

MEDIA AND DIGITAL RIGHTS REGULATION IN UKRAINE

Digest #22 - April 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 Council on Television and Radio Broadcasting of Ukraine (hereinafter – NBC) in the area of Media Law implementation.

EVENTS AND HIGHLIGHTS

On 16 April, [martial law was extended for an additional 90 days](#). It will now last till **6 August 2025**. In practice, this extends the applicability of specific additional restrictions, such as [the aggression-related exceptions under the Law on Media](#).

On 11 and 18 April, the President of Ukraine issued [three](#) and [two](#) orders, respectively, which imposed economic and personal sanctions against natural and legal persons who actively supported and cooperated with the aggressor state, spread disinformation, and conducted propagandistic activities. In particular, [Order #230 imposed sanctions on 18 propagandistic media \(such as Pravda.Ru and News Media\) and 71 persons who justify the aggression against Ukraine and spread anti-Ukrainian narratives](#). Among the latter are Alexander Sladkov (the correspondent of the Russian propaganda TV channel “Russia”) and Artem Marchevsky (head of the propaganda resource “Voice of Europe”). Furthermore, approximately 45 websites which spread Russian and Belarusian propaganda were blocked by the Order.

On 15 April, [Mykola Chernotytskyi was re-elected](#) by the Supervisory Board as the new head of the National Public Broadcasting Company of Ukraine (Suspilne) after receiving 10 out of 16 votes. Having led Suspilne since

2021, Chernotytskyi [will remain](#) in the position for another four years with a primary focus on expanding audience reach while maintaining trust in the content.

FREEDOM OF EXPRESSION AND MEDIA REGULATION

On 15 April, **the Parliament adopted Draft Law #5870-d on conditional access to media services**, analysed in detail in [July 2024](#). The draft prohibits the advertising, promotion, and popularisation of illegal conditional access devices or related services without the provider's permission, thereby protecting official content distributors from piracy. The **draft is currently awaiting the President's signature**. It aligns Ukrainian legislation with the requirements of [Directive 98/84/EC](#) as part of Ukraine's obligations within its European integration process.

Earlier this spring, on 21 March, the text for the second reading of the **[Draft Law #7033-d on the prevention of disclosure of certain information in the texts of court decisions](#)** (analysed in detail in [May 2024](#)) was published. The draft restricted the publication of certain categories of court decisions, citing national security reasons as a primary concern. The **new amendments removed the provision, [widely criticised by human rights experts for its impact on public access to information](#)**, requiring the publication of court decisions on national security matters one year after the cessation of martial law. Instead, the second-reading draft edition restricts access to the criminal and administrative **cases solely related to military drafting**. At the same time, **the provision granting access to decisions in criminal proceedings related to property seizure, searches, and covert investigative measures one year after they are published in the Register remains unchanged**.

On 23 April, the Parliamentary Committee on Humanitarian and Information Policy **[recommended Draft Law #12111 on Amendments to Certain Laws of Ukraine on Media Activities](#)**, analysed in [October](#), **for adoption in the second reading**. 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. Amendments submitted

by the MPs for the second reading also extend some transparency of ownership requirements to all types of media, in line with the provisions of the European Media Freedom Act.

As to the new bills, on 3 April, **Draft Law [#13150](#) on Ensuring Legality in the Activities of Local Self-Government Bodies and Officials** was submitted to the Parliament. The draft suggests the creation of the Unified State Register of Local Self-Government Acts along with the designation of responsible authorities for its coordination and maintenance. The Register will consist of two independent subsystems – one for open information and one for limited access information – determining citizens’ access to specific data. Otherwise, the Register data will be publicly available and published on both the official website of the Register Holder and the Unified State Web Portal of Open Data. **The Parliamentary Committee on Organisation of State Power, Local Self-Government, Regional Development and Urban Planning is currently processing the draft.**

Draft Law [#13169](#), registered on 11 April, amends the [Law of Ukraine “On National Minorities \(Communities\) of Ukraine”](#) and its adjacent acts, **calling for the use of EU official languages in education and media to support Ukraine’s EU integration process.** In the media sector, the draft encourages television and radio broadcasting in the languages of national minorities — provided these languages are official EU languages — where such minorities make up a significant part of the local population. Noticeably, the **draft law [was submitted](#) by Nestor Shufrych, a former deputy from a pro-Russian political party**, who is currently under suspicion of state treason and held in pre-trial detention. Considering this, it is unlikely that the draft law will undergo any legislative steps in the future.

There was no progress on drafts described in the [previous digests](#), including Draft Law [#12191](#), decriminalising the dissemination of pornography, Draft Law [#13001](#) on the prevention of antisemitism, Draft Law [#12253](#), which improves the legal provisions of the [Law on Advertising](#), Draft Law [#11533](#) on Specifics of Providing Information from Public Electronic Registers, 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.

PRIVACY AND DATA PROTECTION

On 17 April, **Draft Law #13181 on the Verkhovna Rada of Ukraine Commissioner for Human Rights** was registered in the Parliament. The draft provides an improved version of [the current law](#) and increases the Ombudsman's institutional capacity in accordance with international human rights protection standards. In particular, **the draft strengthens the Ombudsman's legal powers as a current personal data protection regulator, granting full access to restricted information and state secrets of all security levels**. The Ombudsman is also empowered to use photo and video recording equipment and other tools for official purposes, as well as access the photo and video materials from surveillance systems. Furthermore, the draft imposes enforcement functions, enabling the Ombudsman to initiate disciplinary, administrative, or criminal proceedings against individuals for failing to comply with their legal requirements. The draft is currently being processed by the Parliamentary Committee on Human Rights, Deoccupation and Reintegration of the Temporary Occupied Territories, National Minorities and Inter-Ethnic Relations.

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 [#12349](#) on the Cyber Forces of the Armed Forces of Ukraine, described in [March](#), did not undergo any legislative steps. Draft Law [#8153](#) on Personal Data Protection is still being prepared for the second reading.

INTERNET REGULATION

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 2024 digest](#)) and three sanctions-related drafts ([#11492](#), [#11492-1](#), and [#12406](#)).

NATIONAL COUNCIL ON TELEVISION AND RADIO BROADCASTING OF UKRAINE

On 10 April, NBC expanded the List of Aggressor State On-Demand Audiovisual Media Services and Services of Audiovisual Service Providers by requesting the blocking of 24 websites related to nine media services (KINOBAR, TIVIX, etc.).

Following the results of the public discussions, **the Procedure for the Operation of the Electronic Cabinet in the Media Sector** was approved on 24 April. The document outlines the electronic cabinet's operation, user identification and authentication procedures, and regulates interactions with the Council. The decision will take effect once the electronic cabinet is officially launched.

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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