

Georgian National Communications Commission (ComCom)

Audiovisual Media Services

Regulation of hate speech and obscenity



Following the amendments introduced to the law of Georgia on Broadcasting in October 2023, hate speech and obscenity on audiovisual services fell within the regulation of the Communications Commission. Specifically, pursuant to paragraphs 2 of Article 56 of the law, *broadcasting of programs containing the apparent and direct threat of inciting racial, ethnic, religious or other hatred in any form and the threat of encouraging discrimination or violence toward any group is prohibited.*

The amendments were aimed at aligning the Georgian legislative framework with the AVMS Directive and the European Commission was actively involved in all phases of the process.

Prior to the mentioned amendments, hate speech and obscenity were addressed exclusively by broadcasters' self-regulation mechanisms, proven to be ineffective and insufficient.

Practical case

ComCom received a complaint from several individuals alleging that derogatory and offensive statements were made against them during the live broadcast of "Summary of the Day with Nikoloz Mzhavanadze" on "Sezoni TV". The complainants argued that the story contained hate speech and was intended to incite hostile and negative attitudes.

Following a thorough review, ComCom determined that although offensive language was used in the program, the mandatory conditions for the qualification of hate speech were not met. Under Georgian law, in order to establish the use of hate speech, elements of incitement to violence or hatred on grounds such as disability, ethnicity, gender, religion, nationality, race, or other protected characteristics must be evident. The complaint was therefore rejected on this basis.

Nevertheless, ComCom determined that the program broadcast by "Sezoni TV" between 21:00 and 22:16 was unsuitable for minors due to the repeated use of offensive language by both the host, as well as the guest of the program. Pursuant to the law of Georgia on Broadcasting, programs unsuitable for minors, shall not be aired between 06:00 and 23:00. Based on the circumstance that "Sezoni TV" committed a similar violation for the second time within 1 year, ComCom imposed a minimum fine of 2,500 GEL on the broadcaster, taking into account that "Sezoni TV" reported an annual income of 0 GEL.

Amendments related to content regulation

In April 2025, the Parliament of Georgia introduced further amendments to the law on Broadcasting. Specifically, the April 2025 amendments introduced, for the first time, statutory requirements relating to due accuracy of facts and the right to reply; fairness and impartiality of news and socio-political programs; protection of private life; restrictions on covert methods of obtaining/transmitting information; coverage of armed conflict, accidents, and emergency situations; and protection of minors participating in programs. Prior to these amendments, the above standards were addressed exclusively through broadcasters' self-regulatory mechanisms, whose decisions were neither binding nor subject to appeal before ComCom or the courts. The new law vests ComCom with the legal mandate to supervise and enforce compliance in these areas.



To support the effective implementation of the amendments to the law, on September 1, ComCom published the [Guidelines on the Requirements Applicable to Broadcasting Content – fairness, impartiality, due accuracy, right of reply, privacy, coverage of emergency situations](#). The document aims to assist broadcasters in complying with their legal obligations and provides a clear interpretation of the regulatory approach in areas such as fairness, impartiality, due accuracy, right of reply, privacy, and coverage of emergency situations.

Practical case

In June 2025, the Commission reviewed its first cases under the amended Law on Broadcasting. The governing political party, Georgian Dream, lodged complaints against the broadcasters Formula TV and TV Pirveli, requesting that they be held liable under Article 54 (Fairness and Impartiality), Article 59¹ (Response to Violations), and Article 76 (Transitional and Final Provisions).

In order to ensure transparency and due process, the Commission convened a public hearing on 19 June 2025, where all parties presented their positions. At this hearing, the Chairman of ComCom emphasized that the Commission would apply the new provisions in a tolerant manner during the initial period, while also committing to organize advisory meetings with broadcasters to explain the obligations stemming from the amendments.

Following a detailed examination of the evidence, ComCom concluded that Formula TV and TV Pirveli had violated Article 54, Paragraph 5, which prohibits broadcasters from expressing views in support of or against political parties, religious associations, or other groups of common interest in news and socio-political programs. Allegations concerning Article 54, Paragraph 2 (failure to separate facts from opinions) were dismissed, as the conduct was already covered under Paragraph 5.

Although violations were established under Article 54(5) and Article 59¹(5), the Commission exercised its discretion, taking into account the transitional period provided under Article 76⁴, and refrained from imposing administrative liability. This approach reflects ComCom's commitment to balance: safeguarding

freedom of expression and pluralism, while ensuring the gradual and proportionate implementation of new journalistic standards in line with European best practices.

Media and Information Literacy

In alignment with the Audiovisual Media Services Directive, ComCom continues its proactive efforts to promote media literacy within Georgian society. To achieve this mission, ComCom focuses on two strategic objectives:

- Integrating media literacy across all levels of formal education;
- Ensuring digital inclusion through innovative non-formal education projects and programs.



ComCom has been a driving force behind the systemic adoption of media literacy into formal education. Media literacy has been incorporated into the National Curriculum through collaborative efforts with the Ministry of Education, Science, and Youth (MOESY) and UNICEF Georgia. As a result, since September 2023, media literacy has been offered as an elective subject in Georgian public schools. In the 2024-2025 academic year, 227 schools have included media literacy in their curricula, with 91% located in regional areas. Given the high demand, ComCom provided a tailored training program to support teachers in effectively

delivering media literacy education. As of now, 2500 teachers have been trained in media literacy standards and the relevant handbook. In collaboration with MOESY and UNICEF, ComCom has conducted an advocacy campaign, organizing informational meetings with 300 school principals to promote media literacy and enhance awareness among school leaders.

Beyond general education, ComCom is actively supporting the integration of media and information literacy into higher education and initiated the project of introducing media literacy into the pre-school target audience.

In the first half of 2025, ComCom trained partner university lecturers in teaching media literacy. Beginning in the next academic year, these universities will introduce a dedicated media literacy course into their curricula, to be delivered by trained lecturers. The training provided participants with comprehensive knowledge of media and information literacy. In addition, they were introduced to effective methodologies for developing a course syllabus, delivering lectures, and integrating media literacy components into existing academic courses.

In addition, to support the integration of media literacy into formal education, a knowledge-sharing conferences for teachers were held in Tbilisi and Kutaisi, organized by ComCom and supported by the Ministry of Education, Science and Youth of Georgia, as well as the United Nations Children's Fund (UNICEF Georgia). The main objective of the conference was to share practical teaching experiences. The event was attended by teachers, school principals, and students. The conference addressed topics such as the progress achieved in integrating media literacy into formal education, approaches to planning the

teaching process, and cognitive activities that help students learn to filter media messages, navigate the digital space safely, identify misinformation, and assess the accuracy of information.

Alongside its formal education initiatives, ComCom actively implements non-formal educational projects. Notable student competition such as “Fake or Real?!” was held successfully for the 12th time. 215 students from grades VIII, IX, X and XI from different regions of Georgia participated in the competition. The jury selected three winners who were awarded high-tech prizes by ComCom. In addition, ComCom awarded gift vouchers to the top 20 participants.

Complementing its educational efforts, ComCom actively promotes digital inclusion through an innovative non-formal education program. The Digital Adoption Program (DAP) implemented within the framework of the Log in Georgia project is an initiative that has extended ComCom’s reach to remote, mountainous rural areas of Georgia since 2022. This program, implemented with the support of the World Bank and the European Investment Bank (EIB), is designed to equip the residents of these rural communities with essential digital skills, enabling them to navigate an increasingly interconnected technological world and ensuring that no part of the country is left behind, fostering digital inclusivity and empowerment for all by promoting internet use in the underserved targeted rural areas. Through thematic training modules, DAP aims to raise awareness about digital literacy in general, the use of digital services, and the safe use of the Internet. The Program provides two main modules focusing on Digital Literacy, Safe Use of the Internet and Cyber Hygiene. Additionally, the Program offers awareness-raising meetings and seminars on e-governmental services for all residents (aged 14 and above) in villages/settlements or regional centers. Special attention is given to vulnerable groups, including women and women-headed households, ethnic and social minorities, the elderly (65 and older), and persons with disabilities, as well as schoolteachers, high school students, local librarians and small entrepreneurs.



In the first half of 2025, DAP was launched in the target villages of Baghdati and Tsalenjikha municipalities, and the program was finalized in Senaki and Khoni municipalities. 46 seminars on digital literacy and the safe use of the Internet were held in Senaki and 39 seminars in Khoni, within the framework of which over 1200 beneficiaries were trained. In total, as of September 2025, within the framework of the DAP, practical thematic seminars have been conducted for the residents of over 250 targeted villages/settlements of 17 municipalities, and the program reached 9000 beneficiaries.

In line with the EU’s recommendation for Georgia, ComCom has also been delivering training sessions for civil servants in the administrative units of DAP’s target municipalities. In the first half of 2025, informational meetings on media literacy were held for the employees of the City Halls of Oni, Ambrolauri, Lentekhi and Tsageri municipalities. The meetings covered methods of informing and persuading audiences, distinguishing between fact, opinion and false information, as well as identifying trolls and bots. Participants were also introduced to the notion of propaganda, conspiracy theories and

disinformation, along with the opportunities and challenges presented by artificial intelligence. The meetings also incorporated practical exercises, during which the participants analyzed and discussed specific examples in teams, completing collaborative tasks to reinforce the concepts learned.

Since 2018, the Communications Commission has provided training to over 19,000 schoolchildren, 8,700 teachers and 1,800 students to develop critical thinking and media literacy skills. In total, more than 1,500 educational seminars and awareness-raising meetings have been conducted.