



# ნოდია, ურუმაშვილი და პარტნიორები

## NODIA, URUMASHVILI & PARTNERS

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## 1. Amendments to the Law of Georgia "On Grants"

On 4 March 2026 and on 15 April 2026, amendments were introduced into the Law of Georgia "On Grants." Both sets of amendments entered into force upon promulgation.

By the amendment of 4 March 2026, article 2 of the Law was supplemented. Following paragraph 1<sup>3</sup>, new paragraphs 1<sup>4</sup> - 1<sup>6</sup> were added. Under these new paragraphs, the following are additionally classified as a "grant": funds transferred, in monetary or in-kind form, by a subject referred to in sub-paragraph "a" of paragraph 1 of Article 3 of this Law, or by a citizen of another state, to a citizen of Georgia, a person holding the right of residence in Georgia, a legal entity defined under sub-paragraph "d<sup>1</sup>" of Article 4 of this Law, or a legal entity of Georgia - where such funds are used, or may be used, for an activity (already carried out or to be carried out) that is directed at exerting influence upon the Government of Georgia, State institutions, or any part of society, and which is aimed at the formulation, implementation or alteration of the domestic or foreign policy of Georgia; or which is used, or may be used, for an activity stemming from the political or public interests, approaches or relations of the government of a foreign state or of a foreign political party. By the amendment of 15 April 2026, this article was supplemented with a note providing that the conduct described above does not extend to a diplomatic mission, consular institution, or representation of an international organization accredited in Georgia.

By the amendment of March 4<sup>th</sup>, 2026, the following were also classified as a "grant," for the purpose of carrying out the activity referred to in paragraph 1<sup>4</sup>- by a subject referred to in sub-paragraph "a" of paragraph 1 of Article 3 of this Law, or by a citizen of another state, to a citizen of Georgia, a person holding the right of residence in Georgia, a legal entity defined

under sub-paragraph "d<sup>1</sup>" of Article 4 of this Law, or a legal entity of Georgia:

- a) funds transferred in monetary or in-kind form, in exchange for which the recipient renders to the provider of such funds technical assistance in the form of sharing technologies, specialized knowledge, skills, expertise, services and/or other forms of assistance (this sub-paragraph does not apply to technical assistance rendered, in exchange for such funds, by an employee of a foreign government, its representation, or of an international organization referred to in sub-paragraph "a" of paragraph 1 of Article 3 of this Law, to that employer);
- b) Technical assistance rendered in the form of sharing technologies, specialized knowledge, skills, expertise, services and/or other forms of assistance;
- c) Technical assistance referred to in sub-paragraphs (a) and (b) of this paragraph, where rendered free of charge.

The amendment further establishes that the granting of a grant referred to in paragraphs 1<sup>4</sup>-1<sup>6</sup> of Article 2 of this Law requires the consent of the Government of Georgia, or of an authorized person/body designated by the Government of Georgia. The basis for such consent shall be a written agreement concluded between the parties, and a written decision of the subject referred to in sub-paragraph "a" of Article 3 of the Law. The grantor must submit the written decision and the draft written agreement referred to in this article to the Government of Georgia, or to the person/body it designates, in order to obtain the consent. The latter is entitled to request additional documentation for the purposes of its decision on the granting of the grant.

Additionally, the funds transferred, in monetary or in-kind form, by a legal entity of a

foreign state to its representation, branch or division registered in Georgia (this does not apply to funds transferred for the conduct of entrepreneurial activity) are considered as grant.

Article 2 of the Law was further supplemented with a new paragraph 2, providing that funds granted for the achievement of entrepreneurial purposes shall not be treated as a grant, with the exception of funds transferred to a legal entity holding the status of an agricultural cooperative under the Law of Georgia "On Agricultural Cooperatives."

Article 4 of the Law was supplemented with sub-paragraph "d<sup>1</sup>," which additionally defines, as a grant recipient, a legal entity of another state whose activity substantially encompasses activity concerning matters related to Georgia. The amendment also establishes criminal liability for violation of the relevant requirements of this Law.

By the amendment of 15 April 2026, paragraph 3 of Article 5<sup>1</sup>- which lists the organizations/institutions exempted from the procedure, established under this Law, for the granting of a grant by a foreign grantor - was supplemented to include the organization provided for under the Law of Georgia "On the Red Cross Society of Georgia," together with the grants issued by it.

## **2. The Law of Georgia "On Factoring"**

On 1 April 2026, the Law of Georgia "On Factoring" was adopted. Articles 1- 32 shall enter into force on 1 January 2027, while Articles 32-34 entered into force upon promulgation.

Under Article 1, the Law defines: the concept and subject-matter of factoring, the parties to factoring and their rights and obligations, the types of factoring and the conditions and

procedure for carrying out factoring. Under the Law, "factoring" is a transaction involving the transfer of accounts receivable arising from an underlying contract, which transaction is registered in the Factoring Registry, and as a result of which title to the claim arising from such accounts receivable passes to the relevant factor.

The adoption of this Law necessitated consequential amendments to a number of other enactments, including (but not limited to) the following:

### **1. The Law of Georgia "On Microfinance Organizations"**

On 1 April 2026, amendments were introduced into the Law of Georgia "On Microfinance Organizations," to enter into force on 1 January 2027.

The amendments address matters arising in connection with the Law "On Factoring." Specifically, the term "factoring" was added to paragraph 1 of Article 2 (the definitions article). Under the amendment to Article 4, a microfinance organization is prohibited from holding an equity participation in a factoring company as defined under the Law of Georgia "On Factoring." In addition, violation by an administrator of a microfinance organization of the requirements of the Law of Georgia "On Factoring" was established as a violation and as a ground for the imposition of a sanction.

### **2. The Law of Georgia "On Securitisation"**

On 1 April 2026, an amendment was introduced into the Law of Georgia "On Securitisation," to enter into force on 1 January 2027.

Under the amendment, the Law of Georgia "On Factoring" does not apply to a special-purpose securitization entity, nor to its activity carried out in accordance with that Law.

### **3. The Law of Georgia "On Commercial Bank Activities"**

On 1 April 2026, an amendment was introduced into the Law of Georgia "On Commercial Bank Activities," to enter into force on 1 January 2027.

The amendment defines "factoring" under sub-paragraph "zh" of Article 1 of the Law. In addition, a commercial bank is prohibited from holding, directly or indirectly, an interest of any size in a factoring company as defined under the Law of Georgia "On Factoring," as well as in the capital of any legal entity that is not a financial institution or whose activity is not connected with banking activity or with the commercial bank's social projects. This restriction does not extend to securities held for the purpose of conducting dealing operations in accordance with the rules established by the National Bank.

### **4. The Law of Georgia "On Securities Market"**

On 1 January 2026, amendments were introduced into the Law of Georgia "On Securities Market," to enter into force on 1 January 2027.

Under the amendment, a State authority and/or an enterprise established with State equity participation in which the State's equity participation does not exceed 50% is prohibited from holding an interest in a financial institution, save for holding an interest in a factoring platform established under the Law of Georgia "On Factoring," and holding an interest in a platform established under the Law of Georgia "On Investment Funds."

In addition, under the amendment to paragraph 54 of Article 2, a factoring company was designated as a "financial institution."

### **5. The Law of Georgia "On Investment Funds"**

On 1 April 2026, an amendment was introduced into the Law of Georgia "On Investment Funds," to enter into force on 1 January 2027.

Under the amendment, the Law of Georgia "On Factoring" does not apply to an investment fund, nor to the activity carried out by it in accordance with that Law.

### **6. The Law of Georgia "On Facilitating the Prevention of Money Laundering and the Financing of Terrorism"**

On 1 April 2026, amendments were introduced into the Law of Georgia "On Facilitating the Prevention of Money Laundering and the Financing of Terrorism," to enter into force on 1 January 2027.

Under the amendments, a factoring company and a factoring platform are deemed accountable persons and are required to comply with the requirements of the Law of Georgia "On Facilitating the Prevention of Money Laundering and the Financing of Terrorism." Accordingly, the list of reporting persons in paragraph 3 of Article 1 of that Law was supplemented with two sub-paragraphs: "a.s" - a factoring company; and "a.t" - a factoring platform.

As regards the National Bank of Georgia, it was designated as the supervisory authority over a factoring company and a factoring platform, for the purposes of supervising compliance with the requirements of the Law of Georgia "On Facilitating the Prevention of Money Laundering and the Financing of Terrorism." For this reason, the former wording - "the National Bank of Georgia, in respect of the persons defined under sub-paragraphs 'a.a', 'a.d'-'a.i' and 'a.l'-'a.r' of paragraph 1 of Article 3 of this Law" - was amended, and the list was

supplemented to include the reporting persons defined under sub-paragraphs "a.s" and "a.t".

## **7. The Law of Georgia "On the Activities of Micro-Banks"**

On 1 April 2026, an amendment was introduced into the Law of Georgia "On the activities of Micro-Banks." This amendment shall enter into force on 1 January 2027.

Specifically, paragraph 1 of Article 2 of the Law was supplemented with sub-paragraph "k", defining the concept of "factoring" as a transaction as defined under the Law of Georgia "On Factoring."

In addition, sub-paragraph "a" of paragraph 3 of Article 3 was amended and reworded to read: "the issuance of loans, guarantees, letters of credit and leases, and the carrying out of factoring, within the limits established by this Law." Correspondingly, the formerly used expression "the carrying out of factoring operations" was replaced by the term "the carrying out of factoring."

The amendment also concerned the investment restrictions applicable to micro-banks under sub-paragraph "a" of Article 16. Under the previously applicable regime, a micro-bank was entitled to invest (including by establishing or acquiring a subsidiary) only in legal entities that were either financial institutions, or whose activity was connected with the micro-bank's own profile or with its social projects. Strict percentage limits applied: a micro-bank's participation in any such enterprise could not exceed 20% of that enterprise's share capital, and the aggregate value of the micro-bank's investments was limited to 30% of the micro-bank's share capital (although the National Bank could exempt a micro bank from these limits for a period of up to one year).

As a result of the legislative amendment, factoring companies were entirely removed from these restrictions. Under the new

regulation, micro-banks are permitted to make investments of any size in factoring companies - including establishing or acquiring such companies - without regard to the 20% and 30% limits. As regards other categories of partner financial institutions or enterprises, the above percentage restrictions continue to apply to them as previously.

In addition, Article 33 (the list of violations) was supplemented with sub-paragraph "v<sup>1</sup>": "violation by a micro-bank, its administrator, or a controlling person, of the requirements of the Law of Georgia 'On Factoring'." Accordingly, the list of violations now includes violation of the requirements of the Law of Georgia "On Factoring" and/or of the normative acts issued on its basis.

## **8. The Civil Code of Georgia**

On 1 April 2026, amendments were introduced into the Civil Code of Georgia, on the basis of the Law of Georgia "On Factoring."

By the amendments of 1 April 2026, it was established that legal relations arising under the Law of Georgia "On Factoring" are not subject to the legal norms governing the acquisition of title to rights and claims.

Where, as a result of factoring as defined under the Law of Georgia "On Factoring," accounts receivable are transferred to the factor, any pledge encumbering the accounts receivable terminates, and any property not encumbered by such pledge passes into the ownership of the factor. In such case, the pledge right continues to subsist over the proceeds received as a result of the transfer of the accounts receivable into the factor's ownership. Where only part of the accounts receivable is transferred to the factor, this rule applies only to the part so transferred.

The amendments further prohibit the use, as security for a claim arising under a contract, of factoring - including reverse factoring - of residential real estate belonging to a natural

person (including an individual entrepreneur), unless it is confirmed that the Public Registry shows at least one additional residential real estate property registered in the ownership of the provider of such security or of a member of that person's household.

The amendments made by the Law of 1 April 2026 to the Civil Code shall enter into force on 1 January 2027.

### **9. The Law of Georgia "On Public Registry"**

As of 1 January 2027, amendments to the Law of Georgia "On Public Registry" shall enter into force, establishing the legal basis for the creation and maintenance of a State Factoring Registry. The Law is supplemented with a new Chapter IV<sup>4</sup>, setting out the rules, principles and legal consequences of factoring registration.

The Factoring Registry is a body of data comprising the mandatory registration particulars of factoring transactions, together with data on amendments to and termination of such transactions.

Under the amendments, only the factor is entitled to submit an application electronically to the registering agency. The Registry shall record: the number of the relevant tax invoice, the total amount of the accounts receivable and the portion thereof used in the factoring, the names of the factor and of the assignor of the claim and the date for repayment of the debt. The factoring takes legal effect upon registration, in the Registry, of title to the accounts receivable, however, the electronic consent of the assignor of the claim is also required, in the absence of which the transaction does not acquire legal effect.

It is significant that simultaneous double registration of the same accounts receivable is excluded; the agency is obliged, prior to registration, to verify in advance whether any such coincidence exists. Following full

performance of the obligation by the debtor, the factor is obliged, no later than the following business day, to apply for registration of the termination of its title.

The Factoring Registry will be integrated with the data of the Revenue Service for the purposes of automated verification of tax invoices. It should be noted that the role of the registering authority is limited: it bears no responsibility either for the authenticity of the documents submitted, or for whether the factor was in fact entitled to seek registration; the agency verifies only the formal correspondence between the data provided by the factor and the data held by the Revenue Service.

### **3. Amendments to the Law of Georgia "On Advertising"**

On 27 May 2026, amendments were introduced into the Law of Georgia "On Advertising."

Under the amendments, legal entities of public law established by self-governing cities are now involved in the regulation, permitting, and administration of outdoor advertising. This amendment does not apply to the capital city and applies to all self-governing cities other than Tbilisi.

Under the previously effective wording: pursuant to paragraph 3 of Article 6, where a permitting regime was introduced, the exclusive right to issue permits for the placement of outdoor advertising belonged solely to the executive body of the municipality; and pursuant to paragraph 7 of the same Article, outdoor advertising was required to indicate only the number of a permit issued by that body.

Correspondingly, under paragraph 2 of Article 21, responsibility for compliance with the requirements applicable to outdoor advertising rested with the municipal authorities alone,

and under paragraph 5 of Article 21, in the event of a legal dispute, subjects of advertising could appeal only the decisions of those authorities to the courts.

Under the amendment to paragraph 3 of Article 6, in self-governing cities (other than Tbilisi), permits for the placement of outdoor advertising may now be issued, alongside the executive body of the municipality, also by a legal entity of public law established by the city itself. Correspondingly, under paragraph 7 of Article 6, outdoor advertising may now indicate the number of a permit issued either by the municipal authority or by such legal entity of public law.

Under paragraph 2 of Article 21, responsibility for compliance with the requirements established under this Law is now imposed, jointly with the municipality, on the legal entity of public law established by the self-governing city; and under paragraph 5 of Article 21, this also grants participants in the advertising market (the principal, the producer and the disseminator) the right to challenge the decisions of that entity before the courts.

It should also be noted that, under paragraph 6 of Article 21, the bringing of a claim before a court does not automatically suspend the enforcement of the act issued or the decision adopted, unless the court itself issues a specific ruling suspending it.

#### **4. Amendments to the Law of Georgia "On Tourism"**

On 28 May 2026, an amendment was introduced into the Law of Georgia "On Tourism." The principal part of the amendment entered into force upon promulgation, while part of it entered into force on 1 June 2026.

Under the amendment, the Law was supplemented with a new Article 11<sup>1</sup>.

Under this article, subjects of tourism activity (tour operators, travel agencies and tourist guides) are required to register in the database of the National Tourism Administration, and to notify the Administration in writing of the commencement or cessation of their activity, or of any change in their registered particulars. In addition, paragraph 5 of Article 36 was re-enacted: whereas it previously regulated the procedure, conditions and fee for the registration of a foreign-national tourist guide, and that guide's registration obligation, under the new wording it merely indicates the procedure - to be established by a resolution of the Government - for the carrying out of activity in the territory of Georgia by such a guide. As a result, the registration of these subjects has moved from the Public Registry to the database of the National Tourism Administration.

The second principal amendment concerns the regulation of risk-bearing tourist services and mountain guiding. Article 34, which previously regulated specifically the activity and certification of three categories of guides, was re-enacted and now regulates, in general terms, the carrying out of risk-bearing tourist services: the fields of such services and the relevant powers shall be determined by a technical regulation of the Government, and such services may be carried out only by an authorised person. Certification of providers is to be ensured by the National Tourism Administration, which shall maintain a register of them and shall take appropriate measures in the event of a violation.

In addition, paragraph 4 of Article 33 was re-enacted, providing that the Government shall, by resolution, establish the list of risk-bearing tourist services, the procedure for their provision, and determine which services require professional and/or civil liability insurance.

The amendment also revised the list of liabilities under Article 49 for violations of the legislation of Georgia on tourism, clarifying the fines and adding cases of repeat violations. Specifically: carrying out a risk-bearing tourist service without the appropriate certificate: a fine of GEL 3,000 (GEL 6,000 for a repeat violation); carrying out such a service in breach of the technical regulation: a warning, or a fine of GEL 1,500 (GEL 3,000 for a repeat violation); carrying out activity without registration in the database: a fine of GEL 500 (GEL 1,000 for a repeat violation); Failure to fulfil the obligation to provide security to the Administration: a fine of GEL 1,000 (GEL 2,000 for a repeat violation); a tour operator carrying out activity without insolvency protection in place: a fine of GEL 1,500 (GEL 3,000 for a repeat violation); Obstruction of an authorized representative supervising enforcement of tourism legislation: a warning, or a fine of GEL 500 (GEL 1,000 for a repeat violation); Carrying out activity without organizational status: a fine of GEL 1,000 (GEL 2,000 for a repeat violation).

As of 1 June 2027, the entire regulatory regime governing package travel and linked travel arrangement contracts shall enter into force (pre-contractual information, content of the contract, price revision, termination, the tour operator's liability, compensation for damage, and other matters), as shall the regulation of timeshare, long-term holiday product, resale and exchange contracts. The fines for carrying out risk-bearing services without the appropriate certificate, and in breach of the technical regulation, shall also enter into force from this date.

As of 1 January 2027, the fine for a subject of tourism activity carrying out activity without registration in the National Tourism Administration's database shall enter into force. The registration obligation itself has already applied since June 2026, but sanctions for its breach will apply only from January 2027.

In addition, the application of paragraph 1<sup>3</sup> of Article 49 is suspended until 1 January 2027. These paragraphs establish the procedure for administrative-offence protocols and electronic penalty notices - i.e. the sanctioning mechanism itself is suspended until January 2027, coinciding with the date on which the fines for failure to register in the database take effect.

As of 1 June 2030, the entire chapter on insolvency protection shall enter into force (protection of advance payments made by tourists and of repatriation in the event of a tour operator's insolvency, and the calculation and application of the amount of the financial guarantee). The fines for failure to provide security to the Administration and for a tour operator carrying out activity without insolvency protection are also linked to this date.

## **5. Amendments to the Law of Georgia "On General Education"**

On 4 February 2026, amendments were introduced into the Law of Georgia "On General Education."

The concept of general education was clarified: complete general education in Georgia comprises no less than 11 and no more than 12 years. The Law was supplemented with a provision specifying that the State document/document certifying general education is: in respect of complete general education - a certificate confirming completion of complete general education; and in respect of basic general education- a certificate confirming completion of basic general education. Grade XII became optional, and complete general education is deemed obtained where a person completes Grades X and XI, on the basis of which a school certificate is issued; provision was also made for the issuance of the

school certificate where Grade XII is completed voluntarily.

The age for commencing study at the primary level of general education was set at six years, attained by 15 September inclusive. For general education programmes delivered in a foreign language, it became permissible to allocate the years of study among the primary, basic and secondary levels differently, provided the aggregate number of years for these levels is neither more nor less than 12.

The Law was supplemented with a new Article 19<sup>1</sup>, making the wearing of school uniform mandatory for pupils at the primary level of public schools, subject to the possibility of exemption on health grounds, by written agreement between the public school and the Ministry.

The Government of Georgia was charged with the obligation to approve and implement a targeted programme for the free provision of textbooks to pupils, and a targeted programme for the free provision of school uniforms to pupils at the primary level of general education.

The Ministry's powers were supplemented to include: establishing - for the purpose of acquiring the status of a general education institution - a legal entity of public law or a non-entrepreneurial (non-commercial) legal entity of private law; approving their charters; and, on the basis of the results of registration of pupils/persons in Grade XII, determining the duration of the secondary level of general education. The Ministry is further authorized to carry out the reorganization and liquidation of a legal entity of public law established by it.

The Ministry was granted the power to establish, in pursuit of objectives in the field of education, both entrepreneurial and non-entrepreneurial (non-commercial) legal entities; by decision of the Minister, such entities may be assigned activities or projects necessary for the Ministry's system to achieve

other statutory objectives. The amendment also granted the Ministry additional powers, in particular to: determine the measures for providing school uniforms to pupils at the primary level of public schools, including the design of the uniform, its price, and the rules for its sale and distribution; create general education textbooks based on the standards of the national curriculum or on cultural heritage, ensure their printing and free distribution to schools, and determine their price and conditions of use; and approve the general rules on the use of electronic communication devices in schools.

For the purpose of acquiring the status of a general education institution providing military training in conjunction with general education, the Ministry of Defense of Georgia shall establish a legal entity of public law, approve its charter, exercise State control over it, and is authorized to carry out its reorganization and liquidation. Such institution is subject to authorization in the manner established by the Minister, is financed from the appropriations of the Ministry of Defence of Georgia, and provides instruction from the basic level (Grade IX) and at the secondary level (excluding Grade XII).

It was established that a general education institution must conduct the educational process using general education textbooks created and/or approved by the Ministry, with the procedure and time limits for such approval to be determined by an individual administrative-legal act of the Minister.

Restrictions on the employment of personnel were tightened: a person who has committed a crime against sexual freedom and inviolability may not be employed at a general education institution, irrespective of whether their criminal record has been expunged or has lapsed. It was further established that, where an employment contract has been terminated on grounds of violence against a pupil, that person's right to be employed at a general

education institution shall be restricted, with the administrative procedure for such restriction to be determined by the Minister.

New mechanisms for the management and oversight of the educational process were established: the school curriculum and the list of teaching materials prepared by the pedagogical council are subject to the consent of the relevant authorized body, while the list of teaching materials to be used during the academic year is determined in agreement with the board of trustees.

The Law was further supplemented with transitional provisions, under which, from 2026, the structure of the basic and secondary levels of general education will change in stages. In particular:

- new rules were established for completion of the basic level and issuance of the school certificate linked to attainment of the required achievement level in Grades IX and X;
- specific transitional arrangements were established for pupils who have completed, or will complete, the relevant grades in the 2025–2026 academic year;
- it was established that, until the 2028–2029 academic year, completion of Grade XII remains mandatory for obtaining complete general education, and that from that point onward Grade XII becomes optional;
- various transitional regimes were established for pupils who began their education under the previous system, including the conditions for completing Grades X and XI and an obligation on the Ministry to organize external examinations.

The Minister was also empowered to resolve, by individual administrative-legal act, any matters not directly addressed by this transitional article.

Further amendments to this Law, made on 1 April 2026, added a new article providing that, for the 2026–2027 academic year, study at the primary level of general education may, in addition to the case provided for in paragraph 6 of Article 6 of the Law, also be commenced voluntarily, at the decision of a parent, by a person who attains the age of six between 16 September 2026 and 31 December 2026 inclusive.

## **6. Amendments to the Law of Georgia "On Higher Education"**

On 4 February 2026, amendments were made to the Law of Georgia "On Higher Education," under which:

Academic higher education was clarified as a level of higher education comprising bachelor's, master's, integrated master's in veterinary medicine, and doctoral educational programmes.

The "special teacher-training educational programme" was established as a higher educational programme independent of a bachelor's programme, based on the corresponding standard, with learning outcomes corresponding to those defined for Level 6 of the National Qualifications Framework.

The legal concept of "leading professor" was established, as a person holding an academic position at a higher education institution who ensures the conduct of the educational process and the supervision of scientific-research activity.

The concept of "student" was clarified to encompass both: persons enrolled in, and undergoing instruction under, the corresponding programme at a higher education institution of Georgia (bachelor's, master's, integrated master's in veterinary

medicine, qualified physician/dentist, or doctoral); and citizens of Georgia, and holders of neutral travel documents, enrolled at a higher education institution recognized under the legislation of a foreign state, who participate in study and/or research components carried out in Georgia under joint educational programmes.

The concept of "university" was established as a higher education institution carrying out both multi-tier academic programmes (bachelor's, master's, doctoral, integrated master's in veterinary medicine, and medical/dental programmes) and scientific-research activity.

The mechanisms for linguistic integration and instruction in the State language were further clarified: the "Georgian-language preparatory educational programme" was defined as a special programme ensuring that persons enrolled at a higher education institution attain the level of Georgian (and, where relevant, Abkhazian) language proficiency necessary to continue studies under a subsequent academic programme, including for persons admitted without unified national examinations.

The "special State-language course" was established as a special educational component - comprising Georgian (and, in the Autonomous Republic of Abkhazia, also Abkhazian) - forming part of the curriculum of bachelor's, integrated master's in veterinary medicine, and qualified physician/dentist programmes.

It was established that completion of the special State-language course is mandatory for a student enrolled in a State-language bachelor's, integrated master's in veterinary medicine, or qualified physician/dentist programme at a higher education institution, the purpose being to ensure State-language competence for the effective conduct of the academic process.

A legal framework was established for the reorganisation of higher education institutions

founded by the State, under which the Government of Georgia is authorized to adopt a resolution determining the objectives, form, time limits and temporary management arrangements for the reorganisation. Such an act may also temporarily alter or suspend the procedure for the exercise of powers by the governing bodies, where necessary to achieve the objectives of the reorganisation.

To facilitate the reorganisation process, the Minister was empowered to appoint persons to act in various leadership capacities (rector, deputy rectors, head of administration, head of the quality-assurance service), and to establish a temporary collegial governing body - a temporary governing board - to which the powers of the academic council and/or representative council may be temporarily transferred. This mechanism was defined as a temporary, purpose-specific instrument operating only for the duration of the reorganization process, ceasing upon its completion or upon the formation of new governing bodies.

The procedure for forming the academic council was clarified: its members may be elected from among leading professors, professors or associate professors, and the same person may be elected to the academic council for no more than two consecutive terms.

The composition of academic personnel was defined to comprise the leading professor, professor, associate professor, assistant professor and assistant. The status of "leading professor" was further specified as a person who both ensures and participates in the conduct of the educational process and the supervision of scientific-research activity.

The conditions for election to the position of "leading professor" were defined in greater and stricter detail. A person may be elected to this position who holds a doctoral or equivalent academic degree, has no less than 8 years of scientific-pedagogical experience, has

significant scientific achievements - including publications in international and domestic peer-reviewed journals and participation in research projects - and satisfies any additional conditions established by the charter of the higher education institution.

A transitional regime was established for the implementation of educational programmes by State-founded higher education institutions. For programmes that, as of 1 January 2026, are being implemented but are not included in the list of programmes (curricula) determined by the Government of Georgia, a temporary legal possibility was established for their continued implementation, in accredited or authorized form, within defined time limits, namely:

- bachelor's programmes of not less than 180 credits - until the start of the 2029-2030 academic year;
- bachelor's programmes of not less than 240 credits - until the start of the 2030-2031 academic year;
- master's programmes - until the start of the 2028-2029 academic year;
- doctoral programmes - until the start of the 2029-2030 academic year;
- integrated bachelor's-master's teacher-training programmes, the integrated master's programme in veterinary medicine, and the qualified physician and qualified dentist programmes - until the start of the 2030-2031 academic year.

A transitional regulation was established in respect of higher education funding, under which State funding for persons enrolled at a higher education institution prior to the entry into force of this Law shall continue through the 2030-2031 academic year, on the terms applicable under the Law of Georgia "On Higher Education" as in force prior to this Law's entry into force.

It was further established that the specific procedure and conditions for the funding of

this category of students shall be determined by a resolution of the Government of Georgia, which was correspondingly granted the relevant regulatory power within the transitional regime.

## **7. Repeal of the Law of Georgia "On Amendments to the Code on Product Safety and Free Movement"**

On 3 April 2026, the Law of Georgia of 30 June 2023 "On Amendments to the Code on Product Safety and Free Movement" was repealed.

The amendments provided for under the Law of 30 June 2023 were to enter into force on 1 September 2026. That instrument provided for several terminological amendments to the Code on Product Safety and Free Movement. Of particular note, the Law of 30 June 2023 proposed a revised content for the term "zone of special construction regime," which, under that Law, was to cover:

- territories defined by the legislation of Georgia;
- territories defined by the Forest Code of Georgia and the Law of Georgia "On the Management of Water Resources";
- zones protecting cultural heritage;
- resort-recreational and other zones in which additional special conditions are established for the issuance of a construction permit.

Under the currently effective wording, the "zone of special construction regime" comprises territories defined by the legislation of Georgia; territories defined by the Forest Code of Georgia and the Law of Georgia "On Water"; zones protecting cultural heritage; and resort-recreational and other zones in which additional special conditions are established for the issuance of a construction permit.

It should also be noted that the reference, in the Code on Product Safety and Free Movement, to

the Law of Georgia "On Water" - which, under the Law of 30 June 2023, was to be replaced by a reference to the Law of Georgia "On the Management of Water Resources" - remains unchanged under the currently effective wording.

## **8. Amendments to the Code on Product Safety and Free Movement**

On 1 April 2026, amendments were introduced into the Code on Product Safety and Free Movement.

First, the text of the Code was supplemented with a provision regulating the national market-surveillance strategy. It was established that the national market-surveillance strategy shall define the priorities, goals and objectives of the policy for market surveillance of products falling within the regulated sphere and shall set out the approaches for achieving those goals and objectives. The Ministry of Economy and Sustainable Development of Georgia shall ensure the development of the national market-surveillance strategy at least once every four years and shall ensure approval of the first such strategy by 1 January 2028.

Under the Law of 1 April 2026, the terms "manufacturer," "distributor" and "authorized representative" were amended. Under the Code on Product Safety and Free Movement: a "manufacturer" is any natural or legal person who manufactures a product, or places it on the market, under its own name or trademark; a "distributor" is any natural or legal person in the supply chain who, in the course of its activity, makes a product available on the market and who is neither the manufacturer nor the importer; and an "authorized representative" is a natural or legal person authorized by the manufacturer, acting on the basis of a written mandate issued by the manufacturer, on the manufacturer's behalf, to perform certain obligations under the Code on Product Safety and Free Movement and/or the

relevant technical regulation. An authorized body may address the authorized representative, instead of the manufacturer, in respect of the requirements of the technical regulation.

Among the amendments made on 1 April 2026, a chapter regulating market surveillance was added to the Code. This chapter governs the surveillance of products placed on the market of Georgia for which requirements are established under the relevant technical regulations, and for which the market-surveillance authority is a legal entity of public law within the system of the Ministry of Economy and Sustainable Development of Georgia - the Market Surveillance Agency (the "Agency"). This chapter applies both to products manufactured in Georgia and to imported products. It does not govern the surveillance of products to which the Code on Food/Feed Safety, Veterinary and Plant Protection applies.

Under the Law of 1 April 2026, the Government of Georgia is required to ensure that corresponding amendments are made to Resolution No. 539 of the Government of Georgia of 14 November 2018 "On the Approval of the Rule for Market Surveillance and the Rule for the Suspension of Sale, Withdrawal from the Market, Recall and Destruction of a Product," and the relevant agencies are required to ensure the conformity of the corresponding subordinate normative acts with this Law.

The above amendments/innovations entered into force on 1 June 2026.

## **9. Amendments to the Law of Georgia "On Licenses and Permits"**

During April–May 2026, several amendments were made to the Law of Georgia "On Licenses and Permits."

Under these amendments, the Law does not apply to activity or actions otherwise provided for under it, where carried out by:

- a ministry defined under the Law of Georgia "On the Structure, Powers and Rules of Operation of the Government of Georgia," or a State sub-agency under its authority;
- the Emergency Management Service - a State sub-agency under the authority of the Ministry of Internal Affairs of Georgia - or a legal entity of public law operating under the authority of the State Reserves and Civil Safety Service Agency;
- the State Security Service of Georgia and the legal entities of public law operating under its authority.

The Law also does not apply to a State expert institution, where it carries out the following activities provided for under the Law:

- emergency medical care;
- forensic medical examination;
- forensic psychiatric examination;
- pathological-anatomical activity;
- activity involving especially dangerous pathogens;
- production transfusiology activity.

A State expert institution is also not required to obtain a permit for a stationary institution.

The Law likewise does not apply to the legal entity of public law - the L. Sakvarelidze National Centre for Disease Control and Public Health - where it carries out activity involving especially dangerous pathogens provided for under the Law.

In addition, the licensing obligation does not apply to the non-entrepreneurial (non-commercial) legal entity Central Blood Bank, where it carries out production transfusiology activity and the export from Georgia of human

blood components (plasma that may be used for the manufacture of medicinal products).

It should also be noted that the legal entity of public law within the system of the Ministry of Environmental Protection and Agriculture of Georgia - the Nuclear and Radiation Safety Agency - is not required to obtain the relevant permit for: licensed activity involving nuclear and radiation matters; the domestic acquisition of radioactive material; the import, export, transit and return-to-manufacturer of radioactive material; the import-export of nuclear technologies or know-how; and the export of radioactive waste. These particular amendments entered into force on 1 April 2026.

As regards the amendments made in May 2026: under the currently effective wording, the architectural service is not required to obtain a license or permit under the Law where it carries out works on a cultural heritage monument or archaeological works; in such cases, the procedure for, and conditions of, granting permission are established by the Government of Georgia. This amendment entered into force on 14 May 2026.

The May 2026 amendments also provide that the Law does not apply to the Tbilisi Municipality, to any other self-governing city, or to a legal entity established by the Tbilisi Municipality or by the mayor of another self-governing city, where it carries out the following activity:

- construction (other than the construction of facilities of special importance, or of radiation or nuclear facilities);
- construction of facilities of special importance (other than radiation or nuclear facilities);
- works on a cultural heritage monument.

The amendments further address the procedure for issuing permits for the carriage of passengers by passenger car - taxi (category M1) - in the capital of Georgia or in another self-governing city. A permit for such carriage in the capital of Georgia is issued by the Government of the Tbilisi Municipality, by a structural unit of Tbilisi City Hall authorized by it, or by a legal entity established by the Tbilisi Municipality; in another self-governing city, it is issued by a structural unit of that city's

city hall, or by a legal entity of public law established by that self-governing city. An applicant for such a permit, whether in the capital or in another self-governing city, must pay the fee for its issuance; no State duty is charged for the issuance of such a permit. This amendment entered into force on 29 May 2026.

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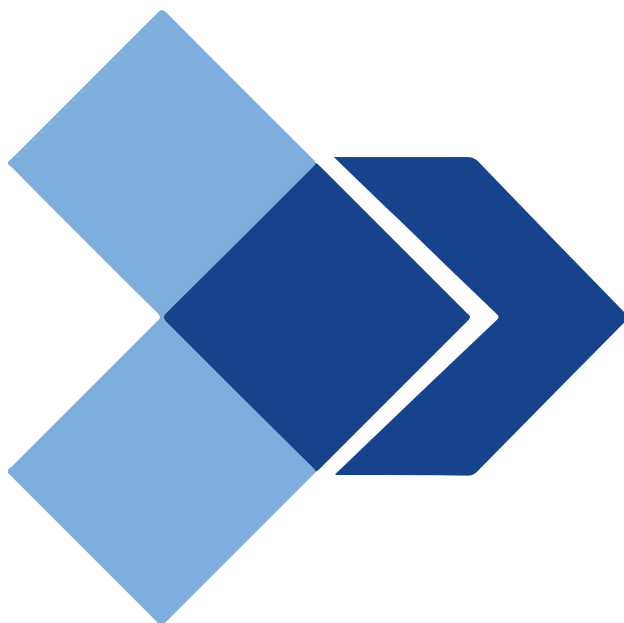
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