

MEDIA AND DIGITAL RIGHTS REGULATION IN UKRAINE

Digest #30 - December 2025

DSLJ 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 10 December, the President of Ukraine signed [the Law on the State Budget of Ukraine for 2026](#), adopted by the Parliament on 3 December. **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".

On 15 December, [Recommendations for Moldovan and Ukrainian legislators and regulators for mitigating systemic risk - particularly during electoral periods were published](#). This report, developed by the HLEG for Resilience Building in Eastern Europe and involving DSLJ's Maksym Dvorovyj, presents **a set of guidelines for developing regulatory frameworks on human-rights-centered platform regulation** for Ukraine and Moldova in light of the ongoing EU accession processes. Key recommendations include the establishment of independent platform regulators under the EU's DSA model, fostering bilateral cooperation between the EU and the EU Candidate States, and encouraging observer status for Moldovan and Ukrainian regulators in the European Board for Digital Services (EBDS).

On 17 December, DSLJ [presented the first Mapping of the AI Act Implementation in Ukraine](#), which was prepared to assess Ukraine's state

of compliance with its EU integration obligations on AI regulation. The Mapping contains **applicable Ukrainian legislation, soft law, and already implemented policies related to AI**. Here, DSLU recommends establishing a risk-oriented approach to high-risk AI systems, forbidding the prohibited AI practices, developing procedural provisions for the implementation of AI by state bodies, and appointing notification and market surveillance authorities.

FREEDOM OF EXPRESSION AND MEDIA REGULATION

On 17 December, almost a year after its adoption, **the President of Ukraine finally signed Draft Law #11321**. Analysed in detail in [the June 2024 Digest](#), the law enables journalists to freely visit the public events and premises of public authorities. In terms of the work of parliamentary committees, the law now **requires the broadcasting of their open meetings online**, with the subsequent posting of video recordings on the Parliament's official website within 24 hours after the meetings conclude. Overall, its adoption is **a positive step towards enhancing the transparency of the Verkhovna Rada of Ukraine**.

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](#)). There was no progress on Draft Law [#14202](#), analysed in [the November digest](#).

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 2 December, the Parliamentary Committee on Digital Transformation, in its meeting, **recommended adopting Draft Law #14118 on third parties' access to public electronic registers in the first reading**. The draft, analysed in [the October digest](#), introduces a provision to the [Law of Ukraine "On Public Electronic Registers"](#) according to which **a person should be notified of the use of their information contained in the registers within five days from the date such information was accessed**.

On 4 December, Draft Law [#8153](#) on Personal Data Protection **was transferred** from the Parliamentary Committee on Human Rights, Deoccupation and Reintegration of Temporarily Occupied Territories of Ukraine, National Minorities and Interethnic Relations to **the Parliamentary Committee on Legal Policy**. The latter is currently preparing the draft for the second reading.

No progress was made on other [previously analysed documents](#), such as the draft laws on [the criminalisation of electronic communication fraud, counterintelligence activities](#), and Draft Law [#13181](#) on the Ukrainian Parliament Commissioner for Human Rights. Draft Law [#14056](#) and Draft Law [#14057](#), which respectfully amend Book I and Book II of the [Civil Code of Ukraine](#), analysed in [the November digest](#), did not undergo any legislative updates.

INTERNET REGULATION

On 5 December, **Draft Law #14278 on Digital Accessibility in Ukraine** was registered in the Parliament. This draft **was introduced** in accordance with Ukraine's EU integration obligations on ensuring citizens' accessibility to websites, audiovisual media services, and mobile apps, as well as the implementation of the [National Strategy for Creating a Barrier-Free Space in Ukraine for the Period Until 2030](#). The draft outlines the scope of application of digital accessibility requirements, the subjects covered by these provisions, and the powers of the competent authority to ensure legal and monitoring compliance. Its alternative **Draft Law #14278-1 on Digital Accessibility of Digital Resources and Electronic Services**, registered on 22 December, is largely similar in content. Both drafts are being processed by the Parliamentary Committee on Digital Transformation.

On 2 December, **Draft Law #14197**, analyzed in detail in [the November digest](#), **was recommended for revision by the Parliamentary Committee on Digital Transformation in its meeting**. This is the correct step considering the draft's controversial provisions, which potentially allow for the imposition of sanctions on providers for their non-compliance with [NCON's orders to block access to websites](#).

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

In December, the NBC was active in the sphere of information security protection and **expanded the [List of Aggressor State On-Demand Audiovisual Media Services and Services of Audiovisual Service Providers](#)** by requesting the blocking of 112 websites related to 7 new media services and adding 23 websites providing access to the previously listed HD REZKA, KINOBAR, and RusTv.live. **The NBC also imposed a fine** in the sum of 296,000 UAH (approx. 5,968 EUR) on the on-demand audiovisual media service "youtv" (LLC "Platforma TV") for containing in its catalogue a movie "Mission Impossible: Protocol Phantom", **which featured Vladimir Mashkov, included in the List of Persons Threatening National Security**.

On 5 December, the NBC **commenced the public consultation on the 2026 Draft Implementation Plan of the Strategy of Activities for 2024-2026**. Among the measures aimed for implementation next year are the protection of the information space from the state-aggressor's influence,

improving the inclusivity of the media space, protecting children's rights, and reducing discrimination in the media.

On 18 December, the **NBC approved the Calendar Plan for the preparation and holding of conferences of public unions and associations in two spheres:** physical education and sports, and human rights. According to the Calendar Plan, the conference on the elections of Suspilne's Supervisory Board members in the sphere of physical education and sports will be held between 27 April and 22 May 2026, and in the sphere of human rights, between 23 November 2026 and 22 January 2027. Additionally, in January 2026, **the NBC will hold conferences to elect Suspilne's Supervisory Board members from five spheres:** creative sphere, the spheres of ensuring the rights of national minorities, education and science, protection of the interests of children and youth, and protection of the rights of persons with special needs.

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

