

MEDIA AND DIGITAL RIGHTS REGULATION IN UKRAINE

Digest #21 - March 2025

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 4 March, the Cabinet of Ministers [approved Order #244](#), introducing amendments to the provisions governing the travel of male artists and media representatives abroad during martial law. In particular, the Order **specifies the required documents and sets the maximum permitted duration of staying abroad - 60 calendar days**. New provisions [are intended](#) to speed up both the document acquisition process and border crossing procedures. They formalised the procedure, which lacked a proper legal basis for the last three years, adding an additional step of approval from the military administrations.

On 12 March, [the Guide for Risk Management in the Context of Emergencies, Armed Conflict and Crises](#) was presented. Within the project "SHIELD: Strengthening Honesty, Integrity, and Ethics for Legitimate Discourse", a group of experts, including DSLU, the media regulator, and several other stakeholders in the online sphere, researched the digital landscape of Ukraine and developed recommendations for the largest online platforms. The latter includes guidance on countering disinformation and hate speech online and improving human rights compliance on global platforms such as Meta, Google, etc.

FREEDOM OF EXPRESSION AND MEDIA REGULATION

Draft Law #12253, analysed in detail in [November](#) and aimed at **improving the legal provisions of the [Law on Advertising](#), was adopted in the first reading by the Parliament on 11 March**. It is now awaiting the second reading by the Parliamentary Committee on Humanitarian and Information Policy. Its key provisions establish a clearer role for the media regulator in overseeing the law's enforcement.

On 19 March, the **sub-Committee on Information Policy and European Integration** [reviewed](#) the amendments of the second reading of the **Draft Law #12111 on Amendments to Certain Laws of Ukraine on Media Activities**, analysed in [October](#). In particular, the draft improves the language of provisions on content restrictions, including the protection from aggressor-state media resources under Section IX of the Law, and clarifies the procedures of the NBC members' appointment and dismissal. It is expected to be submitted for the Committee review and second-reading voting in April.

On 21 March, the Parliamentary Committee on Legal Policy [reviewed](#) **Draft Law #11533 on Specifics of Providing Information from Public Electronic Registers** (registered in August), **recommending its adoption in the first reading**. The **draft suggests several restrictions on access to information on defence enterprises** contained in public registries during martial law and one year after its cessation. The draft law was scheduled to be voted on by the Parliament on 27 March but did not progress [due to public criticism](#).

There was no progress on other drafts described in the [previous digests](#), including Draft Law [#12191](#), decriminalising the dissemination of pornography, Draft Law [#13001](#) on the prevention of antisemitism, and two draft laws regarding the activities of the Antimonopoly Committee of Ukraine ([#12440](#) and [#12440-1](#)).

Draft Law [#11321](#) on improving journalists' access to official events and Draft Law [#11153](#) amending the rules on journalists' work trips to the emergency area are still awaiting the President's signature. Despite multiple requests urging the President to sign the laws, including appeals from human rights experts who [raised concerns about non-compliance with the legal procedure for signing the legislation](#) by exceeding the respective period by two months, the drafts remained unchanged in their status.

PRIVACY AND DATA PROTECTION

On 20 March, the Parliamentary Committee on National Security, Defence, and Intelligence [recommended](#) the adoption of **Draft Law #12349 on the Cyber Forces of the Armed Forces of Ukraine**, analysed in [December](#), in the first reading. The draft aims to establish a military and technical unit within the AFU to handle cyber defence under NATO standards.

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

INTERNET REGULATION

On 24 January, the **Cabinet of Ministers approved an [order on certain issues of operational and technical management of telecommunication networks during emergency situations and martial law](#)**. In particular, the **order extended the powers of the National Center for Operational Management of Telecommunications Networks (NCON)** – an authority specially designated to regulate electronic communications during wartime – **by enabling it to restrict access to Internet resources** (websites, autonomous systems, IP addresses) in a technically feasible manner for providers. Earlier, NCON was empowered to issue orders on managing telecommunication networks; however, the scope of such orders was broad and unspecified, [which undermined the legality of the website blocking procedure](#). In this regard, **new amendments fill the lacuna in provisions by granting the NCON blocking powers on the sub-legislative level**.

No legislative steps were taken regarding other submitted initiatives, namely [Draft Law #11115](#) on Regulation of Information-Sharing Platforms That Disseminate Mass Information (analysed in the [March digest](#)) and three sanctions-related drafts ([#11492](#), [#11492-1](#), and [#12406](#)).

NATIONAL BROADCASTING COUNCIL

On 13 March, NBC **issued** prescriptions for five media entities for non-compliance with broadcasting programming concepts (lack of children's programs as required by law), advertising legislation (lack of advertising labelling), and Law on Media provisions on ownership structure.

The co-regulatory body in the sphere of audiovisual media elected Anton Gladun as its director. At the meeting with NBC, he mentioned that his main task is to establish effective communication between stakeholders to develop the relevant speech codes.

On 27 March, NBC **expanded** the **List of Aggressor State On-Demand Audiovisual Media Services and Services of Audiovisual Service Providers** by requesting the blocking of 217 websites related to five media services already included in the list beforehand (KINOGO, Kinokrad, Kinotochka, KinoZapas, and GidOnline).

Additionally, NBC **has appointed** an unscheduled on-site inspection of the NGO Civil Movement "All Together!" due to its failure to amend its content, which violates the Law on Media. Earlier, the NGO and its unregistered online media service "Vsi Razom!" was issued a **prescription for publishing an article promoting negative stereotypes about LGBTIQ+ people**. Since the article was not changed or moderated, NBC may impose a fine if the inspection confirms further non-compliance.

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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