

Media and digital rights regulation in Ukraine

DSLUI monthly digest on media and digital rights regulation in Ukraine provides an overview of the proposed and adopted legislation in the spheres of freedom of expression, media regulation, privacy and data protection, Internet regulation in general, and the activities of the National Broadcasting Council in the area of Media Law implementation.

Events and Highlights

On 19 December, **Draft Law #12349 on the Cyber Forces of the Armed Forces of Ukraine** was registered in the Parliament. The draft aims to **establish a military and technical unit within the AFU to handle cyber defence** under NATO standards. As of now, the draft serves primarily an organisational purpose, outlining the main tasks and functions of the Cyber Forces in cyberspace operations. It is currently being processed by the Parliamentary Committee on National Security, Defence, and Intelligence.

Freedom of Expression and Media Regulation

Verkhovna Rada did not approve the Draft Law #10242, registered in November last year, sending it for further consideration. Content-wise, the draft strengthens criminal liability for unauthorised dissemination of confidential information from public registers. The draft's blanket ban and lack of legitimate exceptions **raise concerns about the potential prosecution of journalists and whistleblowers** who share information in the public interest. Digital Security Lab and other media experts repeatedly **urged MPs not to approve the current version of the draft** – thus, the Parliament's rejection of the draft in this regard can be considered a positive step. **The draft is now awaiting another vote under the repeated second reading procedure by the Parliamentary Committee on Law Enforcement Activities.**

Draft Law #12111 on Amendments to Certain Laws of Ukraine on Media Activities, registered in [October](#), **was adopted in the first reading on 5 December** and is now being prepared for the second reading by the Parliamentary Committee on Humanitarian and Information Policy. Its provisions are primarily intended to improve the regulatory dialogue between the media and the regulator.

Draft Law #12191, aimed at decriminalising dissemination of pornography, was recommended by the Parliamentary Committee on Law Enforcement Activities **for adoption in the first reading**, although still awaiting the Parliament's further approval. It was analysed in more detail in [last month's](#) digest edition.

There were neither new draft laws registered in December nor any legislative steps taken regarding other initiatives described in [earlier editions of digests](#), such as the two Draft Laws ([#11321](#) on improving the access of journalists to official events, analysed in [June](#), and [#5870-d](#) on conditional access to audiovisual media services, voted for in the first reading in [July](#)) are still awaiting the second reading by the Parliament. Draft Law [#11153](#), analysed in [April](#) and amending the rules on the journalists' work trips to the emergency areas, still awaits the President's signature.

Privacy and Data Protection

Draft Law #8153 on Personal Data Protection awaits the second reading by the Parliamentary Committee on Human Rights, Deoccupation and Reintegration of the Temporary Occupied Territories, National Minorities and Inter-Ethnic Relations. At this stage, the MPs have submitted their amendments, and the Committee is scheduled to review them in due course, preparing the text for the final vote in the Verkhovna Rada.

There was no progress on other drafts analysed in [previous digests](#). These include the drafts on [a unified system of public security video monitoring](#), the [exclusion of prosecutorial discretion](#) in temporary access to sensitive personal data, and the [criminalisation of electronic communication fraud](#) as well as [cyberstalking](#). [Draft Law #11228-1](#) on counterintelligence activities, analysed in [May](#), still awaits the second reading.

Internet Regulation

On 18 December, Draft Law [#12102](#) on Formation and Maintenance of a List of Terrorist Organisations (Groups), analysed in [October](#), was adopted by the Parliament. It now **awaits the President's signature**. It may clarify the use of sanctions for blocking websites.

No legislative steps were taken regarding other submitted initiatives, namely [Draft Law #10101](#), which permits the monitoring of the Internet to block unlicensed online gambling websites and mobile applications, [Draft Law #11115](#) on Regulation of Information-Sharing Platforms That Disseminate Mass Information (analysed in the [March digest](#)), and two sanctions-related drafts ([#11492](#) and [#11492-1](#)).

National Broadcasting Council

On 5 December, NBC **announced** the submission of the [Draft Implementation Plan of 2025](#) of NBC's Strategy for 2024-2026 for public discussion, which [will last](#) for one month. On the same day, the regulator **adopted its Code of Ethics**, outlining the core principles guiding its work and aiming to strengthen public trust in the regulator.

On 23 December, NBC **reported on the results of their first systemic monitoring of online media and non-linear audiovisual services' compliance with the Law on Media** and other national legislation. The monitoring results revealed that the **majority of violations by media services were related to the non-disclosure of initial data** on their official websites. While media services are currently only [required](#) to provide written explanations for the identified violations, these breaches may serve as a basis for sanctions to be imposed by the regulator in the future.

NBC also continued its involvement in creating co-regulatory bodies in the various spheres of media services. **On 23 December, NBC announced the creation of the co-regulatory body in the sphere of print media** – it was officially registered as a public union. The latter is now tasked with creating working groups to develop speech codes. This event marks the creation of all the co-regulatory bodies that can be practically created under the Law on Media; the creation of the outlying co-regulatory body in the sphere of video-sharing platforms is impossible as no such subjects are under Ukrainian jurisdiction.

Digital Security Lab Ukraine is a non-government organisation aiming to create a human-rights-centered digital environment in Ukraine. We work toward achieving this goal by providing digital security support for high-risk Ukrainian human rights and media organisations and contributing to policy development in the field of human rights on the Internet through conducting legal monitoring, research and analysis, advocacy, and awareness-raising campaigns.

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