

Media and digital rights regulation in Ukraine

DSLU 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 15 January, **Verkhovna Rada approved the President's [Order on the Martial Law Extension](#)**. The Order extends the martial law period until 9 May 2025. It will also extend the applicability of specific additional restrictions, such as the aggression-related exceptions under the Law on Media. As of now, the Order is awaiting the President's signature.

Freedom of Expression and Media Regulation

On 9 January, the **Parliamentary Committee on Humanitarian and Information Policy [recommended Draft Law #5870-d for adoption in the second reading](#)**. Analysed in [July](#), the draft prohibits advertising, promotion, and popularisation of illegal conditional access devices without the provider's permission or services related to such devices and imposes liability for the violation of provisions.

On 14 January, **Verkhovna Rada adopted Draft Law [#11321 on improving journalists' access to official events](#)**, analysed in [June](#). According to the draft, journalists and the public will be able to attend meetings held via video conferences and open events. At the same time, **the provision allowing accredited journalists to move freely during curfews under martial law was removed from the final draft**. In future, this might affect journalists' freedom of movement during their work trips. The draft is awaiting the President's signature.

Draft Law #12253, which improves the legal provisions on advertising, **was recommended for adoption in the first reading by the Parliamentary Committee on Humanitarian and Information Policy**. Analysed in the [November digest](#), the draft distinguishes between “direct advertisement” and other advertising, improves the ways of advertisement’ identification, prohibits unlawful usage of deepfakes in advertising, and clarifies the scope of NBC’s enforcement powers.

There was no progress on drafts described in the previous digests, which include Draft Law [#11153](#) amending the rules on the journalists’ work trips to the emergency areas, Draft Law [#12111](#) amending the media activities, and Draft Law [#12191](#) decriminalising dissemination of pornography. Draft Law [#10242](#) is still awaiting another vote under the repeated second reading procedure by the Parliamentary Committee on Law Enforcement Activities.

Privacy and Data Protection

There was no progress on any [previously analysed documents](#). These include the drafts on [a unified system of public security video monitoring](#), the [criminalisation of electronic communication fraud](#), the draft on [counterintelligence activities](#), and the [cyber forces of the Armed Forces of Ukraine](#). Draft Law [#8153](#) on Personal Data Protection is still being prepared for the second reading.

Internet Regulation

On 14 January, **Draft Law #12406** was registered in the Parliament. It introduces amendments to the [Criminal Code of Ukraine](#) by establishing criminal liability for entities breaching sanctions. Additionally, the draft correctly excludes penalties for non-compliance with the sanctions in the form of website blocking, thus not criminalising access to them. **The Parliamentary Committee on Law Enforcement Activities processes the draft.**

Draft Law #12102 on Formation and Maintenance of a List of Terrorist Organisations (Groups), analysed in [October](#), **was finally signed by the President on 7 January**. It modifies the procedure for recognising organisations as terrorist, thus influencing the procedure for website blocking under the Law on Sanctions.

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

As part of the co-regulation framework, **the first meeting of the national security working group of the co-regulatory body in the field of audiovisual media was held** on 7 January. The 12-member working group discussed the priority topics for drafting the broadcasting codes on the respective content provisions of the Law on Media.

On 10 January, NBC [submitted](#) a **Draft Procedure outlining requirements for subtitling and/or translating campaign materials into Ukrainian sign language for entities in linear audiovisual media during elections and referendums.**

On 23 January, NBC [updated](#) the **List of Aggressor State On-Demand Audiovisual Media Services and Services of Audiovisual Service Providers** by **expanding the list of websites providing access to Baskino, Filmix, and HD REZKA** media platforms. The decision was made after discovering new websites providing unlimited access to these services despite previously introduced restrictions.

The Council has also [approved](#) the **2025 Implementation Plan of the Strategy of Activities for 2024-2026**. To operationalise the Strategy, the Implementation Plan sets out the regulator's main priorities for this year, which include, in particular, the protection of the information space from the aggressor state's influence, inclusiveness of the media space, protection of children's rights, and ensuring the transparency and accessibility of information in the media sector.

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.

Contact us: dslua@dslua.org



Digital Security Lab