

Further Amendments to the Law of Georgia on Labour Migration



On 15 April 2026, further amendments were introduced to the Law of Georgia on Labour Migration. Under the updated version, the scope of exceptions to which the law does not apply (with respect to obtaining a Work Permit, Residence Permit, and a D1 Visa) has been expanded.

The exemptions include the cases as follows:

- ▶ Possession by a foreign national of a valid Special Residence Permit issued on the basis of a written initiative of a member of the Government of Georgia.
- ▶ Engagement in Short-Term Professional Activities in Georgia, determined by the Ordinance of Government of Georgia. The amendments clarify that Short-Term Professional Activity refers to professional work/services carried out by a foreign national in Georgia for a period established by Georgian legislation, which does not constitute long-term employment in the local labour market and is linked to a specific short-term project, event, or service. The list, duration, and criteria of such activities will be further specified by a relevant Ordinance of the Government of Georgia.
- ▶ Performance of activities in favor of a public institution or an enterprise established with state participation.
- ▶ Full remote performance of work for a local employer, provided that the foreign national does not need to enter the territory of Georgia.
- ▶ Provision of work/services in favor of a non-resident person, provided that such activity is connected to operations carried out outside Georgia.
- ▶ Activities related to conservation, restoration, and/or rehabilitation works of cultural heritage monuments.
- ▶ Performance of managerial or governing functions as provided by the Law of Georgia on Entrepreneurs, or service on an audit committee, in enterprises classified as Category I, II, or III under the Law of Georgia on Accounting, Reporting and Auditing. Accordingly, if an enterprise does not fall within Category IV and meets the criteria of Categories I–III, the requirements of the law shall not apply to its foreign managers, directors, or members of governing bodies or audit committees.

In this regard, it should be noted that prior to these amendments, the Employment Agency had confirmed that the law applied to members of supervisory boards as well; however, it remains unclear whether, in light of the recent amendments, supervisory board members will fall within the above-mentioned exemptions.

As for partners, the Agency has confirmed that the law does not apply to the partners of legal entities registered in Georgia. Furthermore, under the recent amendments, the term “Partner” has been removed from the definition of a Self-Employed Foreigner.



The amendments further stipulate that a foreign national may be denied a Work Permit if they fail to submit documentation confirming compliance with the criteria established by the Ordinance of the Government of Georgia for carrying out labour/entrepreneurial activities and/or other relevant documentation required by such Ordinance. The respective Ordinance has not yet been adopted, and it remains unclear what additional documentation will be required.

In addition to the above legislative amendments, the Agency has clarified certain practical matters, namely:

- ▶ A Self-Employed Foreigner must personally apply for the Work Permit and complete the application on the relevant portal. Submission of an application and/or obtaining a Work Permit by a third party, even on the basis of a Power of Attorney, is not permitted.
- ▶ A foreign national entering Georgia for tourism purposes must not engage in labour or entrepreneurial activities. For such purposes, the individual must obtain a Work Permit, D1 category visa and subsequently a Work Residence Permit.
- ▶ the Employment Promotion Agency has clarified that, when registering a labour migrant in the electronic system, the date of conclusion of the Employment Agreement must be indicated, rather than its effective date (for example, if an Employment Agreement is concluded on 1 April 2026 but becomes effective on 1 May 2026, the system should reflect the conclusion date, i.e. 1 April 2026).
- ▶ Since a foreign national providing services in Georgia (except for the above-mentioned Short-Term Professional Activities) is deemed to be Self-Employed Foreigner, any person receiving such services (the Service Organizer) is obliged to verify whether the foreign national has obtained a Work Permit.

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