

MEDIA AND DIGITAL RIGHTS REGULATION IN UKRAINE

Digest #26 – August 2025

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.

FREEDOM OF EXPRESSION AND MEDIA REGULATION

On 4 August, [Draft Law #13597](#) on combating discrimination was registered in the Parliament. The draft amends Article 161 of the Criminal Code, offering to **impose liability for public calls for violence motivated by intolerance** towards a person and/or group of persons based on their characteristics. The imposed sanctions alternate between a fine of 3,200 - 8,000 UAH (approx. 66 - 166 EUR), restriction of liberty for a term of up to 5 years, and imprisonment for a term of up to 3 years with the deprivation of the right to hold official positions for the same term. Additionally, the draft amends Article 300 of the Criminal Code – on import, production or distribution of works or other materials that promote the cult of violence and cruelty, intolerance and discrimination – **criminalising the distribution of such content through any means**, including printed publications and/or other digital materials. **The Parliamentary Committee on Law Enforcement Activities processes the draft.**

On 17 August, [Draft Law #13653](#) on Improving Procedures for Adapting Ukrainian Legislation to European Union Law (EU *acquis*) was registered in the Parliament. The draft introduces a new chapter to the Rules of Procedure of the Verkhovna Rada of Ukraine on the initiation, registration and

consideration of adapted draft laws, **establishing, in particular, the rules for their accelerated consideration in a single reading.** This draft law represents a step in the right direction – the newly adopted procedure will simplify the review and adoption of Euro-integrated draft laws, especially those related to the media. The draft law is **currently being processed by the Parliamentary Committee on Rules of Procedure, Deputy Ethics and Work Organisation of the Verkhovna Rada of Ukraine.**

On 21 August, [Draft Law #11533 on Specifics of Providing Information from Public Electronic Registers](#), analysed in the [March](#) digest, was adopted by the Parliament. The **draft suggests several restrictions on access to information on defence enterprises** contained in public registries during martial law and one year after its cessation. Despite the [public criticism](#) the draft faced, the latter was adopted, **awaiting the President's signature.**

There was no progress on other 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 [#13150](#) on Ensuring Legality in the Activities of Local Self-Government Bodies and Officials, Draft Law [#13457](#) which introduces criminal liability for facilitating fraud through the dissemination of information, two draft laws regarding the activities of the Antimonopoly Committee of Ukraine ([#12440](#) and [#12440-1](#)), and draft laws criminalising insult of the military servicepeople ([#13384](#) and [#13384-1](#)). Draft Law [#11321](#) on improving journalists' access to official events, 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 [previously analysed documents](#), such as the drafts on [a unified system of public security video monitoring](#), [the criminalisation of electronic communication fraud](#), [the creation of Cyber Forces of the Armed Forces of Ukraine](#), and [counterintelligence activities](#). Draft Law [#13181](#) on the Ukrainian Parliament Commissioner for Human Rights, analysed in [April](#), did not undergo any legislative steps. Draft Law [#8153](#) on Personal Data Protection is still being prepared for the second reading.

INTERNET REGULATION

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, Draft Law [#13505](#) on the Prohibition of Use and Distribution of Hostile Software Products and Hostile Information Technology, and two sanctions-related drafts ([#11492-1](#), and [#12406](#)).

NATIONAL COUNCIL ON TELEVISION AND RADIO BROADCASTING OF UKRAINE

The NBC [has completed](#) the first stage in the selection process for members of the Supervisory Board of the National Public Broadcasting Company of Ukraine (Suspilne) in the spheres of journalism and local self-governance. In particular, 40 out of 72 public associations and unions [were approved to participate](#) in the upcoming conferences and have been officially granted the right to take part in the selection. The next step [involves](#) these organisations nominating their candidates for membership in the Supervisory Board. **The NBC will accept candidate submissions between 25 August and 2 September 2025.**

On 21 August, the regulator [announced](#) its **decision to submit for public discussion** a draft amendment to the [Procedure for holding conferences of public associations and unions, electing members of Suspilne's Supervisory Board, and terminating their powers](#). The draft primarily [contains](#) administrative amendments, determining the list of documents to be submitted with an application for participation in the conference and clarifying the grounds on which an application may be disregarded in case of procedural violations.

The media regulator [fined](#) Mega, a national audiovisual broadcaster, for **airing a 41-minute episode of the "Rechdok" programme in Russian without dubbing or voiceover in Ukrainian**. The company attributed the use of Russian on air to a technical failure, but NBC found a significant violation and fined the media 454,000 UAH (approximately 9,491 EUR).

In the co-regulatory sphere, the NBC has approved **the Broadcasting Rules on Memorial Days for linear audiovisual media** – the first code developed by the co-regulatory body in the field of audiovisual media services. The rules require linear audiovisual media to announce a minute of silence at 12:00 am, preceded or accompanied by an announcement explaining the day's significance. Moreover, a unified visual symbol is introduced for four remembrance days: Holocaust Remembrance Day, Victory over Nazism in World War II Day, the Day of Remembrance for Fallen Ukrainian Defenders, and the Holodomor Remembrance Day.

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 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.

Contact us: dslua@dslua.org

