

MEDIA AND DIGITAL RIGHTS REGULATION IN UKRAINE

Digest #34 - April 2026

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

At the end of March, [the Draft Strategy for the Development of Artificial Intelligence until 2030 was published](#). Developed by government agencies, businesses, and experts, the Strategy aims to improve state policy on AI governance, establish a clear plan for AI applications in decision-making, and implement strategic AI goals.

On 1 April, the **Cabinet of Ministers of Ukraine** [approved the National Program for the Adaptation of Ukrainian Legislation to the Law of the European Union \(EU Acquis\)](#). Chapter 10 on Digital Transformation and Media of the Program contains a rather broad and ambitious list of tasks (for example, the adoption of national legislation on an electronic communications regulator, digital services, a unified digital regulator, AI, etc.) set out to be completed by January 2028.

On 6 April, an **Expert Council on the Formation of State Information Policy was formed under the Ministry of Culture of Ukraine**. The Expert Council [constitutes](#) a permanent advisory and consultative body that, among other tasks, prepares recommendations on state information policy and participates in the development of draft laws on media and information. **DSLJ's Head, Vita Volodovska, joined the Council.**

The High-Level Expert Group for Resilience Building in Eastern Europe [has published the first collective expert definition on “Operational Readiness for DSA Alignment”](#). The publication, prepared with the participation of DSLU’s Maksym Dvorovyi, includes a list of practical steps for EU candidate states to assess their governments’ readiness for DSA implementation. It is an essential document, in particular for Ukraine, which is currently aligning its legislation with EU frameworks.

On 30 April, the **President of Ukraine signed a new [Order on the Martial Law Extension](#)**. The Order **extends the martial law period until 2 August 2026**. It will also extend the applicability of specific additional restrictions, such as the aggression-related exceptions under the Law on Media.

FREEDOM OF EXPRESSION AND MEDIA REGULATION

In April, two draft laws amending [the Criminal Code of Ukraine](#) (CCU) regarding freedom of expression were registered in Parliament. **Draft Law [#15186](#) expands Article 161 of the CCU (Prohibition of discrimination) to prohibit “ukrainophobia”**. Ukrainophobia is defined as incitement to hatred, humiliation of national honor and dignity, as well as public denial of the Ukrainians’ right to self-determination, and was proposed to be punishable under the sanctions provided in Article 161, that is, for up to 3 years of imprisonment.

Draft Law [#15192](#) establishes a new Article of CCU, criminalizing public denial of the Holodomor of 1932-1933 in Ukraine as a genocide and desecration of the memory of millions of Holodomor victims. Non-compliance leads to a term of imprisonment of 3-7 years. Aggravating circumstances - the repetitiveness, the commission of the crime by a public official or an organized group, and the use of media - shall be punishable by imprisonment for a term of 5-7 years of imprisonment. **The Parliamentary Committee on Law Enforcement Activities processes both draft laws**.

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

Due to the increasing number of cases involving the distribution in the media of content that may include personal data or other private information, the NBC has published [Recommendations for the media community on the protection of personal data during the publication of photo- and videomaterials in journalistic investigations](#), prepared earlier this year by the Ombudsman. The document contains recommendations for the media on how to balance the right to freedom of expression with personal data protection. The recommendations [include](#) the need to assess the legal basis, the data subject's consent, and the public interest in the publication.

On 9 April, **Draft Law [#15150](#), the new draft of the [Civil Code of Ukraine](#)**, was registered in the Parliament. As its last predecessors ([#14394](#), [#14394-1](#) and [#14394-2](#)) - which were withdrawn from consideration by the Parliament - the draft law aims to improve the provisions by incorporating concerns raised in the initial draft presented by human rights experts. The sixth legislative attempt at recodifying the civil law sphere is currently [facing](#) strong backlash. Media experts [raise](#) concerns, in particular, about **provisions that might restrict the activities of investigative journalists, in areas related to the protection of private information and access to state registers**. Notwithstanding the critique, on 28 April, the draft law [was voted on by the Parliament in the first reading](#). Relevant amendments to the draft can be submitted till 19 May.

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

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 Laws on digital accessibility ([#14278](#) and [#14278-1](#)) and Draft Law [#12349](#) on the Cyber Forces of the Armed Forces of Ukraine remained unchanged in status. [Draft Law #11115](#) on Regulation of Information-Sharing Platforms That Disseminate Mass Information, which was recommended to be adopted in the first reading, is yet to be voted on.

NATIONAL COUNCIL ON TELEVISION AND RADIO BROADCASTING OF UKRAINE

On 31 March, certain provisions of Article 40 of the [Law on Media](#) on language quotas [entered](#) into force. According to the new rules, **non-linear media services must ensure that at least 25% of the programs and films in their program catalog** are in the state language. **Audiovisual service providers** are obliged to distribute television channels in Ukrainian, amounting to **at least 60% of the total number of channels in a package**.

The co-regulatory body in the sphere of audiovisual media has [developed and approved](#) the [Regulations on expert panels](#). In this regard, on 22 April, the co-regulatory body [announced](#) **the recruitment of experts to the expert panel, which will prepare expert opinions on the compliance with the [Broadcasting Rules on Memorial Days for linear audiovisual media](#)**.

On 23 April, the NBC **sanctioned** the Berehove-based local radio broadcaster for the Hungarian community «Pulzus Radio» for non-compliance with the language quotas under the Law on Media. Since the volume of news programs in the state language accounted for **54,4% instead of the required 90%**, the broadcaster was fined 5,041.92 UAH (approximately 98 EUR).

On 23 April, the NBC **expanded** the **List of Persons Threatening National Security** by including **Aleksandr Stefanov, the Russian blogger and online content creator**, who publicly and systematically spread anti-Ukrainian narratives.

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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