The State of the Internet and Digital Rights in Georgia (2019–2025)

In the report “The State of the Internet and Digital Rights in Georgia (2019–2025)” an analysis is provided of the development and regulation of the internet sphere in the country. The report examines key aspects, including the growth in the number of internet users, infrastructure development, speed and quality of access, as well as the dynamics of the internet providers market.
Special attention is devoted to issues of digital rights and freedoms. The legislation in the field of the internet is analysed, cases of blocking and censorship are examined, as well as the practice of state surveillance. The document also considers the use of VPN services in the context of ensuring anonymity and access to information.

The report highlights significant events that influenced Georgia’s digital environment, including public protests and the adoption of laws that caused widespread resonance. In addition, the international context is analysed, including relations with Russia and the influence of European integration on the country’s digital policy.

The text was partially generated using several large language models (LLM). The information presented in it is based on the analysis and synthesis of data from the indicated sources; however, the process of its structuring, summarising and presentation was carried out with the help of technology.

It is recommended to use this text as a starting point for further research and to critically verify critically important data against primary sources.

1. GENERAL INFORMATION

1.1. GEOGRAPHICAL LOCATION

Georgia is a country located in a strategically important region at the intersection of Eastern Europe and Western Asia, known as the Caucasus. It has access to the Black Sea in the west and borders the Russian Federation to the north and north-east, Turkey to the south-west, Armenia to the south and Azerbaijan to the south-east.[1] The total area of the country is 69 700 square kilometres.[1] Such geographical position historically determines Georgia's role as a transit corridor and has a significant influence on its geopolitical orientation, economic ties, infrastructure development, including telecommunications, as well as on the nature of its relations with neighbouring countries and international partners.[1] Location at the junction of regions and proximity to major powers such as Russia and Turkey forms a complex foreign-policy context which, in turn, influences domestic policy, including approaches to internet management, information security and susceptibility to external digital threats.[1]

1.2. POPULATION

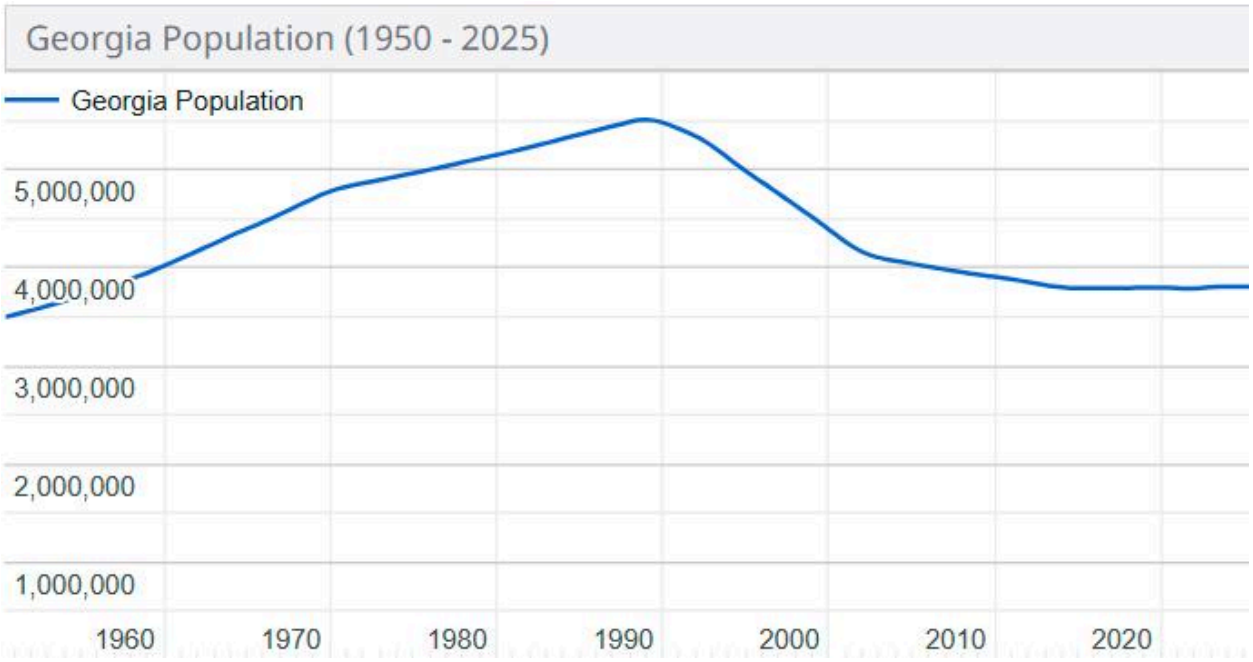
According to the National Statistics Office of Georgia (Geostat), the population of the country as of 1 January 2025 was estimated at 3 704 500 people.[4] This represents a slight increase of 9 900 people compared with the figure at the beginning of 2024.[4] It is important to note that the official population statistics of Georgia do not include data on the occupied territories – Abkhazia and the Tskhinvali region (South Ossetia).[4] The majority of Georgia's population (61.5 % at the beginning of 2025) lives in urban areas. There is a high concentration of population in the capital: 1.282 million people live in Tbilisi, which is almost one-third of the country's total population.[4] The ethnic composition of the population, according to the 2014 census, is predominantly Georgian (86.8 %), but the country has significant ethnic minorities, mainly Azerbaijanis (6.2 %) and Armenians (4.5 %).[8]

In recent years the demographic situation in Georgia has been characterised by certain fluctuations. After a slight population decline in 2019–2020, growth was recorded in 2021 and

2023, followed by a decline at the beginning of 2024 and a small increase at the beginning of 2025. These changes are due to the complex interaction of natural population movement and migration flows. In 2024 a negative natural increase was recorded (–4 488 people), but it was compensated by a significant positive migration balance (+14 386 people), which led to an overall increase in numbers.[4] This underlines the increased role of migration as a key factor determining the short-term demographic dynamics of the country, especially against the background of the trend towards natural population decline. In 2023 a significant increase in emigration was also recorded,[6] which may have contributed to the population decline at the beginning of 2024. Such dependence on migration processes makes the demographic situation in the country sensitive to external economic and political factors such as the economic situation in neighbouring countries, regional stability and the visa policy of other states. These factors can indirectly affect the internet services market through changes in the number and composition of consumers.

Signs of population ageing are also observed: the proportion of persons aged 65 and over reached 16.6 % at the beginning of 2025,[4] and the average age of the population was 39 years.[4] Life expectancy at birth in 2024 remained relatively stable at 74.9 years (70.5 years for men and 79.3 years for women).[4]

Graph 1: Dynamics of the Population of Georgia (1950–2025)



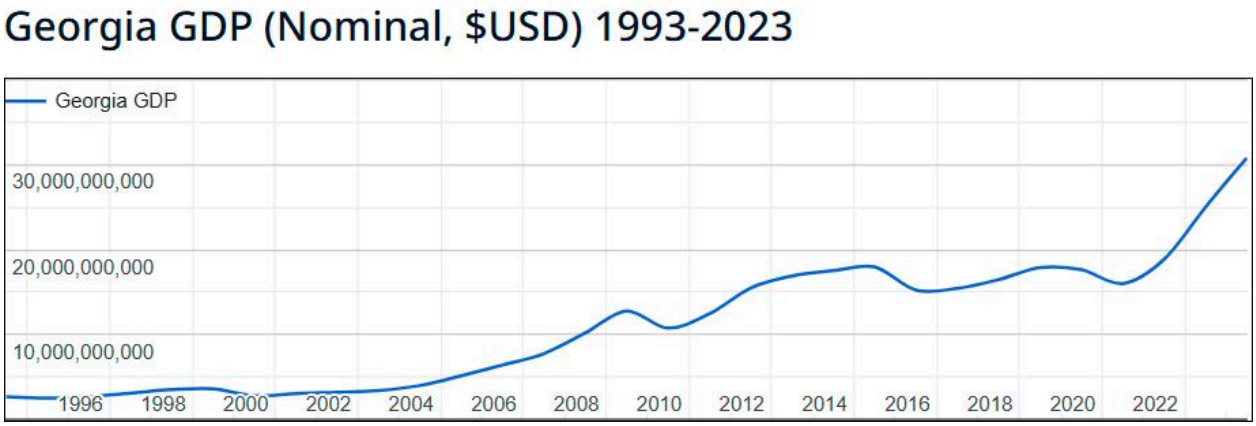
Source: worldometers.info

1.3. GROSS DOMESTIC PRODUCT (GDP)

Georgia's economy is classified as an emerging market economy[1] and belongs to the category of upper-middle-income countries according to the World Bank classification.[11] Over the past decade the country has achieved notable success in economic growth and poverty reduction.[13] Despite global challenges, including the COVID-19 pandemic which caused a 6.8 % contraction in GDP in 2020,[14] the economy demonstrated resilience and rapid recovery.[14] Real GDP growth rates were high: 10.5 % in 2021,[12] 11.0 % in 2022,[15] 7.8 % in 2023.[15] According to preliminary estimates of the National Statistics Office of Georgia (Geostat), real GDP growth in 2024 amounted to 9.4 %.[13] Nominal GDP in 2024 reached 91.9 billion lari (GEL),[15] equivalent to approximately 33.8 billion US dollars.[13] GDP per capita also showed positive dynamics, rising from $6 731 in 2022 to $8 284 in 2023 and, according to preliminary data, to $9 141 in 2024.[15]

Economic growth in 2024 was supported by strong domestic demand stimulated by a 15.3 % increase in real wages and a significant 16.2 % increase in real lending.[13] In terms of production structure, the main contribution was made by the services sector, in particular information technology (IT), education and public services.[13] However, despite high growth rates in recent years, international financial organisations forecast a slowdown in economic dynamics. Real GDP growth is expected to decrease to 5.5 % in 2025[13] and stabilise at around 5.0 % in the medium term.[13] This projected slowdown is linked to the expected weakening of domestic consumption, investment activity and external demand.[13] Additional risks to the economic forecast are created by continuing global uncertainty as well as domestic political polarisation and tension that escalated at the end of 2024, which may negatively affect the business climate, tourism and investor confidence.[13] The weakening of investor confidence is already reflected in the decline in net foreign direct investment (FDI) from 5.2 % of GDP in 2023 to 2.7 % of GDP in 2024.[13] Workers' remittances also fell by 14.2 % in 2024, mainly due to reduced inflows from Russia.[13] These economic trends and risks directly affect the possibilities for further development of digital infrastructure, the accessibility of internet services and the overall level of digitalisation of the country.

Graph 2: Dynamics of Nominal GDP of Georgia (1993–2023)



Source: worldometers.info

1.4. MAIN ECONOMIC CHARACTERISTICS

Georgia's economy in the period 2019–2024 demonstrated considerable volatility but overall showed the ability to recover and grow. After the decline caused by the COVID-19 pandemic in 2020 (–6.8 % real GDP[14]), there followed a period of rapid recovery and growth: 10.5 % in 2021,[12] 11.0 % in 2022,[15] 7.8 % in 2023[15] and 9.4 % (preliminary) in 2024.[13] This growth often exceeded the forecasts of international financial organisations.[16] The GDP structure remains stable: the services sector dominates, accounting for 60.6 % to 67.9 % of GDP.[10] Industry accounts for approximately 23.7 %–24.6 %,[10] and the share of agriculture fluctuates around 6.9 %–10 %.[10] The key industries contributing to the economy are agriculture (especially winemaking, nut and fruit growing), tourism, mining (manganese, copper, gold), metallurgy (ferroalloy production), the transport sector and, to an increasing extent, the information technology sector.[10] A positive trend is the decline in unemployment, which fell from 20.6 % in 2021 to 13.9 % by the end of 2024,[13] having reached a historic low of 16.7 % in 2023.[10] The poverty level also showed a downward trend.[13]

Despite the positive growth dynamics, Georgia's economy faces a number of serious structural problems. One of the key problems is low labour productivity at enterprise level and limited creation of high-quality jobs.[19] A significant part of the workforce (about one-third) is still employed in low-productivity agriculture.[19] Businesses, especially small and medium-sized enterprises (SMEs), experience difficulties in accessing financing.[19] Another problem is the mismatch between workforce skills and market requirements.[19] The high degree of economic openness and dependence on external factors such as tourism, remittances (especially from

Russia, the volume of which decreased in 2024[13]) and foreign direct investment (which also decreased in 2024[13]) make the country vulnerable to external shocks.[13] In addition, continuing political polarisation and the recent suspension of EU accession negotiations create additional risks for economic stability and the investment climate.[13] The presence of a growing services sector, especially IT,[13] creates good potential for digitalisation. However, if structural problems such as low productivity in other sectors[19] and shortage of qualified personnel[19] are not addressed, this may lead to uneven digital development and deepening of the "digital divide" between different sectors of the economy and regions of the country.

1.5. GENERAL POLITICAL SITUATION

Georgia is a parliamentary republic[30] with a multi-party system.[31] According to the Constitution, it is a unitary state,[30] although it includes two autonomous republics – Adjara and Abkhazia – and there is the territory of the former South Ossetian Autonomous Region with disputed status.[31] Abkhazia and South Ossetia have de facto not been controlled by the central government of Georgia since the early 1990s.[1] Executive power is headed by the Prime Minister, who is the head of government.[31] The President performs mainly ceremonial functions as head of state.[31] Legislative power is exercised by a unicameral parliament.[31]

Since the early 2010s Georgia's political life has been characterised by the dominance and acute rivalry of two main political forces: the ruling party "Georgian Dream" and the opposition "United National Movement" (UNM).[31] As of early 2025, according to polls, "Georgian Dream" retained leading positions (approximately 25–31 % support), followed by various opposition blocs and parties, including the "Coalition for Change" (10–18 %), UNM (8.5–15 %), "Strong Georgia" (6–11 %) and "Gakharia for Georgia" (5–9.5 %).[36] The current Prime Minister is Irakli Kobakhidze (since February 2024), representing "Georgian Dream".[35] The situation with the presidency remains uncertain: Salome Zourabichvili, elected by direct vote in 2018, disputes the legitimacy of Mikhail Kavelashvili's election by the Electoral College in December 2024; this election is not recognised by the opposition and part of the international community.[31]

The political situation in Georgia in recent years (especially 2023–2024) has been characterised by growing polarisation,[31] mass protests and increasing tension between the ruling party and the opposition as well as civil society.[39] The adoption in May 2024 of the Law "On Transparency of Foreign Influence", which requires NGOs and media outlets with more than 20 % foreign funding to register as "organisations pursuing the interests of a foreign power", provoked sharp criticism inside the country and from international partners (EU, USA), exacerbating concerns about backsliding from democratic standards and the European path of development.[39] The subsequent

government decision to suspend EU accession negotiations until 2028[13] further intensified political instability and triggered new waves of protests.[39] This internal instability and shift in foreign-policy vector create an uncertain environment for the development of digital rights and freedoms. Against the background of political tension and criticism from civil society and international partners, the authorities may be inclined to strengthen control over the information space, including the internet, under the pretext of protecting national interests or combating disinformation, which could lead to the adoption of more restrictive laws and practices in the digital sphere.

Administratively the country is divided into 9 regions (mkhare), two autonomous republics (Adjara and Abkhazia) and the capital Tbilisi, which has the status of a region.[32] The regions and Adjara are further divided into municipalities (formerly districts).[32] As of 2025 there were 69 municipalities.[31]

2. INTERNET

2.1. NATIONAL DOMAIN

The national top-level domain (ccTLD) for Georgia – .GE – was delegated on 2 December 1992.[48] Administration and sponsorship of the domain is carried out by Caucasus Online.[48] Initially, in 1992, the domain was delegated to the internet provider SaNet. In 2006, after the merger of SaNet with two other companies, Caucasus Online was formed and became the sponsor of the domain, consolidating administrative and registration functions.[48] An important change in domain management was the transition on 16 April 2018 to a model with accredited registrars. According to the updated rules, Caucasus Online retains the functions of administrator of the .GE registry, while direct registration and management of domain names is performed by accredited registrar companies.[48] This step corresponds to international practice and is aimed at developing competition in the domain name market and improving the quality of services for end users.

Registration of domain names in the .GE zone is available both directly at the second level (e.g. domain.ge) and at the third level under a number of specialised second-level domains.[48] For second-level domains registration is open to individuals and legal entities from all over the world without restrictions on citizenship or place of residence.[48] For third-level domains certain rules apply: .COM.GE is intended for commercial organisations and individuals; .EDU.GE – for

educational institutions (general schools and universities); .ORG.GE – for non-profit organisations; .NET.GE – for network providers and companies related to electronic communications; .PVT.GE – for individuals; .SCHOOL.GE – for general schools; .GOV.GE – for state bodies and public-law entities (registration delegated to LEPL "Smart Logic" of the Ministry of Justice); .MIL.GE – for Georgia's military structures.[48] Technical requirements for a domain name include the use of only Latin letters, digits (0–9) and hyphen (the hyphen cannot be the first or last character). The length of the name must be from 2 to 63 characters; letter case is irrelevant.[49]

In 2011 an internationalised top-level domain (IDN) .ეს (Punycode representation: .xn--node) using letters of the Georgian Mkhedruli alphabet was registered for Georgia.[48] This domain became actively used from 2016, providing the possibility of registering domain names in the national language.[48] The introduction of the IDN domain is an important step towards supporting linguistic and cultural diversity in the Georgian segment of the internet, making it more accessible to users who do not know the Latin alphabet.

2.2. NUMBER OF USERS

As of the beginning of 2025 the number of internet users in Georgia was estimated at 3.12 million people.[50] This corresponds to an internet penetration level of 81.9 % of the country's total population.[50] Despite such a high figure, approximately 690 thousand people, or 18.1 % of the population, still remained offline.[51]

The dynamics of the number of internet users in recent years has been mixed. After a period of growth, for example in 2020–2021 when the number of users increased by 9.5 %,[54] in subsequent years there was stagnation or even a slight decline: −0.3 % in 2021–2022,[55] −0.5 % in 2022–2023,[56] −0.4 % in 2023–2024[57] and −0.009 % in 2024–2025.[51] Data for 2019 indicated 2.85 million users (75 % penetration)[58] and for 2020 – 2.70 million (68 % penetration).[59] It should be borne in mind that these figures may have been influenced by changes in counting methodology[54] as well as possible delays in the publication of data, due to which the actual figures may be slightly higher.[51] Nevertheless, the overall picture of recent years points to market saturation in the most accessible segments and the existence of barriers to further growth. A high level of penetration has already been achieved, and the remaining 18 % of the population most likely represent groups whose connection requires additional efforts – these may be residents of remote rural areas with undeveloped infrastructure,[45] elderly people with low digital literacy[60] or

low-income households. This underlines the importance of state initiatives such as the Open Net Georgia project to develop broadband infrastructure in the regions[45] and programmes to improve the digital literacy of the population.

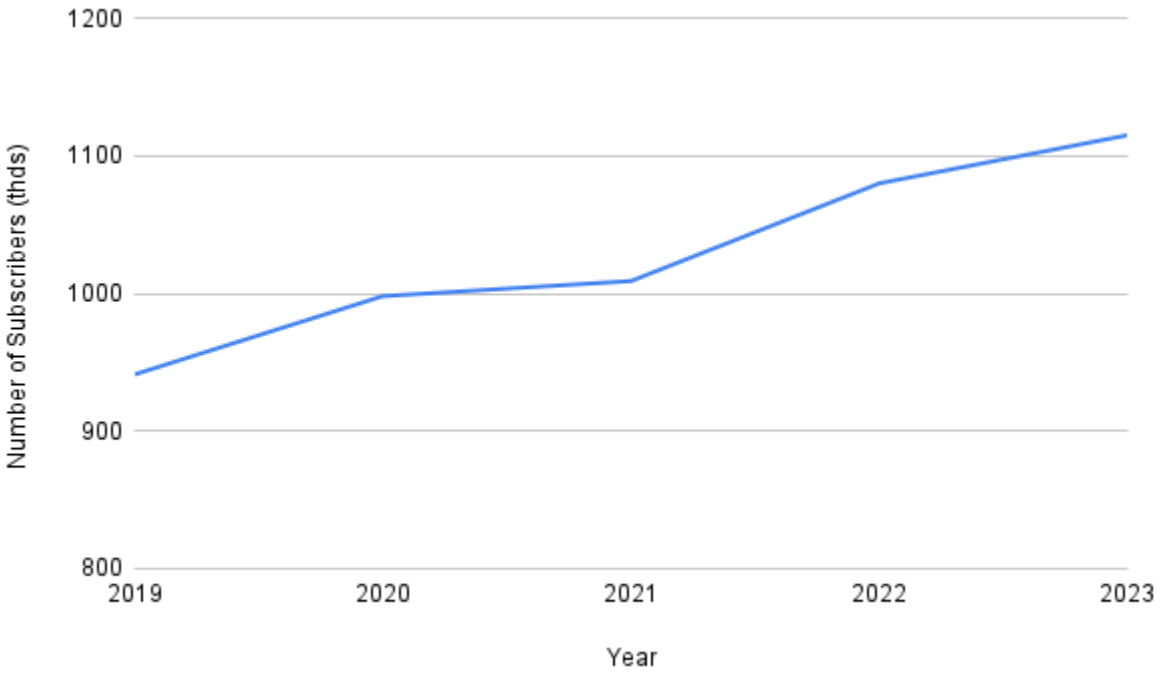
The main sources of data on the number of internet users and penetration level are DataReportal reports,[50] the International Telecommunication Union (ITU),[52] the National Communications Commission of Georgia (GNCC)[62] and reports of international organisations such as Freedom House, which often refer to ITU and Geostat data.[60]

2.2.1 FIXED INTERNET

Fixed broadband access (BBA) remains the main way of connecting households and businesses to the internet in Georgia, especially in urban areas. Fixed BBA penetration in households showed steady growth, reaching 80.9 % in 2019,[65] 83.3 % in 2020,[65] 86.7 % in 2021[65] and 92.7 % in 2022–2023.[65] The dominant connection technology is fibre-optic (FTTx). Already in 2018 75 % of all fixed connections were fibre-optic technologies,[66] and in 2019 82 % of private subscribers used FTTx.[67] At the same time xDSL technologies are gradually being displaced, while in rural areas, where fibre-optic infrastructure is less developed, wireless access via Wi-Fi technology continues to play a significant role.[66]

The total number of fixed BBA subscribers has grown steadily throughout the period 2019–2023, exceeding the 1 million mark.

Graph 3: Dynamics of the Number of Fixed BBA Subscribers in Georgia (2019–2023)



The fixed BBA market in Georgia is characterised by a high degree of concentration. The two largest providers, MagtiCom and Silknet, control the overwhelming majority of the market.[60] According to GNCC data at the end of 2023, MagtiCom served 508 thousand private and 21 thousand business subscribers, while Silknet had 322 thousand private and 23 thousand business subscribers.[72] By market share calculated by revenue for 2022, MagtiCom accounted for 46.7 % and Silknet for 33.6 %.[71] Such a dominant position of two players raises concerns about the level of competition in the market. Although there are regulatory mechanisms such as the obligation of large operators to provide access to their infrastructure to smaller providers,[64] their effectiveness in stimulating real competition may be limited. High market concentration can potentially restrain innovation, affect pricing and quality of services for end consumers, which requires constant monitoring by antitrust authorities and the GNCC regulator.

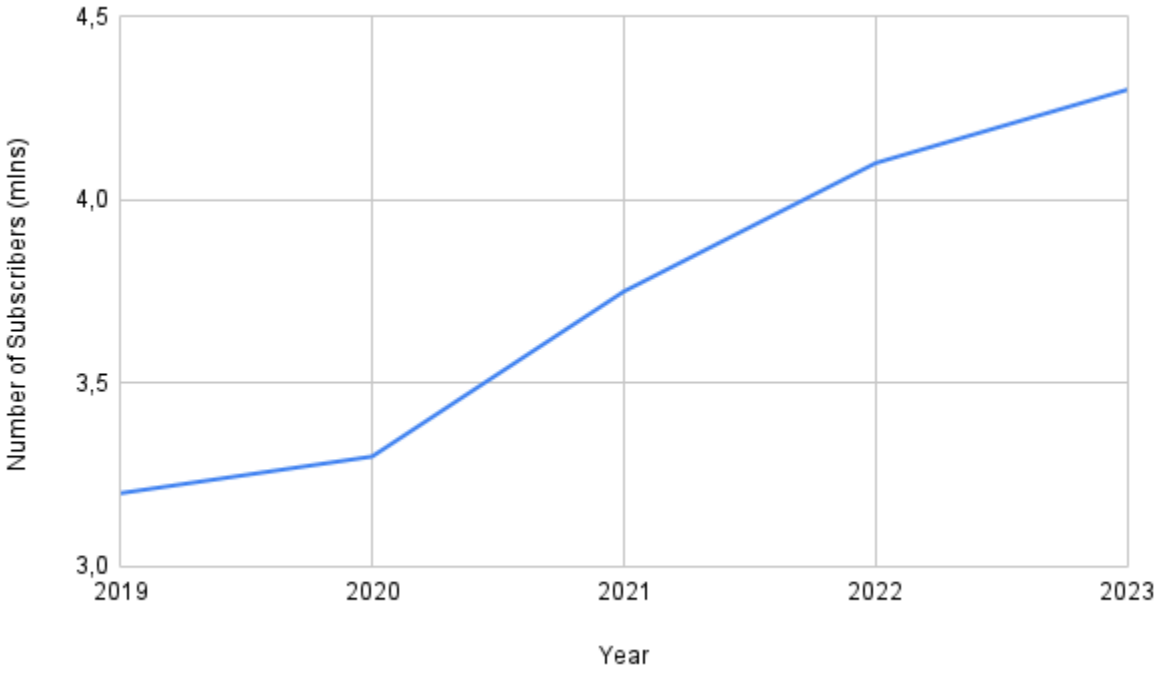
- MagtiCom: https://www.magticom.ge/ [74]
- Silknet: https://silknet.com/ [75]

2.2.2 MOBILE INTERNET

Mobile internet plays an extremely important role in providing internet access to the population of Georgia. This is confirmed by the very high mobile penetration rate, which at the beginning of 2025 was 163 % of the country's total population,[51] indicating the widespread use of several SIM cards per user. The vast majority (95.1 % at the beginning of 2025) of mobile connections in the country are broadband, i.e. use 3G, 4G or 5G technologies.[51] 3G and 4G networks already provided almost complete coverage of populated areas of the country by 2019 (99.98 % and 99.7 % respectively).[66] In 2023 fifth-generation (5G) networks were launched in Georgia, opening up new opportunities for high-speed mobile access.[63]

The number of subscribers using mobile internet services showed steady growth in the period 2019–2023, reflecting the growing need of the population for mobile data access and online services.

Graph 4: Dynamics of the Number of Mobile BBA Subscribers in Georgia (2019–2023)



The market for mobile communications and mobile internet in Georgia, like the fixed BBA market, is characterised by high concentration. The three main operators – MagtiCom, Silknet and Cellfie Mobile (formerly known as Beeline, VEON Georgia brand) – control almost the entire market.[62] According to GNCC data at the end of 2023, the distribution of market shares by total number of mobile subscribers was as follows: MagtiCom – 41 %, Silknet – 34 %, Cellfie Mobile – 24 %.[62] By

number of subscribers using mobile internet at the end of 2023 Silknet was the leader (1.57 million), followed by MagtiCom (1.52 million) and Cellfie Mobile (1.21 million).[72] However, if we consider the share of internet users within the subscriber base of each operator, Cellfie Mobile showed the highest figure (86 % of its subscribers used mobile internet), ahead of Silknet (78 %) and MagtiCom (62 %).[72] This may indicate differences in tariff policy and target audience of the operators: Cellfie probably more actively attracts data-oriented users, for example youth. The distribution of market shares by revenue from mobile communications (2022 data) also confirms the leadership of MagtiCom (49.3 %) and Silknet (34.4 %), leaving Cellfie Mobile 16.3 %.[65] At the end of 2022 the first mobile virtual network operator (MVNO) – Hallo – entered the market, but its market share in 2023 remained negligible (0.5 %),[62] which has not yet had a significant impact on the overall competitive situation.

- MagtiCom: https://www.magticom.ge/ [74]
- Silknet: https://silknet.com/ [75]
- Cellfie Mobile: https://cellfie.ge/ [76]

2.3. INTERNET ACCESS SPEED AND QUALITY OF SERVICES PROVIDED

Data on internet access speeds in Georgia for the period 2019–2025 show a mixed picture with significant improvements in the mobile segment but lag in the fixed BBA segment compared to some countries in the region and the world.

Mobile internet speed: There was impressive growth in the median data download speed in mobile networks. According to Ookla's Speedtest service, the median speed increased from 25.9 Mbps in May 2020[3] and 33.52 Mbps at the beginning of 2024[57] to 111.17 Mbps in January 2025.[51] In the global Speedtest Global Index ranking for February 2025 Georgia ranked a high 16th place with a median speed of 158.81 Mbps.[78] Ookla data for Q4 2023 showed that Geocell (now Cellfie Mobile) provided the highest median download speed (50.52 Mbps), ahead of Magti (39.73 Mbps) and Beeline (13.64 Mbps).[79] Such a sharp jump in median speed, especially between the beginning of 2024 and the beginning of 2025, is most likely largely due to the active deployment and expansion of 5G network coverage that began in 2023.[63] However, it is important to understand that median values, especially during the introduction of new technologies, may not reflect the real experience of all users. Most likely high figures are achieved in 5G coverage areas and among users with modern devices, while users in regions with 4G or 3G coverage may not feel such a significant improvement.

Fixed internet speed: In the fixed BBA segment the growth of median speed was more modest. According to Ookla, the median download speed was 24.8 Mbps in May 2020,[3] 26.8 Mbps in May 2021,[60] 26.44 Mbps at the beginning of 2024[57] and reached 41.65 Mbps in January 2025.[51] In Q4 2023, according to Ookla, MagtiCom led in fixed BBA speed (27.81 Mbps), slightly ahead of Silknet (25.16 Mbps).[79] In the global Speedtest Global Index ranking for February 2025 Georgia occupied only 114th place with a median speed of 44.58 Mbps,[79] which is significantly lower than the figures of many countries, including regional neighbours.[60] The Cable.co.uk study for 2023 showed an even lower average speed for Georgia – 18.54 Mbps (139th place in the world).[80]
The significant gap between Georgia's global rankings in mobile (16th place) and fixed (114th place) internet speed indicates a clear imbalance in infrastructure development. This can lead to a "mobile divide", when users who rely solely on mobile access (often in rural areas or with low income) receive potentially faster but less stable and possibly more expensive (per volume of traffic) services compared to urban residents who have access to fixed BBA.

Quality of services: Despite the recorded growth in speed indicators, especially in the mobile segment, the quality of internet services remains the subject of user complaints. Freedom House reports for 2020 and 2021 noted user complaints about low connection quality, which became particularly acute during the COVID-19 pandemic.[3] In 2020, 297 official complaints about low connection quality were submitted through the GNCC platform "Sheamotsme" ("Check").[60] This indicates that measured speeds do not always translate into stable and reliable connection for all users.

Sources of speed data: Ookla Speedtest Global Index,[78] DataReportal (referring to Ookla),[51] Freedom House (referring to Ookla),[3] Cable.co.uk,[80] ITU.[83]

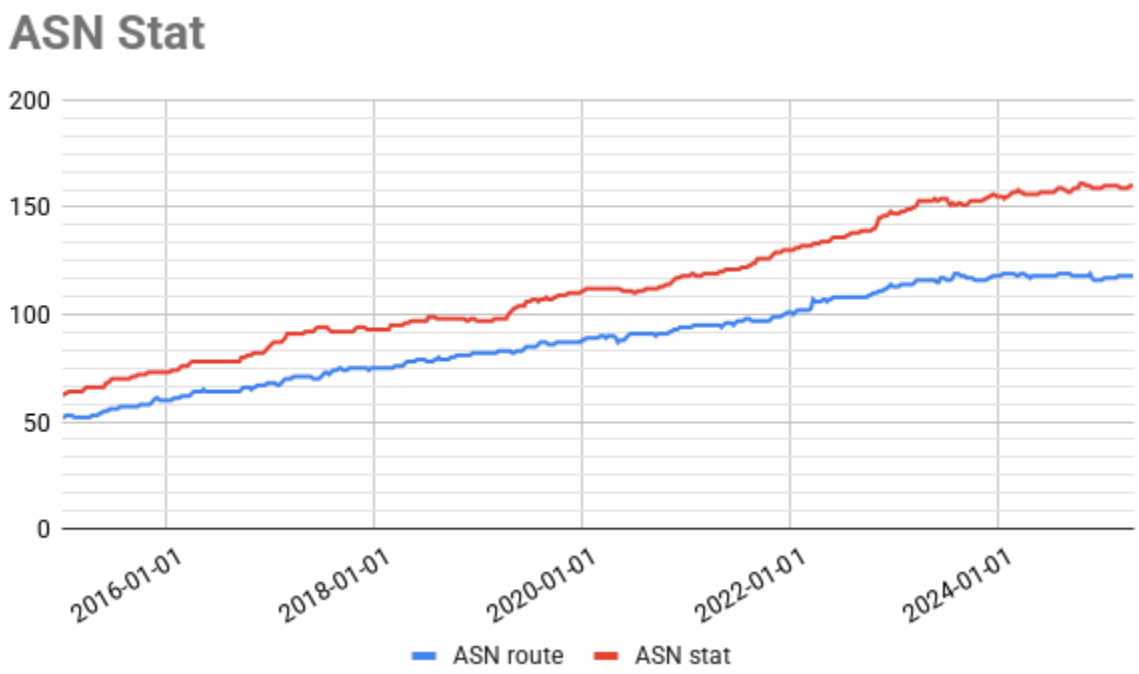
2.4. DEVELOPMENT OF PROVIDERS AND AUTONOMOUS SYSTEMS

An Autonomous System (AS) is a set of IP networks and routers managed by one or more operators that have a single routing policy when interacting with other AS in the Internet. Accounting and allocation of AS numbers (ASN), as well as IP addresses, is performed by regional internet registries (RIR). For the region that includes Georgia, the RIR is RIPE NCC (Réseaux IP Européens Network Coordination Centre). The RIPEstat service provided by RIPE NCC is the main tool for obtaining statistical data on the distribution and use of internet resources, including ASN, by country.

The dynamics of the number of registered and actively routed (announcing prefixes in BGP) autonomous systems in a country is an important indicator of the development and maturity of

the national internet infrastructure. Growth in the number of AS usually indicates an increase in the number of independent network operators (internet providers, large companies, academic networks), development of competition and complication of the topology of the national network segment.

Graph 5: Dynamics of Autonomous Systems in Georgia (2015–2025)



Over the past decade Georgia has seen confident and stable growth in both the total number of registered autonomous systems (ASN stat) and the number of systems announcing routes in the global network (ASN route). This testifies to the systematic development of the country's internet infrastructure.

Gap between registration and use: The red line (total number of AS) is steadily above the blue line (AS in routing). This means that not all autonomous systems registered in Georgia are actively used for traffic routing. The difference between 160 registered and 118 active systems indicates the presence of "dormant" or reserve networks.

Slowdown in growth rates: Starting approximately from 2023, the growth rates of both registered and active AS have somewhat slowed, which may indicate gradual market saturation or consolidation of internet providers.

Total number of AS per 1 million inhabitants: (160 AS / 3.7 million) × 1 million ≈ 43.2 AS

Active (routed) AS per 1 million inhabitants: (118 AS / 3.7 million) × 1 million ≈ 31.9 AS

This indicator is quite high and testifies to a high degree of decentralisation and competition in Georgia's internet services market. A large number of autonomous systems for a relatively small population indicates a developed internet ecosystem with many independent providers and organisations managing their own networks. This, as a rule, has a positive effect on the quality and cost of internet access for end users.

Table 1: Top 10 Largest Autonomous Systems in Georgia

#	Number of AS	Name	Web Site	Foreign neighbour count	Local neighbour count	Total neighbour count	Foreign neighbours share
1	35805	SILKNET-AS	https://silknet.com	65	69	134	49%
2	20771	Caucasus Online	http://www.co.ge	10	28	38	26%
3	16010	Magticom Fixed-Broadband	https://www.magticom.ge/	2	33	35	6%
4	198150	SIACOM JSC	https://sia-com.com/	25	5	30	83%
5	34797	SYSTEM-NET		5	15	20	25%
6	49628	SKYTEL	http://www.skytel.ge	1	14	15	7%
7	44327	Delta-Comm	http://www.delta.ge	1	13	14	7%
8	57814	Cloud9	https://www.cloud9.ge/	3	8	11	27%
9	209046	ASGAL	http://www.airlink.ge	0	6	6	0%
10	20545	GRENA-AS Tbilisi, Georgia	http://www.grena.ge	3	3	6	50%

The internet connectivity market in Georgia is highly concentrated. The three leading operators – Silknet, Caucasus Online and Magticom – form the core of the network.

Silknet (AS35805) is the undisputed leader. This system has 134 direct connections (peerings), which is more than three times the figures of the nearest competitor. Silknet maintains an almost equal balance between local (69) and foreign (65) neighbours. This indicates that the company is not only the largest provider for end users but also a key transit operator ensuring Georgia's connection with the rest of the world.

Caucasus Online (AS20771) and Magticom (AS16010) occupy second and third places with 38 and 35 connections respectively. Their strategy differs markedly from Silknet's: they focus mainly on

internal peerings (28 and 33 local neighbours). This may indicate that for access to the global network they largely rely on purchasing transit from larger players such as Silknet.
Silknet (49 % foreign peers) and GRENA-AS (50 %) maintain a healthy balance, ensuring good connectivity both within the country and beyond its borders. GRENA, being a research and education network, needs high-quality international channels for data exchange with global research centres.
SIACOM JSC (AS198150) stands out with 83 % foreign connections. Most likely this company specialises in providing international transit services to other Georgian operators or is a point of presence of a large international network (CDN).
Most other operators, including Magticom (6 %), SKYTEL (7 %) and Delta-Comm (7 %), clearly focus on the domestic market.

ASGAL (AS209046) is an extreme example, having 0 % foreign neighbours. This network is completely dependent on other Georgian providers for access to the global internet.

General Conclusions
Market concentration: Georgia's internet market rests on "three pillars" (Silknet, Caucasus Online, Magticom), with Silknet playing a dominant role in international connectivity.
Importance of local peering: The large number of local connections for most operators testifies to the developed infrastructure for traffic exchange within the country. This allows faster access to local resources and reduces dependence on expensive international channels.

Potential vulnerability: Concentration of a significant share of international connectivity in the hands of one or two operators can create potential risks. Failures in their operation can seriously affect the availability of foreign internet resources for the entire country.

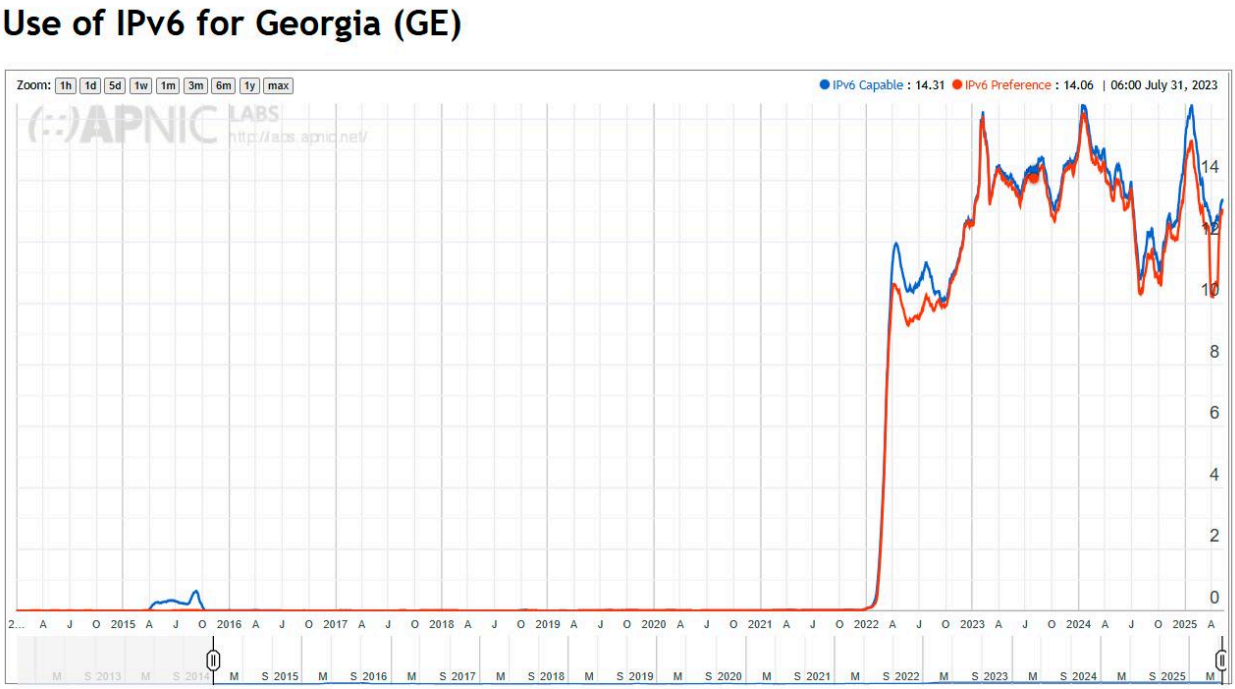
2.5. IPv6 PENETRATION

The transition to the new version of the internet protocol IPv6 is a global necessity caused by the exhaustion of IPv4 address space and the need to support the growing number of connected devices (Internet of Things – IoT) and new services.[91] IPv6 provides practically unlimited address space (128-bit addresses compared to 32-bit in IPv4) and other technical improvements.[91] Monitoring of IPv6 adoption levels in different countries is carried out by several organisations, including APNIC Labs, Google and Akamai, based on analysis of actual user traffic.

In Georgia the level of IPv6 penetration remains relatively low compared to world leaders and global averages. According to APNIC Labs data, based on the share of users able to connect to IPv6 resources, the penetration level in Georgia as of May 2025 was approximately 12.7 %.[93]

Historical data for the period 2019–2024 require extraction from the data files provided by APNIC Labs.[94] Google data show the world average IPv6 penetration at around 47.5 % as of April 2025,[95] but detailed statistics for Georgia in available sources are absent.[96] Similarly, Akamai "State of the Internet" reports mention IPv6 trends but do not provide specific figures for Georgia.[97]

Graph 6: Dynamics of IPv6 Penetration in Georgia (2015–2025)



Source: stats.labs.apnic.net

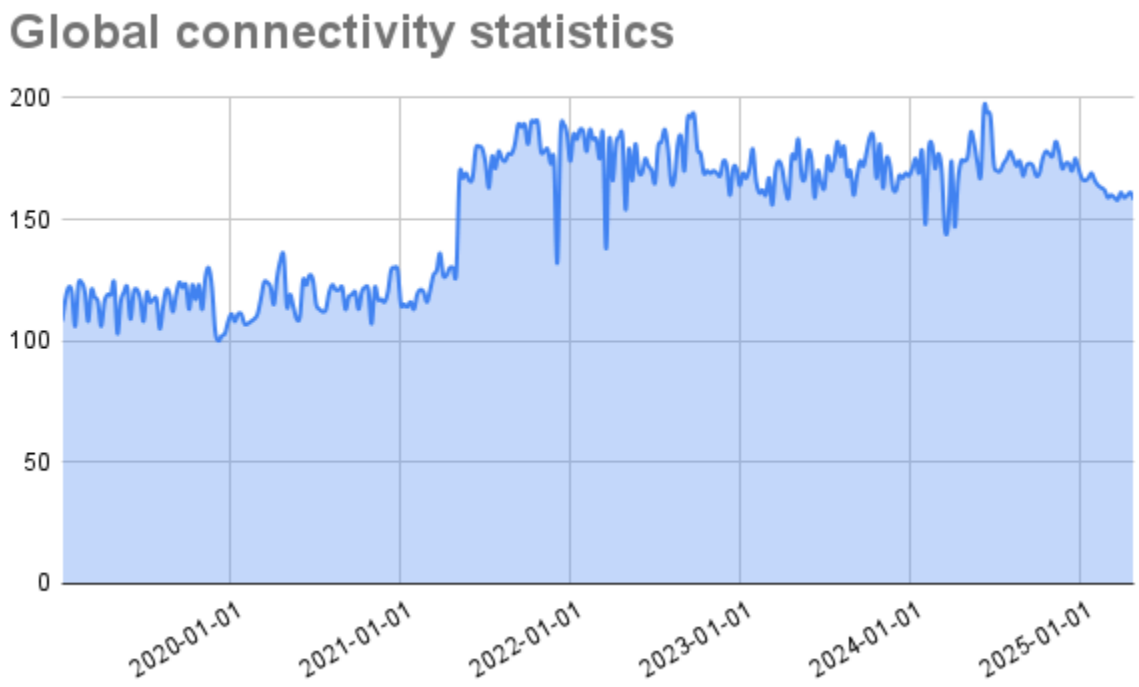
The current level of IPv6 adoption in Georgia (~12.7 %[93]) significantly lags behind the figures of leading countries where penetration exceeds 50–80 % (e.g. France, Germany, India[91]) and is significantly below the world average measured by Google.[95] This testifies to slow rates of transition to the new protocol. Possible reasons for such lag may include insufficient investment incentives from dominant market providers,[60] lack of active state policy to promote IPv6, as well as technical and economic difficulties of transition for operators.[91] Slow IPv6 adoption may in the future become a restraining factor for the development of new internet technologies such as IoT and full-scale 5G deployment, limit the possibilities of connecting new users and devices and potentially create compatibility problems with global resources transitioning to IPv6.

2.6. CONNECTIVITY INDEX

To assess the level of integration of the internet segment two key indicators are used based on the analysis of pairwise connections (peerings) between Autonomous Systems (ASN).
Global Connectivity Index: This index represents the total number of unique connections between each Georgian ASN and each external (foreign) ASN. In essence, it measures how widely and diversely the internet segment is connected to the rest of the world. The higher this indicator, the more "windows" the country has to the global network.
Local Connectivity Index: This index is calculated as the total number of unique connections between different local ASNs. It reflects the intensity and complexity of the domestic internet market, in particular the activity at internet exchange points (IXP). A high indicator indicates a developed internal ecosystem that enables efficient traffic exchange within the country, minimising delays and dependence on external channels for local data.

Analysis of the ratio of these two indices allows understanding the strategic orientation of the national network: whether it is predominantly self-sufficient or deeply integrated into global infrastructure.

Graph 7: Dynamics of Global Connectivity of Autonomous Systems in Georgia (2019–2025)

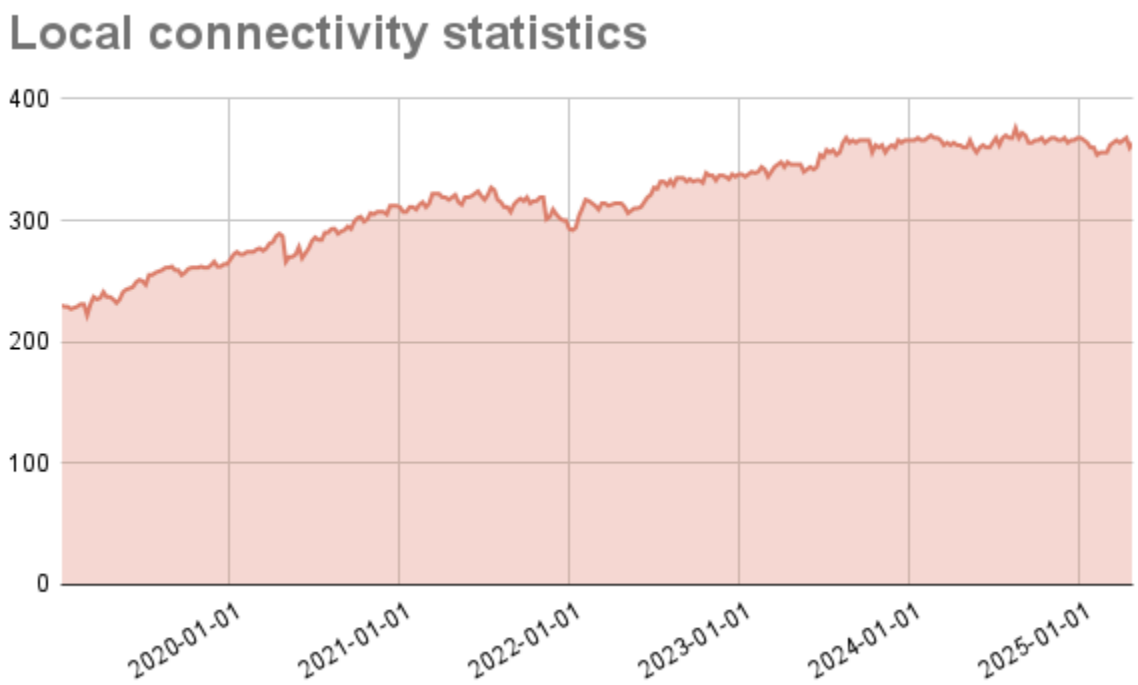


The graph shows a sharp jump-like growth in international connectivity at the end of 2021 – beginning of 2022. The index, which fluctuated in the range of 100–130 unique connections,

almost instantly rose to the level of 160–190. After this jump the indicator stabilised at a new higher level, showing high but no longer growing volatility.

This jump testifies to a significant qualitative breakthrough in the integration of Georgia's internet into the global network. Most likely it was caused by the arrival in the country of a major transit operator, the launch of a new traffic exchange point with international participation or the implementation of a large infrastructure project. After 2022 efforts apparently shifted from expanding the number of "windows to the world" to mastering and maintaining the already existing capacities.

Graph 8: Dynamics of Local Connectivity of Autonomous Systems in Georgia (2019–2025)

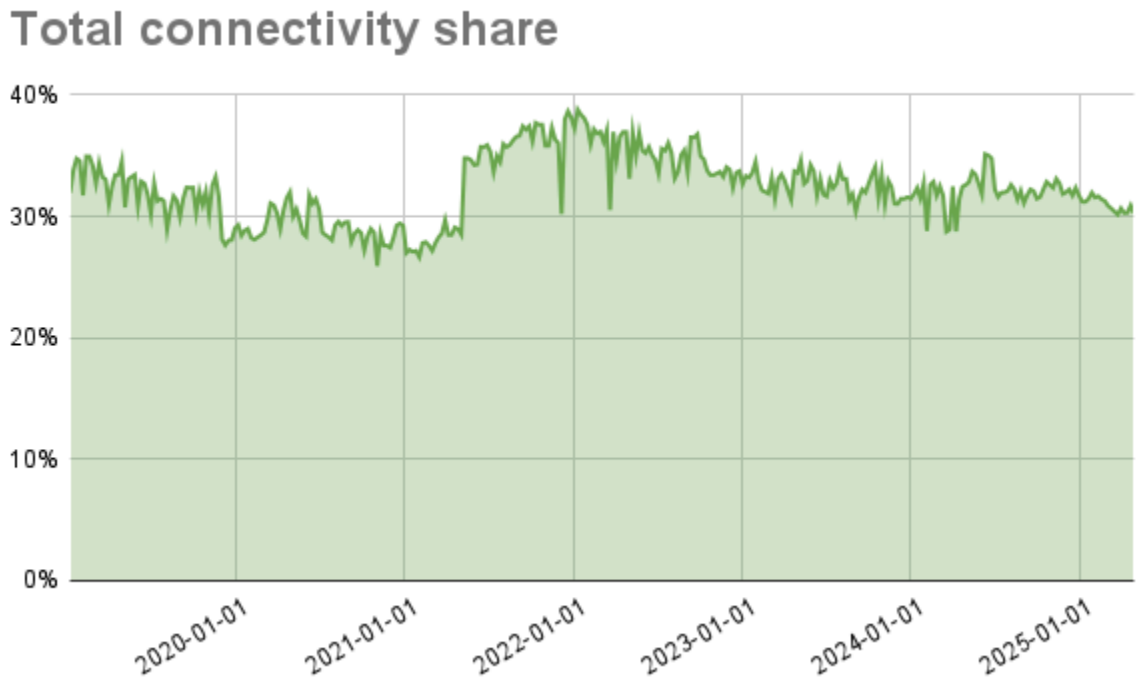


Unlike global connectivity, local connectivity demonstrates systematic and sustained organic growth throughout the period. The number of unique connections between Georgian autonomous systems consistently increased from approximately 220 at the beginning of 2019 to more than 360 by 2025. The graph lacks sharp jumps, which indicates constant and natural development of the domestic market.

Such dynamics indicates the maturity and increasing complexity of Georgia's internal internet ecosystem. The constant increase in the number of local peerings testifies to the active work of national traffic exchange points (IXP) and the operators' desire to optimise routes for internal

traffic. This increases access speed to local resources, reduces delays and strengthens the overall resilience of the national network segment.

Graph 9: Dynamics of the Ratio of Global and Local Connectivity of Autonomous Systems in Georgia (2015–2025)



This graph shows that the share of global connections in the overall connectivity structure underwent significant changes. Before the end of 2021 its gradual decline was observed (from ~35 % to ~27 %), as local connectivity grew faster than global. The sharp jump in international connectivity at the beginning of 2022 caused its share to rise almost to 40 %, marking a strategic shift towards global integration.

However, after this peak the share of global connectivity began to decline smoothly again, dropping to ~30 % by 2025. This indicates that after the one-time "global breakthrough" the domestic market returned to outpacing growth rates. Thus, Georgia's internet segment is developing in a balanced manner: having made a qualitative leap in international integration, it

continues to actively build up the density and complexity of internal connections, moving towards a self-sufficient and at the same time well-integrated model.

3. INTERNET LEGISLATION

3.1. PRINCIPLES OF INTERNET GOVERNANCE

Internet governance in Georgia is formally based on principles corresponding to international standards and the multi-stakeholder model, which envisages the participation of all interested parties: the state, the private sector, the technical community and civil society.[101] The key declared principles are universality and equality of access, protection of human rights and social justice in the online environment, accessibility, freedom of expression and association, privacy and data protection, security, diversity, network neutrality, the use of open standards and transparent governance.[103] The Constitution of Georgia, especially after the 2018 amendments, enshrines the right to internet access as a fundamental human right[3] and also guarantees freedom of speech and expression and access to information.[3]

However, despite the existence of a progressive legislative framework and a declared commitment to international principles, the actual practice of internet governance in recent years has caused increasing concern among observers and human rights organisations.[39] A discrepancy is noted between formal guarantees and their application.[39] Criticism concerns the insufficient independence of the judiciary[3], which is supposed to ensure the protection of digital rights, as well as legislative initiatives of the ruling party aimed at strengthening state control over the information space and restricting the activities of independent media and non-governmental organisations (NGOs).[39] The adoption of the Law "On Transparency of Foreign Influence"[44] and the expansion of the powers of the National Communications Commission (GNCC) to supervise content[42] are regarded as steps that contradict the principles of openness and freedom of speech and indicate a trend towards strengthening state control over the digital sphere.

3.1.1. REGULATION

The regulation of the internet and related services in Georgia is based on comprehensive legislation. The key act is the Law "On Electronic Communications"[106], which establishes the legal and economic foundations of activities in this sphere, the principles of regulation and the formation of a competitive environment, as well as the rights and obligations of operators and users.[110] Other important laws include the Law "On Broadcasting"[42], the Law "On Personal Data Protection" (substantially updated in 2023–2024)[111], the Law "On Freedom of Speech and Expression"[104], as well as provisions of the Criminal and Civil Codes concerning liability for unlawful actions on the network.[60]

The regulatory approach in Georgia is aimed at achieving several objectives: the development of competition in the market[107], the protection of the rights of consumers of telecommunications services[113], the effective management of limited resources (radio frequency spectrum, numbering resources)[113] and ensuring non-discriminatory access to network infrastructure.[64] In recent years, steps have been taken to harmonise Georgian legislation with the norms and standards of the European Union, especially within the framework of the Association Agreement.[67] However, alongside this, an opposite trend is observed – the adoption of legislative acts that strengthen regulatory control, especially with regard to content. The amendments to the Law "On Broadcasting", adopted at the end of 2022 – October 2023, expanded the powers of the GNCC to supervise content related to hate speech, calls for terrorism and obscenity, transferring to the regulator the final decision on these issues, which provoked criticism from local and international organisations as a potential threat to freedom of speech.[42] This duality in legislative trends reflects the complex position of the country, which is balancing between the desire for European integration and the strengthening of state control against the background of internal political struggle and external challenges.

3.1.2. REGULATORY BODIES AND RESPONSIBLE PERSONS

The key regulator in the sphere of electronic communications and broadcasting in Georgia is the **Georgian National Communications Commission (GNCC, also known as ComCom).**[53] The GNCC has the status of an independent state body accountable to the Parliament of Georgia.[113] The Commission is not financed from the state budget; its revenues are formed from regulatory fees levied on authorised communications operators and broadcasters.[115] The GNCC consists of five members who are elected by the Parliament on the proposal of the President for a term of six years.[113] The Chairman of the Commission is elected by the members of the GNCC themselves by a majority vote for a three-year term with the possibility of one re-election.[113]

- **Chairman of the GNCC: Kakhi Bekauri.** Has held the post since 2017, was re-elected for a third term in January 2023.[113]
  - Official profile: https://comcom.ge/en/the-commission/commissioners/chairman-kakhi-bekauri.page[116]
- **Members of the GNCC (as of May 2025):**[118]
  - **Natia Kukuladze.** Profile: https://comcom.ge/en/the-commission/commissioners/natia-kukuladze.page
  - **Ekaterine Imedadze.** Profile: https://comcom.ge/en/the-commission/commissioners/ekaterine-imedadze.page
  - **Ivane Makharadze.** Profile: https://comcom.ge/en/the-commission/commissioners/ivane-makharadze.page
  - **Vakhtang Abashidze.** Profile: https://comcom.ge/en/the-commission/commissioners/vakhtang-abashidze.page

Despite the legally enshrined independent status of the GNCC[113], its activities, especially under the leadership of Kakhi Bekauri, have repeatedly been criticised by independent media and civil society for alleged political bias and the adoption of decisions that infringe freedom of speech and the interests of critically minded media.[43] The re-election of the chairman for a third term against the background of this criticism[117] may indicate his support from the ruling elite and strengthen doubts about the real independence of the regulator from political influence. This is of particular importance given the broad powers of the GNCC in market regulation and, more recently, in content supervision.

In addition to the GNCC, issues related to the internet fall within the competence of other state bodies:

- **Ministry of Economy and Sustainable Development:** Forms the general policy in the ICT sphere.
- **Ministry of Justice:** Through subordinate structures (LEPL "Smart Logic", LEPL Data Management Agency) participates in the management of the .gov.ge domain[49] and, probably, in issues of registration of legal entities in the ICT sphere.
- **State Security Service (SSS):** Through the Operative-Technical Agency (OTA) is responsible for cybersecurity issues and the implementation of lawful interception of information (surveillance) in communications networks.[3] The activities of the OTA cause concern among human rights defenders due to insufficient transparency and accountability.[3]
- **Personal Data Protection Service:** Exercises supervision over compliance with the legislation on personal data protection, including in the digital environment.

3.2. MONOPOLISATION OF THE MARKET

The legislation of Georgia contains norms aimed at preventing monopolisation and protecting competition. The Law "On Monopolistic Activity and Competition", adopted back in 1996, prohibits the abuse of a dominant position in the market and unfair competition.[119] It defines a monopolistic position as a situation in which an economic agent can exert significant influence on the market and restrict competition.[119] The Law "On Electronic Communications" supplements these general norms with special provisions for the telecommunications sector, providing for the regulation of access to networks and infrastructure[64] and the mechanism for determining operators with significant market power (Significant Market Power – SMP), with the subsequent imposition of specific regulatory obligations on them.[113]

Despite the existence of a legislative framework, the actual situation in the market of electronic communications in Georgia is characterised by a high level of concentration.[60] Two major operators, MagtiCom and Silknet, occupy a dominant position both in the fixed broadband market[60] and, together with the third operator Cellfie Mobile, in the mobile communications market.[62] This oligopolistic market structure has persisted for many years.

The National Communications Commission (GNCC) is authorised to conduct analysis of relevant markets, identify operators with SMP and apply regulatory measures to them to prevent anti-competitive practices.[113] These measures may include obligations to provide access to the network to other operators (including MVNOs), control over tariffs, requirements for transparency and non-discrimination. In 2023–2024, the GNCC conducted a comprehensive analysis of telecommunications markets with the involvement of European experts, including consideration of the issue of assigning SMP status to Magticom in the mobile communications market.[72] This provoked objections from the company, which considers the regulator's conclusions unfounded and the proposed measures (for example, mandatory access for MVNOs) harmful to investments in the network.[120] The existence of an obvious contradiction between the legislative prohibition of monopolism and the actual high concentration of the market indicates possible problems in the effectiveness of antitrust regulation in the sector. Either the existing tools are insufficient to stimulate real competition, or the regulator does not consider the current oligopolistic market structure to be an abuse of a dominant position requiring more decisive actions, such as the forced division of companies (theoretically provided for by the 1996 law[119]). The ongoing disputes around the determination of SMP and the choice of regulatory measures[120] underline the complexity of effective regulation in an oligopoly.

3.3. INTERNET SHUTDOWNS ON THE ORDERS OF THE AUTHORITIES

In the legislation of Georgia, in particular in the Law "On Electronic Communications"[107], there are no clear and detailed provisions regulating the procedure for complete or partial shutdown of internet access (internet shutdown) by order of state bodies. The possibility of restricting or suspending communications services, including internet access, may be implied by the general norms of legislation on national security, defence, as well as on the legal regime of a state of emergency or martial law. The Constitution of Georgia allows the restriction of the right to internet access, but only "to the extent necessary in a democratic society to ensure national or public security or territorial integrity, to protect the rights of others...".[45] The Freedom House report mentions that the government can take control of the domestic internet in the event of the introduction of martial law or a state of emergency.[64]

However, the specific procedures for such control or shutdown, clear grounds for their introduction, the list of authorised bodies and officials entitled to issue the relevant orders, as well as the mechanisms for supervision and appeal of such decisions, are not clearly spelled out in publicly available legislative acts. The absence of a clear, transparent and legally enshrined procedure for such a serious restriction of rights as an internet shutdown creates significant risks. This gives rise to legal uncertainty and opens up opportunities for the arbitrary application of such measures by state bodies, especially during periods of political instability or mass protests, without proper legal control and accountability. International human rights standards require that any restrictions on internet access be strictly necessary, proportionate to the legitimate aim pursued, based on clear law and subject to judicial review. The current situation in Georgia does not fully comply with these requirements.

3.4. LEGISLATION ON "WORDS ON THE INTERNET"

In Georgia, there is no single special law regulating liability for "fake news" or disinformation on the internet. Liability for statements disseminated online is determined by the general norms of legislation, primarily the Constitution, the Law "On Freedom of Speech and Expression"[104], the Civil and Criminal Codes.

Defamation (libel): Criminal liability for libel was abolished in Georgia back in 2004 with the adoption of the Law "On Freedom of Speech and Expression".[60] This law brought national legislation into line with the practice of the European Court of Human Rights.[112] The law protects freedom of expression and establishes high standards for bringing civil liability for defamation.[104] Libel is recognised as a statement about a substantially false fact that harms a person's

reputation.[104] At the same time, opinions, evaluative judgments, criticism, even in harsh form, are protected by absolute immunity and cannot be the basis for a libel claim.[104] The burden of proving the falsity of the fact and the existence of damage lies with the plaintiff.[104]

Hate speech and calls for violence: In 2015, amendments were made to the Criminal Code criminalising "public calls for violent actions" aimed at inciting discord.[60] The exact wording and practice of applying this article require additional study, as there is a risk of its excessively broad interpretation. In addition, the amendments to the Law "On Broadcasting" adopted in October 2023 granted the GNCC expanded powers to supervise the content of broadcasters and video platforms related to hate speech, calls for terrorism and obscenity.[44] These changes provoked criticism from civil society and media organisations due to fears of possible use of these powers to restrict freedom of speech.[43]

Disinformation ("fakes"): There is no special legislation that would define "fake news" or disinformation and establish liability for their dissemination.[112] Although in 2019 statements were made by politicians about the need to regulate this issue, often confusing it with the problem of libel[112], no specific legislative initiatives were adopted. The discussions mentioned the experience of France, where a law was adopted to combat information manipulation during elections, but it has a clearly defined scope and criteria (intentionality, scale, impact on elections).[112] In Georgia, the fight against disinformation is carried out mainly by independent media, fact-checking projects and media literacy initiatives, including those supported by the GNCC.[44]

Liability of intermediaries: Georgian legislation, in accordance with international approaches (similar to § 230 Communications Decency Act in the USA[122]), as a rule, exempts internet intermediaries (providers, hosting platforms, social networks) from liability for content posted by third parties.[60] The Law "On Freedom of Speech and Expression" directly states that no one is liable for libel published by an anonymous or unknown person.[124]

The absence of a special law "on fakes" is in itself a positive factor, as such laws often become an instrument of censorship. However, the existing norms on liability for "calls for violence"[60] and the expanded powers of the GNCC to supervise "hate speech" and "obscenity"[44] create potential risks. The vagueness of the wording and the possibility of their broad interpretation, especially in conditions of political polarisation and doubts about the independence of the regulator[43] and the judicial system[44], can lead to the selective application of these norms against opposition opinions or criticism of the authorities under the pretext of combating harmful content.

3.5. LEGISLATION ON INTERNET BLOCKING

In Georgia, there is no single legislative act that would comprehensively regulate the procedure for blocking internet resources. The practice of blocking is based on the provisions of various laws, such as the Criminal Code (for example, with regard to child pornography or extremism), the Law "On Copyright and Related Rights" (for pirated content) and the Law "On Electronic Communications".[108] Decisions on blocking can be made by courts or the National Communications Commission (GNCC).[108]

Blocking procedures are often criticised for insufficient transparency and the lack of clear legal guarantees.[125] The absence of a single, clear legislation creates risks of disproportionate or unjustified restrictions on access to information. Blockings initiated by the regulator or the court without clearly prescribed procedures, notification of resource owners and effective appeal mechanisms can be used to restrict access to legitimate content or for censorship.

3.5.1. LEGISLATION

As noted above, there is no special law on blocking. The grounds for blocking may arise from:

- **Criminal Code:** Blocking of sites containing child pornography, materials promoting terrorism or extremism.[108]
- **Law "On Copyright and Related Rights":** Blocking of resources that systematically violate copyright (pirated content). It was on this basis that the GNCC ordered providers to block hundreds of sites.[125]
- **Law "On Electronic Communications":** This law[107] grants the GNCC general regulatory powers, which can be interpreted as including the right to demand blocking in certain cases, although the direct norm on blocking content by decision of the GNCC was declared unconstitutional in 2019 with regard to "inadmissible content".[3]
- **Court decisions:** Courts can issue decisions on blocking sites within the framework of civil or criminal cases (for example, in lawsuits for defamation or copyright protection, although blocking for defamation is unlikely due to high standards of freedom of speech protection).
- **Legislation on child protection:** The Law "On the Rights of the Child" and amendments to the Law "On Broadcasting" oblige providers and platforms to take measures to protect minors from harmful content.[60] Internet safety policies requiring the use of filters are in force in schools.[126]

3.5.2. BLOCKING PROCEDURES

There is no single procedure for blocking clearly described in legislation. In practice, blockings are initiated either by the GNCC (mainly on copyright issues) or by law enforcement agencies/courts.

- **Blocking by decision of the GNCC:** In cases of copyright infringement, the GNCC apparently sends orders to internet providers (ISPs) to block access to certain sites.[125] The procedure for making such decisions, the criteria for assessing violations and the appeal mechanisms are insufficiently transparent.[125]
- **Blocking by court decision:** The court can issue a decision on blocking within the framework of the consideration of a specific case. It is assumed that such a decision must be reasoned and indicate the specific resources to be blocked.
- **Technical aspects:** Blocking can be carried out at different levels: by IP address, by domain name (DNS blocking) or using deep packet inspection (DPI) technology. The blocking method is usually chosen by the provider.

The absence of clear procedural guarantees, such as mandatory notification of the resource owner, the possibility of submitting objections before blocking and an effective judicial appeal mechanism, creates risks of abuse and blocking of legitimate content.[127]

3.5.3. REGISTRIES OF BLOCKED INTERNET RESOURCES

There is no official, publicly available single registry of blocked internet resources in Georgia.[125] The GNCC, providers and other state bodies do not proactively publish statistics or lists of blocked sites.[125]

The absence of such a registry seriously complicates public control over the practice of blocking and the assessment of its scale and validity. Users and resource owners often cannot understand why a particular site is unavailable – due to a technical problem or deliberate blocking. This lack of transparency contradicts the principles of open internet governance.

In the absence of an official registry, information on blockings in Georgia can be obtained from the following sources:

- **Reports of NGOs and research organisations:** For example, the Institute for Development of Freedom of Information (IDFI) published the report "Blocked Websites in Georgia: Legal and Practical Analysis"[108], in which, based on requests for public information to the GNCC and ISPs, hundreds of blocked sites were identified, mainly due to copyright infringement.
- **OONI (Open Observatory of Network Interference) data:** OONI collects data on internet censorship worldwide using its OONI Probe software used by volunteers.[129] The OONI

Explorer platform allows viewing measurement results for specific countries, including Georgia.[129] These data can reveal anomalies in access to sites and applications indicating possible blocking. However, OONI warns of the possibility of false positives and the need to analyse data over time.[129]

- **Media and social media reports:** Information about individual blocking cases may appear in the news or be discussed by users online, especially if popular resources are blocked.

The work of these unofficial sources is important for increasing transparency, but they cannot fully replace an official, regularly updated registry.

3.5.4. DEVELOPMENT OF BLOCKINGS

OONI data for Georgia show the presence of measurements for various test categories (websites, messengers, circumvention tools).[129] As of May 2025, more than 5.2 million measurements from 62 networks in Georgia had been collected.[129] However, specific conclusions about confirmed blockings in the available report fragments are absent ("Confirmed blocked categories: Loading..."[129]).

The IDFI report, based on GNCC data for a five-year period (until November 2022), revealed the blocking of 480 websites by order of the regulator, mainly due to copyright infringement.[125] This indicates that blockings, although not of a massive political nature, are an applied practice.

In the past, there were isolated cases of short-term blocking of major platforms such as WordPress (due to the placement of extremist materials) and YouTube (due to scandalous videos with politicians) in 2015–2016.[124] These incidents show that the technical capability for blocking major platforms exists and can be applied by the authorities.

Conclusion: The practice of blocking internet resources in Georgia exists, mainly motivated by the fight against copyright infringement, but is carried out without due transparency and clear procedural guarantees. The absence of an official registry and clear legislation creates risks for freedom of access to information. Although massive political blockings have not been recorded in recent years, the existing mechanisms and precedents can be used to restrict access to undesirable content in the future, especially in conditions of political tension.

4. HUMAN RIGHTS VIOLATIONS ON THE INTERNET

The internet environment in Georgia is generally characterised as free[44], however, in the period from 2019 to 2025, certain human rights violations and alarming trends were observed. These include cases of persecution for online statements, pressure on media and NGOs, as well as issues related to state surveillance and cyberattacks. Although there were no systematic internet shutdowns and criminal prosecution for online statements was rare, there were cases of administrative prosecution, online harassment and the use of digital tools to put pressure on critics of the authorities.

The situation deteriorated particularly noticeably in 2023–2024 against the background of the adoption of the Law "On Transparency of Foreign Influence" and the related protests. Cases of online threats, intimidation and disclosure of personal data of activists and journalists[45] became more frequent, as well as financial and legal pressure on NGOs supporting the protesters.[105]

4.1. INTERNET SHUTDOWN ON THE ORDERS OF THE AUTHORITIES

In the period from 2019 to 2025, no cases of large-scale, deliberate internet shutdowns or communications services by order of the authorities at the national or regional level were recorded in Georgia.[64] Reports of organisations monitoring shutdowns worldwide, such as Access Now (#KeepItOn)[132], do not include Georgia in the lists of countries that applied such practices in recent years.

Although the legislation on a state of emergency can theoretically allow the government to take control of communications networks[64], in practice this measure was not applied even during mass protests or political crises. There were only short-term technical failures at individual providers[3] or targeted but limited in time and scale blockings of individual platforms in the past (WordPress, YouTube in 2015–2016[124]). The absence of the practice of shutdowns is a positive aspect of the state of digital rights in Georgia.

4.2. CRIMINALISATION OF ONLINE STATEMENTS

In Georgia, there is no systematic criminal prosecution of citizens for statements on the internet, especially in comparison with some neighbouring countries. The decriminalisation of libel in 2004[60] created an important legal guarantee of freedom of speech. However, in the period 2019–2025, cases of administrative prosecution and short-term detentions for online statements that the authorities considered offensive or violating public order were recorded.

- **Cases of administrative prosecution:**

- **July 2022:** A user was briefly detained for using obscene language towards police officers in a Facebook post.[125]
- **2023 (before October):** A user was fined 2000 lari ($732) for obscene language towards the Mayor of Tbilisi and the police in a TikTok video.[125]
- **2023 (before October):** Another user was detained for 48 hours and then fined 2500 lari ($914) for a Facebook post presumably containing insults towards the police.[125]
- **May 2025:** TV Pirveli operator Lasha Dzhiashvili was fined 3000 lari for a Facebook post that the court considered offensive to a police officer (this happened after his detention at a protest rally).[40]

- **Criminal prosecution (rare cases related to extremism/terrorism):**
  - The Freedom House report for 2020 mentions a sentence (passed before 2019) of user Orkhan Abbasov to 4 years' imprisonment for a 2016 Facebook post with calls to besiege the Armenian embassy during the Armenian-Azerbaijani clashes, which was regarded as public support for terrorism.[3]

Although there is no direct criminal prosecution for criticism of the authorities or expression of opinion, the use of administrative articles (for example, "petty hooliganism" or "disobedience to the police" in connection with online posts) to punish harsh or offensive statements towards officials causes concern. This can have a "chilling effect" on freedom of expression on the network, especially for activists and critics of the authorities.

4.3. PERSECUTION OF MEDIA AND NGOS

In the period 2019–2025, especially in 2023–2025, there was an increase in pressure on independent media and non-governmental organisations (NGOs) in Georgia, including in connection with their activities and publications on the internet. This pressure manifested itself in various forms: legislative restrictions, financial audits, lawsuits, verbal attacks by officials, as well as physical attacks and online harassment.

- **Legislative pressure:**
  - **Law "On Transparency of Foreign Influence" (May 2024):** This law, requiring media and NGOs with more than 20% foreign funding to register as "organisations pursuing the interests of a foreign power", was perceived as a direct tool for stigmatising and restricting the activities of independent media and civil society, many of which actively use online platforms.[39]
  - **Amendments to the Law "On Broadcasting" (October 2023, February 2025):** The amendments expanded the powers of the GNCC to supervise content (hate speech,

obscenity)[44] and introduced restrictions on foreign funding of broadcasters[42], which was regarded as an attempt to strengthen censorship and undermine the financial stability of critically minded TV channels.[42]

- **Amendments to the Administrative Code and the Law on Assemblies (December 2024):** An increase in fines and terms of administrative detention for violations at protest rallies, a ban on covering the face created additional obstacles for the work of journalists covering protests and for NGOs supporting protesters.[39]

- **Financial and legal pressure:**
  - **Freezing of NGO accounts (March 2025):** By court decision, the bank accounts of five NGOs (including Human Rights House Tbilisi and Shame Movement) that provided financial and legal assistance to detained protest participants were frozen. The Prosecutor's Office accused them of financing "sabotage".[105]
  - **Lawsuits against media:** There was a trend of coordinated libel lawsuits against critically minded TV channels ("Mtavari Arkhi", "Formula", "TV Pirveli"), often from persons associated with the ruling party.[43]
  - **Nika Gvaramia case (2022):** The conviction and imprisonment of the founder and director of "Mtavari Arkhi" TV channel Nika Gvaramia on charges of abuse of power was regarded by many local and international organisations as politically motivated persecution.[43]
  - **Fines for journalists:** Cases were recorded of imposing disproportionately high administrative fines on journalists covering protests, including for "blocking roads".[40]
- **Physical attacks and harassment:**
  - **Attacks on journalists:** In 2024–2025, cases of physical attacks on journalists covering protests became more frequent, both by law enforcement officers and unidentified persons.[39] Investigations of these incidents were often ineffective.[40]
  - **Online harassment and threats:** Journalists and NGO representatives criticising the authorities or working on sensitive topics (LGBT+, minority rights) were subjected to online threats, intimidation and discrediting campaigns.[39] During the protests against the "foreign agents law", activists received threatening calls from foreign numbers, and their personal data were leaked to the network.[45]

These cases indicate systemic pressure on independent media and NGOs in Georgia, which seriously undermines freedom of speech and expression, including in the online space.

5. CIVIL SOCIETY IN THE FIELD OF INTERNET GOVERNANCE

Civil society in Georgia plays an active role in issues related to digital rights, internet freedom and its governance. A number of non-governmental organisations (NGOs) are engaged in monitoring legislation, researching the application of laws, protecting user rights, promoting media literacy and digital security, as well as advocacy at the national and international levels. These organisations often criticise the actions of the authorities that may restrict digital freedoms and contribute to public discussion on internet issues.

However, in recent years, especially in 2023–2024, civil society has faced increased pressure from the authorities. The adoption of the Law "On Transparency of Foreign Influence"[44] created serious obstacles to the work of many NGOs dependent on foreign funding, including those working in the field of digital rights. There were also cases of financial pressure (freezing of accounts[105]), verbal attacks by officials and pro-government media, as well as online harassment of activists.[45] Despite this, Georgian NGOs continue their activities to protect human rights in the digital environment.

5.1. ORGANISATIONS

Several organisations actively engaged in protecting digital rights and internet freedom operate in Georgia:

- **Institute for Development of Freedom of Information (IDFI):** A leading analytical organisation that conducts research and monitoring in the field of freedom of information, open governance, the rule of law, media freedom, internet freedom and cybersecurity. IDFI publishes regular reports and analytical materials, including on the blocking of sites, internet legislation and surveillance.[44]
  - Website: https://idfi.ge/en[128]
  - Online platform on internet freedom: http://www.freedomtointernet.com[128]
- **Transparency International Georgia (TI Georgia):** The local branch of Transparency International, a leading anti-corruption organisation that also deals with media freedom,

government accountability and human rights protection. Publishes reports and statements on current issues, including pressure on media and NGOs.[40]
    - Website: http://www.transparency.ge/en[140]
- **Georgian Young Lawyers' Association (GYLA):** A large human rights organisation providing free legal assistance and representing the interests of citizens in courts, including in cases related to human rights violations, freedom of speech and assembly. Actively participates in monitoring legislation and advocacy.[143]
    - Website: (Not indicated in the fragments, but easily found by search – gyla.ge)
- **Human Rights House Tbilisi:** An association of five human rights NGOs working to protect human rights defenders and organisations, raising awareness of human rights. It is a regional hub for activists and provides support to those at risk.[135] The organisation was subjected to account freezing in 2025.[105]
    - Website: (Not indicated in the fragments, but easily found by search – hrh.ge)
- **Shame Movement ("Sirtskhvilia"):** A pro-democratic movement founded in 2019 that advocates systemic democratic reforms and Euro-Atlantic integration through non-violent activism. Actively uses digital channels for mobilising youth and conducting campaigns.[137] The organisation was also subjected to account freezing in 2025.[105]
    - Website: https://shame.ge/en/[146]
- **Media Development Foundation (MDF):** An NGO whose goal is to promote the protection of fundamental human rights and freedoms, support the professional and institutional development of media and the establishment of media accountability systems.[143]
    - Website: (Not indicated in the fragments, but easily found by search – mdfgeorgia.ge)
- **Commit Global:** An international organisation providing technological support to NGOs in Georgia, including a platform for creating websites (Website Factory: NGO) and a technical support service (Civic Tech 911).[138]

These and other organisations make an important contribution to protecting the digital space and user rights in Georgia.

5.2. VPN AND CIRCUMVENTION TOOLS

The use of VPNs (virtual private networks) and other circumvention tools is a common practice in many countries to protect privacy, security when using public Wi-Fi networks and to access content restricted by geography or otherwise. In the context of Georgia, where direct blocking of politically significant resources is rare, but there are concerns about surveillance[3] and possible

blockings for other reasons (for example, copyright[125]), VPNs can be used both to increase privacy and to access blocked resources.

Data on the scale of VPN use in Georgia are limited. Global surveys show an increase in VPN use, but specific statistics for Georgia for 2019–2025 are not found in the available materials.[51] The legislation of Georgia does not directly prohibit the use of VPNs for legal purposes.

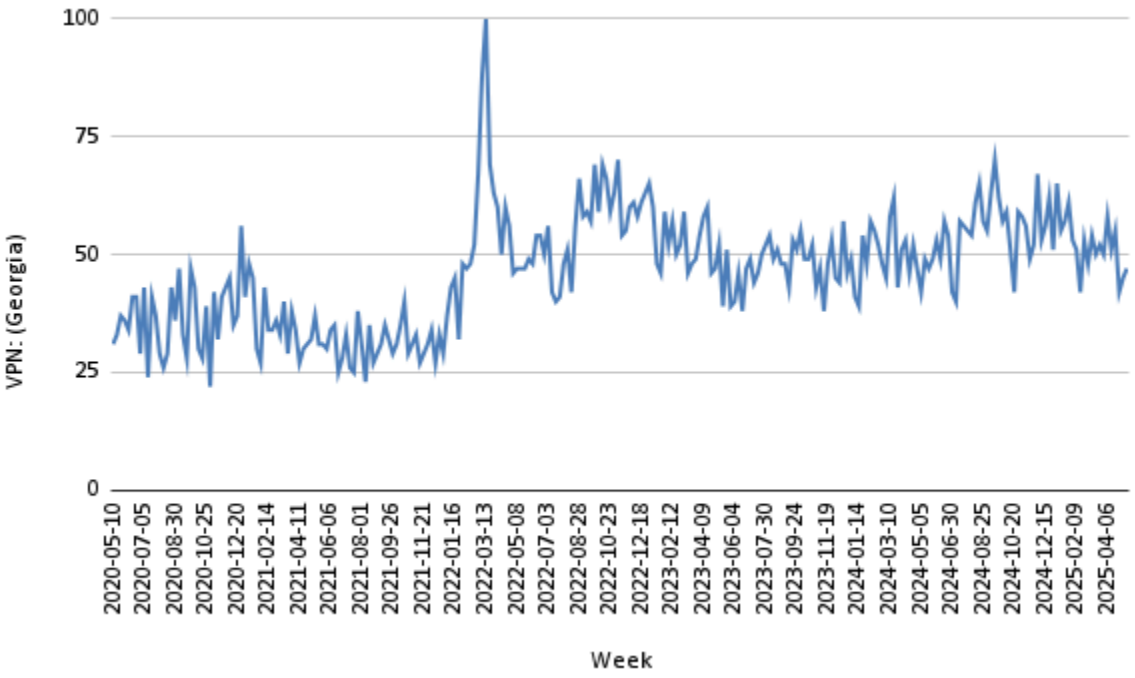
5.2.1. STATUS OF VPN SERVICES

At present, there is no special legislation in Georgia that would directly prohibit or restrict the use of VPN services by individuals or organisations for lawful purposes, such as protecting privacy or bypassing geoblocking. The legislation on electronic communications[107] does not mention VPNs.

5.2.2. NUMBER OF VPN USERS

It is difficult to find accurate and reliable data on the number of VPN users in Georgia for the period 2019–2025. Global reports and studies[147] indicate a general trend of increasing VPN use worldwide, but do not provide a breakdown by country or specific figures for Georgia.[51]

Graph 10: Dynamics of Search Queries for VPN in Georgia (2020–2025)



Source: trends.google.com

Based on the graph, it can be concluded that the events of early 2022 radically and irreversibly changed attitudes towards VPN services in Georgia, creating a new, higher level of demand for them.

Catalyst for demand: February–March 2022

The sharp, unprecedented surge in search queries for VPN in the first quarter of 2022 is directly related to the start of the war in Ukraine and the subsequent wave of immigration from Russia. The arrivals, faced with the need to bypass the blocking of Russian resources and gain access to familiar online services (for example, banking), created an explosive demand for VPNs. This peak reflects the acute need of newcomers for tools to maintain access to information and digital freedom.

Formation of the "New Normality": The most important conclusion is that after the peak, interest in VPNs did not return to the previous, pre-February level. It stabilised at a new, significantly higher mark (on average 50–60 units on the Google Trends scale instead of the previous 25–40). This indicates that VPNs have changed from a niche tool to a permanently used service for a large group of people. Demand has shifted from situational to permanent, which speaks of the rooting

of the habit of using VPNs among relocants and, possibly, an increase in awareness of such technologies among the local population.

Blocking of VPN services: There is no information in the available materials about targeted blocking of VPN services or protocols at the national level in Georgia. However, on 25 April 2025, Proton VPN reported the unavailability of its servers in Georgia due to problems at the data centre of the provider.[149] This was a technical incident, not a state blocking. In general, Georgia is not among the countries actively blocking VPNs.

5.2.3. CASES OF PERSECUTION FOR USING VPN

In the analysed sources, there is no information about cases of criminal or administrative prosecution of citizens or organisations in Georgia for the very fact of using VPN services in the period from 2019 to 2025. Prosecution is possible only in the case of using VPN to commit other offences.

5.2.4. MONITORING OF BLOCKINGS

Monitoring of internet resource blockings in Georgia is carried out by several organisations and projects:

- **OONI (Open Observatory of Network Interference):** This global initiative collects data on internet censorship using tests run by volunteers through the OONI Probe application.[129] Data for Georgia are available on the OONI Explorer platform.[129] OONI makes it possible to detect anomalies in access to sites and applications that may indicate blocking. Over the past 5 years, OONI has collected millions of measurements in Georgia, but no specific reports on large-scale or politically motivated blockings during this period have been published (although the data may contain evidence of blocking of individual resources, mainly for copyright reasons).
- **IDFI (Institute for Development of Freedom of Information):** This Georgian NGO conducts research on internet freedom and publishes reports, including on the practice of site blocking based on data obtained from the GNCC and providers.[125] Their 2022 report revealed the blocking of 480 sites over 5 years, mainly due to copyright.[125]
- **NetBlocks:** A global organisation that tracks incidents related to internet availability, including shutdowns and platform blockings.[150] In their reports over the past years, Georgia has not appeared as a country that applied large-scale shutdowns or blocking of social networks during political events.[151]

- **Freedom House:** In its annual "Freedom on the Net" reports, it analyses the state of internet freedom in Georgia, including cases of blocking and content restriction.[3] The reports confirm the absence of systematic political blockings, but point to problems with the transparency of copyright blockings[64] and isolated incidents in the past.[124]

Digest of reports over the past 5 years: The main conclusion from the monitoring data for 2019–2025 is that Georgia has avoided large-scale political blockings of the internet or social networks. The main practice of blocking is related to the demands of copyright holders and is carried out by the GNCC without due transparency.[125] OONI and other monitoring resources have not recorded major censorship incidents characteristic of more authoritarian regimes. However, the lack of transparency in procedures and the existence of precedents for platform blocking[124] leave room for concern.

6. CONCLUSION

The analysis of the state of the internet and digital rights in Georgia for the period from 2019 to 2025 shows a complex and contradictory picture. On the one hand, the country demonstrates a high level of internet penetration[50], a developed mobile infrastructure with high speeds[51] and formally progressive legislation guaranteeing basic digital rights and freedom of speech.[3] The absence of the practice of internet shutdowns[64] and massive political censorship or blockings[64] favourably distinguishes Georgia from many countries in the region.

On the other hand, alarming trends are observed that cast doubt on the sustainability of these achievements. The high concentration of the telecommunications market[60] may restrain competition and innovation, including the slow implementation of IPv6.[93] The procedures for blocking websites, although applied mainly for copyright reasons, remain opaque and devoid of clear legal guarantees.[125] The greatest concern is caused by the deterioration of the overall political situation[31] and the increase in pressure on independent media and civil society.[40] The adoption of controversial laws (for example, "On Transparency of Foreign Influence"[44]), the expansion of the powers of the GNCC regulator to control content[44], as well as cases of administrative prosecution for online statements[40] and online harassment of critics of the authorities[45] indicate a narrowing of the space for freedom of speech and expression in the digital environment. Although formally human rights in the field of access to information are respected at a basic level (absence of shutdowns, massive censorship), there is an erosion of guarantees and the use of indirect methods of pressure on independent voices.

Forecast of developments:

- **Neutral scenario:** Preservation of the current status quo. The level of internet access will remain high, but structural problems (market concentration, slow IPv6 implementation) will persist. Legislation will formally comply with international standards, but its application will remain selective. Pressure on critical media and NGOs will continue through legal and financial mechanisms, without transitioning to massive repression or blockings. Political polarisation affecting the media environment will persist.
- **Positive scenario (deregulation, liberalisation):** This scenario is possible in the event of de-escalation of political tension, cancellation or substantial revision of controversial laws (on "foreign agents", on expanding the powers of the GNCC), strengthening the independence of the judiciary and the regulator. This would lead to an improvement in the media climate, a reduction in pressure on civil society, an increase in transparency in internet governance (including blocking procedures) and stimulation of competition in the telecommunications market. The resumption of active dialogue with the EU could become a catalyst for such changes.
- **Negative scenario (strengthening of censorship):** This scenario assumes a further strengthening of authoritarian tendencies, an increase in political polarisation and confrontation with the West. Under these conditions, it is possible to tighten legislation on "hate speech", "disinformation" or "extremism" in order to suppress criticism. Attempts may be made to strengthen control over content in social networks, restrict the use of VPNs or introduce broader practices of site blocking under the pretext of protecting national security. Pressure on independent media and NGOs will intensify, possibly with the use of criminal prosecution. Attempts at more active interference in the work of internet providers are not excluded.

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