Russian Law” and the so-called “Agents Law” clearly shows that the vast majority of civic organizations with active status in Georgia did not apply to the relevant agencies for registration in the registry of transparency of foreign influence or registration as an agent of a foreign principal defined by the so-called “Agents Law.” Precise quantitative data on active civic organizations is not available;¹⁰⁵ however, according to data from the National Statistics Office of Georgia, as of October 1, 2025, there are 33,714 non-entrepreneurial (non-commercial) legal entities registered in Georgia, out of which 3,878 organizations have active entity status.¹⁰⁶ Among these, as of December 2025, according to the requirements of the so-called “Russian Law,” 383 non-entrepreneurial (non-commercial) legal entities are registered in the “Registry of Organizations Pursuing the Interests of a Foreign Power” maintained by the National Agency of Public Registry.¹⁰⁷ Meanwhile, according to the official website of the Anti-Corruption Bureau, based on the requirements of the so-called “Agents Law” (also known as the Georgian FARA/GEO FARA), as of December 2025, 12 active foreign principals are registered.¹⁰⁸

It is interesting that the intensive legal consultation process for civic organizations proceeded in collective or individual forms for months prior to the full enactment of the law, uniting the significant efforts of civic organizations. However, the research shows that the forms of resistance utilized and the legal support provided did not prove sufficient for resolving the complex dilemmas that a substantial number of organizations faced. Consequently, the decisions made by organizations in response to the so-called “Russian Law” – which in certain cases entailed forced registration, termination of organizational activities, temporary suspension, continuation of activities, or the search for alternative forms – were made by the organizations based on their own capacities, resources, and potential to cope with risks, and these solutions differed significantly from one another.

105 CSO Meter 2024: Georgia Country Report. Reporting Period: January – November 2024, p. 24.

106 National Statistics Office of Georgia, *Number of Registered and Active Subjects in Georgia by Organizational-Legal Forms and Sizes*, 2025. <https://www.geostat.ge/ka/modules/categories/67/organizatsiul-samartlebrivi-formebis-mikhedvit>. (Accessed December 28, 2025.);

107 Official Website of the National Agency of Public Registry, *Registry of Organizations Pursuing the Interests of a Foreign Power*, 2025. <https://fitreg.napr.gov.ge/fitr/fitr-pub> (Accessed December 28, 2025.);

108 Official Website of the Anti-Corruption Bureau, *Foreign Agents Registration Act*, 2025. <https://fara.acb.gov.ge/search/by-principal>, (Accessed December 28, 2025.);

Research participants consider the false expectation existing after the adoption of the so-called “Russian Law” regarding the results of the October 26, 2024, parliamentary elections to be a mistake by civil society organizations, as the expectation of collective survival for civil society organizations was linked to the inevitable defeat of “Georgian Dream” in the elections. Consequently, in most cases, a temporary solution was found within organizations, thinking about long-term solutions halted, and a significant portion of resources was mobilized to continue the resistance process, as the parliamentary elections were viewed as a common way out and a historic opportunity. As a result, time was wasted when the greatest resources and opportunities existed within and among organizations for preparing survival and solution scenarios for civic organizations. Furthermore, among the interviewed representatives of civic organizations, there is a somewhat exceptional opinion that, parallel to building the resistance process, civil society organizations should have invested more energy into preserving spaces for dialogue with the government and not easily given up the existing institutionalized formats for dialogue, which could have created opportunities for reaching a certain consensus with the government and prompting a retreat.

From today’s perspective, missing out on the timing opportunity twice is considered a significant mistake, but so too is the absence of discussion spaces necessary for the collective search for survival paths. Similar to the formats for resistance and legal consultation created within civil organizations, a discussion space focused on the adaptation and survival of civic organizations was not created. The existing formats for the coordination of civic organizations did not allow for setting survival objectives, discussing them pragmatically, examining possible negative scenarios, and planning collective response actions to them. The severe political processes that developed following the October 2024 elections, along with the intensity and speed of events, extremely narrowed the spaces for collective thought and action regarding the survival of civic organizations, which had a significant impact on the viability of the sector.

“Looking at the current situation, [the sector] should have done something completely different during that period. Because now we neither have the resources nor as many people around us as we had before the elections; realistically, we had more space and more resources to think about other alternatives.”

(Representative of a civil society organization)

“The general approaches are so dominant that even the slightest resistance to them places you in the opposing camp... The same thing happened before the elections. If you were to say, ‘maybe [the government] will rig the elections,’ they would tell you, ‘no, no, they cannot rig it like that, the Georgian people will not allow it’... Thinking about worst-case scenarios is unacceptable; even the thought is banished.”

(Representative of a civil society organization)

The research shows that, unlike the experience of resistance against the so-called “Russian Law,” the process of collective resistance by civic organizations concerning the so-called “Law on Agents” and the amendments to the “Law on Grants” was much smaller, which is largely explained by two factors. On the one hand, by 2025, the political environment in the country had already significantly deteriorated. On the other hand, a large segment of organizations was completely or temporarily halted, weakened, or in the process of searching for new paths, which did not create the potential for collective mobilization and joint resistance similar to 2024. In connection with the bill initiated in February 2025, the work of common consultation formats for civic organizations also continued, which aimed at formulating common solutions among the organizations. However, the research shows that the measure of criminal liability stipulated by the so-called “Agents Law” rendered the paths to survival and solutions for civic organizations even more heterogeneous and individualized.

“During the ‘Russian Law,’ it seemed there was more coordination and mobilization, and during ‘FARA,’ these patchwork alliances broke down.”

(Representative of a civil society organization)

“Although we attended information meetings and received information, ultimately, the mechanisms for survival became individualized anyway.”

(Representative of a civil society organization)

In summary, it can be said that the resistance of civil society proved impressive and strong for the research participants, pointing to the sector’s resilience and fighting spirit. Furthermore, in terms of providing legal consultations, the support of well-resourced organizations was accessible to many civic organizations,

demonstrating a significant exertion of effort by the sector. However, especially for regional and small-sized organizations, this process failed to create the kind of solution upon which their actual paths to survival could be based.

Thus, the central challenge of crisis management is considered to be the absence of working spaces directed at the survival of civic organizations. This is viewed more as the responsibility of local foundations and infrastructural organizations, whose direct function entails strengthening and supporting the civil sector. Such a process could have better identified pathways to solutions for organizations with diverse needs and challenges. Through coordinated work and the proactive proposition of common survival strategies to donor organizations, it could have ensured the effective mobilization of new support opportunities. However, the creation of such a collective process directed at the objectives of adaptation and survival could not be achieved.

The research shows that in this process, one of the main challenges for individual civic organizations was the need to simultaneously achieve the objectives of resistance, adaptation, and survival, alongside finding the proper navigation and balance among them. The majority of organizations concurrently attempted to continue their organizational activities unhindered, while playing an active role in the continuous process of resistance and protest, and additionally working to achieve the objectives of adapting their organizational activities and ensuring their survival. This multi-layered challenge was made exceptionally difficult by a generalized sense of crisis, shock, and powerlessness, brought on by the state of rapid and irreversible descent into authoritarianism. The research shows that in the initial stage of the processes, more time on the organizations' agendas was dedicated to building protest and resistance, which significantly diminished the labor required for adaptation and survival, and moreover, weakened the primary objectives and activities of the organizations.

Even prior to the adoption of the so-called "Russian Law," the process of preparation for negative scenarios was weak, even at the level of individual organizations. As a result, upon the onset of the crisis, organizations attempted to develop and implement physical and digital security protocols parallel to solving the strategic challenges of their activities. We encounter experiences of creating and activating crisis plans in organizational operations only in exceptional cases. For the most part, without such a crisis plan, organizations attempted to cope with the challenges facing them in a piecemeal manner within their daily work processes.

For those organizations participating in the research that continue to function today, the primary issue remains the adaptation of their activities and infrastructure, as well as potential damage control, which requires significant effort from the organizations. However, following the legislative amendments adopted in 2025, which endowed the government with indefinite levers of arbitrariness, a segment of organizations ceased working on damage control, viewing it as an impossible objective. There is a high sense among the leaders of organizations that the development of events in relation to the organization is possible under any scenario, and that control over them is largely in the hands of the government. Furthermore, there is a universal feeling that even thinking about development – including the development of vital services – no longer represents a feasible objective for organizations.

“I am in the role of an observer, carefully looking around to see which way to steer it; practically, I am not thinking about any development. I even had an offer [from an international donor] last year to start another [service] because we have the resources... however, I told them that right now I do not know what will happen, and we paused it.”

(Representative of a civil society organization)

The differing capacities for resilience and viability among organizations, upon which their varied pathways to solutions were based, were also determined by several additional structural factors. According to the research participants, the development dynamics and trajectories of relatively well-resourced organizations operating in Tbilisi and small-sized regional organizations have always differed significantly from one another. The experience of creating equal and close ties among civic organizations and building spaces for cooperation aimed at mutual strengthening was hardly a characteristic of the local civil sector. Moreover, with minor exceptions, spaces for equal sharing and cooperation between civic organizations of different sizes, geographical coverage, needs, and capacities generally did not exist; meanwhile, experiences of cooperation created through project intersections failed to generate practices directed at mutual strengthening.

“These cooperation networks were not mature before, and unfortunately, during this crisis, it did not happen – or rather, the creation of common spaces and networks for survival did not happen... My criticism has always been that large and central organizations almost never perceived organizations working

in the regions as partners, and when receiving grants, the reality was that they would implement [projects] on us in many cases... Mainly, the policy was that organizations received grants for themselves to implement [projects] involving/on us. These experiences of partnership were not really there."

(Representative of a civil society organization)

The research participants cite as a significant problem those weaknesses of Georgian civil society whose timely overcoming by the sector could have created the possibility of building a more resilient and consolidated civil society. Such a self-reflective and more accountable civil sector would have made it even more difficult for "Georgian Dream" to achieve its objectives; the government effectively utilized the structural weaknesses of the sector and built the objective of producing distrust toward the entire sector and its general marginalization upon the existing alienation between a segment of civic organizations and the public.

"NGOs' did not work on economic discontents because they were in a neoliberal paradigm for years... which 'Georgian Dream' grasped onto well. The second argument regarding democracy is that they are not democratic... and there is no one standing behind them. This rhetoric also grasped onto the weaknesses that existed in the 'NGO' sector, and 'NGOs' genuinely had a problem with democracy and 'grassroots' self-organization. Also, the fact that you are 'foreign' to the society, what you work on is not understandable or acceptable to these people... you are foreign to the people and failed to work with them. Besides the fact that this was an organized process [by 'Georgian Dream']. I think that the structural and historical weaknesses the sector had – these weak points were utilized very effectively."

(Representative of a civil society organization)

The self-criticism expressed by the research participants encompasses issues regarding the unequal and asymmetrical environment existing among Georgian civic organizations, which is manifested in differing access to resources, as well as inequality in the organizations' human potential and organizational development opportunities. The research participants also emphasize a certain disconnect between the agendas and activities of a significant portion of Georgian civic organizations and the needs and concerns existing in society. Over the years, this caused alienation between the civil sector and large groups of society, which was later artificially fertilized and utilized for propaganda objectives. A segment of the

research participants also speaks about the problematic nature of organizations' accountability to the public, building connections with the broader society, and their forms of working with them, as well as the deficit in representing the interests and needs of broad societal groups in public policy.

"What did the 'NGO' sector learn from the first blows? Two years passed before we reached 'FARA.' Nothing happened, not even a reassessment... inefficient spending [by individual organizations], producing policy devoid of content, etc. This inefficiency and incorrect approaches are a huge problem... we will have to start talking about this sooner or later."

(Representative of a civil society organization)

"[The civil sector] is very fragmented, class-based [segmented by class], has its own structure, and this is visible. [The sector] is more or less elite, and we know the shortcomings we might have, which are directed at the criticism of resourced organizations... friendly internal criticism... failing to see local voices, failing to reflect local realities, lacking interest in local solutions – this criticism was always there. This crisis revealed it. I thought we would be able to achieve some kind of renewal, I thought the sector would manage to see itself better in the mirror. In this case, I do not mean the 'grassroots'; I mean the resourced organizations in the center, which possess some kind of ambition and claim to be much more knowledgeable, etc. Their necessity today is unequivocal, that they must survive, and I have no two thoughts about that. The fact that they never resorted to self-criticism is simply regrettable."

(Expert interview)

"We can only say what we might have done a little better to slightly soften this massive blow; otherwise, what is happening is certainly not our fault... The main issue is – to whom is a civil society organization accountable... It is understandable that you are financially accountable to the donor, but what is the source of your legitimacy? Your source of legitimacy is the people, the community, the group of individuals you work for... You might have the legitimacy of 5 people; this legitimacy can be very large or very small, but somewhere this [legitimacy] must exist... Sometimes it seemed to me that the source of our [sector's] legitimacy [was not the people] to whom we were actually accountable."

(Expert interview)

Some research participants consider discussing these and other challenges and structural characteristics of the Georgian civil sector critically important for the process of searching for better solutions. However, for others, the current crisis and survival agenda leave no time and space for self-reflection, especially considering the unprecedented mobilization and resistance demonstrated by the civil sector.

7.2. The Role of Donor Organizations in the Survival Process of CSOs

The adaptation and survival capabilities, as well as the viability of Georgian civil society organizations, were significantly determined by the role of donor organizations, which the vast majority of research participants evaluate critically. An analysis of the research participants, including expert interviews, shows that the main actors responsible for providing development support – who are simultaneously international political actors – met the acute political situation in the country unprepared, facing an agenda that openly included the objectives of neutralizing civic organizations. Moreover, even during the one-year continuous process, donor organizations failed to respond to the existing situation in a coordinated and adequate manner, and failed to make a significant contribution to the survival process of civic organizations as democratic forces.

The criticism from the majority of representatives of civic organizations is linked to the donor organizations' unpreparedness for the foreseeable crisis facing the civil sector, and the lack of a crisis management strategy and corresponding plan. This criticism is particularly important and acute toward those donor organizations that, in addition to Georgia, also work in our region and in contexts where processes of authoritarian consolidation have been actively taking place in recent years. The knowledge regarding this (both of the political context and the provision of development assistance) should be accumulated precisely within these donor organizations. Furthermore, there was an expectation that this specific experience of donors responsible for providing development assistance in authoritarian contexts would play a significant role in the effective, rapid, and crisis-driven distribution of development assistance on the ground, which, with minor exceptions, did not happen.

The research shows that even after the onset of the crisis, donor organizations failed to properly adapt and conduct an organized and coordinated work process

aimed at overcoming the crisis. Numerous research participants still fail to see signs of such necessary coordination among donor organizations. The failure of rapid response to the crisis or the need for coordination, as well as the general disorientation on the part of the donors, was accompanied by the absence of a vision for sector adaptation and survival on the part of civil society. This given reality disconnected the process on both sides and reduced this cooperation between donor organizations and their individual local partner organizations to individualized survival plans, which also encouraged individual, rather than sectoral, solutions.

The state of donor organizations is frequently described by respondents with words such as “confusion,” “unpreparedness,” and, consequently, transitioning into a state of “waiting” and “halting.” According to the evaluation of the research participants, the scale of the crisis proved shocking for donor organizations, continuously deepened by the government’s new destructive initiatives, which created a state of paralysis and constant uncertainty, leaving no space for substantial reconfiguration. Consequently, at the initial stage, the leading approach for a large segment of donor organizations turned out to be a strategy of halting and waiting. This postponed the issue of rapid and crisis-driven action and ultimately complicated the support of local organizations considering the so-called “Law on Agents” and the amendments to the “Law on Grants.”

The creation and activation of flexible and crisis-driven instruments for providing development assistance were hindered by the internal bureaucracy of donor organizations, which was frequently used to justify the difficulties of issuing necessary and vital support. According to the research participants, especially in the case of small organizations, the support of donor organizations was largely limited to a moral dimension and rarely translated into tangible support. Additionally, in individual cases, the postponement of grant application announcements, the opaque selection process, and the focus on funding only low-budget and short-term projects also played a significant role in the rapid weakening of organizations.

“The donors are waiting for something in general, but even they do not know what.”

(Representative of a civil society organization)

"In the end, the donors were already holding back on long-term grants and relations, saying 'we do not know what will happen, let's wait, let's see'... Over here, we were left with the risk of criminal liability, security risks, and the absence of grants, and practically nothing more is needed for [the organization's] termination, when there is no security, no cooperation, and no finances."

(Representative of a civil society organization)

A direct refusal by donor organizations regarding financial support became a decisive argument for the termination or halting of activities by numerous organizations, as it became clear to the leaders of the organizations that without the potential support of international foundations and/or the flexible use of existing resources, they would be unable to cope with the expected fines.

"Small organizations did not have the resources for this, not even the resources for the fine amount. [Some] did not even have an accountant to put their documents in order. Local organizations lacked the resources for this. They pleaded, met with donors [saying], 'If I am fined, will you be able to help me, or something financial...' [Tears up and stops talking]."

(Representative of a civil society organization)

In contrast to this shared negative experience, we encounter numerous individual cases, mostly in the experiences of large and medium-sized organizations. In the case of numerous organizations, supportive donor organizations with whom they had strong ties and trust built over years played a significant role in their survival and demonstrated good examples of using flexibility, tangible support, and individual approaches. Moreover, in those cases where small-sized organizations were able to receive such individualized and flexible support from their partner donor organizations, they managed to continue their activities and seek new opportunities and pathways for functioning, despite other structural and legislative challenges. Such experiences in the case of small-sized organizations were exceptional and primarily tied to organizations operating in Tbilisi with strong organizational and personal connections and skills, which proved decisive in the process of securing support tailored to organizational needs or organizational adaptation. Thus, the role and support of donor organizations played a decisive part for those organizations that managed to mobilize such support. The role of donor organizations also proved decisive in the viability of those organizations that failed to mobilize such support.

The research also shows that those organizations which had organizational support resources (so-called core funding) or relatively sustainable financial support from partner donors over the past few years proved to be more flexible in modifying their activities, adapting their agendas, and seeking new opportunities for survival. Thus, it is clear that resource flexibility and stability significantly increased the viability potential of these organizations.

According to the research participants, it would have been decisive for donor organizations to rapidly acknowledge the crisis upon its onset, coordinate, and timely create a flexible infrastructure for providing development support. This would be based not on the principles of activity effectiveness, sustainability of achieved results, or accountability (which are important in classic models of development assistance), but rather oriented toward crisis-driven, immediate, and flexible support, focused solely on the organizations' survival and the prolongation of their viability. The donor organizations' initial "strategy of waiting" more or less changed during the March-April 2025 period, when it became clear that the financial crisis caused by the closure of USAID was massive and had a significant impact on organizations of all sizes. Interviews show that, taking this crisis into account, existing donor organizations actively began issuing financial support to partner civic organizations, particularly large rights-defending organizations, whose existing or expected crisis was also becoming tangible by this period. During this same period, it was already clear that a new legislative initiative would soon enter into force in the form of amendments to the "Law on Grants," which would, in the shortest possible time, close off the opportunities for distributing development assistance through traditional channels. This likely also influenced the donors' decision to rapidly distribute resources.

Securing crisis financial support from donor organizations was more successfully achieved by relatively large and resourced organizations, which was possibly conditioned by several circumstances. During the March-April 2025 period, when the process of issuing crisis assistance somewhat accelerated, it was primarily received by large and medium-sized rights-defending organizations. On the one hand, these organizations were still functioning and working on significant rights-related issues existing at that time – including cases of ill-treatment, persecution, or harassment of citizens and activists – and they were also providing critically important legal support to small-sized (including regional) organizations in the wake of the strengthening repressive environment. A large portion of small and regional organizations was already

no longer functioning, was weakened, or, considering the new legislative initiatives, was requesting less assistance by this time.

The development assistance sector, as well as the priorities and agendas of donor organizations, were significantly impacted by the changes occurring on the global stage of development assistance. Most notably, the American government's decision regarding the closure of USAID substantially reduced development assistance resources and further narrowed the operational capacities of donor organizations. Interviews show that the accumulated resources for development assistance – against the backdrop of the resource deficit created by the closure of USAID and the damage inflicted upon the civil sector – were mostly distributed to large and medium-sized organizations that were functioning at the time and were also performing the function of critical infrastructure for the sector and for public processes.

Additionally, the research participants single out those structural factors whose existence also significantly determined the resilience and viability of small, mostly regional organizations. The central line of criticism involves the problem of the unequal distribution of development assistance, which is primarily directed at the actors responsible for its distribution. The significant and insurmountable resource asymmetry (not only financial) existing between relatively large and medium organizations and small organizations is considered an essential issue. This is one of the major manifestations of the civil sector's unequal development over decades. This structural reality manifested most acutely during the crisis and automatically separated the survival paths and opportunities of small organizations from those of relatively large organizations.

“[Regional organizations] were always supporters of the large organizations... the role of the regionals was to help, etc. These organizations did not have real autonomy on the ground; they were either coordinators or assistants. [Donors] created a codependent relationship between the center and the ground... These [regional organizations] were never the ‘drivers’ of the project, so now they have neither the resources, nor the skills, nor the capacities. This diversification was never realistically achieved.”

(Expert interview)

“The main problem was that for years, the donors’ policy was aimed at ensuring the local NGO sector acted as hands or implementers, not as policy producers or resourced organizations. We managed to secure a grant for organizational development through daily pressure over the course of years.”

(Representative of a civil society organization)

Significant criticism of the development assistance agenda is also directed at the approaches under which the physical infrastructure necessary for the existence of civic organizations was not created over the years. The research shows that the workspaces owned by civic organizations created significant foundations for their resilience. However, such cases are exceptions, as creating autonomous and state-independent local physical infrastructure for the civil sector was never a priority of development assistance, which is considered a particularly grave mistake today. The lack of physical spaces and the constant mobilization of financial resources to maintain them was always a primary reason for the organizations’ weakness and fragility (especially for small and medium-sized organizations), which became an insurmountable obstacle for a large portion of them during the crisis. Significant development assistance resources directed at developing spaces were mainly utilized to create public infrastructures under the management of local municipalities, from which civic organizations are completely expelled today.

“They did not create independent infrastructure on the ground, they did not create institutional guarantees of independence... they were strengthening the state more... We must change this in the future so that resources are invested in strengthening the community, not the state.”

(Representative of a civil society organization)

Significant criticism toward donors is directed at the issue of their continued support for government-loyal, so-called “GONGO” (government-organized non-governmental organization) organizations. This issue acquired greater awareness against the backdrop of the ongoing crisis, especially for regional and community organizations, who consider it unfair that uniform approaches exist toward organizations in resistance that are on the verge of destruction and organizations loyal to the government. According to the research participants, the organizations belonging to the latter group are envisioned by the government as the future controlled “civil society,” a large portion of which still enjoys the support

of donor organizations. According to respondents, this issue will arise even more acutely on the agenda, and it is important for donor organizations to develop clear policies and criteria for identifying those entities that might be considered democratic forces and groups with civil/public interests eligible to receive development assistance. The issue of developing approaches toward organizations loyal to the government causes significant agitation within civic organizations as well, frequently prompting demands for “clarity” and “calling things by their names.” Additionally, a matter of anxiety is the necessity of developing relationships and approaches toward those organizations that registered in the special registry according to the requirements of the so-called “Russian Law.” Frequently, organizations loyal to the government and organizations registered in the special registry are treated identically. However, the research shows that in the case of numerous organizations, the decision made regarding registration entailed coercion, and the fact of registration should not automatically be considered an indicator of loyalty to the government.

It is interesting that the research reveals certain attempts by the government to co-opt civic organizations, which might be manifested in the government’s creation of the LEPL State Grant Management Agency on April 15, 2025. The primary goal of its activities was defined as supporting and facilitating civic organizations registered and operating in Georgia through the issuance of state grants. A state grant was defined as funds issued by the agency from state budget allocations in accordance with the priority directions for issuing state grants approved by the government.¹⁰⁹ A few months after its creation, in July 2025, the agency announced a grant competition, as a result of which 17 civic organizations received a state grant in an amount up to 100,000 GEL, while the total state grant budget amounted to 1,657,775 GEL.¹¹⁰ Considering the short duration of the agency’s functioning and the scale and volume of its work, it is currently premature to judge the government’s objectives and its actual results. Furthermore, the research shows that at this time, co-optation, as a form of adaptation, does not represent the strategy chosen by the vast majority of civic organizations.

109 Decree of the Government of Georgia No. 119 of April 15, 2025, *On the Creation of a Legal Entity Under Public Law – State Grant Management Agency and Approval of its Statutes*, Article 2.1.

110 Commersant, *The Public Competition for Small Grants Announced by the LEPL – State Grant Management Agency Has Concluded*, 2025.

7.3. Government's Potential Objectives and the Future of the Sector

According to the vast majority of research participants, the primary objective of the government is the destruction of civic organizations, which entails neutralizing the democratic force, energy, and potential that has a significant impact on public processes and can play a special role in maintaining and fighting for democratic processes. As it appears impossible to tame a large portion of civic organizations, their weakening and destruction became the ruling party's main objective. A segment of the research participants also speaks about the sharpening of the role and place of organizations loyal to the government, especially in the regions, which might gain access to certain privileges in the future and become a tamed and controlled alternative to the autonomous and independent civil sector.

According to a segment of the research participants, the government's objective is to neutralize large and resourced organizations, mostly working on democracy and human rights issues, and that small regional organizations were merely "caught" in the destructive process caused by the enactment of the new laws. However, the fieldwork conducted for this research does not confirm this assumption and proves the opposite. The research shows that alongside neutralizing large and resourced organizations, the complete neutralization of relatively small regional organizations is also important for the government. In the case of numerous organizations, a deliberate "effort" directed toward this goal is visible, which drove small regional organizations to the decision to close. Moreover, the research shows that it is unacceptable to the government, and it wishes to neutralize, even that small portion of service-providing organizations' activities that involves so-called "advocacy" work, which turns service-providing organizations into entities with influence over sectoral policy and the shaping of public opinion.

According to the research participants, alongside the work related to containing authoritarianism and its impacts and reacting to it immediately – which has recently consumed a large share of civic organizations' activities – it is important not to halt the building of internal support, solidarity, and safe spaces, which will acquire vital importance as time passes. Furthermore, alongside reactive labor, it is important not to concede the effort of creating new knowledge and proactive actions, the time and space for which is increasingly narrowing in the wake of the shrinking civil space.

In the opinion of the majority of research participants, in the near future, the existence of civic organizations operating in an organizational form with an independent and autonomous agenda will become difficult and practically impossible, as the existential environment necessary for this type of organizing has already been destroyed. In the future, the objectives of maintaining public spaces might exist largely in the form of informal, decentralized, and self-organized connections and networks. In this situation, the importance of locally emerged self-organized initiatives and social movements could also be exceptionally significant. In recent years, they have played a massive role in shaping the practices of self-organized and informal action within Georgian civil society, and the creation of a flexible and self-organized civil society with entirely new types, contents, and forms of action might be based on their experience.

“We must agree, we should have agreed in 2022 and 2023, that we must forget everything that existed. We must completely ‘unlearn’ the process because nothing will be the way it was... We must try, now is the moment, to create some new forms and spaces.”

(Representative of a civil society organization)

8. Conclusion

The research shows that the government's policy toward civic organizations, which, parallel to discreditation and the creation of a hostile and exclusionary environment, also encompassed structural reforms in the form of fundamental legislative amendments and numerous instruments of persecution and repression against civic organizations, significantly impacted the functioning of civic organizations and, in most cases, determined the issue of their existence.

The policy utilized against civil society organizations up to this point aimed at the complete neutralization of Georgian civic organizations, which represented a major objective of the government on the path to establishing authoritarianism. The research shows that the government's objective to neutralize the civil sector was directed at all types of organizations, regardless of their form of activity or size. Moreover, the first, somewhat "natural" targets of "Georgian Dream's" structural reforms turned out to be small-sized regional, mostly community-based organizations and initiatives, a large portion of which ceased to exist or continue their activities minimally and in altered forms. It is also evident that for a large portion of civic organizations, the new restrictive legislation took effect through a "chilling effect," as the laws began operating via self-enforcement and self-restriction, determining the future of a large segment of organizations without their direct enforcement. In this regard, the adoption of the so-called "Russian Law" in 2024 was a significant blow, which effectively initiated the irreversible process of damaging the sector and determined the activities of small and medium organizations and the issue of their existence.

The research reveals that the legislative amendments implemented by the government in 2024-2025 – in the form of the so-called "Russian Law," the so-called "Law on Agents," and the amendments to the "Law on Grants" – practically entirely restricted the operational capabilities of civic organizations. Parallel to the enactment of the laws, this severely impacted medium as well as large-sized resourced organizations and had a fundamental influence on their functioning. However, the research also shows that the structural reforms failed to completely halt the activities of relatively strong and resourced organizations, which was followed by "Georgian Dream's" activation of individual mechanisms of persecution and repression against specific target organizations starting in the summer of 2025. These waves of repression and persecution manifested in the monitoring and in-

spections initiated under the so-called “Law on Agents” and the new regulations “On Grants.” In individual cases, it involved freezing (as well as search) measures utilized against organizations within the framework of criminal investigations. This made it practically impossible for the targeted organizations to work in their existing form and created experiences of criminalizing public and rights-defending activities.

In response to the altered legal and political environment, resistance represented the central strategy utilized by Georgian civil society organizations. A segment of the organizations, mostly small-sized regional and community organizations, made the decision to terminate activities and exit the organized civil space immediately upon the enactment of the first restrictive legislation. Another segment attempted to adapt to the existing environment in a way that would make it possible to save and continue a portion of their independent and autonomous activities. The research also shows that the viability trajectories of the organizations differed significantly from one another. Specifically, various structural factors – such as unequal access to resources, the size of organizations, connections, and others – essentially determined the capacities for the viability and resilience of civic organizations.

Up to this point, a policy of co-optation of civic organizations by the government is less evident. However, it appears that a small fraction of organizations chose the logic of loyalty to the government and complying the existing legislation. The research also reveals that for a segment of organizations, the logic of complying with the new restrictive laws was selected not for the purpose of loyalty, but for the objectives of adaptation, and was mostly driven by the survival of basic services. Compared to other organizations, the direct and immediate impact of the existing environment on the functioning of service-providing organizations is currently smaller; however, a substantial number of this type of organizations interviewed in the research point to the existing impact on their activities, the vagueness of their organizational future, and the risks of substantial damage.

The research describes the delayed process of survival and adaptation of civic organizations, which, in contrast to the experience of resistance, reveals the absence of a collective survival/adaptation process and the individualization of organizations’ paths to survival. The research also highlights as a significant challenge the extremely problematic role of donor organizations operating in Georgia. Accord-

ing to the evaluation of the vast majority of research participants, these donors failed to cope with the significant task before them: to rapidly and effectively support the Georgian civic organizations facing destruction, a large portion of which are no longer functioning as of today, or are fighting to maintain and survive significantly reduced, altered, and frequently basic activities.

Appendix #1: Interviews with Respondents

Respondent #	Respondent Status	Date of Interview
Respondent #1	Expert	18.07.2025
Respondent #2	Expert	18.07.2025
Respondent #3	Expert	05.08.2025
Respondent #4	Expert	13.08.2025
Respondent #5	Expert / Representative of a Civic Organization	21.08.2025
Respondent #6	Representative of a Civic Organization	21.07.2025
Respondent #7	Representative of a Civic Organization	30.07.2025
Respondent #8	Representative of a Civic Organization	31.07.2025
Respondent #9	Representative of a Civic Organization	31.07.2025
Respondent #10	Representative of a Civic Organization	31.07.2025
Respondent #11	Representative of a Civic Organization	02.08.2025
Respondent #12	Representative of a Civic Organization	07.08.2025
Respondent #13	Representative of a Civic Organization	08.08.2025
Respondent #14	Representative of a Civic Organization	11.08.2025
Respondent #15	Representative of a Civic Organization	15.08.2025
Respondent #16	Representative of a Civic Organization	18.08.2025
Respondent #17	Representative of a Civic Organization	18.08.2025
Respondent #18	Representative of a Civic Organization	19.08.2025
Respondent #19	Representative of a Civic Organization	19.08.2025
Respondent #20	Representative of a Civic Organization	19.08.2025
Respondent #21	Representative of a Civic Organization	20.08.2025
Respondent #22	Representative of a Civic Organization	28.08.2025
Respondent #23	Representative of a Civic Organization	02.09.2025
Respondent #24	Representative of a Civic Organization	11.09.2025
Respondent #25	Representative of a Civic Organization	12.09.2025
Respondent #26	Representative of a Civic Organization	17.09.2025
Respondent #27	Representative of a Civic Organization	24.09.2025
Respondent #28	Representative of a Civic Organization	26.09.2025
Respondent #29	Representative of a Civic Organization	01.10.2025
Respondent #30	Representative of a Civic Organization	18.10.2025
Respondent #31	Representative of a Civic Organization	31.10.2025

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