

Media and digital rights regulation in Ukraine

DSLUs 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 Broadcasting Council in the area of Media Law implementation.

Events and Highlights

On 5 September, **Verkhovna Rada** [appointed](#) **Mykola Tochytskyi as the Minister of Culture and Strategic Communications of Ukraine**, arguing that a candidate with international experience was needed to strengthen the fight against disinformation. It is difficult to assess the efficiency of such an appointment, considering that the new minister was professionally involved in diplomacy but lacked experience in media-related matters. **The Ministry was also rebranded**, suggesting an improved focus on strategic communications among its functions.

On 13 September, the DSLU [organised and moderated](#) the event where the **Implementation Plan of the European Act on Media Freedom was presented**. The MPs, representatives of state authorities in the sphere of media, and civil society representatives discussed key aspects of the Act, including the independence of the national regulator, protection of journalistic sources, transparency of media ownership and media interaction with online platforms. The Implementation Plan will be discussed further, setting the priorities for action for key governmental players in the foreseeable future.

On 14 September, **Draft Law #12000 on the State Budget of Ukraine for 2025** was submitted to the Parliament. The majority of the funds will be allocated to financing the defense and security sector. The funding allocated for the media sector remained relatively stable: for example, 221.75 million UAH has been designated for the NBC which is slightly less than the amount allocated in 2024. However, there has been a notable increase

in the funding allocated to the public broadcaster. For 2025, the National Public Broadcasting Company of Ukraine will receive 2.1 billion UAH, reflecting a significant rise compared to the 1.8 billion UAH allocated in the current year. It is also planned to reduce expenditures for the parliamentary TV channel “Rada”, which covers the activities of the Verkhovna Rada, – only 78.2 million UAH have been allocated for this purpose this year.

Freedom of Expression and Media Regulation

On 19 September, the **National Coordination Center for Cyber Security** **decided to limit the use of the Telegram messenger within state authorities, military formations, and critical infrastructure facilities**. This decision is driven by national security concerns, particularly due to allegations that the state aggressor can access personal correspondence and even deleted messages within the Telegram platform. An exception will be made for individuals whose official duties require the use of this messenger, and the ban will apply solely to work computers, not personal smartphones. This decision also reflects the provisions of the previously registered [Draft Law #11115](#) (analysed in [March](#)).

Draft Law #12062 On the Responsibility for the Propaganda of the Symbols of Russian Imperial Policy in Ukraine was registered in September. The legal basis for the draft is the [Law of Ukraine “On the Condemnation and Prohibition of Propaganda of Russian Imperial Policy in Ukraine and the Decolonization of Toponymy”](#), adopted in 2023. The draft introduces new articles in the Criminal Code of Ukraine and Code of Ukraine on Administrative Offenses, **prohibiting the production, use, dissemination and promotion of the symbols of Russian imperial policy in Ukraine**. Respective sanctions depend on the severity of the violation, ranging from fines to deprivation of liberty. The Parliamentary Committee on Law Enforcement Activities processes the draft.

In the context of Ukraine’s recent ratification of the Rome Statute, **Draft Law #11538 on Criminal Responsibility for International Crimes** was registered. In particular, the draft imposes criminal **liability for public calls for the crime of genocide or its justification or denial, and propaganda of an act of aggression**, both of which are punishable by imprisonment for up to 20 years. Current text of the draft is formulated in vague and general terms which calls for further review to avoid the wide interpretation in the future. The draft is being processed by the Parliamentary Committee on Law Enforcement Activities.

There were no legislative steps taken regarding the previously submitted initiatives described in [earlier editions of digests](#), which include proposals to enhance the Parliament's transparency, numerous amendments to the speech-related offences in the Code of Ukraine on Administrative Offences and Criminal Code of Ukraine, the decriminalisation of pornography, and the prevention of disclosure of certain information in the texts of court decisions. Although Verkhovna Rada did not adopt any of the three drafts, which were voted for in the first reading in [July](#), namely [#5870-d](#), [#11321](#) and [#11153](#), the text for the second reading of the latter initiative was published on 23 September, preserving the draft's main provisions.

[Privacy and Data Protection](#)

There were no new initiatives or progress on other drafts analysed in previous digests in [July](#). These include the drafts on [a unified system of public security video monitoring](#), [personal data protection](#), [porn-related draft laws](#), the [exclusion of prosecutorial discretion](#) in temporary access to sensitive personal data, and the [criminalisation of electronic communication fraud](#). [Draft Law #11228-1](#) on counterintelligence activities, analysed in [May](#), still awaits the second reading by the Parliamentary Committee on Law Enforcement Activities.

[Internet Regulation](#)

Draft Law [#11492-1](#) on Amendments to the Law of Ukraine “On Sanctions” Regarding the Prohibition of the Use of Software Products (Software) was registered at the end of August. The draft **introduces a new type of sanction, namely the prohibition of the import, sale, and usage of software products (software) and their components**. This draft is an alternative to [Draft Law #11492](#), analysed in the [previous digest](#), that does not suggest website blocking and is limited solely to software. Both drafts are currently being processed by the Parliamentary Committee of National Security, Defence and Intelligence.

No legislative steps were taken regarding the previously submitted initiatives, namely [Draft Law #10101](#), which permits the monitoring of the Internet to block unlicensed online gambling websites and mobile applications, and [Draft Law #11115](#) on Regulation of Information-Sharing Platforms That Disseminate Mass Information (analysed in the [March digest](#)).

National Broadcasting Council

The NBC's activities in September were largely focused on registration and licensing routine. On 26 September, NBC [registered](#) 19 print media, 23 online media and 9 audiovisual media. The Council has also [prepared](#) its proposals and comments on the draft acts submitted by the Antimonopoly Committee of Ukraine on the determination of markets in the sphere of media.

On 10 September, the **NBC representatives and the delegation from the Council of Europe** [held a meeting](#) focused on exchanging experiences and developing tools to **safeguard freedom of speech in light of the widespread use of SLAPP lawsuits**, which are frequently employed to exert pressure on journalists and human rights defenders.

Digital Security Lab Ukraine is a non-government organisation aiming to create a human-rights-centered digital environment in Ukraine. We work toward achieving this goal by providing digital security support for high-risk Ukrainian human rights and media organisations and by contributing to policy development in the field of human rights on the Internet through conducting legal monitoring, research and analysis, advocacy, and awareness-raising campaigns.

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