

MEDIA AND DIGITAL RIGHTS REGULATION IN UKRAINE

Digest #33 – March 2026

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 26 March, the European Court of Human Rights published an admissibility decision in [*Boyarov and Others v Ukraine*](#) concerning the blocking of the social networks *Vkontakte*, *Odnoklassniki*, and the mail service *mail.ru*. The applicants challenged the compliance of the restrictive measures imposed by the authorities in 2017 in response to the spread of harmful content and the ties with Russian government in light of the ongoing war. **The Court found all claims inadmissible since the applicants - the users of these websites - failed to demonstrate their victim status.** Within its admissibility analysis, the Court recognised the special role of social media, however, emphasised that lost access to the latter does not automatically grant such victim status. ECtHR has also recognised **that the measures were imposed in the specific context of war**, which makes exceptional political choices necessary against the threat to national security and public order. **The Court did not comment on the quality of the Law on Sanctions and its provisions related to website blocking**, thus leaving the question of their compliance with the three-part-test open.

FREEDOM OF EXPRESSION AND MEDIA REGULATION

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](#)), two draft laws criminalising the insult of military personnel ([#13384](#) and [#13384-1](#)), and draft law [#14202](#) on accessibility of media services for people with disabilities. There was no progress on Draft Law [#14372](#), analysed in the [January 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

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. Draft Law [#14394](#) of the [Civil Code of Ukraine](#) (the Code of Private Law), as well as its two alternative draft laws ([#14394-1](#) and [#14394-2](#)), are still being processed by the Parliamentary Committee on Legal Policy.

INTERNET REGULATION

On 9 March, **revised text for the second reading of Draft Law #12349 on the Cyber Forces of the Armed Forces of Ukraine was published.** Analysed in [the December 2024 digest](#), the draft outlines the main tasks and functions of the Cyber Forces in cyberspace operations. The newly revised and proposed amendments to the draft law do not contain any provisions with a negative effect on digital rights. **The draft is now ready for voting in the Parliament.**

On 25 March, the Parliamentary Committee on Humanitarian and Information Policy **recommended Draft Law #11115 on Regulation of Information-Sharing Platforms That Disseminate Mass Information to be adopted in the first reading.** Analysed in the [March 2024 digest](#), the draft amends the Law on Media, **imposing a range of obligations on online platforms and prescribing fines for non-compliance with content removal orders** that the media regulator might impose, but it does not provide the regulator with blocking powers. It also introduces **a number of restrictions on platforms which have a non-transparent structure of ownership.** The necessity for draft's adoption [was justified](#) by the fact that the current Law on Media does not provide specific rights or obligations for online platforms that have significant audiences in Ukraine (for example, Telegram). **Some of the draft's provisions are likely to threaten Internet freedom if adopted in their current version. The draft also received criticism from the Council of Europe experts.**

No legislative steps were taken regarding earlier submitted initiatives, namely Draft Law [#13311](#) imposing liability for adopting unlawful decisions while applying sanctions, Draft Law [#14150](#) on Public-Private Interaction in the Field of Cybersecurity, Draft Law [#13505](#) on the Prohibition of Use and Distribution of Hostile Software Products and Hostile Information Technology, Draft Law [#14197](#) strengthening enforcement powers in the sphere of electronic communications, and two sanctions-related drafts ([#11492-1](#) and [#12406](#)). Draft Law [#14278](#) and Draft Law [#14278-1](#) on digital accessibility remained unchanged in status.

NATIONAL COUNCIL ON TELEVISION AND RADIO BROADCASTING OF UKRAINE

On 4 March, the NBC presented Recommendations to the Media on Preventing Hate Speech and Discrimination, aimed at assisting the media in **complying with the requirements of the Law on Media on content restrictions**. The Recommendations contain the definitions and examples of the prohibited language, as well as the methods to identify hate speech in the content.

On 26 March, the NBC expanded the List of Aggressor State On-Demand Audiovisual Media Services and Services of Audiovisual Service Providers by requesting the blocking of 9 websites related to 9 new media services, namely myru, Ontvtime.tv, and RusTV.

In March, the NBC also continued its process of electing Suspilne's **Supervisory Board members in the sphere of physical education and sports**, by allowing 31 public associations and groups to participate in the relevant conference which is scheduled for May.

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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