

MEDIA AND DIGITAL RIGHTS REGULATION IN UKRAINE

Digest #31 – January 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 January, the **President of Ukraine signed a new [Order on the Martial Law Extension](#)**. The Order **extends the martial law period until 4 May 2026**. It will also extend the applicability of specific additional restrictions, such as the aggression-related exceptions under the Law on Media.

On 13 January, the Verkhovna Rada of Ukraine **[voted to dismiss Mykhailo Fedorov from his position as Minister of Digital Transformation of Ukraine, following his \[appointment\]\(#\) as the new Minister of Defense](#)**. As of now, **Oleksandr Borniakov** (former Deputy Minister for European Integration) **[has been appointed](#) Acting Minister of Digital Transformation**.

In addition, on 27 January, the DSA Human Rights Alliance, of which DSLU is a member, presented **[the Principles for a Human Rights-Centred Application of the DSA: A Global Perspective](#)**. This set of recommendations, developed with input from DSLU experts, outlines steps the European Commission, as the main DSA enforcer, as well as national policymakers and regulators, should take to bring diverse groups to the table as a means of ensuring that the implementation of the DSA is grounded in human rights standards. The Principles **also offer guidance for regulators outside the EU who look to the DSA as a reference framework**, as well as for international bodies and global actors concerned with digital governance and the wider implications of the DSA.

FREEDOM OF EXPRESSION AND MEDIA REGULATION

On 12 January, **Draft Law #14372** was registered in the Parliament. The draft extends the wording of Article 346 of the [Criminal Code of Ukraine](#), which criminalises threat or violence against a public or civic figure, by prohibiting “**public appeal or public incitement of an unspecified group of persons to commit murder, violence, kidnapping, imprisonment, harm to their health or destruction or damage to their property**”, including via means of the Internet, against respective persons. Non-compliance leads to a term of imprisonment of 6-10 years. Aggravating circumstances – the repetitiveness, usage of explosives or firearms, usage of information technologies, and the commission of the crime during martial law – shall be punishable by imprisonment for a term of 10-15 years or life imprisonment. The draft law is currently being processed by the **Parliamentary Committee on Law Enforcement Activities**.

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](#)), and two draft laws criminalising the insult of military personnel ([#13384](#) and [#13384-1](#)). There was no progress on Draft Law [#14202](#), analysed in [the November 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

On 22 January, **Draft Law #14394** of the [Civil Code of Ukraine](#) (the **Code of Private Law**) was submitted to the Parliament by the Speaker, Ruslan Stefanchuk. The new draft aims to systematically update the regulation of private relations, taking into account digitalization, cross-border legal

relations, and European approaches to protecting civil rights. According to the draft law's lead proponent, this draft is **the unified document of all the amendments proposed by the MPs, media experts, and civil society.** It partially addresses the concerns raised during the work on the previously registered Draft Laws [#14056](#) and [#14057](#), which respectfully amend Books I and II of the [Civil Code of Ukraine](#), analysed in [the November digest](#), and might substitute them. **The Parliamentary Committee on Legal Policy processes the draft.**

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

On 12 January, **the 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. Currently, the amendments to the draft law remain mainly semantic without any negative effect on the digital rights. **The Parliamentary Committee on National Security, Defence, and Intelligence has recommended the adoption of the draft.**

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 [#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, analysed in the [previous digest](#), remained unchanged in status.

NATIONAL COUNCIL ON TELEVISION AND RADIO BROADCASTING OF UKRAINE

On 8 January, the NBC expanded the List of Aggressor State On-Demand Audiovisual Media Services and Services of Audiovisual Service Providers by requesting the blocking of 5 websites related to 5 new media services, namely onelike.tv, SMOTRET TV, telik.top, VITS TV, and MAGIYA TV. Later, the NBC expanded the List of Persons Threatening National Security by including **Lyubov Uspenskaya, the famous Russian singer**, who publicly supports Russia's military aggression against Ukraine.

The inspection by the media regulator of the LLC "OTT Ukraine" (provider of the VOD service "Sweet.tv"), analysed in the November digest, demonstrated that media-service contained in its catalogue a movie "Tenet" and Season 4 of "Game of Thrones", **both of which featured Yuri Kolokolnikov, included in the List of Persons Threatening National Security**. In this regard, the NBC imposed a fine of 320,000 UAH (approximately 6,261 EUR).

In January, the NBC also held conferences for electing Suspilne's Supervisory Board members in the relevant spheres. Among the five selected representatives are Yevhen Hlibovytskyi in the creative sphere, Stepan Makhsma in the sphere of ensuring the rights of national minorities, Halyna Tytysh in the spheres of education and science, Vadym Miskyi in protection of the interests of children and youth, and Natalia Garach in protection of the rights of persons with special needs.

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.

Contact us: dslua@dslua.org

