

MEDIA AND DIGITAL RIGHTS REGULATION IN UKRAINE

Digest #27 – September 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 September, **Draft Law #14000 on the State Budget of Ukraine for 2026** was submitted to the Parliament. As always, the majority of the funds will be allocated to the defence, security sector and social security. **The funding allocated for the media sector has been slightly increased:** 239.88 million UAH has been designated for the NBC compared to the financing of the media regulator in 2024 (221.75 million UAH). Similarly, there has been **a slight increase in the funding allocated to the public service media**. For 2026, the National Public Broadcasting Company of Ukraine will receive 2.47 billion UAH, which is slightly higher compared to the 2.1 billion UAH allocated in the current year. The expenditures for the parliamentary TV channel “Rada”, which is supposed to cover the activities of the Verkhovna Rada, remained relatively the same – approximately 80.8 million UAH have been allocated for this purpose this year.

On 23 September, **the Draft Program of Activities of the Cabinet of Ministers of Ukraine (CMU) was presented**. The document contains a list of 12 main priority spheres with the respective objectives set to achieve as well as deadlines for their implementation. Among the main objectives related to media and digital policy are the harmonisation of Ukrainian legislation with EU regulations (in particular, Euro-integration of digital markets and services, and open data accessibility), improving the journalists’ insurance in war zones, supporting print media working close to the frontline, and strengthening the partnership with NATO.

FREEDOM OF EXPRESSION AND MEDIA REGULATION

On 1 September, [Draft Law #13653-1](#) on Preparation, Initiation, Consideration and Adoption of Euro-Integration Bills was registered in the Parliament. Similar to its predecessor, [Draft Law #13653](#), analysed in the [August](#) digest, the draft introduces rules for **the accelerated consideration of EU integration-related draft laws in a single reading**. The draft also empowers the Parliamentary committee, whose competence includes assessing the compliance of draft laws with Ukraine's international legal obligations of European integration, with an additional review of the draft law after the latter was prepared for the second reading by the main committee, provided that such a draft law contains provisions related to the adaptation of Ukrainian laws to the EU standards. Both draft laws are **currently being processed by the Parliamentary Committee on Rules of Procedure, Deputy Ethics and Work Organisation**.

Regarding the drafts described in the [previous digests](#), on 17 September, [Draft Law #11533 on the Specifics of Providing Information from Public Electronic Registers](#), [analysed in March](#), **was signed by the President** after its adoption in late August. Despite the [public criticism](#) the draft faced, the [final text](#) **retained the provisions which restrict access to information** on defence enterprises contained in public registries during martial law and one year after its cessation.

At the end of August, **the Parliamentary Committee on Law Enforcement Activity**, in its extraordinary meeting, [recommended](#) **that the Parliament adopt the Draft Law #13384-1**, which criminalises the insult of military personnel, in the first reading, and, alternatively, withdraw from consideration the initially registered **Draft Law #13384**.

On 4 September, **Draft Law #13150 on Ensuring Legality in the Activities of Local Self-Government Bodies and Officials**, analysed in the [April](#) digest, **was dismissed in the second reading**. The draft law was part of Ukraine's obligations under the EU's financial support program (Ukraine Facility), which required the creation of a system to supervise the legality of local governments' decisions.

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](#), Draft Law [#13457](#) which introduces criminal liability for facilitating fraud through the dissemination of information, two draft laws regarding the activities of the Antimonopoly Committee of Ukraine ([#12440](#) and [#12440-1](#)), and Draft Law [#13597](#) on combating discrimination.

Draft Law [#11321](#) on improving journalists' access to official events, Draft Law [#5870-d](#) on conditional access to media services, and Draft Law [#12320](#) on Safeguarding the Barristers' Activities are still awaiting the President's signature.

PRIVACY AND DATA PROTECTION

On 21 September, Ruslan Stefanchuk, Head of the Verkhovna Rada of Ukraine, initiated the registration of the **Draft Laws [#14056](#) and [#14057](#) on amending, respectively, Book 1 and Book 2 of [the Civil Code of Ukraine](#)**. The draft laws [aim](#) to adapt civil legislation to the digital environment and implement the main EU regulations, such as GDPR. In particular, the draft extends the list of personal rights, adding new rights for the protection in the online sphere, such as the right to a digital image (to counteract the creation of fake pages and other identity manipulations) and the right to be forgotten (to remove irrelevant, inaccurate or unlawful information about oneself), as well as the rights of the legal person (reputational rights).

Media experts have already [expressed serious concerns](#) about certain provisions in the **Draft Law [#14057](#)**. In particular, it provides for the automatic recognition of information not published in the court verdict as unreliable if it infringes upon the presumption of innocence, as well as enables compensation for moral damages related to value judgments. Such a wide interpretation [heavily impacts potential future journalistic investigations](#). Additionally, the draft law allows for the simultaneous application of the right to refutation and the right to reply, which places an additional burden on the person disseminating the original information. It also **extends the possibility of issuing prior restraint orders in the digital world**, preventing the publication of specific pieces of information. **Both drafts are currently being processed by the Parliamentary Committee on Law Policy.**

On 3 September, [**Draft Law #11031**](#) on a unified system of public security video monitoring, analysed in detail in the [February 2024](#) digest, was **withdrawn from consideration in the Parliament**. This is a positive legislative step considering [the numerous issues with privacy and data protection that the draft posed](#).

No progress was made on other [previously analysed documents](#), such as the drafts on [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

No legislative steps were taken regarding earlier submitted initiatives, namely [Draft Law #11115](#) on Regulation of Information-Sharing Platforms That Disseminate Mass Information (analysed in the [March 2024 digest](#)), Draft Law [#13311](#) imposing liability for adopting unlawful decisions while applying sanctions, Draft Law [#13505](#) on the Prohibition of Use and Distribution of Hostile Software Products and Hostile Information Technology, and two sanctions-related drafts ([#11492-1](#) and [#12406](#)).

NATIONAL COUNCIL ON TELEVISION AND RADIO BROADCASTING OF UKRAINE

On 1 September, **members of the co-regulatory body** in the sphere of the audiovisual media [signed](#) the recently developed [Broadcasting Rules on Memorial Days for linear audiovisual media](#). The rules [require](#) linear audiovisual media to announce a minute of silence at 12:00 am, preceded or accompanied by an announcement explaining the day's significance, as well as stop broadcasting comedy films or humorous programs (excluding children's channels) during this time. **The code has entered into force and is mandatory for all television broadcasters.**

On 18 September and 24 September, the NBC [held](#) two respective **conferences during which members of Suspilne's Supervisory Board were elected from public organisations operating in the fields of journalism and**

local governance. Oksana Romaniuk from the Institute of Mass Information [was selected](#) from the journalistic sphere and will continue to serve on the Supervisory Board for a second term. At the same time, Oleksandr Solontai, Head of the NGO “Agency for Recovery and Development”, [will represent](#) the sphere of local governance for the first time.

Between 15 and 30 September, public associations and unions, whose activities are related to education, the rights of national minorities, youth and children’s interests, art, and the needs of people with special needs, [applied to participate in additional conferences](#) to select five more members of Suspilne’s Supervisory Board. The respective conferences will be held later in the autumn. Additionally, on 11 September, **Vyacheslav Kozak**, who was elected a member of Suspilne’s Supervisory Board in February 2021, **voluntarily [resigned](#) from his position.**

On 25 September, [the NBC issued a prescription for the online media outlet “Forbes” for posting photos of nicotine patch packages and instructions on how to purchase them on its website](#), which violates the requirements of the [Law on Advertising](#). This is one of the first instances of the media regulator reacting to violations of advertising rules and sanctioning the media for them.

Digital Security Lab Ukraine is a non-governmental organisation aiming to create a human-rights-centered digital environment in Ukraine. We work towards achieving this goal by providing digital security support to 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, analysis, advocacy, and awareness-raising campaigns.

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