

Georgian National Communications Commission (ComCom)

Audiovisual Media Services



One of the key issues identified through monitoring reports in the Georgian media landscape was the improper integration of product placements. Despite various administrative proceedings and fines imposed by the ComCom, the issue remained unresolved. To address this matter, a dedicated working group was established to develop a comprehensive, multi-phased solution. Subsequently, international regulatory approaches were analyzed and with the involvement of international experts, a detailed action plan was formulated. The plan included engaging with stakeholders, conducting a public information campaign, and implementing necessary measures to rectify the product placement practices in media content.

Consequently, in 2024, the ComCom granted an 8-month transitional period to broadcasters to allow them to adjust their professional activities to the revised rules in compliance with the standards implemented in the EU developed as a result of the project above. From March 1, 2025, the broadcasters are being actively monitored for the compliance of their activity with the legislative requirements in terms of product placement/sponsorship in accordance with the EU standards.

In doing so, the ComCom aimed at protecting the audience from misleading and subliminal advertising on one hand and protecting the broadcaster from commercial influences as violation of product placement rules also negatively affect the advertising market, product placement price being inferior to actual advertising fees. At the same time, undue prominence frequently given to a product's advantages makes it impossible to dissociate the advertisement from the program's content.

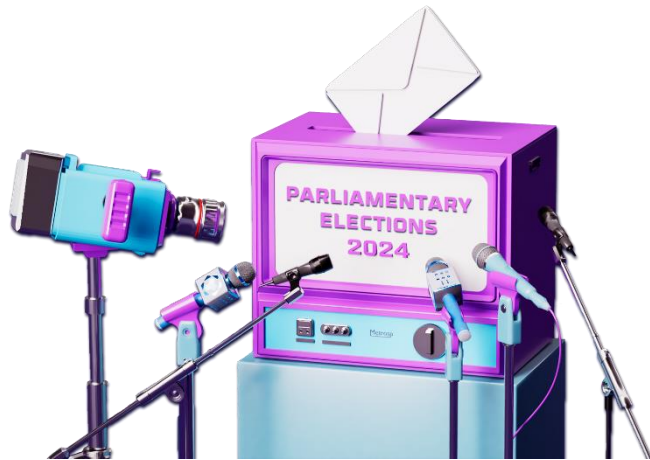
The ComCom actively supervises the compliance with the established rules for product placement/sponsorship.

Enforcement of the regulatory framework for Video on Demand Service Providers (VODs) and Video Sharing Platforms (VSPs)

In June 2024, the ComCom adopted the relevant secondary normative acts as per the law of Georgia on Broadcasting to establish an effective administrative framework. Namely, Codes of Conduct for On-demand Audiovisual Media Services and Video Sharing Platform Service Providers were adopted. Based on the newly introduced provisions related to the regulation of VODs and VSPs, the ComCom issued authorizations to all the subjects providing Video on Demand Services and Video Sharing Platforms and initiated the enforcement of the established regulatory framework. Therefore, the

ComCom regularly monitors VODs and VSPs for the performance of their legal obligations related to advertising/sponsorship rules, copyright and related rights, protection of minors from harmful influence and simultaneously, is empowered to react to the relevant complaints.

Media monitoring of the 2024 Parliamentary Elections and the challenges identified in the Georgian media



Pursuant to the legislation in force, the ComCom conducted the media monitoring of the 2024 Parliamentary Elections that included the monitoring of 55 TV broadcasters during 24 hour-period. Along with the quantitative monitoring, the ComCom also conducted the qualitative monitoring of Public Broadcasters and 5 other channels with the highest ratings (Imedi TV, Rustavi 2, PosTV, Mtavari TV and TV Pirveli). The monitoring covered the pre-election period, from August 27 to October 26.

The qualitative media monitoring demonstrated that the media environment during the pre-election period was pluralistic and diverse. Viewers received information about current events and the pre-election campaign from various sources, and election subjects had the opportunity to address potential voters and present their programs.

In addition, it is noteworthy that, unlike in previous years, no instances of hate speech were observed on broadcasters' programs. While the media environment during the pre-election period was pluralistic and diverse, bias and sharp polarization remained a challenge. This is evidenced by the findings of both qualitative and quantitative monitoring, as well as several international reports monitoring and assessing the elections. Among private broadcasters, the hosts of both news programs and socio-political talk shows eagerly expressed their political views and made direct appeals.

It is noteworthy that prior to the commencement of the monitoring process, the ComCom's staff and qualitative monitors were trained with the support of the Council of Europe.

In addition to media monitoring, the ComCom actively enforced the standards and requirements set out in the Election Code regarding coverage of the pre-election campaign.

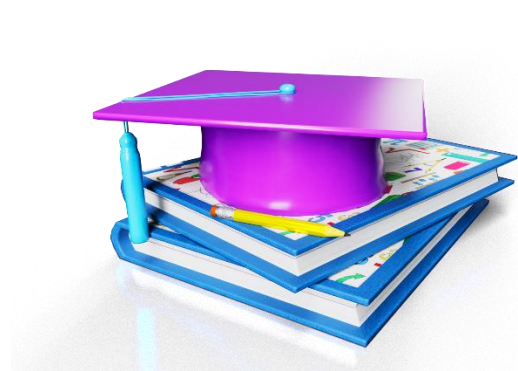
With the purpose to facilitate the process of pre-election coverage for broadcasters in observance of the regulations in force, on August 16, 2024, before the start of the pre-election campaign, the ComCom published the [“Guidelines for Broadcasters on the Regulation of Election-related Matters”](#) to assist the broadcasters in navigating the legal provisions regulating the coverage of the pre-election period for the 2024 elections. The document aimed to provide the broadcasters with a clear and comprehensive understanding of the legal requirements related to political advertising, including obligations regarding

both free and paid political advertisements, as well as the rules for publishing public opinion polls and conducting pre-election debates. Further, the document specifically outlined the ComCom's vision and approach to media monitoring as well as the responses to the violations of the legislation in force. It also elaborated on the legal liabilities under the relevant provisions of the law of Georgia on Broadcasting, the Election Code of Georgia and the ComCom's relevant resolutions for breaches in election-related coverage.

Media and Information Literacy

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

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



The ComCom has been a driving force behind the systematic 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, the 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 newly developed handbook. In collaboration with MOESY and UNICEF, the 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, the ComCom is actively supporting the integration of media and information literacy into higher education. As of March 2025, the ComCom formalized a cooperation agreement (MOU) with seven public and private universities. This cooperation aims to integrate media and information literacy into various programs and enhance awareness among students and academic professionals. As a result of this cooperation, the European University offers the elective course “Media and Information Literacy” and since 2020, Business and Technology University (BTU) has been offering the courses “Digital Literacy and Cyber Ethics” and “Strategic Communications”. In 2024, the ComCom

piloted specialized training sessions for lecturers from partner universities, equipping them with the skills to develop a tailored syllabus and integrate media literacy into their courses.

Alongside its formal education initiatives, the ComCom actively implements non-formal educational projects. Notable actions such as “Truth or Fiction?!” “Media Key”, “Hello Ruby”, and “Media Literacy Day at Schools” are among its efforts. In October 2024, the ComCom inaugurated the new competition - “Media Literacy Olympiad” aimed at raising awareness about media literacy and equipping the school community with tools to combat disinformation. In addition, the “Media Literacy Hackathon” brought together youth and startups to develop innovative solutions addressing critical issues such as disinformation, cybersecurity and digital literacy. Both competitions were implemented within the framework of UNESCO’s Global Media and Information Literacy Week in October 2024. The ComCom, as the authority responsible for the development of media literacy in the country, has been joining the UNESCO Global Media and Information Literacy Week for the fourth consecutive year by organizing various events for public awareness.



Complementing its educational efforts, the 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 the ComCom’s reach to remote, mountainous rural areas of Georgia since 2022. This program 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), conducted 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. As of March 2025, within the framework of the DAP, 550 practical thematic seminars have been conducted for the residents in over 200 targeted villages/settlements. As of March 2025, the Program reached 7600 beneficiaries.

In line with the EU's recommendation for Georgia, the ComCom has also been delivering training sessions for civil servants in the administrative units of DAP's target municipalities. These sessions



equip officials with the skills to identify, analyze and counter disinformation, fostering informed decision-making and institutional integrity. The meetings cover topics concerning the importance and role of media literacy, distinguishing facts from opinions, identifying disinformation techniques, fact-checking methods, recognizing online manipulation, including propaganda, conspiracy theories and AI-driven disinformation. In addition to theoretical knowledge, each training session includes a practical group task, where participants analyze real-life cases of fake news.

The media literacy online platform, is yet another instrument aiming to raise awareness on media literacy amongst students, teachers and parents. It serves as a hub for diverse stakeholders working on promoting media literacy in Georgia, namely public agencies, international organizations, civil society, and academia. It offers open access to the latest educational resources and informative notes on disinformation, misinformation, digital rights, fact-checking and safe use of the internet. With over 117,000 visitors, 150 articles and 33 members, the online platform represents a vital tool for fostering critical thinking, digital citizenship, and informed media consumption.

In line with its efforts, as the national authority responsible for advancing media literacy, the ComCom has also officially endorsed the European Digital Media Observatory's (EDMO) Guidelines for Effective Media Literacy Initiatives, further strengthening its commitment to international best practices.

Since 2018, the Communications Commission has provided training to over 16,200 schoolchildren, 6000 teachers and 1800 students to develop critical thinking and media literacy skills. In total, more than 1000 educational seminars and awareness-raising meetings have been conducted. Altogether, over 31,000 individuals have benefited from the ComCom's media literacy projects and programs.