

# MEDIA AND DIGITAL RIGHTS REGULATION IN UKRAINE

Digest #25 – July 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 15 July, the President of Ukraine signed a new [Order on the Martial Law Extension](#). The Order **extends the martial law period until 5 November 2025**. It will also extend the applicability of specific additional restrictions, such as the aggression-related exceptions under the Law on Media.

On 16 July, MPs [voted](#) for **the resignation of Prime Minister Denys Shmyhal and his entire Cabinet**. Among the dismissed ministers was Mykola Tochytskyi, who had chaired the Ministry of Culture and Strategic Communications since September 2024. Although the appointment of the new Cabinet of Ministers was expected on 17 July, **the Parliament [had not appointed a fully fledged Minister](#) at that time**. On 28 July, [Tetiana Berezna was appointed as Interim Acting Minister of Culture and Strategic Communications](#).

## FREEDOM OF EXPRESSION AND MEDIA REGULATION

On 22 July, the Parliament had adopted in the second reading the [Draft Law #12320](#) on Amending the Code of Ukraine on Administrative Offences, Criminal and Criminal Procedural Codes of Ukraine Regarding Safeguarding the Barristers' Activities. It introduces **administrative liability**

**for publicly associating barristers with their clients** by broadly defining such association as, inter alia, "*any identification of the barrister with the client which points at the personal involvement of the barrister in the client's case*". Such a broad definition [was criticised by the Ukrainian civil society](#) after the second reading vote, and **they called upon the President to veto the bill**. The draft is currently awaiting the President's signature.

On 8 July, two drafts amending the Criminal Code of Ukraine were registered in the Parliament. **Draft Law #13384-1** is an alternative to Draft Law [#13384](#), analysed in detail [last month](#), which **imposes criminal liability for insult and defamation of the military servicepeople**. Instead of rearranging the norms, the alternative draft suggests adding the respective norms to the section on specially protected categories of persons. Just like the main draft, **it expands the potential circle of violators from the military to the general public**. Both drafts are currently being examined by the Parliamentary Committee on Law Enforcement Activities.

**Draft Law #13457 introduces criminal liability for facilitating fraud through the dissemination of information**. In particular, the draft **prohibits appearing in or conducting any form of advertising that promotes activities later recognised as fraud by the court**. The imposed sanctions vary between a fine of 17,000 - 25,500 UAH (approximately 347 - 520 EUR) and a restriction of liberty for a term of up to 3 years. If the aggravating circumstances are present, namely, the action is repeated, or is done via nationwide media, or if the subject of the crime has a social media audience of over 10,000 users, then the penalty rises to up to 3-5 years of imprisonment. Similar to the previous drafts, this bill is now under examination by the Parliamentary Committee on Law Enforcement Activities.

On 14 July, the finalised text for **the second reading of the Draft Law #13150 on Ensuring Legality in the Activities of Local Self-Government Bodies and Officials**, analysed in the [April digest](#), **was published**. 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. In particular, **the amendments did not substantially change the previous text**: the Register data (excluding limited access information) will remain publicly available and published on both the official website of the Register Holder and the Unified State Web Portal of Open Data. In this regard, the **current version of the draft has no negative impact on citizens' right to access to information**.

**Draft Law [#11533](#) on Specifics of Providing Information from Public Electronic Registers**, analysed in the [March](#) digest and reconsidered by the Parliamentary Committee on Legal Policy last month, **was not included in the Parliament's agenda** on 22 July. This might be related to the [public criticism](#) that the draft has faced since its registration.

There was no progress on other drafts described in the [previous digests](#), including [Draft Law #7033-d](#) on the prevention of disclosure of certain information in the texts of court decisions, Draft Law [#12111](#) on Amendments to Certain Laws of Ukraine on Media Activities, Draft Law [#12191](#), decriminalising the dissemination of pornography, Draft Law [#12253](#), which improves the legal provisions of the [Law on Advertising](#), 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 [#5870-d](#) on conditional access to media services are still awaiting the President's signature.

## PRIVACY AND DATA PROTECTION

No progress was made on [previously analysed documents](#), such as the drafts on [a unified system of public security video monitoring](#), [the criminalisation of electronic communication fraud](#), [the creation of Cyber Forces of the Armed Forces of Ukraine](#), and [counterintelligence activities](#). Draft Law [#13181](#) on the Ukrainian Parliament Commissioner for Human Rights, analysed in [April](#), did not undergo any legislative steps. Draft Law [#8153](#) on Personal Data Protection is still being prepared for the second reading.

## INTERNET REGULATION

On 18 July, the **Draft Law [#13505](#) on the Prohibition of Use and Distribution of Hostile Software Products and Hostile Information Technology** was registered in the Parliament. The draft [aims](#) to establish a regulatory framework for these digital tools in response to their widespread use and exploitation by the aggressor state in Ukraine's information space. In this regard, the draft defines "hostile software" and "hostile information technology", sets criteria for identifying such tools, and imposes liability – a fine of 2% of a business entity's total annual turnover – for violations related to prohibited products. The list of such hostile software and information technologies will be approved and reviewed by the Cabinet of Ministers

of Ukraine. The Draft's terminology can be interpreted as restrictive towards the provision of access to apps and websites of certain platforms whose ultimate beneficiary are the citizens of the aggressor-state (such as Telegram) in Ukraine from 1 January 2030, with the potential for imposing fines on the Internet service providers providing such access. **The Parliamentary Committee on Digital Transformation is currently reviewing the draft.**

The **text for the second reading of the Draft Law #12406**, analysed in the [January](#) digest, was published on 14 July. The draft introduces amendments to the [Criminal Code of Ukraine](#) by establishing criminal liability for entities breaching sanctions. Proposed amendments do not provide liability for accessing websites blocked under the sanction orders, and the **current version does not negatively impact digital rights.**

On the topic of sanctions-related drafts, **Draft Law #11492** on Amendments to the Law of Ukraine "On Sanctions" Regarding the Prohibition of the Use of Software Products and Access to Electronic Information Resources, analysed in detail in the [August 2024 digest](#), **was withdrawn from consideration by the Parliament** due to the Cabinet reshuffle and the former Prime Minister's dismissal.

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 Draft Law [#13311](#) imposing liability for adopting unlawful decisions while applying sanctions.

## **NATIONAL COUNCIL ON TELEVISION AND RADIO BROADCASTING OF UKRAINE**

On 10 July, the NBC [signed](#) a memorandum of cooperation with the Ministry of Digital Transformation and "PlayCity" (the successor to the Commission for the Regulation of Gambling and Lotteries) to jointly monitor compliance with gambling advertising laws in the media.

On 17 July, the NBC [expanded](#) the [List of Aggressor State On-Demand Audiovisual Media Services and Services of Audiovisual Service Providers](#) by requesting the blocking of 84 websites related to 7 new media services and added 10 websites providing access to the previously included KINOGO.

On 24 July, the **NBC [found](#) a gross violation by the NGO Civil Movement “All Together!”**, running a similarly named online media. The NGO’s website published a post titled *“LGBT flags are more important than ramps: between accessibility and profanity”*, with provocative images portraying vulnerable social groups, such as people with disabilities and military personnel, as being dominated and subjected to inappropriate behaviour by members of the LGBTQ+ community. The regulator imposed a fine of 88,000 UAH (approximately 1,795 EUR). Noticeably, this is [not the first instance](#) in which the NGO has been the subject of the NBC proceedings.

The **NBC [has officially launched](#) the selection process for members of the Supervisory Board of the National Public Broadcasting Company of Ukraine (Suspilne)**. The Public Commission, composed of 28 members, [has established](#) the procedure and organisational framework for evaluating applicants’ documents. It will be responsible for assessing the compliance of the documents submitted by the NGOs wishing to take part in the selection procedure in the respective sphere against the criteria established by the Law on Public Service Media in Ukraine.

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**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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