

MEDIA AND DIGITAL RIGHTS REGULATION IN UKRAINE

Digest #39 – September 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 15 September, **Draft Law [#16000](#) on the State Budget of Ukraine for 2027 was submitted to the Parliament**. As always, the majority of the funds will be allocated to the defense, security sector, and social security. Some additional funding was allocated to the media sector: 280.28 million UAH (approximately 5.5 million EUR) has been designated for the NBC, roughly a 40 million UAH increase over 2026 (239.66 million UAH), while the National Public Broadcasting Company of Ukraine will receive 3.05 billion UAH. Expenditures for coverage of the Verkhovna Rada activities, which include, inter alia, the Rada TV channel, were slightly increased to approximately 84.8 million UAH. The funds allocated for foreign broadcasting and the marathon amounted to 1.62 billion UAH.

On 22 September, **the Parliamentary Committee on Humanitarian and Information Policy [announced](#) the selection process of candidates for the positions of the National Council's three members under the Verkhovna Rada's quota**. The candidates are to be nominated by 13 October.

FREEDOM OF EXPRESSION AND MEDIA REGULATION

On 30 September, **Draft Law #16117 on combating SLAPPs**, developed by a working group that included DSLU's Vita Volodovska and Tetiana Avdieieva, was submitted to the Parliament. This is the first legislative attempt to protect media and journalists from unjustified interference in their professional activities through civil lawsuits, with the aim of aligning Ukrainian legislation with the EU Anti-SLAPP Directive. **The draft law establishes a system of state guarantees to protect public participation, introducing special procedures to combat abuse of the judicial process.** Since media freedom constitutes one of the milestones on the EU-integration track, enshrined in [the Rule of Law Roadmap](#) of May 2025, Ukraine took an obligation to develop and adopt its legislation in line with the Anti-SLAPP Directive by Q4 2026.

On 4 September, **Draft Law #16023** was registered in the Parliament. The draft expands [the Law of Ukraine "On the Prevention and Countering of Antisemitism in Ukraine"](#) **to prohibit "ukrainophobia", hostility towards national minorities, racism, and racial discrimination.** Ukrainophobia is defined as discriminatory actions, publicly expressed appeals, including in the media, literary and artistic works, that deny the existence of the Ukrainian state, Ukrainian nation, the fight against the exploitation, and assimilation of Ukrainian people, as well as disparage the distinctive ethnocultural traits of Ukrainians, and ignore the Ukrainian language and culture. According to the draft law, ukrainophobia includes, but is not limited to, public disdain for the Ukrainian language, traditions, or history, public calls or statements denying the Ukrainian nation's right to self-determination, and intolerance towards individuals of non-Ukrainian origin. The draft is currently being processed by the Parliamentary Committee on Human Rights, Deoccupation and Reintegration of the Temporarily Occupied Territories, National Minorities and Inter-Ethnic Relations.

Furthermore, **Draft Law #16022 expands Article 161 of the Criminal Code of Ukraine** and provides accompanying amendments regarding the provisions of the above-mentioned draft law. The Parliamentary Committee on Law Enforcement Activity processes the draft.

There was no progress on drafts described in the [previous digests](#) and voted upon in the first reading, 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, and Draft Law [#12253](#), which improves the legal provisions of the [Law on Advertising](#). Draft Laws [#15186](#) on criminalizing Ukrainophobia, [#15192](#) on criminalizing public denial of the Holodomor in Ukraine, [#15256](#) on specifics of the publication of laws, and [#15563](#) on mandatory openness of the court proceedings regarding the approval of plea agreements, analyzed in the [previous digests](#), are still under the pre-voting consideration.

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

Draft Law [#16014](#), registered on 2 September, **proposes to criminalize the creation of, leadership of, or participation in an electronic communication fraudulent organization**. The activities of such an organization include, among others, gathering and storing personal data, individual account information, authentication codes, and other data used for fraud. In practice, **this draft law introduces liability for the creation and participation in fraudulent call centers, which have recently become widespread**. Depending on the aggravating circumstances, the violation results in a deprivation of liberty for 5-12 years, with or without confiscation of property. The Parliamentary Committee on Law Enforcement Activity processes the draft.

No progress was made on other [previously analyzed documents](#), such as the draft laws on [personal data protection](#), [third parties' access to public electronic registers](#), and Draft Law [#15289](#) prohibiting hate speech against politicians. Draft Law [#15150](#) on the new draft of the [Civil Code of Ukraine](#), Draft Law [#13181](#) on the Ukrainian Parliament Commissioner for Human Rights, and Draft Law [#15294](#) on decriminalization of the voluntary creation and distribution of pornography by adults are still being prepared for the second reading. Draft Law [#15379](#), which criminalizes fraud committed through AI systems and was analyzed in the [previous digest](#), did not undergo any legislative developments.

INTERNET REGULATION

No legislative steps were taken regarding the previously submitted initiatives, namely Draft Law [#14278-1](#) on digital accessibility and Draft Law [#12349](#) on the Cyber Forces of the Armed Forces of Ukraine. 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 22 September, [Criteria regarding the promotion of the Russian totalitarian regime, the armed aggression of the Russian Federation against Ukraine, and symbols of the military invasion entered into force](#). The working group of the co-regulatory body in the sphere of audiovisual media services, comprising 12 members, including DSLU's Maksym Dvorovyi, worked to develop the document. The Criteria [shall assist](#) in determining which information may contain support for or justification of the criminal nature of the activities of the Russian Federation, its bodies, and officials, as well as propaganda of armed aggression or symbols of military invasion.

On 18 September, the NBC [announced](#) the public consultation on its [Strategy of Activity Until 2032](#). The proposals for the document are due by 18 October and will shape the media regulator's key aims over the medium term.

At the end of September, the NBC [commenced](#) the public consultation on two draft documents: **Requirements for the text message and the "All-Ukrainian Referendum Campaign" label** during the dissemination of all-Ukrainian referendum campaign materials by subjects in the field of linear audiovisual media, as well as the **Regulation on the Establishment of the Expert Council** on such campaigns. The proposals are to be submitted by the end of October.

Digital Security Lab Ukraine is a non-governmental organization 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 organizations, 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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