

MEDIA AND DIGITAL RIGHTS REGULATION IN UKRAINE

Digest #29 - November 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 4 November, the **European Commission published [Ukraine's Enlargement Report 2025](#)**, which assesses the country's progress on European integration and provides recommendations to strengthen readiness across all negotiation clusters. **Regarding Chapters 10 and 23 of the acquis**, the Commission emphasized the need to continue implementing platform regulation, such as DSA and DMA, aligning legislation with EMFA provisions to enhance the editorial freedom and independence of media service providers, and adopting an anti-SLAPP policy at the legislative level. The Commission has also encouraged Ukraine to continue working on legislation related to the protection of personal data and the regulation of AI. **Direct recommendations to the government involve:** ensuring that independent telecom and media regulators have adequate funding and human resources to perform their role, maintaining adequate funding for the public service broadcaster, ensuring content produced by publicly funded media is representative of Ukraine's political and societal pluralism, and investigating promptly, independently, and effectively cases of direct intimidation and harassment as well as indirect forms of pressure against journalists and media outlets.

On 5 November, the **Cabinet of Ministers of Ukraine** [approved](#) the **amendments to the Draft Law #14000 on the State Budget of Ukraine for 2026** for the second reading in the Verkhovna Rada of Ukraine. **The funding allocated for the media sector remained unchanged**, with 239.88 million UAH designated for the NBC, 2.47 billion UAH for the National Public Broadcasting Company of Ukraine, and 80.8 million UAH for the parliamentary TV channel "Rada".

FREEDOM OF EXPRESSION AND MEDIA REGULATION

On 11 November, **Draft Law #14202 on Ensuring Accessibility of Audiovisual Media Services (except Audio Media Services) for Persons with Disabilities** was registered in the Parliament. The governmental draft obliges audiovisual media service providers (excluding radio) to ensure inclusivity by providing **subtitling, sign language interpretation, and/or audio description**. The Parliamentary Committee on Humanitarian and Information Policy processes the draft.

There was no progress on 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, Draft Law [#13597](#) on combating discrimination, two draft laws on accelerated consideration of EU integration-related drafts ([#13653](#) and [#13653-1](#)), and two draft laws criminalising the insult of military personnel ([#13384](#) and [#13384-1](#)).

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 5 November, **Draft Law #14057 on Amending Book II of the Civil Code of Ukraine**, analysed in detail in [the September digest](#), was **voted on by MPs in the Parliament in the first reading** with an extended deadline for the second reading preparation. MPs had the opportunity to submit amendments until 26 November. Earlier, Ruslan Stefanchuk, the Speaker of the Parliament and the draft's leading author, agreed to [take the proposed amendments of media experts into consideration](#). Such amendments concern compensations for moral damages, the right to reply, the right to information, and digital privacy. At the same time, **Draft Law #14056 on Amending Book I of the Civil Code of Ukraine** is still being prepared for the second reading by the Parliamentary Committee on Legal Policy without any status changes.

No progress was made on other [previously analysed documents](#), such as the draft laws on [the criminalisation of electronic communication fraud](#), [counterintelligence activities](#), Draft Law [#13181](#) on the Ukrainian Parliament Commissioner for Human Rights, Draft Law [#8153](#) on Personal Data Protection, and Draft Law [#14118](#) on third parties' access to public electronic registers.

INTERNET REGULATION

On 7 November, **Draft Law #14197** was registered in the Parliament. The draft strengthens enforcement powers in the sphere of electronic communications, **empowering the regulator (NCEC) to impose fines for failure to comply with orders to eliminate violations of electronic communications legislation during martial law**, as well as for failure to submit registry information or provide unreliable reporting. The fines range from 17,000 UAH (approximately 347 EUR) to 85,000 UAH (approximately 1,737 EUR), depending on the size of the business entity providing the services. In practice, **this also means sanctions might be imposed on the providers for their non-compliance with [NCON's orders to block access to websites](#)**. The Parliamentary Committee on Digital Transformation processes the draft.

No progress was made on the draft laws, analysed in [the October digest](#), namely Draft Law [#14150](#) on Public-Private Interaction in the Field of Cybersecurity, Draft Law [#12349](#) on the Cyber Forces of the Armed

Forces of Ukraine, and Draft Law [#13505](#) on the Prohibition of Use and Distribution of Hostile Software Products and Hostile Information Technology.

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, and two sanctions-related drafts ([#11492-1](#) and [#12406](#)).

NATIONAL COUNCIL ON TELEVISION AND RADIO BROADCASTING OF UKRAINE

On 13 November, the NBC [scheduled](#) an inspection of the LLC “OTT Ukraine” (provider of the VOD service “Sweet.tv”) for the **distribution of the series featuring a Russian actor who was included in the List of Persons Threatening National Security**. The decision in the case, which concerns hosting Season 4 of “Game of Thrones” on the platform, is expected in late December or early January.

On 20 November, the media regulator [has also imposed](#) **finances totaling over 765,000 UAH** (approximately 15,657 EUR) on four media entities (LLC “TRK Ildana”, LLC “Radio-Era” (legal entity of “Radio NV”), LLC “Media-Inform”, Radio Station “Chornobayivska Hvyliia”) for failing to timely notify changes in their ownership structure and conduct broadcasting.

On 20 November, the NBC [identified](#) **public associations and groups that will participate in conferences on the elections of Suspilne’s Supervisory Board members**. Admitted participants will first submit their candidates and then select their representatives in five spheres: education and science, the rights of national minorities, the protection of children and youth, the creative sphere, and the rights of persons with special needs. The submission of candidates to the NBC [will last](#) till 2 December.

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.

Contact us: dslua@dslua.org



Digital
Security Lab
Ukraine