



Platform regulation, disinformation and FIMI in Ukraine

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Tetiana Avdieieva, Roman Horbyk, Dariia Opryshko, Oleksandr Monastyrskyi
and Igor Rozkladaj



Foreword

Arguably, the 1898 Spanish-American War marks the beginning of the era of disinformation. Although it was not the first military conflict to appear on the silver screen, it was the first in which fake battle footage was used. In the early days of the film industry, *naïveté* among viewers was the rule and filmmakers found a lucrative business in the reenactment of war battles in studios with scale models. This new film genre, halfway between entertainment and propaganda, demonstrated the potential of motion pictures for audience manipulation, as had occurred some decades earlier with photography.

At the same time, the press witnessed the birth of so-called “yellow journalism”, named after “Yellow Kid”, a cartoon shared by the American sensationalist press of the time that fabricated all kinds of false war-related facts with clear, premeditated manipulation purposes. As the years went by, propaganda became more sophisticated and dangerous, and its distribution channels wider and increasingly diverse, especially with the advent of the internet and artificial intelligence.

The problem with the term “propaganda” is its ambiguity. In light of this, contemporary European discourse has adopted the more precise concept of “foreign information manipulation and interference” (FIMI). FIMI has been a key weapon used by the Russian Federation in its war of aggression against Ukraine, and countering it is especially complicated in a war context and in view of the massive use of digital platforms to spread all kinds of illegal content for hybrid battle purposes.

The European Audiovisual Observatory (EAO), which investigated FIMI in Eastern Europe, the Western Balkans and Türkiye in 2025, now offers a new report focusing solely on Ukraine. This new report, released on the occasion of Ukraine’s accession to the EAO as a member state, aims to analyse Ukraine’s media sector and current media legislation with a view to countering the impact of FIMI in the context of the war.

I would like to warmly thank all the authors who contributed to this report for their engaged participation and excellent work in extremely complicated circumstances (by order of chapter): Roman Horbyk, Tetiana Avdieieva, Dariia Opryshko, Oleksandr Monastyrskyi and Igor Rozkladaj.

Enjoy the read!

Maja Cappello

IRIS Coordinator

Head of the Department for Legal Information

European Audiovisual Observatory

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Executive Summary

This IRIS report offers a comprehensive analysis of the role of platform regulation in the field of disinformation and foreign information manipulation and interference (FIMI) in Ukraine. Five distinguished authors, experts in their respective fields, have contributed individual chapters that explore different areas relevant for the analysis of this topic, which is of particular importance at the present time.

Chapter 1, authored by Roman Horbyk, focuses on the structure and dynamics of Ukraine's media sector. After an explanation of some key concepts, the chapter delves into a historical analysis of the Ukrainian media system from 1991, the year that marks the end of the Soviet era, until the present day, and examines the current sector from both legal and political angles.

As well as analysing how the Ukrainian media system has evolved over the past three decades, the author offers an overview of the main challenges facing Ukraine's current media ecosystem, ranging from severe infrastructural damage to severe staff shortages and continuous cyberattacks suffered by the Ukrainian media.

In **Chapter 2**, Tetiana Avdieieva explains the Ukrainian media legislation system now in force. This chapter studies the pre-2022 media legislative landscape and delves into the most relevant aspects of the 2022 reforms that resulted in the current Ukrainian Media Law (UML), which takes the form of a media code and has significantly changed the treatment of the different media players.

This chapter analyses the innovations, challenges and implementation of the new law from various angles and looks at future steps regarding the Ukrainian commitments to implement European legislation such as the European Media Freedom Act (EMFA), the Anti-SLAPP Directive and other relevant laws in relation to media freedom. In this context, the author analyses in particular the necessary amendments to the UML and other reforms required to align with EU standards.

Chapter 3, authored by Dariia Opryshko, explores the specific set of tools used to counter disinformation in Ukraine. After studying Ukraine's media system and legal framework in the context of war and democratic resilience, this chapter examines the current state of freedom of expression under the Ukrainian legal framework and the special measures adopted to combat disinformation from both legal and administrative points of view since the first legal mechanisms to counter hostile Russian influence campaigns and FIMI were introduced back in 2014.

This chapter also delves into the main aspects of core platform regulation in Ukraine and political advertising through platforms, analysing convergence with EU standards.



Chapter 4, authored by Oleksandr Monastyrskyi, examines foreign information manipulation and interference (FIMI) in Ukraine, focusing on its main actors and the key challenges faced today. It evaluates how different platforms are used for FIMI activities and how they can be countered from a legal point of view.

The chapter analyses the UML and its relevance in terms of combatting information threats, and reviews regulatory measures specifically targeting information linked to Russia, including an analysis of the role of national authorities in the enforcement phase. Lastly, it assesses how Ukraine's legal framework aligns with European Union standards in this regard.

Finally, the particularities of platform regulation are examined in **Chapter 5**, authored by Igor Rozkladaj. This chapter provides a comprehensive overview of Ukraine's platform sector, tracing its development from independence to the wartime context after 2022.

The chapter analyses the evolution of Ukrainian media legislation, with a focus on the UML and reforms introduced in response to disinformation and Russian aggression, and examines legal and regulatory instruments used to counter disinformation spread through platforms. It also explores FIMI in the context of platforms, identifying key actors, challenges and the role of national authorities.

Finally, Rozkladaj assesses Ukraine's alignment with EU media and platform regulation standards in the context of EU accession.



1. The structure and dynamics of Ukraine's media sector

Roman Horbyk, University of Zurich

A defining feature of contemporary societies is their profound entanglement with media and communication. From mobile connectivity to fibre-to-home, from news portals to messenger apps, communication envelops, saturates, supports, shapes and constitutes social fabric through the process known as mediatisation. The moulding force of mediatisation stands out in times of crisis and conflict. In war, communication plays an even more important role, not only in strictly military terms but also as the core tool of the whole-of-society approach adopted by many European defence doctrines.

The decisive role of communication in a mediatised society at war has become evident in Ukraine during recent decades. Following the 2014 annexation of Crimea and the limited invasion of Donbas by Russia, Ukraine encountered serious problems curbing hostile information influence and building its own resilience through communication from the ground up. The full-scale Russian invasion in 2022 saw these efforts bear fruit but also brought new challenges. Ukraine's telecom infrastructure, the backbone and lifeline of its society, came under attack, and its burgeoning media sector experienced enormous upheaval and painful transformation. Technical and economic challenges aside, the largest conventional interstate war in Europe since 1945 forced Ukrainian decision-makers to confront a host of utterly novel legal and political challenges. Ukraine's very survival depends on its ability to navigate these uncharted waters.

Such a unique situation dictates the relevance and urgency of this publication. This introductory chapter aims to map and prepare the field for the analysis of the wartime transformations in Ukraine's media sector by explaining its roots, recent history and formation, the current situation, the principal problems and reactions to them. It is structured accordingly: after clarifying key concepts, it traces the historical development of the Ukrainian media system. It sketches out an analytical snapshot of the country's media market and explains what has changed in response to the Russian aggressions in 2014 and 2022. It then zooms in on the main current challenges of Russia's ongoing and unrelenting military assault for the media sector in Ukraine before summarising the key takeaways in conclusion.

1.1. Key concepts explained

Before these questions are addressed, it is important to clarify several recurring concepts indispensable for an academic and legal understanding of wartime adaptations in Ukrainian media. The concept of mediatisation has already been explained above. The media sector, which is the main focus here, can be understood as the set of actors that produce, distribute



and monetise content in a market that is also regulated by the government and influenced by various non-governmental stakeholders.

An adjacent but not synonymous concept is that of a media system, which, as developed by Hallin and Mancini, is centred on national media in their political and social environment.¹ It is related to Pierre Bourdieu's field theory in which society is considered to consist of fields competing for different sets of resources and governed by different logics.² The media field is seen as semi-autonomous and dependent on the political field. While the media sector embraces a pragmatic group of actors based on their market activity, the media system is broader, encompassing the professionalisation of journalism, links between the press and politics, institutional relations and development. It is used to capture the media sector's broader context.

Information sovereignty is a contested concept shaped by globalisation, the rise of satellite broadcasting and, later, the internet. It has been actively developed in China and, to a certain extent, in Russia, which explains its inherent ambiguity. In Europe, debates tend to revolve around data sovereignty, and the concept has remained relatively underdeveloped outside questions of privacy. In Ukraine, the term is used predominantly in legal discourse and in the context of international relations. As a flexible alternative, this chapter refers to a more democratically inflected concept of communication sovereignty: the state's capacity to develop its entire communication infrastructure and media system in the interests of the population and independently from any hostile foreign influence.

Furthermore, Ukrainian legislation (especially the new laws adopted in the formative period of 2015-22, discussed below) offers several key definitions that are essential for understanding the terms on which the media sector in Ukraine functions. Media is defined as "a means of disseminating mass information in any form that is published or made available periodically or on a regular basis, under editorial control, and under a permanent name serving as an identifying characteristic."³ Oligarch is defined as "a person with significant economic and political weight in public life", determined by at least three of these four features: 1) participation in political life; 2) having significant influence on the media; 3) being the final beneficiary of a monopolist company; or 4) owning assets in access of 1 million subsistence minimums (state-defined minimal income to meet basic living needs).⁴

A crucial legal basis for media regulation is the definition of Russia as "the aggressor state". Ukrainian legislation often recursively defines it as "the state recognised by law as aggressor", referring to the 2015 Verkhovna Rada Ukrayiny (Ukrainian Parliament)

¹ Hallin D. C. and Mancini P, *Comparing Media Systems: Three Models of Media and Politics*. Cambridge University Press, Cambridge, 2004.

² Bourdieu P. and Wacquant L. J., *An Invitation to Reflexive Sociology*, University of Chicago Press, Chicago, 1992.

³ Verkhovna Rada Ukrayiny (Ukrainian Parliament), Law No. 2849-IX, [Про медіа](#) [Ukraine Media Law - UML] of 13 December 2022, Article 1(30).

⁴ Ukrainian Parliament, Law No. 1780-IX, [Про запобігання загрозам національній безпеці, пов'язаним із надмірним впливом осіб, які мають значну економічну та політичну вагу в суспільному житті \(олігархів\)](#) [On Preventing Threats to National Security Related to the Excessive Influence of Persons Who Have Significant Economic and Political Weight in Public Life (Oligarchs)], 23 September 2021.



resolution establishing the fact of military aggression against Ukraine and calling on various international institutions to recognise it as such.⁵

1.2. The making of the Ukrainian media system: a brief history, 1991-2014

The current Ukrainian media system can formally trace its existence back to Ukraine's liberation from the Soviet Union in 1991.⁶ The Soviet system displayed strong imperialist features, such as centralism, complete state control over means of production and editorial work, and a hierarchy in which all central (Moscow-based) outlets always had production and distribution advantages over Ukrainian outlets, as did Russian-language publications over those in Ukrainian.

During perestroika, increasing freedom of expression led to the appearance of the first non-state Ukrainian publications (including the first private TV channel) in 1989.⁷ In the 1990s, media liberalisation was framed as a linear "transition" from state control to free markets and expression, but the reality proved more complex, leading scholars to adopt the more modest concept of "transformation". In some analyses, post-Communist media systems experienced "imitative revolutions" – radical changes imitating an idealised example.⁸ These examples could be foreign (European or North American), but could also come from a country's own national history, leading to "atavistic" regeneration of pre-Communist features. Central and eastern Europe experienced a "mimetic change" oriented towards imitation of European corporatist models but, in reality, under pressure from the US and marketisation, producing a more liberal media sector.⁹

Independent Ukraine also followed EU and US templates, particularly in legislation. Western practices without local precedents, such as election debates, were enshrined in law early on.¹⁰ Russia also pursued a similar path, adopting an imported western-style media policy. However, its "imitative revolution" was quickly disrupted by cataclysmic events such as the 1993 crisis, the rise of financial-industrial groups with vested interests in politics

⁵ Ukrainian Parliament, Law No. 129-VIII, [Про Звернення Верховної Ради України до Організації Об'єднаних Націй... про визнання Російської Федерації державою-агресором](#) [Resolution "On the Appeal of the Parliament of Ukraine to the Organisation of United Nations... on recognising the Russian Federation as an aggressor state"], 27 January 2015.

⁶ Political scientist Maria Popova proposed, at the 2024 ASEES annual convention and elsewhere, that the phrase "collapse of the Soviet Union" be replaced with "liberation from the Soviet Union" in order to reflect the emancipatory rather than the catastrophic ("collapse") political meaning of the event. See Popova M., ["Liberation, not collapse"](#), *Eurozine*, 3 March 2025.

⁷ Notably, while Soviet Russia had been actively liberalising since 1985, Ukraine remained under tighter control until 1989 due to the traditional Soviet fear of nationalism and secession.

⁸ Splichal S., ["Imitative Revolutions: Changes in the Media and Journalism in East-Central Europe"](#), *Javnost – The Public*, 8(4), 2001, pp. 31-58.

⁹ Harcourt A., "Transnational Media Regulation in Central and Eastern Europe", in Downey J. and Mihelj S. (eds.), *Central and Eastern European Media in Comparative Perspective*, Farnham, Ashgate, pp. 137-156, (undated).

¹⁰ Horbyk R., ["Road to the Stadium. Televised Election Debates and 'Non-Debates' in Ukraine: Between Spectacle and Democratic Instrument"](#), in Juárez Gámiz J., Holtz-Bacha C. and Schroeder A. (eds.), *Routledge International Handbook on Electoral Debates*, Routledge, London/New York, 2020, pp. 157-165.



(oligarchs), the spread of corruption and the return of state control. Public service television, which Ukraine, for example, did not introduce as early, was launched in a hollowed-out form. Thus, a tightly controlled system of “neo-Soviet” media emerged in Russia, with mimetic change gradually shifting onto even deeper, tsarist-era atavisms.¹¹

Oligarchy, corruption and state encroachment were also all present in Ukraine after the initial free media boom of the early 1990s; these were common post-Soviet elements, the legacy of the late Soviet system’s decay. The “big bang” explosion of independent publications and media/cultural industries of the 1989-91 period was severely undercut by the economic crisis (paper shortages were especially destructive). This cleared the nascent independent media market for the newly assertive state and industrial concentration. The number of TV channels, now commercial, quickly rose to around a dozen, eventually growing to 40-50, some of which were highly niche and specialised.

However, just as in Russia and other post-Soviet countries, the imitative change soon shifted from western examples alone and turned to its own past, where, unlike Russia’s bureaucratic, traditionally top-down, state-controlled journalism, Ukraine’s main tradition was anti-imperial activism in journalistic form. The tradition of early Ukrainian publications from the 1800s, often underground, continued in the diaspora press and Soviet *samvydav*.¹²

This reflected the general situation in an eastern Europe divided between empires, where “the role of the journalist has traditionally been regarded more as a political activity than as a content producer or manufacturer of ‘objective’ news for the market”.¹³ While the Ukrainian Government attempted to impose control over the media, especially during the Kuchma years (1996-2004), the new technological affordances were quickly mobilised for the contemporary iteration of that tradition of activist and independent media, symbolic in the founding of *Ukrayinska Pravda* by Heorhiy Gongadze in 1999. His death at the hands of a government-controlled killing squad just one year later also marked an era of conflict between journalists and the government, as did *temnyky*, a form of censorship through approved “theme lists” sent to editors by the president’s administration (borrowed from Russian practice). When the authoritarian tendencies came to an end with the 2004 Orange Revolution, it was accompanied by a much less known Journalist Revolution, when media professionals of major oligarch-controlled channels refused to spread government propaganda.¹⁴

Since that era, Ukraine’s media sector has been defined by the triad of actors: the state, large media owners (oligarchs) and independent media. Notably, Ukraine’s independent media were not reduced to token resistance outlets, as was eventually the case in Russia or Belarus, but quickly became an influential political actor. Thus, Ukraine’s

¹¹ Oates S., “[The Neo-Soviet Model of the Media](#)”, *Europe-Asia Studies* 59(8), 2007, pp. 1279-1297.

¹² The Ukrainian word for *samizdat* (underground self-publishing in the Soviet era).

¹³ Salovaara-Moring I., “[Beyond East and West: Alternative Spheres of Journalism, Capitalism and Public](#)”, in Salovaara-Moring I. (ed.), *Manufacturing Europe: Spaces of Democracy, Diversity and Communication*, Nordicom, Gothenburg, 2009, pp. 97-116.

¹⁴ Lyhachova N. and Hanzha L. (eds), [Журналістська Революція—2004 Події. Люди. Дискусії](#), Vistka, Kyiv, 2005.



media sector became “the field where power is contested”, as aptly described by Diana Dutsyk and Marta Dyczok.¹⁵

This triad is characterised by tension between journalists and the authorities,¹⁶ which, coupled with the activist journalist tradition, led to the rise of two types of Ukrainian journalists: conformists and activists.¹⁷ In practice, these were often mixed and blurred in different proportions. However, they mapped two different career paths: while some conformed to owner pressures in order to preserve a more stable and prestigious job, others chose a riskier path of uncompromised professional autonomy.

At the same time, Ukraine had to solve issues in the communication sphere that were typical for post-colonial societies. In 1991, Ukraine’s media system was enmeshed with the overall Soviet state media system, where Russian dominated and Moscow dictated the rules. This continued well into the independence era but was asymmetrical: while Russian media freely circulated in Ukraine, Ukrainian media did not have access to the Russian market. Similarly, the Russian language dominated the media market in Ukraine while Ukrainian was absent in the Russian media market. This is a classical feature of post-colonial media.

Just as Ukraine needed to establish political sovereignty, it also had to establish infrastructural and communication sovereignty. The story of Ukraine’s media system is, in many respects, the story of a gradual, slow construction of infrastructural borders long after its political borders were demarcated. It is also a story of a return from a massive but already decrepit and collapsing centralised system imposed by the Russian Empire and the Soviet Union to a decentralised and multi-actor media ecology.

As Kyiv began asserting communication sovereignty, even the shift from Moscow time (UTC+3) to Kyiv time (UTC+2) was crucial, aligning infrastructure with Europe and delaying Russian broadcasts by an hour. The year 1996 served as a watershed, when Russian television disappeared and Russian newspapers could no longer circulate in the Ukrainian market directly as Russian businesses, but were obliged to establish legal entities in Ukraine. After this, Moscow TV could still be watched as part of a cable package or via satellite, while all Russian newspapers were still available as (partly) localised versions. However, they were now under formal and legal Ukrainian control, even though the state did not seek to exercise this control for real until after 2014. Dictated by economic reasons, this decision proved crucial from a historical perspective.

Establishing communication sovereignty proved easier where new infrastructure was created, and Ukraine was assisted in this by the technological shift towards digitalisation. Internet connectivity became Ukraine’s own infrastructure, developed from scratch and without external control. Throughout the 2000s, the digital sector grew very

¹⁵ Dutsyk D. and Dyczok M., “Ukraine’s Media: A Field Where Power Is Contested”, in Minakov M., Kasianov G. and Rojansky M. (eds.), *From “The Ukraine” to Ukraine: A Contemporary History, 1991–2021*, ibidem Press, Stuttgart, 2001, pp. 169-206.

¹⁶ Budivska H. and Orlova D., “[Between Professionalism and Activism: Ukrainian Journalism after the Euromaidan](#)”, *Kyiv-Mohyla Law and Politics Journal* 3, 2017, pp. 137-156.

¹⁷ Horbyk R., “[In Pursuit of Kairos: Ukrainian Journalists between Agency and Structure during Euromaidan](#)”, *Baltic Worlds* 12(1), 2019, pp. 4-19.



fast, especially in 2010-11.¹⁸ Similarly, mobile communication arrived in Ukraine after independence, with the first mobile call ever made in the country on 1 July 1993, when its first president, Leonid Kravchuk, telephoned his ambassador in Germany. By 2001, UMC, Ukraine's first mobile operator (now Vodafone), boasted 1 million subscribers and already faced competition from rival Kyivstar.

1.3. Post-Euromaidan: decisive formation, 2014-21

After the liberal “Orange” era, Viktor Yanukovich’s administration found itself in conflict with the media sector, struggling for its autonomy. While the government strove to control the media, independent investigative journalists, by exposing its unprecedented corruption, laid the groundwork for the mass social and protest movement of Euromaidan, which was provoked by the investigative journalist Mustafa Nayyem and eventually forced Yanukovich to abandon office and flee.¹⁹ The Ukrainian media sector in its current form took shape after 2014 under the impact of Euromaidan and as a reaction to Russian aggression.

The rebooted Ukrainian government, with a new parliament and spearheaded by President Petro Poroshenko, initiated significant legislative and policy changes that sounded an abrupt farewell to the post-Soviet legacies. Its most important acts included laws on media ownership transparency²⁰ and state and municipal media reform.²¹ Together, they made it easier to trace media ownership and more or less bring an end to state media ownership, signifying the state’s aim to curb both the oligarchic excesses and its own direct presence as a media market player.

However, and typically for Ukraine, the problem was the presence of loopholes and the difficulty of enforcing legislation. Despite the transparency law, the ultimate beneficiaries were often obscured by offshore structures. Still, oligarchic control remained widely recognised. Some of the major holdings included StarLightMedia (ICTV, Novy, STB, M1, M2), belonging to Viktor Pinchuk and his wife, and Media Group Ukraine (Ukraine, Ukraine 24, NLO TV, football channels) linked to Rinat Akhmetov. The majority owners of 1+1 Media (1+1, 2+2, TET, PlusPlus) were Ihor Kolomoyskyi and Hennadiy Boholiubov, with 8.22% held by Oksana Marchenko, wife of Russian influence agent and Putin ally Viktor Medvedchuk (who controlled his own smaller media holding). Inter Media Group (Inter, K1, K2, NTN, Pixel) was controlled by Dmytro Firtash, Serhiy Liovochkin and Valeriy

¹⁸ “[У другому кварталі в Україні різко зростає кількість інтернет-абонентів](#)” [In the second quarter, the number of Internet subscribers in Ukraine increased sharply], *Finance.ua*, 14 August 2012.

¹⁹ For the detailed chronology of Euromaidan, and its political, historical and media contexts, see the monograph: Horbyk R., *Mediated Europes: Discourse and Power in Ukraine, Russia and Poland during Euromaidan*, Södertörn University, Huddinge, 2017.

²⁰ Ukrainian Parliament, Law No. 674-VIII, “[Про внесення змін до деяких законів України щодо забезпечення прозорості власності засобів масової інформації та реалізації принципів](#)” [On amendments to certain laws of Ukraine regarding transparency of media ownership and implementation of state policy principles in the field of television and radio broadcasting], 3 September 2015.

²¹ Ukrainian Parliament, Law No. 917-VIII, “[Про реформування державних і комунальних друкованих медіа](#)” [“On Reforming State and Municipal Print Media”], 24 December 2015.



Khoroshkovsky, while smaller news channels 5 Kanal and Priamyi remained under the influence of President Poroshenko.²²

Alongside lasting oligarchic power resulting in pressure or censorship by owners as well as widespread journalist corruption, particularly in the form of “envelope journalism”, this period also witnessed a significant rise in the influence of independent and activist media.²³ It was no coincidence that it also saw the internet overtake television as the preferred information source for most Ukrainians in 2021 (51% versus 44%).²⁴ The explosive rise of social media continued throughout the 2010s and also contributed to Ukraine’s blooming pluralism. While many household names from the media sphere became politicians after 2014, even Volodymyr Zelensky’s victory in 2019 may be partly attributed to the efforts of investigative journalists, paradoxically working in sync with oligarch-controlled television.²⁵ Significantly, the overall vector of media policy did not change under Zelensky.

The role of the state followed a tricky route in this era. On the one hand, its direct influence waned, particularly with the 2015 state and municipal media reform law that triggered the privatisation of state-owned media. By 2019, 62% of local outlets (401 out of 664) and 23% of national publications (23 out of 98) had been privatised.²⁶ This completely changed the media landscape, especially at local level. In 2017, an inert network of state-owned TV and radio channels was turned into the National Public Broadcasting Company of Ukraine (UA:PBC, now *Suspilne*). Having inherited infrastructure from the Soviet state broadcaster, UA:PBC is the biggest media company in Ukraine, comprising two national TV and three national radio channels, 24 local TV and radio broadcasters, an orchestra and a recording studio. Fully independent from the government, it is run by a pluralist supervisory board mainly comprising civil society representatives (plus political party delegates).

At the same time, the state did not fully retreat but retained significant regulatory power. An example is a so-called anti-oligarch law adopted in 2021. According to the law, as well as considerable wealth, political power and a market monopoly, an individual was supposed to have a substantial media influence in order to qualify as an “oligarch”. Oligarchs were prohibited from funding political parties and participating in large-scale asset privatisation. The law, originally seen as controversial and primarily aimed at Zelensky’s defeated rival Poroshenko, was also used to undermine the position of Viktor Medvedchuk. Independent legal experts noted unrealistic criteria, the potential for legal counteraction and ease of evasion as its main weaknesses.²⁷

²² Minyailo N., “[Офшори, дружини і матері. Хто володіє провідними українськими телеканалами](#)” [Offshore companies, wives and mothers. Who owns Ukraine’s leading television channels?], *MediaSapiens/Detector Media*, 10 August 2021.

²³ Orlova D., “[Ukrainian Media after the EuroMaidan: In Search of Independence and Professional Identity](#)”, *Publizistik* 61(4), 2016, pp. 441-461.

²⁴ “[Більшість українців надають перевагу Інтернету як джерелу інформації – опитування](#)” [Most Ukrainians prefer the Internet as a source of information – survey], *Detector Media*, 1 March 2021.

²⁵ Horbyk R., “[Road to the Stadium...](#)”, op. cit.; Horbyk R., “[Media Maketh Ze President](#)”, *Baltic Worlds*, 2 May 2019.

²⁶ Dutsyk D. and Dyczok M., “Ukraine’s Media: A Field Where Power Is Contested”, op. cit., pp. 193-194.

²⁷ Riaboshtan I., [Юристи про законопроект про олігархів: Коломойський, Пінчук, Медведчук, Фірташ можуть не підпасти під визначення «олігарха»](#) [Lawyers on the draft law on oligarchs: Kolomoisky, Pinchuk, Medvedchuk, and Firtash may not fall under the definition of “oligarch”] *Detector Media*, 10 June 2021.



Partly on account of these trends, media scholars tend to define the 2014-22 period as torn between “freedom of speech” and “information security”.²⁸ While this is justified to an extent, this era could also be seen as consolidating infrastructural and communication sovereignty, and setting boundaries with the former empire. Although this process was neither smooth nor ever complete, it helped to create a media system that was free, pluralist but resilient enough to withstand the aggression on a vast scale.

Security and sovereignty concerns were, of course, directly inspired by the need to react to Russian propaganda and disinformation. Russian media were therefore restricted in order to protect communication sovereignty. Since 2014, civil society rather than government has played a crucial – even dominant – role in countering Russian disinformation and propaganda. While the state required time to develop legal frameworks and could not adopt rapid or radical measures, civil society actors were far more agile and responded quickly to emerging threats. Numerous Ukrainian NGOs have been continuously engaged in anti-disinformation activities since 2014. They include fact-checking and counter-propaganda initiatives such as StopFake, Detector Media and InformNapalm. LikBez was an informal group of historians tackling Russian imperialist narratives and historical fakes. Other initiatives such as the Ukraine Crisis Media Centre focused on assistance to foreign journalists and support of communication between government, business and the civil sector.²⁹

When the war started, Ukrainian media consumption was still dominated by Russia. In 2013-14, among the 40 million registered social media accounts, the most popular were Russian services VKontakte (27 million users) and Odnoklassniki (11 million); Facebook and Twitter lagged behind with 3.2 million and 430 000 accounts respectively.³⁰ The share of Russian content on Ukrainian TV varied from 87% to 42% in late 2014; 64% of Ukrainian e-mail accounts were hosted by Russian services.³¹ In 2016, the Ukrainian Parliament restricted the distribution of films glorifying the Russian army and book imports from Russia.³² A year later, the National Security and Defence Council of Ukraine obliged internet providers to block the Russian VKontakte and Odnoklassniki social media platforms, Yandex web portal, Mail.ru e-mail service, and Kaspersky and Doctor Web antivirus software.³³ The state also sanctioned the largest Russian media holdings, 468 legal entities in total. This decision had three aims: to tackle Russian disinformation, prevent the Russian state from

²⁸ Dutsyk D. and Dyczok M., op. cit., p. 191.

²⁹ Bolin G. and Stahlberg P., *Managing Meaning in Ukraine: Information, Communication, and Narration since the Euromaidan Revolution*, MIT Press, Cambridge, MA, 2023.

³⁰ *Компанія «Яндекс» оприлюднила нове дослідження про українців у соцмережах* [Yandex has published a new study on Ukrainians on social media], *MediaSapiens/Detector Media*, 21 August 2014.

³¹ *“Обсяг російського контенту на українських екранах збільшується - дослідження”* [The amount of Russian content on Ukrainian screens is increasing, according to research], *Gazeta.ua*, 30 September 2014; *“64% email українців припадають на російські Mail.ru, “Яндекс” і “Рамблер”* [64% of Ukrainians use Russian Mail.ru, Yandex and Rambler], *Lb.ua*, 18 December 2014.

³² Ukrainian Parliament, Law No. 1780-VIII, *Про внесення змін до деяких законів України щодо обмеження доступу на український ринок іноземної друкованої продукції антиукраїнського змісту* [“On Amendments to Certain Laws of Ukraine Regarding Restrictions on Access to the Ukrainian Market for Foreign Printed Products of Anti-Ukrainian Content”], 8 December 2016.

³³ President of Ukraine, Volodymyr Zelenskyy, *указ Президента України №133/2017* [Decree of the President of Ukraine No. 133/2017], official website, 15 May 2016.



collecting Ukrainian users' data (securing data sovereignty and privacy) and limit Russian companies' profits. A total of 80 Russian TV channels were blocked.

Initially, most Ukrainians opposed the government's anti-Russian communication protectionism measures, which were also criticised by international NGOs. However, soon afterwards, the number of users of Russian websites and social media fell more than twofold, from 22.7 million to 9.1 million. By 2019, the monthly reach of Russian social media had dropped to one third of its previous level, and they no longer figured among the 25 most popular websites for Ukrainians.³⁴

The decision proved effective and justified in the long run. As Russia continued operating inside Ukraine through Medvedchuk's smaller holding, it was sanctioned in February 2021 by the National Security Council and President Zelensky.³⁵ Several days after the invasion, the European Union followed Ukraine's example and blocked access to Russian propaganda outlets RT and Sputnik, later adding Rossiya RTR/RTR Planeta, Rossiya 24/Russia 24 and TV Centre International to the list.³⁶

The 2017-19 period also saw the introduction of legal measures to promote content in Ukrainian through language quotas. In particular, all authorities and news media were required to publish in Ukrainian, although this was difficult to enforce and real change did not occur until after 2022. As with the Russian media ban, these measures were initially opposed by most Ukrainians, before a major shift in opinion after 24 February 2022.

This period was a key phase in the formation of the infrastructural backbone of Ukraine's connectivity. Whereas the internet was regularly accessed by just under half of Ukrainians in 2013, 74% were users by 2019. Before the invasion, Ukraine had as many smartphones as its entire population, with many people using several phones at once due to the convenience of being able to access several networks, work-related needs and the option to combine an older, more disposable phone with a state-of-the-art smartphone, typical among soldiers.³⁷ A sprawling system with 5 000 or so commercial internet providers, many of them small and regional/local, made Ukraine's connectivity infrastructure highly decentralised and fragmented, but also more resilient. Heavyweights such as Ukrtelekom, Volia, Triolan and Lanet came under increasing competition from the mobile operator Kyivstar. The Ukrainian mobile market was an oligopoly, with 97% of the market belonging to three major providers: Kyivstar (26 million users), Vodafone (19 million) and lifecell (7 million). At the same time, both leading providers of this critical infrastructure experienced a protracted and painful process of decoupling from Russia-linked owners.

In summary, it is possible to identify at least five distinct stages in the formation of the Ukrainian media sector (and, more broadly, the country's entire media system).

³⁴ Dmitry Zolotukhin, D., "[Про ефективність «блокування» російських соцмереж](#)" [On the effectiveness of 'blocking' Russian social networks], *UKRINFORM*, 16 August 2018.

³⁵ President of Ukraine, Volodymyr Zelensky, [указ Президента України №43/2021](#) [Decree of the President of Ukraine No.43/2021], official website, 2 February 2021.

³⁶ Cabrera Blázquez F.J., [The implementation of EU sanctions against RT and Sputnik](#), European Audiovisual Observatory, Strasbourg, 2022.

³⁷ Horbyk R., "[The War Phone: Mobile Communication on the Frontline in Eastern Ukraine](#)", *Digital War* 3, 2022, pp. 9-24.



1. **Germination (1989-96).** Rapid boom of independent media initiatives; Russian media freely circulate in Ukraine (but not vice versa).
2. **Consolidation (1996-2004).** The state partially reintroduces censorship in mainstream oligarchic media (*temnyky*); Journalist and Orange Revolutions; Russian TV rebroadcast by Ukrainian channel *Inter*, Russian newspapers open Ukrainian offices.
3. **First rapid growth (2004-08).** The Ukrainian media sector's growth intensifies in terms of both technical infrastructure and media production, cut short by the global financial crisis; Russia acquires assets in critical mobile infrastructure and influences public discourse indirectly through agents of influence.
4. **Second rapid growth (2008-13).** Online media develop rapidly after the crisis and are dominated by activist and investigative journalism; dramatic rise of social media; the pro-Russian and authoritarian government tries to impose control on the mainstream media in 2010-13, contributing to Euromaidan.
5. **Towards full sovereignty (2014-22).** Ban of Russian social media and TV channels after Russia's aggression; introduction of language quotas on TV and radio; state support of Ukrainian cinema; privatisation of state media; creation of public broadcaster *Suspilne*.

Since 2022, the sector has been in a phase of decolonisation and completion of Ukraine's communication sovereignty.

1.4. Tested by fire: a snapshot of the Ukrainian media sector after 2022

The state, financial-industrial groups, independent media, civil society and citizens remain the main stakeholders of Ukraine's media sector, which underwent a rapid and dramatic restructuring following the Russian invasion.

The state's role rose again as the oligarchs relinquished control, sometimes abandoning their media assets but, in most cases, retaining ownership. On the first day of the invasion, Ukrainian TV shifted to continuous news coverage. The advertising market almost disappeared, but recovered later. By the end of 2022, advertising had shrunk by 81% on TV, 79% in newspapers and 61% on radio compared with just before the invasion.

Therefore, in late February 2022, as Russian forces approached Kyiv, channels from three major media groups joined *Suspilne* and the parliamentary channel *Rada* to form the 24/7 *United News* telethon, each contributing fixed editorial time slots. For the channels that had not been news channels per se, it eased the burden of having to provide 24-hour news coverage and helped to save their newsrooms. It also gave the state a much needed single voice and offered a win-win solution for all: the media received funding while the state had a unified television market.

The wartime unification of previously competing oligarch-owned TV groups into a single news telethon was unprecedented in Ukraine. Despite the government's stated anti-



oligarch agenda, state funds were channelled to these media outlets. Unlike before the war, oligarchs currently lack political ambition and are mainly pursuing business interests, making this arrangement stable and advantageous for them, especially as their newsrooms are now being publicly financed amid broader wartime economic losses.

However, this centralisation was not without controversy, since the unified telethon restricted access to airtime for journalists and outlets outside the consortium. Three opposition channels owned by former President Poroshenko – *5 Channel*, *Priamyi* and *Espresso TV* – were not allowed to join *United News* despite expressing interest in doing so.

The *United News* telethon was also criticised on account of the prominence it gave to Zelensky's party spokespersons (often around 70%) and the co-optation of former Medvedchuk propagandists. However, it continues because it is beneficial for all the participants. Currently, it remains a trusted information source for 38% of Ukrainians (a level that has remained stable for several years now), and a similar proportion want it to continue, which generally correlates with the level of personal support for Zelensky.³⁸

Overall, the oligarchic conglomerates remain passive players, with the notable exception of Rinat Akhmetov, who closed his Media Group Ukraine in July 2022, dismissing nearly 4 000 staff (but later forming the basis for a new channel *My Ukrayina*, associated with the former Head of the President's Office, Andriy Yermak). Although this closure was formally attributed to the anti-oligarch legislation, experts point to economic motives: Akhmetov's assets had suffered major wartime losses (USD 9.5 billion) and, with elections postponed indefinitely, his media assets no longer offered political returns that could justify continued investment.

However, television is also losing some of its significance to digital services. Before the invasion, TV dominated Ukrainian media consumption: 67% watched it daily, sustained by a rapidly modernising national digital infrastructure, including the DVB-T2 Multiplex MX-7 network, introduced in 2019 and fully launched for consumers in 2023.³⁹ After 2022, social media, and Telegram in particular, became the dominant news source for 80-90% of Ukrainians, compensating for the rapid decline of traditional media (television consumption dropped to 30-40%).⁴⁰

This hybrid media ecology underpinned Ukraine's remarkable communicative resilience, enabling what has been termed "swarm communication", i.e. a decentralised, horizontal, fluid and participatory mode of information circulation.⁴¹ Yet this environment has produced both synergies and tensions. Professional journalism must now compete with unregulated, anonymous Telegram channels unconstrained by editorial standards. Simultaneously, this platform has become ubiquitous in official communication. Almost all public officials, even at village level, maintain active Telegram channels despite persistent

³⁸ ["Про правовий режим воєнного стану"](#) [Ukrainian media: news consumption and trust in 2025], *Internews Ukraine*, July-August 2025.

³⁹ ["Українське телебачення є найважливішим джерелом інформації для 67% українців – дослідження ДМ"](#) [Ukrainian television is the most important source of information for 67% of Ukrainians, according to a study by DM], *Detector Media*, 15 February 2022.

⁴⁰ USAID-Internews Media Consumption Survey, [Ukrainian media use and trust in 2022](#).

⁴¹ Boyko K. and Horbyk R., "Swarm Communication in a Totalizing War: Media Infrastructures, Actors and Practices in Ukraine during the 2022 Russian Invasion", in Mortensen M. and Pantti M. (eds.), *Media and the War in Ukraine*, Peter Lang, New York, 2023, pp. 37-56.



concerns about its opaque ownership structure, data security vulnerabilities and use by Russian intelligence for recruitment among sympathisers and minors. Unlike earlier bans of Russian platforms in 2017, restricting Telegram is widely viewed as impossible due to its embeddedness in public communication (which is largely a trap of the government's own making). Meanwhile, TikTok's rapid rise introduces additional challenges to information integrity and media regulation. Its destructive potential was recently revealed in the Romanian elections and experts fear it may work similarly in post-war Ukraine. Unsystematic monitoring already indicates the presence of networks with hundreds of accounts, likely coordinated, undermining military mobilisation efforts.

In the invasion's immediate aftermath, Ukrainian independent media underwent a brief period of shock as journalists and newsrooms struggled to orient themselves, yet this quickly gave way to a reconfiguration of professional purpose. Investigative journalists redefined their role, recognising a new field of work centred on documenting and investigating war crimes. Many have now returned to covering corruption and mismanagement, seen as crucial to Ukraine's effectiveness in its fight for survival.

Beyond television, newspapers were looking for survival strategies such as integrating editorial teams, cutting the number of pages or completely going online.⁴² However, that did not prevent the collapse of the printed press market. Print outlets virtually disappeared, while radio assumed renewed importance in frontline areas, where it often remained the only functioning medium capable of broadcasting evacuation routes and safety instructions. However, print media have sometimes resurged in difficult-to-access frontline areas.

At the same time, regional media experienced higher audience demand, reflecting the public's need for hyper-local information, although this was accompanied by severe financial strain due to the withdrawal of major donors such as USAID in 2025. Regional disparities deepened: local media in western Ukraine remained comparatively stable, a situation reinforced by an influx of displaced editorial teams from the east. Yet across the country, economic conditions remained harsh, forcing outlets to rely on an unstable combination of donor grants and grassroots crowdfunding.

1.5. The wartime media sector from a legal and political perspective

From a legal standpoint, wartime communication in Ukraine is shaped by the martial law framework, which formally grants the state far-reaching powers over the media, including the right of military administrations to directly regulate newsrooms and even to place military controllers (censors) inside editorial teams, as stipulated in Article 8(1) of the Law

⁴² Dan'kova N., "[Як виживають газети і журнали під час війни. Сім історій із різних кінців України](#)" [How newspapers and magazines survive during wartime. Seven stories from different parts of Ukraine], *Detector Media*, 28 May 2022.



of Ukraine “on the legal regime of martial law”.⁴³ In principle, these provisions amount to a legal infrastructure for wartime censorship.

In practice, however, the Ukrainian government has deliberately refrained from implementing the mechanisms it is fully entitled to use: no military officers have been embedded in editorial teams, nor does any central authority exercise routine command over content in the manner characteristic of Russia’s presidential “Thursday calls.”⁴⁴ What remains, i.e. operational restrictions linked to security considerations (e.g. ban on reporting of troop movements), the structural clash between military and media logic, and the inevitable political struggles over influence, does not constitute censorship in a meaningful sense (it is also outlawed by the Constitution and many legislative acts). Rather, this reflects the tension inherent in pluralistic wartime governance, where the state must manage risks without dismantling the autonomy and integrity of the media sphere. It also displays the well-known problem for scholars of war and media: the clash between military and media logic.⁴⁵

The new Ukrainian Media Law (UML), developed since the early days of Zelensky’s presidency and finally adopted in December 2022, is widely seen as a positive contribution to the development of communication sovereignty and a thriving, independent media system.⁴⁶ It is also crucial from a political point of view, since it is one of the requirements for Ukraine’s EU integration. Notably, it marked the final shift towards the adoption of current international terminology: for the first time, Ukrainian legislation adopted and defined the concept of “media”, fully replacing the previous “ZMI”,⁴⁷ a relic of the Soviet era and a twentieth-century “mass communication” paradigm. The law strengthened media freedom while also enabling clearer regulation. In particular, the national regulator received greater autonomy alongside a broader mandate. The law also corrected some loopholes in earlier legislation such as the “oligarch” law, defining levels of owners’ power as “decisive impact” (50%+ ownership), “essential participation” (10%+) and “key participation” (2%+). It also reinforced restrictions against media services from the aggressor state (Russia) and outlawed violent and hateful discriminatory content, pornography, and the glorification of Nazi and Communist regimes and the Russian aggression, while enshrining free circulation for EU content under the European Convention on Transfrontier Television, solidifying Ukraine’s position within the European information sphere.

However, implementation of the law remains in its infancy and will take several years, reaching full effect ten years after its adoption. It faces significant obstacles, partly due to the absence of necessary funding. It expanded the mandate of the National Broadcasting Council without increasing its resources accordingly. Key components of the

⁴³ Ukrainian Parliament, Law No. 389-VIII, [Про правовий режим воєнного стану](#) [On the legal regime of martial law], 12 May 2015.

⁴⁴ Kovalev A., “[The Political Economics of News Making in Russian Media: Ownership, Clickbait and Censorship](#)”, *Journalism* 22(12), 2021, pp. 2906-2918.

⁴⁵ Maltby S., “[The Mediatization of the Military](#)”, *Media, War & Conflict* 5(3), 2012, pp. 255-268.

⁴⁶ Ukrainian Parliament, Law No. 2849-IX, [Про медіа](#) (UML), op cit.

⁴⁷ *Zasoby masovoyi informatsiyi*, lit. “means of mass information”, was a post-Soviet adaptation of the classical Soviet abbreviation ZMIP (“means of mass information and propaganda”); the new law refers to it when defining media, ostensibly to establish continuity with older legislation in which it appears, but itself consistently uses “media” alone. It also replaces “ZMI” with “media” in most of these older laws.



law, including the creation of an online media register, require additional institutional capacity, as noted by Council of Europe experts.⁴⁸ While voluntary registration of online media has already begun, this development substantially increases the Council's workload. External donor support is decisive for full implementation of the law.

The law contains a section regulating media activity during wartime, including restrictions on Russian media, content and ownership. These include bans on ownership by citizens of the aggressor state. The regulator can impose various measures (operational review, penalties, warnings, registration withdrawals and restrictions through court action). However, these measures and their enforcement are not always clear. For example, the regulator cannot reject a media outlet's registration application, even when it is obvious that it is intended as a disinformation tool, unless its owners are directly from Russia (or Belarus, although this country's status as an aggressor has not been recognised in law). At best, it can launch an investigation immediately after its registration, although there are doubts over the effectiveness of such models.

The Russian invasion has also underscored the central role of social media and messaging services such as Telegram and Viber, over which the state has virtually no regulatory leverage, in contrast to traditional media. The law does not cover this sector, highlighting the need for a debate and more active steps to effectively regulate social media. With 84% of Ukrainians following bloggers and influencers as information sources, a new framework, perhaps a separate new social media law, becomes more urgent than ever.

1.6. Challenges of the Russian aggression

Ukraine's media sector has adapted, consolidated and diversified in response to the war, but also remains intensely challenged by it. The country's IT and communication infrastructure has experienced profound wartime disruption since 2022, marked by a one-third decline in national traffic, a pronounced westward shift as populations have fled the fighting (predominantly in the east and south) and a surge in the use of Telegram. The most serious early challenge was internal overload: driven chiefly by intensified messaging, mobile internet traffic increased by up to 250% in some regions, placing huge strain on operators that were already contending with unprecedented physical destruction.

Liberated areas such as Bucha and Irpin lost everything: server rooms were destroyed, fibre-optic lines were severed and infrastructure needed completely rebuilding. Occupation turned entire regions into digital wastelands, a situation that persisted post-liberation. In frontline cities like Kramatorsk, experts estimate that up to a quarter of communication infrastructure is destroyed weekly, sustained only through a mixture of entrepreneurship, public service and activism by local providers.

Occupation brings with it particular challenges. In Mariupol, for example, major ISPs collapsed as staff fled and surviving networks were absorbed into the Russian system, with

⁴⁸ Council of Europe Project SFEM-UA, [Legal opinion](#) on the Draft Law of Ukraine "On Amendments to Certain Laws on Media Activity", 10 January 2025, LEX_2025_1.



traffic rerouted through Rostelekom and other Russian carriers. The Ukrainian regulator instructed local broadcasters to cease operations and surrender licences to avoid coerced collaboration, after which Russian occupiers established their own outlets, often using Ukrainian equipment that had been left behind.

Even under occupation, residents could initially access Ukrainian and European television via satellites such as Hotbird and Astra. However, acting through the GONGO “All-Russia People’s Front”, Russia launched the free “Russian World” satellite package on Express-AT1 in 2023. Its installation involves reorienting satellite dishes, cutting access to Ukrainian content and making non-reoriented dishes visibly detectable. Satellite infrastructure thus serves both as a means of blocking information and a mechanism for identifying pro-Ukrainian households, singled out for repression, kidnapping, torture and possible murder.⁴⁹ The occupying administrations also faced a shortage of willing collaborators. With few Ukrainian journalists agreeing to cooperate, personnel were imported from Crimea, Donetsk and Russia. Journalists evacuated from Mariupol reported that, from May 2022, numerous supposedly “local” Telegram channels emerged, but these were operated by Russians unfamiliar with the city and prone to basic factual and topographical errors.⁵⁰

On the technical front, cyberattacks, including the 2023 hacking of Kyivstar, which disrupted even basic services such as pay terminals and street lighting, illustrate the vulnerability of both telecommunications and energy infrastructure, with direct consequences for media production and consumption. Blackouts due to attacks on the energy grid have also affected media consumption.

Media workers have faced severe human pressures, including mobilisation, exposure to Russian attacks and forced emigration. While 22 journalists have been killed in the line of duty, nearly 30 have been kidnapped.⁵¹ 40% of media outlets and 44% of journalists have suffered material damage, while 85% of journalists have experienced psychological problems due to the war.⁵² Around 300 media outlets have been closed down, and one third of all news organisations in Ukraine have had to interrupt or suspend their activity at some point.⁵³

There has also been professional drift into adjacent fields such as war documentation, advocacy and strategic communications. Economically, the sector has suffered from donor withdrawal (notably USAID), a collapsed advertising market and

⁴⁹ Dan’kova N., [“Росіяни запустили на окупованих територіях супутниковий «Русский мир». Що це та як Україна може йому протидіяти”](#) [Russians have launched the satellite channel ‘Russkiy Mir’ in the occupied territories. What can Ukraine do to counter this?], *Detector Media*, 23 January 2024.

⁵⁰ Dan’kova N., [“Медійні колаборанти Донеччини: хто, як і чому співпрацював із ворогом”](#) [Media collaborators in Donetsk: who, how and why they collaborated with the enemy], *Detector Media*, 27 September 2023.

⁵¹ UNESCO, [“UNESCO equips hundreds of Ukrainian prosecutors to defend freedom of expression and the safety of journalists”](#), 2 December 2025; Institute of Mass Information (IMI), [“868 crimes against journalists and media in Ukraine committed by Russia since start of full-scale war”](#), 24 November 2025.

⁵² Lviv Media Forum, [“Pid tyskom viyny: stanovyshche media v Ukraini”](#) [Under the shadow of war: the state of the media in Ukraine], Lviv, 2025.

⁵³ IMI, op. cit., and Lviv Media Forum, Ibid.



intensified competition from social media, while most outlets only had enough resources to survive for about one month in 2022. Financial resilience has hardly improved since.

Sovereignty and security also remain under threat: Russian propaganda and disinformation persist via local proxies, Telegram channels and the rising influence of TikTok. Domestic policy failures, such as problematic mobilisation practices, inadvertently increase the resonance of enemy messaging. These dynamics reveal the limited ability of media alone to counter external influence. Furthermore, many professionals question whether the Ukrainian media sector will be able to operate constructively after martial law is lifted. Perhaps a transitional postwar period will be essential to stabilise Ukraine's media sector and restore institutional and operational resilience.

1.7. Conclusion

Throughout its history, the Ukrainian media sector has been marked by several overarching trends. One is a gradual but decisive consolidation of communication sovereignty, achieved through slow but systematic separation from Russian infrastructure and media markets and, in broader terms, the ongoing decolonisation of the media system. Ukraine has also successfully built digital communication infrastructure from scratch for its mediated society.

The second defining feature is a three-part structure that has been present for most of Ukraine's independent existence. The interaction between the state, oligarchic media holdings and independent journalism determines the contours of the media sector, its structure and the "rules of the game". The role of independent, investigative and activist journalists in particular has proved decisive at key points in history, but often remains underestimated. This balance, however, was profoundly disrupted after 2022, as the invasion triggered unprecedented shifts in production, distribution and consumption, while exposing vulnerabilities in infrastructure, human resources and economic sustainability. The ever-changing role of the state has become a third key factor in this process, bringing positives as well as negatives.

Media policy and regulation have played a critical role both in formalising sovereignty and in enabling adaptation to wartime conditions. The Ukrainian case thus illustrates how communication autonomy, regulatory decisiveness and sectoral resilience may be able to sustain an emergent, pluralistic media sphere under conditions of conflict. Ukraine has shown an example of how to defend its democracy from foreign information manipulation and interference without sacrificing pluralism and core freedoms. In spite of this, a number of challenges remain, particularly regarding war fatigue and the postwar future, which may prove chaotic. Ukraine and its partners must begin to consider how these challenges may best be met.



2. Ukrainian media legislation

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2.1. Introduction

The first steps towards harmonisation of Ukrainian media legislation with the EU *acquis* were taken in September 2014,⁵⁴ when the Association Agreement between Ukraine and the EU was signed. Annex XXXVII to Chapter 15 of the Agreement obliged Ukraine to implement the provisions of the 2010 edition of the Audiovisual Media Services Directive (AVMSD).⁵⁵ Despite the multiple amendments that have since been made to the AVMSD, this commitment has never been updated.

In June 2022, Ukraine was granted EU candidate status on condition that it effectively implemented eight reforms,⁵⁶ including alignment with the AVMSD. To achieve this, it adopted a new Media Law (UML) in December 2022.⁵⁷ Later in the negotiation process, the Ukrainian Government approved the EU accession roadmaps that define the scope and tentative timeline of other upcoming reforms in the area of media governance and regulation of the digital environment.⁵⁸ Such commitments, as of May 2025, include an intention to align domestic legislation with the European Media Freedom Act (EMFA), Digital Services Act (DSA), Digital Markets Act (DMA) and Anti-SLAPP Directive.⁵⁹ These acts have not yet been implemented.

Meanwhile, Russia's full-scale invasion, which included FIMI operations⁶⁰, drove Ukraine to introduce additional restrictions in the field of freedom of expression through derogations from international obligations under the European Convention on Human Rights (ECHR) and the International Covenant on Civil and Political Rights (ICCPR)⁶¹

⁵⁴ European Union, [Угода Про Асоціацію, між Україною, з однієї сторони, та Європейським Союзом, Європейським співтовариством з атомної енергії і їхніми державами-членами, з іншої сторони](#) [Association Agreement between the European Union and its Member States, of the one part, and Ukraine, of the other part], ratified on 16 September 2014. Consolidated version: 13 March 2025.

⁵⁵ Ibid, [Annexes to Chapter XV, "Економічне і Галузеве Співробітництво"](#) ["Economic and Sectoral Cooperation"]. Consolidated version: 14 October 2025.

⁵⁶ Delegation of the European Union to Ukraine, press release, [EU Commission's Recommendations for Ukraine's EU candidate status](#), 17 June 2022.

⁵⁷ UML, op. cit.

⁵⁸ Ministry of Justice of Ukraine press release, [Україна затвердила дорожні карти в межах вступу до ЄС: опубліковано тексти документів](#) [Ukraine approved roadmaps within the framework of EU accession: texts of documents published], 16 May 2025.

⁵⁹ Ibid.

⁶⁰ European Union, Strategic Communications, Task Forces and Information Analysis (STRAT.2), [1st EFAS Report on Foreign Information Manipulation and Interference Threats: Towards a framework for networked defence](#), February 2023.

⁶¹ Permanent Representation of Ukraine to the Council of Europe, [Notification of partial withdrawal of derogation](#), Annex to the Notification JJ9614C Tr./005-325, 4 April 2024.



(considered as generally compliant with international human rights law by the Council of Europe⁶²), and to draft legislative provisions addressing specific threats in the information sphere.⁶³ These included amendments to the Criminal Code of Ukraine, as well as a separate Section IX of the UML that restricted media services connected to the aggressor state and affiliated individuals.

2.2. Ukrainian legislative landscape in the media sphere on the eve of 2022 reforms

Before the 2022 media reforms, the Ukrainian legislative landscape in the information sphere was rather fragmented. It consisted of a large number of acts covering substantial, procedural and institutional issues, e.g. the Law on Information⁶⁴, the Law on Television and Radio Broadcasting,⁶⁵ the Law on Public Broadcasters,⁶⁶ the Law on Print Media,⁶⁷ the Law on Information Agencies,⁶⁸ the Law on Advertising,⁶⁹ the Law on the National Council of Ukraine on Television and Radio Broadcasting⁷⁰, and many others. This system not only reflected multiple post-Soviet legacies that did not reflect the technological and information realities, but it also contained numerous gaps and overlaps in its regulation of media subjects.

Experts repeatedly criticised pre-2022 regulatory instruments for operating with outdated terminology,⁷¹ creating market inequalities for different types of media (particularly press and digital)⁷² and entirely disregarding new forms of intermediaries that play a significant role in the design and regulation of the media market, i.e. video-on-

⁶² Apostol L., [Legal Analysis of the derogation made by Ukraine under Article 15 of the European Convention of Human Rights and Article 4 of the International Covenant on Civil and Political Rights](#), Conseil de l'Europe, novembre 2022.

⁶³ Digital Security Lab Ukraine, [Timeline of restrictions](#).

⁶⁴ Ukrainian Parliament, Law No. 2657-XII, [Закон України "Про інформацію"](#) [[Law of Ukraine on information](#)], 2 October 1992.

⁶⁵ Ukrainian Parliament, Law No. 759-XII, [Про телебачення і радіомовлення](#) [Law on television and radio broadcasting], 21 December 1993.

⁶⁶ Ukrainian Parliament, Law No. 1227-VII, [Про суспільні медіа України](#) [Law on social media], 17 April 2014.

⁶⁷ Ukrainian Parliament, Law No. 2782-XII, [Про друковані засоби масової інформації \(пресу\) в Україні](#) [Law on print media], 16 November 1992.

⁶⁸ Ukrainian Parliament, Law No. 74/95-ВР, [Про інформаційні агентства](#) [Law on Information agencies], 28 February 1995.

⁶⁹ Ukrainian Parliament, Law No. 270/96-ВР, [Про рекламу](#) [[Law of Ukraine on Advertising](#)], 3 July 1996.

⁷⁰ Ukrainian Parliament, Law No. 538/97-ВР, [Закон України "Про Національну раду України з питань телебачення і радіомовлення"](#) [On the National Council of Ukraine on Television and Radio Broadcasting], 23 September 1997.

⁷¹ Rozkladai I., [Law on Media: Striving to Join the EU, but Don't Touch the Media Sphere](#), Centre for Democracy and Rule of Law, 13 September 2022.

⁷² Avdeeva T. (CEDEM), [Тетяна Авдєєва, ЦЕДЕМ: Чинна редакція законопроекту «Про медіа» є найбільш збалансованою для України](#) [The current version of the draft law "On Media" is the most balanced for Ukraine], *Detector Media*, 7 September 2022.



demand services (VOD), video-sharing platforms (VSPs) and online media.⁷³ In addition to numerous gaps in substantive regulation, problems existed in relation to the National Council of Ukraine on Television and Radio Broadcasting (NBC), including its independence, efficiency and lack of powers to duly sanction breaches of legislation by the media.⁷⁴

This criticism led to the adoption of several draft laws designed to fill the gaps and harmonise Ukrainian regulation with EU standards. The first of these, amending the old Law on Television and Radio Broadcasting, date back to 2014⁷⁵ and 2017.⁷⁶ However, they only proposed partial solutions to the majority of the aforementioned problems. One of the most comprehensive and consolidated versions was adopted in 2020,⁷⁷ but was then left untouched until 2022, when the media reforms required as part of the EU candidacy process forced its amendment. This document became the foundation of the UML currently in force.

In the run-up to its second parliamentary reading, the draft law faced waves of criticism from various stakeholders, mostly industry-affiliated. The key concerns related to expansion of the powers of the media regulator,⁷⁸ regulation of online media (that had remained entirely unregulated before the reforms)⁷⁹ and allegedly weak provisions restricting Russian-language content, information connected to the aggressor state and content created with the participation of Russia-affiliated individuals.⁸⁰ The majority of the critical remarks were based on misinterpretations of the draft law,⁸¹ which gave rise to a series of articles debunking the most popular myths, such as in relation to increased threats to national security caused by overly soft restrictions on the aggressor state and content stemming therefrom.⁸²

Meanwhile, in its examination of the UML,⁸³ the Council of Europe positively assessed the amendments that had been made. Its experts confirmed the law's overall

⁷³ Ostapa S., [Олександр Бурмагін: Власникам ЗМІ буде значно важче викривляти інформаційне поле після ухвалення закону «Про медіа»](#) [Oleksandr Burmahin: It will be much more difficult for media owners to distort the information field after the adoption of the law "On Media"], *Detector Media*, 5 September 2022.

⁷⁴ Rozkladai I., [Регулювання медій – від телеящика до смартфона, або чи буде онлайн-медіа регулюватися](#) [Media regulation - from the set-top box to the smartphone, or will online media be regulated?], *Centre for Democracy and Rule of Law*, 30 December 2020.

⁷⁵ Ukrainian Parliament, Draft Law No. 5189, [Проект Закону про телебачення і радіомовлення](#) [On Television and Radio Broadcasting], 29 October 2014.

⁷⁶ Ukrainian Parliament, Draft Law No. 7397, [Проект Закону про внесення змін до Закону України «Про телебачення і радіомовлення»](#) [Amendments to the Law of Ukraine "On Television and Radio Broadcasting"], 14 December 2017.

⁷⁷ Ukrainian Parliament, Draft Law No. 2693-d, [Проект Закону про медіа](#) ["On Media"], 2 July 2020.

⁷⁸ Holovenko R., [Аналіз базових положень закону «Про медіа» щодо онлайн-медіа](#) [Analysis of the basic provisions of the Law "On Media" regarding online media], *Detector Media*, 15 December 2022.

⁷⁹ Tolub N., [Закон «Про медіа» не повинен регулювати друковані та онлайн-ЗМІ](#) [The Law "On Media" should not regulate print and online media], *Promote Ukraine*, 28 August 2020.

⁸⁰ [«Повернеться лайтова російська кінопропаганда». Законопроект «Про медіа» містить послаблення для російськомовної індустрії – «Відсіч»](#) [Lite Russian film propaganda will return. The draft law "On Media" contains relaxations for the Russian-language industry – "Vidsich"], *Detector Media*, 29 August 2022.

⁸¹ [Авторка проекту Закону "Про медіа" спростувала міфи, які виникли навколо нього»](#) [The author of the draft Law "On Media" debunked the myths that arose around it], *Ukrinform*, 29 December 2019.

⁸² Shamaida T., [Закон про медіа: Змінити не можна завалити](#) [Media Law: To change impossible to undone], *Detector Media*, 2 September 2022.

⁸³ Salomon E. and Kerševan T., [Opinion of the Directorate General Human Rights and Rule of Law Information Society and Action against Crime Directorate Information Society Department](#), Council of Europe, DGI (2023)03, 24 February 2023, pp. 5-6.



compliance with the provisions of the AVSMD, making only minor suggestions for improvement that will be discussed in more detail in a subsequent chapter. The European Commission also recognised the UML as being aligned with the AVMSD,⁸⁴ requiring the legislator to work on the implementation of other acts, such as the European Media Freedom Act (EMFA) and Artificial Intelligence Act (AI Act).

Ultimately, the 2022 reforms not only significantly changed the scope of the laws in force, but also required the amendment of numerous bylaws and secondary laws.⁸⁵ Some of these remain the subject of public consultation processes, while others are being dealt with under co-regulatory mechanisms that require both state and industry input.

2.3. The new UML: innovations, challenges and implementation level

The UML that was adopted in December 2022 and entered into force at the end of March 2023 significantly reformed media regulation itself and amended multiple laws, including the Law on Advertising.⁸⁶ Taking the form of a new “media code”, the UML consists of nine chapters addressing general provisions, the role and status of media subjects, public interest media, content restrictions, licensing and registration requirements, the NBC’s powers and responsibilities, co-regulation, the regime of liability for violations in the media sphere, as well as specific restrictions related to the existence of the aggressor state. A detailed comparative analysis of the regulatory system before and after the media law reforms can be found below.

2.3.1. New subjects: online media and platform regulation

The UML significantly changed the terminology and structural approach to the treatment of media entities. Whereas all media actors had previously been treated equally, the current provisions distinguish between the legal entities themselves (companies owning and running the media) and the services they provide. Aligning domestic regulations with the AVMSD, Ukraine changed the definition of the different types of media, harmonising their names and functional descriptions with those set out in the AVMSD.

Accordingly, the new UML covers such subjects as providers of linear audiovisual services (audio media services and audiovisual media services), providers of non-linear audiovisual services (audio on demand and VOD), providers of print media services,

⁸⁴ European Commission, [Ukraine 2025 Report](#) accompanying the “Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 2025 – Communication on EU enlargement policy, SWD(2025) 759 final, 4 November 2025, p.79.

⁸⁵ Rozkladai I., [Моніторинг нормативно-правових актів у сфері телебачення і радіомовлення у зв'язку з ухваленням Закону України “Про медіа”](#) [Monitoring of regulatory legal acts in the field of television and radio broadcasting in connection with the adoption of the Law of Ukraine “On Media”], Centre for Democracy and Rule of Law, 1 February 2023.

⁸⁶ Ukrainian Parliament, Law No. 270/96-BP, [Про рекламу \[Law of Ukraine on Advertising\]](#), 3 July 1996.



providers of online media services, Information and Communications Technology providers, VSPs and other platforms (including platforms offering common access to information).

Depending on the nature of the service, there are obligations to obtain a licence or register. Licensing requirements apply only to providers of linear services and DVB-T2 standards. Other providers, except for those of print and online media, are obliged to register. For the print media, registration is compulsory only during wartime and five years afterwards, on security grounds. For online media, registration remains voluntary and whether a service registers or not only affects the procedures followed by the media regulator. Registered providers, for example, can commit more minor violations before fines are imposed. Importantly, the UML does not apply to bloggers or owners of web pages within online platforms,⁸⁷ allowing them to register their channels voluntarily. For those that do so, the regulatory regime is similar to the one that applies to online media services. This, in turn, raises some practical issues. For example, audiovisual media can livestream their broadcasts on their pages within online platforms, but if they are registered, those pages qualify as online media services even though their content is the same as that of the TV version. This problem stills exists and requires legislative amendments if it is to be resolved.

As regards the scope of the obligations, no significant distinction is made between offline and online media. Articles 36 (content restrictions), 42 (restrictions on the rights of minors) and 119 (restrictions related to the armed aggression) of the UML apply to all types of media. Separate obligations specific to audiovisual media services, however, concern quotas for national and European works. The Council of Europe experts' feedback regarding the regulatory framework was generally positive, with some minor remarks concerning the wording of the provision banning hate speech (in particular the list of discriminatory grounds).

2.3.2. Reform of the National Council of Ukraine on Television and Radio Broadcasting

Before the media reforms, the National Council of Ukraine on Television and Radio Broadcasting (NBC) was governed by the Law on the National Council of Ukraine on Television and Radio Broadcasting,⁸⁸ which established the procedure for forming the media regulator and its key powers. Remarkably, the previous law did not provide sufficient guarantees of independence in the appointment of members, especially regarding the President of Ukraine. It also did not provide any safeguards against corruption or address conflicts of interest in much detail.

The situation changed when the new UML introduced a balanced procedure for the appointment of NBC members via an independent competition in which members could be

⁸⁷ Rozkladai I., "[Закон України про медіа: реформа, яка має стати успішною](#)" [The Law of Ukraine on Media: a reform that should be successful], *Centre for Democracy and Rule of Law*, 11 January 2023.

⁸⁸ Ukrainian Parliament, Draft Law No. 538/97-ВР, [Закон України "Про Національну раду України з питань телебачення і радіомовлення"](#) [On the National Council of Ukraine on Television and Radio Broadcasting], 23 September 1997.



nominated by specialist organisations in the media sector and civil society. Notably, the Council of Europe experts considered these changes a step in the right direction, since they provided stronger independence guarantees thanks to an improved public selection procedure following nomination by specialist organisations working in the field of media freedom.⁸⁹ They also stressed the importance of ensuring not only that Articles 76 and 77 UML provided a formal mechanism of independent appointment, but that such guarantees were also met in practice.

Another major change saw the NBC given broader powers to deal with violations by issuing warnings and fines or banning the media concerned on Ukrainian territory (in various ways, depending on the type of media, e.g. by revoking their licence, cancelling their registration, banning their website, etc.). This change has been repeatedly criticised⁹⁰ on the grounds that it enables the NBC to prohibit media activity although, as the Council of Europe experts confirmed, it is fully compliant with the European approach.⁹¹

In practice, however, there have been certain challenges. Since the UML entered into force in 2023, the NBC has not received the necessary level of funding. The Law on the State Budget of Ukraine for 2024⁹² suspended the provisions of Article 78 UML regarding the guaranteed salaries of the NBC members and secretariat. Similar restrictions were introduced by the 2025 budget. In its 2025 enlargement report, the European Commission highlighted the need to ensure sufficient funding and human resources for the NBC to fulfil its mandate.⁹³ Another issue undermining the regulator's effectiveness is the reintroduction of the mandatory state registration procedure for the NBC's regulatory acts by the Ministry of Justice of Ukraine. Although the UML stipulates that such acts are not subject to state registration, as the NBC is a separate constitutional body not subordinate or accountable to the Government of Ukraine, the newly adopted Law on Law-Making Activity (set to enter into force one year after the end of martial law)⁹⁴ reinstates this so-called "justice clearance" procedure.

2.3.3. Co-regulation in the media sphere: current progress and obstacles

One of the key innovations of the UML is the model of co-regulation in which the normative framework is jointly developed by the NBC and industry representatives. Co-regulation does

⁸⁹ Avdieieva T. et al., *Human Rights in The Digital Dimension 2024*, Digital Security Lab Ukraine (DSLUI), Kyiv, February 2025, pp. 31-32.

⁹⁰ Voitiuk T., *Рада попередньо підтримала новий закон про медіа. Що він передбачає та як вплине на вступ до ЄС* [The Council has provisionally supported the new media law. What it provides and how it will affect EU accession], *Suspilne Media*, 30 August 2022.

⁹¹ Council of Europe, *The Law "On Media" of Ukraine*, DGI, Opinion of the Information Society and Action against Crime Directorate, prepared by experts Eve Salomon and Tanja Kerševan, pp. 16-17.

⁹² Ukrainian Parliament, Draft Law No. 3460-IX, *Закон України "Про Державний бюджет України на 2024 рік"* [Law On the State Budget for 2024], 9 November 2023.

⁹³ European Commission, *Communication on EU enlargement policy*, Brussels, 4 November 2025, pp. 79-80.

⁹⁴ Ukrainian Parliament, Draft Law No. 3354-IX, *Закон України "Про правотворчу діяльність"* [Law of Ukraine on "Law-Making Activity"], 24 August 2023.



not replace either the NBC or self-regulatory mechanisms controlled by the Commission of Journalistic Ethics.⁹⁵ This model, defined in Chapter VII of the UML, provides for the possibility to create five co-regulatory bodies for audiovisual media services (television broadcasting and VOD), audio media services (radio and on-demand audio media services), print media, online media and VSPs.

The co-regulatory bodies are created under Article 93 UML, which was further interpreted by the NBC in relation to procedural aspects.⁹⁶ Specifically, working groups should be formed to create charters for and register the co-regulatory bodies, which are then empowered to perform two functions: to develop co-regulatory codes and to provide expert opinions on the application of such codes to particular cases at the request of a co-regulatory body member (Article 96 UML).

Four co-regulatory bodies have so far been established,⁹⁷ covering all areas except VSPs, only two of which have so far been registered in Ukraine.⁹⁸ The co-regulatory body for audiovisual media services has created four working groups to develop codes on the rights of minors,⁹⁹ advertising,¹⁰⁰ restrictions related to national security¹⁰¹ and broadcasting rules on days of remembrance.¹⁰² The latter working group has already produced a code that has been approved by the NBC and is currently applied to labelling procedures.¹⁰³ This was the first such co-regulatory instrument.

The co-regulatory body for online media recently set up a working group to develop the criteria of online media,¹⁰⁴ while the printed media co-regulatory body has created five

⁹⁵ See website of the [Commission of Journalistic Ethics](#).

⁹⁶ NBC press release, [Система спільного регулювання](#) [Co-regulation system], 27 September 2023.

⁹⁷ NBC, [Співрегулювання](#) [Co-regulation].

⁹⁸ NBC press release, [Уперше Національна рада зареєструвала провайдерів платформ спільного доступу до відео](#) [National Council registers video sharing platform providers for the first time], 20 February 2025.

⁹⁹ Joint Regulatory Authority in the Field of Audiovisual Media Services, [Уперше Національна рада зареєструвала провайдерів платформ спільного доступу до відео](#) [Composition of the working groups to develop a code (rules) for the creation and dissemination of information in the field of programme classification and determination of age criteria], 5 December 2024.

¹⁰⁰ Joint Regulatory Authority in the Field of Audiovisual Media Services, [Склад Робочої Групи, для розробки кодексу \(правил\) створення та поширення інформації у сфері реклами алкогольних напоїв, азартних ігор, спонсорства та продакт-плейсменту, а також критеріїв для визначення шкідливої реклами](#) [Composition of the working group to develop a code (rules) for the creation and dissemination of information in the field of advertising of alcoholic beverages, gambling, sponsorship and product placement, as well as criteria for determining harmful advertising], 5 December 2024.

¹⁰¹ Joint Regulatory Authority in the Field of Audiovisual Media Services, [Склад Робочої Групи для розробки кодексу \(правил\) створення та поширення інформації у сфері захисту національних інтересів та протидії тоталітаризму](#) [Composition of the working group to develop a code (rules) for the creation and dissemination of information in the field of protecting national interests and countering totalitarianism], 5 December 2024.

¹⁰² Joint Regulatory Authority in the Field of Audiovisual Media Services, [Склад Робочої Групи для розробки кодексу \(правил\) створення та поширення інформації у сфері мовлення у дні пам'яті](#) [Composition of the working group to develop a code (rules) for the creation and dissemination of information in the field of broadcasting on days of remembrance], 5 December 2024.

¹⁰³ NBC and Joint Regulatory Authority in the Field of Audiovisual Media Services, [Правила мовлення в дні пам'яті для лінійних аудіовізуальних медіа](#) [Rules on broadcasting on days of remembrance for linear audiovisual media], 17 July 2025.

¹⁰⁴ Joint Regulatory Authority in the Field of Online Media Services, [Орган спільного регулювання у сфері онлайн медіа](#) [Composition of the working group to develop criteria for classifying entities as subjects in the field of online media], 11 October 2025.



working groups to draft codes interpreting the content restriction provisions of the UML.¹⁰⁵ The co-regulatory body for audio media has not yet created any working groups.¹⁰⁶ The co-regulatory system has been criticised on account of its slow nature and lack of initiative on the part of industry representatives to help develop co-regulatory instruments.¹⁰⁷ According to the UML, in the absence of the relevant codes, the NBC should interpret and apply the legislative provisions at its own discretion. The proposed co-regulatory model was positively assessed by the Council of Europe as having the potential to “develop into an excellent model of AVMSD-type co-regulation”.¹⁰⁸

2.3.4. Restrictions related to the existence of the aggressor state

Chapter IX of the UML lays down restrictions related to the existence of the aggressor state and the resulting information risks. According to Article 118, its provisions apply as long as an aggressor state exists and for five years afterwards, with the Ukrainian Parliament assessing the need to maintain such limitations on an annual basis.

Chapter IX provides for substantive content restrictions and procedural limitations. Prohibited content includes content that justifies the Russian aggression, calls for the constitutional order of Ukraine to be destroyed by depicting the war as civil unrest, or depicts individuals who are on the list of individuals who threaten the national security of Ukraine. In any information concerning the aggressor state’s internal affairs, that state should be clearly and visibly labelled as an aggressor. The provisions on content restrictions are to be interpreted under the co-regulatory codes, one of which is currently in its final stages of discussion (within the co-regulatory body for audiovisual media services).

In addition, Articles 120 and 121 UML directly prohibit broadcasting by media subjects registered in the aggressor state or editorially controlled by individuals affiliated with it. They also prohibit individuals or legal entities of the aggressor state from owning media in Ukraine. They cannot be registered or licensed in Ukraine. Finally, the law provides for the creation of a list of aggressor state media services and the criteria for adding services to such a list, as well as a list of individuals who threaten the national security of Ukraine. In this respect, the Council of Europe experts stressed that there should be a procedure for reassessing whether such individuals should remain on the list.¹⁰⁹

Importantly, a number of other restrictions have also been introduced since Russia launched the full-scale war in early 2022,¹¹⁰ including a prohibition on publishing the

¹⁰⁵ Joint Regulatory Authority in the Field of Print Media Services, [Громадська спілка «Орган спільного регулювання у сфері друкованих медіа»](#) [Composition of the working group to develop codes and criteria for the creation and dissemination of information in five separate areas in the field of print media], 27 June 2024.

¹⁰⁶ NBC, [Орган спільного регулювання у сфері аудіальних медіа-сервісів](#) [Joint Regulatory Authority in the Field of Audio Media Services].

¹⁰⁷ Ostapa S., “[Орган співрегулювання онлайн-медіа: зареєструвався і впав в анабіоз](#)” [Online media co-regulation body: registered and fell into suspended animation], *Detector Media*, 30 November 2024.

¹⁰⁸ Council of Europe, expert opinion on the [Law “On Media” of Ukraine](#), op. cit., p. 6.

¹⁰⁹ Ibid., pp. 19-20.

¹¹⁰ Digital Security Lab Ukraine, [Timeline of restrictions](#) (undated).



movements of the Ukrainian armed forces and military aid,¹¹¹ military command restrictions on journalists' work¹¹² and executive decisions by the NBC regarding the list of aggressor state media services.¹¹³

2.3.5. Alignment with other AVMSD requirements, including advertising rules

The Council of Europe's assessment of the UML stresses that other relevant provisions of the AVMSD have been duly implemented, including derogations from the principle of free retransmission (of Russian programmes).¹¹⁴ The system of sanctions, particularly the layered approach to punishing violations of the UML, was recognised as compliant with the AVMSD. In particular, the introduction of a notice procedure strengthened the interaction between the NBC and the media industry, not only enabling a punitive function, but also effectively correcting minor breaches without serious consequences for the media concerned. The Council of Europe experts also commented on the suspension of penalties in case of an appeal,¹¹⁵ which is primarily based on Ukraine's obligations under Article 6 of the European Convention on Human Rights. In this regard, the experts agreed that full alignment with the AVMSD should be postponed until Ukraine's accession to the EU.

Since the AVMSD also requires advertising rules to be harmonised with EU standards, a number of changes have been made to the Law on Advertising. In particular, the law was updated¹¹⁶ with the concept of "audiovisual commercial communication", while different forms of advertising, including product placement, were introduced. The relevant changes also involved alignment of advertising time-slots with the EU approach, safeguarding the rights of minors and clarifying the scope of restrictions on advertising for alcohol and gambling activities.

The Law on Advertising has also been updated with self- and co-regulatory mechanisms based on the model proposed in the UML. Specifically, Article 3-1 provides for the possibility to jointly develop rules on sponsorship and product placement related to alcohol and gambling, sponsorship of programmes for minors and the definition of current affairs programmes. Self-regulation, meanwhile, will cover such topics as advertising of medicines and food, and advertising on online platforms.

¹¹¹ Digital Security Lab Ukraine, [Prohibition on publishing the movement of the Ukrainian armed forces and military aid](#), 24 March 2022.

¹¹² Digital Security Lab Ukraine, [Military command restrictions on journalists' work](#), 3 March 2022.

¹¹³ NBC, [Перелік сервісів держави-агресора](#) [List of services of the aggressor state], 6 July 2023.

¹¹⁴ Council of Europe, expert opinion on the [Law "On Media" of Ukraine](#), op. cit., p. 15.

¹¹⁵ Ibid., p. 20.

¹¹⁶ Ukrainian Parliament, Draft Law No. 3136-IX, [Про внесення змін до Закону України "Про рекламу" та інших законів України щодо імплементації норм законодавства ЄС у національне законодавство України шляхом імплементації окремих положень законодавства ЄС у сфері аудіовізуальної реклами](#) [On amendments to the Law of Ukraine "On Advertising" and other laws of Ukraine regarding the implementation of European legislation in the national legislation of Ukraine by implementing certain provisions of EU legislation in the field of audiovisual advertising], 30 May 2023.



In practice, the recent changes have been perceived rather critically due to numerous practical challenges in their implementation.¹¹⁷ Moreover, certain provisions appear declaratory and ineffective, leaving the media regulator with its hands tied in terms of effective enforcement of the new restrictions. This has prompted debate on the need to re-evaluate advertising legislation in the media sector and develop effective safeguards against advertising that might be harmful to minors or public health.

2.4. Future steps: Ukrainian commitments to implement the EMFA, Anti-SLAPP Directive and other European acts in the area of media freedom: current progress and challenges

2.4.1. Necessary amendments to the UML

Since the process of implementing the new media law brought to light several problems relating to ineffective procedures, gaps in legislation and inadequate safeguards, the relevant acts needed to be amended. This was achieved through draft law 12111,¹¹⁸ which proposed solutions to the majority of the aforementioned issues.

In particular, the draft suggests lowering NBC members' salaries during wartime periods in accordance with budgetary needs at the time (and potentially to avoid the possibility of suspending such provisions for financial reasons). Moreover, the proposal exempts the NBC's normative acts from the obligation to be registered with the Ministry of Justice in order to avoid overcomplications in the procedure and ensure the effectiveness of the regulator's work.

The document also provides for other structural changes, such as the new concept of "specialist print media", introduced to ensure the adequate implementation of provisions safeguarding the rights of minors (e.g. in relation to the distribution of erotic media and publications on weaponry, hunting or medical issues, etc.). It also tightens the rules on content restrictions related to minors' rights, banning the distribution of erotic content without adequate safeguards such as specific labelling. The draft also proposes amendments to the chapter on co-regulation, identifying the use of artificial intelligence in the media sphere as one of the priorities for the development of co-regulatory codes, and allowing representatives of media holdings to join the working group (this was hotly debated when the first working groups were set up).¹¹⁹

¹¹⁷ Yurasov, S., "[Casinos are returning to the media: now even a blogger can officially advertise gambling. Moreover, casinos themselves are becoming official media outlets](#)", *Dev.UA*, 14 August 2025.

¹¹⁸ Ukrainian Parliament, Draft Law No. 12111, [Проект Закону про внесення змін до деяких законів України щодо діяльності медіа](#) [On amendments to certain laws of Ukraine regarding media activities], 10 October 2024.

¹¹⁹ Dankova N., "[The first working group to create co-regulatory bodies included representatives of media groups. Suspilne, Megogo, etc.](#)", *Detector Media*, 8 December 2023.



Additionally, the draft law introduces the concept of national broadcasters of indigenous people and national minorities. The changes would not omit the public broadcaster, but provide it with an opportunity to obtain licences for audiovisual and audio services by applying to the NBC rather than following the usual procedure. In this case, the regulator will assess its ability to provide the licence in the requested scope and confirm or accommodate the demands of the public broadcaster. However, this does not preclude the public broadcaster from applying via the general procedure if certain needs have not been met. Finally, minor amendments are designed to improve the licensing and registration procedure by strengthening communication between the NBC and applicants. The reaction of civil society was remarkably positive, with the Centre for Democracy and Rule of Law (CEDEM)¹²⁰ and Digital Security Lab Ukraine (DSLUI)¹²¹ both calling for the draft law to be supported at its second parliamentary reading.

2.4.2. Other legislative changes in the media sphere

The European Commission's 2025 enlargement report on Ukraine¹²² pointed out the need to complete multiple legislative processes, such as by ensuring the President of Ukraine signed Law 11321,¹²³ which had already been adopted and permits journalists and civic society to attend parliamentary sessions.

Another initiative mentioned in the enlargement report¹²⁴ is draft law 12253,¹²⁵ which mirrored draft law 12111 for the advertising sector. Numerous problems have been identified in the regulation of the advertising market. In particular, there is a duplication of powers between the NBC and the specialised agency Playcity, which monitors advertising for gambling and betting services. The NBC has already highlighted this potential conflict of powers and called for legislation to resolve this issue.¹²⁶ Similarly, the current Law on Advertising leaves gaps in the regulation of the gambling sector, giving a wide margin of appreciation to the co- and self-regulatory bodies (which are largely inactive, as mentioned above). Accordingly, the NBC has taken executive steps to curb the spread of gambling and betting advertising by requiring media to develop co-regulatory rules.¹²⁷ This decision has been criticised by industry representatives, ultimately leading to direct application of the

¹²⁰ Rozladai I., "[12111 or Media Act Service pack No. 2](#)", CEDEM, 30 June 2025.

¹²¹ Avdieieva T. et al., "[Human Rights in The Digital Dimension 2024](#)", DSLU, Kyiv, February 2025, p. 32.

¹²² European Commission, "[Communication on EU enlargement policy](#)", Brussels, 4 November 2025, p. 43.

¹²³ Ukrainian Parliament, Draft Law No. 11321, "[Проект Закону про внесення змін до деяких законів України щодо посилення деяких гарантій діяльності медіа, журналістів та громадян на доступ до інформації](#)" [On amendments to certain laws of Ukraine on strengthening certain guarantees for the activities of media, journalists and citizens on access to information] 5 June 2024.

¹²⁴ European Commission, "[Communication on EU enlargement policy](#)", op. cit., p. 43.

¹²⁵ Ukrainian Parliament, Draft Law No. 12253, "[Проект Закону про внесення змін до Закону України "Про рекламу" та інших законів України](#)" [On amendments to the law of Ukraine "On Advertising" and other laws of Ukraine], 27 November 2024.

¹²⁶ NBC press release, "[Позиція Національної ради щодо питань реєстрації онлайн-медіа спортивної тематики](#)" [The National Council's position on the registration of online sports media], 21 August 2025.

¹²⁷ NBC press release, "[Нові правила рекламування азартних ігор: медіарегулятор продовжує надавати роз'яснення](#)" [New rules for advertising gambling: the media regulator continues to provide clarifications], 24 April 2025.



current law and total disregard for the NBC's decision.¹²⁸ In fact, the law has been applied in a rather abusive and overly formal manner, with online media declaring themselves targeted at 21+ audiences¹²⁹ and therefore permitted to advertise gambling services. This situation still remains a point of contention between the media regulator and industry representatives, while Playcity, as a specialised regulator, has already started imposing significant fines on the media.¹³⁰ In this context, it is crucial both to ensure regulatory clarity on the division of powers and scope of restrictions, and to protect the national interest by limiting gambling advertising, such as through the April 2024 decree issued by the National Security and Defence Council.¹³¹

Meanwhile, the European Commission has also identified negative legislative changes,¹³² including Law 12320,¹³³ which has been adopted but is awaiting the president's signature. This act prohibits identifying a lawyer with their client (the interpretation of legislative texts might prohibit even mentioning the names of lawyers), which creates risks for investigative journalism, especially when lawyers are complicit in the commission or concealing of crimes. The European Commission explicitly stated that the broad protective clause does not provide for an adequate balance with the protection of freedom of expression, and that the law should be revised.

The enlargement report also mentioned the recent initiative to amend the Civil Code,¹³⁴ the first two books of which have already been registered as draft laws 14056¹³⁵ and 14057.¹³⁶ In particular, the drafts propose new approaches to the rights of reply and rectification, prohibit publication of any accusation that has not been proven by a court (even within journalistic investigations), broaden the protection of offline and online privacy, introduce the right to be forgotten and clarify the scope of post-mortem rights. Several of the proposed changes have been criticised by civil society experts as disrupting

¹²⁸ Dankova N., [Нацрада почала відмовляти у реєстрації блогерам і казино](#) [The National Council began denying registration to bloggers and casinos], *Detector Media*, 13 November 2025.

¹²⁹ Yurasov S., ["Казино повертаються в медіа: тепер навіть блогер може офіційно рекламувати азартні ігри. Щобільше, самі казино стають офіційними ЗМІ"](#) [Casinos are returning to the media: now even a blogger can officially advertise gambling. Moreover, casinos themselves are becoming official media outlets], *Dev.UA*, 14 August 2025.

¹³⁰ ["Реклама азартних ігор в Україні – що чекає медіа за порушення"](#) [Gambling advertising in Ukraine – what awaits the media for violations], *reNews*, 5 September 2025.

¹³¹ Decree of the President of Ukraine on the decision of the National Security and Defence Council of Ukraine [Про рішення Ради національної безпеки і оборони України від 20 квітня 2024 року "Щодо протидії негативним наслідкам функціонування азартних ігор в мережі Інтернет"](#) [On countering the negative consequences of the functioning of gambling on the Internet], 20 April 2024.

¹³² European Commission, [Communication on EU enlargement policy](#), op. cit., p. 43.

¹³³ Ukrainian Parliament, Draft Law No. 12320, [Проект Закону про внесення змін до Кодексу України про адміністративні правопорушення, Кримінального та Кримінального процесуального кодексів України щодо забезпечення дотримання гарантій адвокатської діяльності](#) [On amendments to the Code of Ukraine on Administrative Offences, the Criminal and Criminal Procedure Codes of Ukraine to ensure compliance with the guarantees of advocacy], 16 December 2024.

¹³⁴ European Commission, [Communication on EU enlargement policy](#), op. cit., p. 43.

¹³⁵ Ukrainian Parliament, Draft Law No. 14056, [Проект Закону про внесення змін до Цивільного кодексу України у зв'язку із оновленням \(рекодифікацією\) положень книги першої](#) [On amendments to the Civil Code of Ukraine in connection with the update (amendment) of the provisions of Book One], 21 September 2025.

¹³⁶ Ukrainian Parliament, Draft Law No. 14057, [Проект Закону про внесення змін до Цивільного кодексу України у зв'язку із оновленням \(рекодифікацією\) положень книги другої](#) [On amendments to the Civil Code of Ukraine in connection with the update (amendment) of the provisions of Book Two], 21 September 2025.



the balance between the right to privacy and freedom of expression,¹³⁷ and limiting journalists' ability to meaningfully conduct and publish public interest content.¹³⁸ Following the criticism, the authors of the draft laws held consultations with civil society,¹³⁹ after which they amended several provisions and made targeted exceptions for media professionals.¹⁴⁰

2.4.3. Upcoming EU accession reforms

Great importance in the period ahead is attached to the fight against FIMI and other malicious information operations,¹⁴¹ though civil society experts point out that there is an urgent need to ensure adequate financing of such processes.¹⁴² Finally, the roadmaps provide for the implementation of other EU acts in the digital sphere, such as the DSA and the DMA (described in more detail in Chapter 4), the EMFA and the Anti-SLAPP Directive. However, according to the CEDEM's analysis, the obligation to oversee the implementation of these acts is assigned to different organs in different chapters of the roadmaps.¹⁴³ There is therefore a pressing need to clarify the responsible body to avoid overlaps and/or shifting responsibility for harmonising the legislation.

As concerns media regulation, implementation of the EMFA and the Anti-SLAPP Directive has already started. Both acts require numerous amendments to various codes, laws and by-laws, making the process rather complicated.

The enlargement report states that the EMFA has been partially implemented in Ukraine.¹⁴⁴ Meanwhile, the DSLU reports that most provisions of the EMFA have yet to be properly implemented,¹⁴⁵ whereas in order to fully comply with EU law not only the EMFA but also the entire package of acts related to platform regulation should be considered. Importantly, some rules will remain inapplicable to Ukraine until its accession to the EU, since they concern the functioning of the EU institutions. The need to harmonise domestic laws with the EMFA was also underlined by the members of the NBC,¹⁴⁶ who stressed that

¹³⁷ "Рада зробила крок до узгодження цивільного законодавства з правом ЄС: що ухвалили та які перестороги мають експерти?" [The Parliament has taken a step towards harmonising civil legislation with EU law: what was adopted and what are the experts' concerns?], *ZMINA*, 5 November 2025.

¹³⁸ Steshenko A., *Новий Цивільний кодекс: спроба наступу на свободу слова*, [The New Civil Code: An Attempt to Attack Freedom of Speech], *Lb.UA*, 25 September 2025.

¹³⁹ Goron D., "Сьогодні відбудеться обговорення частини правок до законопроекту No. 14057" [Today, a discussion of some amendments to draft law No. 14057 will take place], *Detector Media*, 31 October 2025.

¹⁴⁰ *Ibid.*

¹⁴¹ Ministry of Justice of Ukraine press release, *Дорожня карта, з питань верховенства права* [Ukraine approved roadmaps within the framework of EU accession: texts of documents published - Roadmap on the rule of law], 16 May 2025.

¹⁴² Voiuta D., "Де свобода слова та медіа в Дорожніх картах в межах вступу до ЄС?" [Where is freedom of speech and media in the roadmaps for EU accession?], *CEDEM*, 25 July 2025.

¹⁴³ *Ibid.*

¹⁴⁴ European Commission, *Communication on EU enlargement policy*, *op. cit.*, p. 43.

¹⁴⁵ Digital Security Lab Ukraine, *План дій щодо імплементації Європейського акта про свободу медіа в Україні* [Action plan for the implementation of the EMFA in Ukraine], 16 September 2024.

¹⁴⁶ NBC press release, *В ЄС набув чинності медійний акт EMFA: як Україна адаптує законодавство* [The EMFA has entered into force in the EU: how Ukraine is adapting legislation], 2 September 2025.



this process will be aligned with the deadlines set by the EU accession roadmap (Q4 of 2026).

A little more progress has been made with the Anti-SLAPP Directive, since a working group has already been created by the Parliamentary Committee on Freedom of Expression.¹⁴⁷ The working group comprises more than 25 members, including MPs, lawyers, media experts and representatives of the Ombudsman's Office. Its key tasks for the upcoming period are to develop the legal definition and indicators of SLAPPs, identify gaps in current legislation and draft provisions to ensure adequate safeguards.

Alongside active legislative work, awareness-raising campaigns are run by Ukrainian think-tanks,¹⁴⁸ while the Council of Europe regularly organises training for media lawyers,¹⁴⁹ prosecutors¹⁵⁰ and other relevant experts to ensure effective implementation of the anti-SLAPP safeguards. The practical side of this problem, however, is critical. As the European Centre for Press and Media Freedom mapping suggests,¹⁵¹ Ukraine has seen 985 SLAPP cases filed against journalists, media and civil society organisations. Importantly, SLAPP indicators have also been identified among some criminal investigations against anti-corruption activists,¹⁵² which highlights the need to introduce suitable legislative safeguards in this area.

¹⁴⁷ Ukrainian Parliament press release, [Комітет з питань свободи слова утворив робочу групу для розробки законодавчих механізмів протидії SLAPP-позовам](#) [The Committee on Free Speech has formed a working group to develop legislative mechanisms to counter SLAPP lawsuits], 2 July 2025.

¹⁴⁸ ["Slapp-Позови: Зброя Тиші Slapp-Позови: Зброя Тиші Стр Атегічні Позови Пр Оти Участі Громадськості"](#) [SLAPP lawsuits: weapons of silence. Strategic Lawsuits Against Public Participation], ACREC, October 2025.

¹⁴⁹ Council of Europe Office in Ukraine press release, [Regional Training of Trainers on Countering Strategic Lawsuits Against Public Participation \(SLAPP\) in Strasbourg Highlighted the Importance of Building National Expertise in This Emerging Field](#), 26 September 2025.

¹⁵⁰ Council of Europe Office in Ukraine press release, [Key Stakeholders Discuss New Legal Measures and Strategies to Combat SLAPPs in Ukraine](#), 17 September 2025.

¹⁵¹ European Centre for Press and Media Freedom, [Mapping Media Freedom](#) (undated).

¹⁵² ["New Case Against Shabunin: Searches, Notice of Suspicion, Preventive Measure"](#), Anti-Corruption Action Center (ANTAC), July 2025.



3. Tools against disinformation

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3.1. Freedom of expression under Ukraine's wartime legal framework: special measures adopted against disinformation

Russia's armed aggression against Ukraine began in 2014 and escalated into a full-scale invasion on 24 February 2022. Throughout this period, Russia conducted systematic, prolonged and coordinated information influence operations against Ukraine and its citizens.

The first legal mechanisms to counter Russian hostile information influence campaigns and FIMI were introduced in Ukraine after 2014. These included the adoption of the Law on Sanctions in 2014¹⁵³ and the imposition of restrictions on the distribution, screening and broadcast of certain films¹⁵⁴ and TV shows¹⁵⁵ in 2015. Since 2015, individuals and legal entities from the aggressor state¹⁵⁶ have been forbidden from establishing television and radio organisations as well as programme service providers¹⁵⁷ in Ukraine, and from participating in such entities.¹⁵⁸ The importation of published matter (e.g. books) from the territory of the aggressor state and/or the temporarily occupied territory of Ukraine¹⁵⁹ and its distribution in Ukraine was also restricted (except in certain cases).¹⁶⁰ From 2017, access to various Russian web resources and platforms¹⁶¹ also began to be restricted. In

¹⁵³ Ukrainian Parliament, Law No. 1644-VII, [Про санкції](#) [On Sanctions], 14 August 2014.

¹⁵⁴ Ukrainian Parliament, Law No. 9/98-ВР, [Про кінематографію](#) [On Cinematography], 13 January 1998, Article 15-1.

¹⁵⁵ Ukrainian Parliament, Law No. 2849-IX, [Про телебачення і радіомовлення](#) [On Television and Radio Broadcasting], 13 December 2022, part 2, Article 6. This law was repealed after the adoption of the Ukraine Media Law (UML).

¹⁵⁶ The term “aggressor state” is used in Ukrainian legislation and policy documents to refer to the Russian Federation. Ukraine assigned Russia the status of “aggressor state” in 2015 after it had illegally occupied part of its territory.

¹⁵⁷ According to the Law No. 2849-IX “On Television and Radio Broadcasting”, op. cit., a programme service provider was a business entity which, on the basis of a licence issued by the National Council of Ukraine on Television and Radio Broadcasting, provided subscribers, on a contractual basis, with the possibility to view programme packages using the resources of multi-channel television networks to transmit these programmes (Article 1). This law was repealed after the adoption of the UML.

¹⁵⁸ Ibid., part 2, Article 12.

¹⁵⁹ Since 31 December 2023, this restriction has also included the importation and distribution of published matter from the territory of Belarus.

¹⁶⁰ Ukrainian Parliament, Law No. 318/97-ВР, [Про видавничу справу](#) [On Publishing], 5 June 1997, Article 28-1 entered into force on 1 January 2017.

¹⁶¹ See, *inter alia*, the Decree No. 133 of the President of Ukraine, [Про рішення Ради національної безпеки і оборони України від 28 квітня 2017 року "Про застосування персональних спеціальних економічних та інших](#)



2021, Ukraine established two specialist centres to counter disinformation and foreign information manipulation: the [Centre for Countering Disinformation](#) (within the National Security and Defence Council) and the [Centre for Strategic Communications and Information Security](#) (within the then Ministry of Culture and Information Policy of Ukraine). In addition, the national media literacy project “Filter”¹⁶² was launched.

Russia’s full-scale invasion in 2022 forced Ukraine to derogate¹⁶³ from its obligations under Article 19 of the International Covenant on Civil and Political Rights and Article 10 of the Convention for the Protection of Human Rights and Fundamental Freedoms.¹⁶⁴ This led to the introduction of martial law¹⁶⁵ across Ukraine and the subsequent imposition of restrictions on freedom of expression.¹⁶⁶

As of 24 February 2022, Ukraine did not have sufficiently effective legal mechanisms in place to protect its information space from Russian information warfare.¹⁶⁷ In light of the ongoing armed aggression, additional measures were adopted to counter hostile information influence operations. These included, *inter alia*, the introduction of criminal liability for justifying, recognising as legitimate or denying the armed aggression of the Russian Federation against Ukraine and glorifying its participants.¹⁶⁸ Additionally, the

[обмежувальних заходів \(санкцій\)” \[On the Decision of the National Security and Defence Council of Ukraine of 28 April 2017 “On the Application of Personal Special Economic and Other Restrictive Measures \(Sanctions\)”\]](#), 15 May 2017.

¹⁶² See the [Filter](#) project website.

¹⁶³ Ukraine’s derogation from its obligations under the Europe an Convention on Human Rights and the International Covenant on Civil and Political Rights was in line with the international principles and standards in this area (see more in Apostol L. (2022), [Legal analysis of the derogation made by Ukraine under Article 15 of the European Convention of Human Rights and Article 4 of the International Covenant on Civil and Political Rights](#), paragraph 167).

¹⁶⁴ Opryshko D., [Monitoring media pluralism in the digital era: application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022. Preliminary study to the implementation of the Media Pluralism Monitor: Ukraine](#), EUI, RSC, research project report, Centre for Media Pluralism and Media Freedom (CMPF), 2023, pp. 7-8.

¹⁶⁵ Martial law is a special legal regime imposed in Ukraine or certain territories in the event of armed aggression, threat of aggression or threat to the state independence or territorial integrity of Ukraine, and provides for the granting of powers to appropriate state authorities, the Armed Forces Command, military administrations and local governments necessary to avert the threat, to repel the armed aggression and to ensure national security, to eliminate the threat to the state independence and territorial integrity of Ukraine, as well as to provide for temporary threat-related restriction of constitutional rights and freedoms of man and citizen, and the rights and legitimate interests of legal entities, specifying the duration of such restrictions (Article 1 of the Law of Ukraine No. 389-VIII, [Про правовий режим воєнного стану](#) [On the Legal Regime of Martial Law] of 12 May 2015).

¹⁶⁶ Opryshko D., [Freedom of expression during military conflict](#), public value text (25), *ORF*, p. 46; Opryshko D., [Monitoring Media Pluralism the European Union: Preliminary Study to the Implementation of the Media Pluralism Monitor 2025 in Ukraine](#), EUI, RSC, research project report, Centre for Media Pluralism and Media Freedom (CMPF), 2025, p. 5.

¹⁶⁷ Opryshko D., “Regulation of Media in the Context of Armed Aggression” in Batura O., Holznagel B. and Kalbhenn J.C. (eds.), *in Disinformation in Europe. Challenges, Legal Instruments & Policy Recommendations*, Nomos, 2024, pp. 248-249.

¹⁶⁸ Ukrainian Parliament, Law No. 2110-IX, [Про внесення змін до деяких законодавчих актів України щодо посилення кримінальної відповідальності за виготовлення та поширення забороненої інформаційної продукції](#) [On amendments to certain legislative acts of Ukraine regarding the strengthening of criminal liability for the production and distribution of prohibited information products], 3 March 2022.



number of blocked online resources increased,¹⁶⁹ the public use and dissemination of symbols of the Russian invasion of Ukraine were restricted¹⁷⁰ and the United News Telemarathon¹⁷¹ was launched.¹⁷² No censorship was introduced at that time.

The attempt to strike a balance between national security interests in the information sphere and the right to freedom of expression in the context of armed aggression¹⁷³ led to the adoption of the Ukrainian Media Law (UML)¹⁷⁴ in 2022 (along with the alignment of Ukrainian legislation with the EU *acquis*,¹⁷⁵ a general overview of the UML is provided in Chapter 1 of this report).

In the context of countering disinformation and foreign information manipulation and interference (FIMI), the UML establishes several groups of measures. These include restrictions related to (i) the distribution of certain information in Ukraine, (ii) ownership and financing of Ukrainian media, and (iii) activities of media from the aggressor state on the territory of Ukraine.¹⁷⁶ These measures are explained in the following sub-chapters.

3.2. Disinformation in traditional media in Ukraine: legal provisions and administrative decisions

3.2.1. The Ukrainian Media Law (UML)

The term “disinformation” is not defined in Ukrainian legislation. However, certain categories of content are not allowed to be disseminated in the media in Ukraine, either because they echo disinformation narratives that attempt to justify Russia’s armed

¹⁶⁹ Opryshko D., “[Monitoring Media Pluralism the European Union: Preliminary Study to the Implementation of the Media Pluralism Monitor 2025 in Ukraine](#)”, op. cit, pp. 15-17.

¹⁷⁰ Ukrainian Parliament, Law No. 2265-IX, [Про заборону пропаганди російського нацистського тоталітарного режиму, збройної агресії Російської Федерації як держави-терориста проти України, символіки воєнного вторгнення російського нацистського тоталітарного режиму в Україну](#) [On the prohibition of propaganda of the Russian Nazi totalitarian regime, the armed aggression of the Russian Federation as a terrorist state against Ukraine, and the symbolism of the military invasion of Ukraine by the Russian Nazi totalitarian regime], 22 May 2022.

¹⁷¹ The United Telemarathon is a television broadcasting format set up after the full-scale Russian invasion of Ukraine in 2022. It unites nationwide TV channels whose content consists mainly of informational and/or informational-analytical programmes into a 24/7 rolling news programme during which the channels broadcast the same content simultaneously.

¹⁷² Decision of the National Security and Defence Council of Ukraine of 18 March 2022, [Щодо реалізації єдиної інформаційної політики в умовах воєнного стану](#) [On the implementation of a unified information policy under martial law], put into effect by the Decree of the President of Ukraine of 19 March 2022, No. 152/2022; Opryshko D., “[Monitoring media pluralism in the digital era : preliminary study to the implementation of the media pluralism monitor 2024 in Ukraine](#)”, EUI, RSC, research project report, Centre for Media Pluralism and Media Freedom (CMPF), pp. 13, 17, 27-29.

¹⁷³ Opryshko D., “Regulation of Media in the Context of Armed Aggression”, op. cit., pp. 248-249.

¹⁷⁴ Ukrainian Parliament, Law No. 2849-IX, [Про медіа](#) [Ukrainian Media Law - UML] of 13 December 2022.

¹⁷⁵ See Chapter 1 of this Report.

¹⁷⁶ Opryshko D., “Regulation of Media in the Context of Armed Aggression”, op. cit., pp. 251-261.



aggression against Ukraine and aim to weaken and divide Ukrainian society, or because they are connected with individuals who publicly support Russia's illegal actions in Ukraine.¹⁷⁷

3.2.1.1. Distribution of certain information in Ukraine

Since December 2025, 14 categories of media content have been banned in Ukraine, including calls for the violation of Ukraine's territorial integrity, incitement to violence, hate speech and discrimination.¹⁷⁸

Four additional categories of content are banned¹⁷⁹ in the context of armed aggression and a post-conflict period.¹⁸⁰ The first two include:

- information that depicts armed aggression against Ukraine as an internal conflict, civil conflict or civil war;
- unreliable information regarding the armed aggression and actions of the aggressor state, its officials, persons and organisations controlled by it.¹⁸¹

Violation of these restrictions by the media is considered a serious offence that may result in a fine equivalent to 25% of the licence fee for licensed linear audiovisual media, between 10 and 75 minimum wages for registered linear audiovisual media, between 50 and 75 minimum wages for non-linear audiovisual media, and between 10 and 15 minimum wages for print and online media.¹⁸² Dissemination of such content by foreign linear media may result in the rejection and/or cancellation of the provider's registration in Ukraine.¹⁸³

The third and the fourth categories include:

- programmes and materials, except for informational and analytical content, in which one of the participants is included in the list of persons who pose a threat to national security;¹⁸⁴
- music phonograms, videograms and music clips performed by citizens of the aggressor state (with some exceptions) who are not included in

¹⁷⁷ Ibid.

¹⁷⁸ UML, Article 36(1).

¹⁷⁹ UML, Article 119(1).

¹⁸⁰ These special provisions are contained in Chapter IX of the UML, which only applies to an aggressor state officially recognised as such by the Parliament of Ukraine. The application of these provisions is limited in time to the period until and for five years after this status is revoked. As of December 2025, Ukraine has granted the status of aggressor state to only one state, the Russian Federation (in 2015), and only after it illegally occupied part of Ukrainian territory.

¹⁸¹ Both categories of content are only restricted if the dissemination of such information results in the incitement of hostility or hatred, calls for violent change, the overthrow of the constitutional order or a violation of territorial integrity.

¹⁸² UML, Articles 110(4)(7) and (8), (5), (11)(6) and (7), and (12), 111(4)(7) and (8), and (5), 112(4)(7) and (8), and (5), op. cit.

¹⁸³ UML, Articles 67(1)(1) and (4)(1).

¹⁸⁴ [List of persons](#) who pose a threat to national security.



the list of musical performers (singers) of the aggressor state who condemn aggression against Ukraine.¹⁸⁵

In addition, if media cover activities of the authorities of the aggressor state in information and information-analytical programmes and/or materials, the latter must be accompanied by a notification about the status of the aggressor-state.¹⁸⁶

Non-compliance with these provisions is considered to be a serious offence and may result in a fine of 10% of the licence fee for licensed linear audiovisual media, between 5 and 40 minimum wages for registered linear audiovisual media, between 30 and 40 minimum wages for non-linear audiovisual media, and between 5 and 10 minimum wages for print and online media.¹⁸⁷

At the same time, the UML establishes exemptions from liability for the dissemination of the aforementioned content. For example, online media are exempt if such information was disseminated by users in comment sections or user publication sections of their website, provided they restrict access to the information within three working days of receiving the relevant complaint or order from the National Council of Ukraine on Television and Radio Broadcasting (the National Council or the media regulator).¹⁸⁸

Additionally, media may be exempt from liability if they provide sufficient evidence that the violation of legal requirements occurred due to illegal interference by third parties in their activities, and that the dissemination of prohibited information occurred outside their editorial control.¹⁸⁹

3.2.1.2. Ownership and financing of Ukrainian media

To prevent the dissemination of disinformation and hostile propaganda from the aggressor state within Ukraine, the UML has established special rules relating to the media ownership structure applicable during and after a period of armed aggression. The UML prohibits any individual or legal entity operating in the media sector from having any connection, either through ownership structure or funding, with the aggressor state, its citizens (with some exceptions) and legal entities at any level of the corporate rights ownership chain (Article 120(1) UML).

Violation of these restrictions may result in the National Council refusing to register the media entity concerned, not allowing it to participate in a competition to obtain a licence or not extending its licence. If the regulator has evidence that it has violated the aforementioned provisions, it may cancel its licence or registration, revoke its registration or file a lawsuit with the court to cancel its licence.¹⁹⁰ However, if it brings its ownership

¹⁸⁵ More information about the list of persons who pose a threat to national security and the list of musical performers (singers) of the aggressor state who condemn aggression against Ukraine can be found in Opryshko D., "Regulation of Media in the Context of Armed Aggression" op. cit., pp. 252-254.

¹⁸⁶ UML, Article 119(2).

¹⁸⁷ UML, Articles 110(3)(15), (16) and (20), 110(5), 110(10)(14), (15) and (18), 110(12), 111(3)(10), 111(5), 112(3)(9) and (15), and 112(5).

¹⁸⁸ UML, Article 117(4).

¹⁸⁹ UML, Article 117(5).

¹⁹⁰ UML, Articles 59(8), 60(6), 62(1), 64(2) and (3), 65(1)(2), (4)(5) and (5), and Article 120(2) and (3).



structure and financing mechanisms into line with Ukrainian legislation and provides the National Council with the relevant information, the media regulator may reconsider its decision (Article 120(4) UML).

3.2.1.3. Activities of media of the aggressor state on the territory of Ukraine

The National Council may reject or cancel the registration of foreign linear media if they are registered in the aggressor state, have connections with the aggressor state via their ownership structure or funding, or if persons related to the aggressor state via their ownership structure or funding exercise editorial control over them (Article 121(1) UML).

If such circumstances are established regarding foreign linear media originating from an EU member state, the Ukrainian media regulator restricts retransmission of such media on the territory of Ukraine during and after the armed aggression. In such a case, the National Council will immediately inform the media regulator of the relevant EU member state (Article 121(3) UML).

Additionally, the UML prohibits the distribution of the listed audiovisual on-demand media services and services of audiovisual service providers of the aggressor state on the territory of Ukraine (Article 123 UML).¹⁹¹

3.2.2. The Law on sanctions and orders of the National Centre for Operational and Technical Management of Telecommunications Networks (NCU)

Another mechanism used to limit the spread of disinformation and hostile propaganda in Ukraine involves the application of special economic and other restrictive measures (sanctions) to media and websites, including online platforms.

Proposals on the relevant application, cancellation and introduction of amendments to sanctions may be submitted to the National Security and Defence Council of Ukraine (NSDC) for consideration, *inter alia*, by the Ukrainian Parliament, the President of Ukraine, the Cabinet of Ministers of Ukraine and the Security Service of Ukraine (Article 5(1) NCU). The decision on the application, cancellation or introduction of amendments to personal sanctions is adopted by the NSDC and put into effect under a presidential decree (Article 5(3) NCU).

Additionally, websites may be blocked under the provisions of the NCU during Russia's large-scale invasion of Ukraine.¹⁹²

Both of these restrictive measures may be appealed in court.

¹⁹¹ [List](#) of audiovisual on-demand media services and services of audiovisual service providers of the aggressor state.

¹⁹² Ukrainian Parliament, Law No. 1089-IX, [Про електронні комунікації](#) [On Electronic Communications], 16 December 2020, Article 32(8).



3.2.3. Administrative decisions

As of 8 December 2025, no cases involving media dissemination of information depicting armed aggression against Ukraine as an internal conflict, civil conflict or civil war, or of unreliable information regarding the armed aggression and actions of the aggressor state, its officials, persons and organisations controlled by it, resulting in the incitement of hostility or hatred, calls for violent change, the overthrow of the constitutional order or a violation of territorial integrity, have been registered.

In May 2025, the National Council fined an audiovisual services provider for including in its TV channel package 17 foreign linear media that were neither registered under the UML nor originated from an EU member state.¹⁹³ When determining the amount of the fine, the National Council considered several criteria, including the level of public danger posed by the violation. The fact that 16 of the 17 media originated from the Russian Federation and were able to retransmit content forbidden in Ukraine was considered a circumstance that increased the level of public danger.

Based on the results of inspections of on-demand audiovisual media services of LLC 'PLATFORMA TV' (service name: 'YOUTV', Kyiv) and LLC 'OTT Ukraine' (service name: 'SWEET.TV', Kyiv), the NBC adopted decisions No. 2734 of 18 December 2025 and No. 123 of 22 January 2026. Response measures in the form of fines were applied for the placement in the film catalogue of a participant included in the List of persons who pose a threat to national security of Ukraine: 296,000 UAH for LLC 'PLATFORMA TV' and 320,000 UAH for LLC 'OTT Ukraine'.

Special economic and other measures (sanctions) may also be imposed on media and websites, including online platforms. These measures have been applied to various Russian TV channels and newspapers (such as the TV and Radio Company of the Armed Forces of the Russian Federation "Zvezda", The First Channel, World Network, TNT-TV Network, Multimedia Holding, the Moskovsky Komsomolets newspaper editorial office, the State-Owned Publicly Funded Institution of the Republic of Crimea Editorial Office of the "Crimean Newspaper" and others)¹⁹⁴, as well as some Ukrainian TV channels that retransmitted Russian propaganda and disinformation.¹⁹⁵

¹⁹³ [Decision No. 1056](#) [in Ukrainian] of the National Television and Radio Broadcasting Council of Ukraine of 29 May 2025, paragraph 12.

¹⁹⁴ See, for example, the Decision of the National Security and Defence Council of Ukraine, [Про застосування і скасування персональних спеціальних економічних та інших обмежувальних заходів \(санкцій\)](#), [On the application and cancellation of personal special economic and other restrictive measures (sanctions)] of 22 May 2024, put into effect by Decree of the President of Ukraine no. 340/2024 of 22 May 2024, Annex 2.

¹⁹⁵ See, for example, the Decision of the National Security and Defence Council of Ukraine, [Про застосування персональних спеціальних економічних та інших обмежувальних заходів \(санкцій\)](#) [On the application and cancellation of personal special economic and other restrictive measures (sanctions)] of 2 February 2021, put into effect by Decree of the President of Ukraine No. 43/2021 of 2 February 2021, Annex 2; Ukraine Crisis Media Center, [Як "канали Медведчука" стали основою механізму просування російської пропаганди в Україні](#) [How "Medvedchuk's Channels" Became the Basis of the Mechanism for Promoting Russian Propaganda in Ukraine]; Zakusylo M., [«Якби вирубити світло трьом каналам – пропаганди поменшало би в рази», – Отар Довженко](#) [If you cut off the power to three channels, the propaganda would decrease significantly – Otar Dovzhenko]; Dutsyk D., [Як трансформуються українські медіа у вогні війни. Лекція Ліани Луцик](#) [How Ukrainian media are transformed in the flames of war], Journalism Teacher's Academy, 28 September 2022.



The NCU systematically issues orders to block web resources, including so-called “autonomous systems” (AS).¹⁹⁶ Following the imposition of martial law in Ukraine, according to expert estimates, 660 autonomous systems were blocked¹⁹⁷ because the NCU considered them to be linked to Russia. This resulted in over-blocking, making a large number of resources unrelated to war and propaganda inaccessible.¹⁹⁸ Some of the web resources restricted by the NCU included journalistic investigations into corruption and violations,¹⁹⁹ as well as media.²⁰⁰

3.3. Core platform regulation under Ukrainian legislation: convergence with EU standards

The UML defines two types of platforms: video-sharing platforms (VSPs) and shared access to information platforms (online platforms).²⁰¹ It only regulates VSPs and only those that fall within the jurisdiction of Ukraine.²⁰²

VSPs that fall within Ukrainian jurisdiction are considered as subjects in the media sector from the moment they commence the relevant activity and are required to register.²⁰³

In the context of countering disinformation and hostile propaganda, the UML obliges VSPs to comply with the requirements on media ownership transparency and, in their terms of service, to ban the dissemination of information that violates the requirements of the UML (including the aforementioned restrictions applicable during and after armed aggression).²⁰⁴ VSPs must also: publish their terms of service and familiarise users with them; provide in their terms of service a procedure for exercising the right to reply or to refute inaccurate information; implement transparent and comprehensible mechanisms for filing complaints, particularly those related to the dissemination of illegal content, to ensure they are properly dealt with and that complainants are informed of the

¹⁹⁶ An AS is a connected group of networks run by one or more network operators which has a single, clearly defined routing policy (*Guidelines for creation, selection, and registration of an Autonomous System (AS)*, prepared by John A. Hawkinson, Tony J. Bates, RFC 1930, March 1996; Regional Internet Registry for Europe, Middle East and Central Asia. *What is an AS Number?*). This could be a provider, a data centre or a company whose operations are critically related to internet access. Blocking an AS involves preventing any traffic from passing through a specific provider or data centre (Belovolchenko A., «*Надійно заблокувати щось в інтернеті неможливо*». Як в Україні блокуються російські ресурси й чому це зачіпає легальні сайти, [“It is impossible to reliably block something on the Internet.” How Russian resources are blocked in Ukraine and why this affects legal sites], DOU, 13 November 2023).

¹⁹⁷ Correct as of January 2025.

¹⁹⁸ Opryshko D., “*Monitoring Media Pluralism the European Union: Preliminary Study to the Implementation of the Media Pluralism Monitor 2025 in Ukraine*”, *EUI*, RSC, research project report, Centre for Media Pluralism and Media Freedom (CMPF), 2025, pp.16-17.

¹⁹⁹ *Ibid.*, p. 17.

²⁰⁰ Kyiv District Administrative Court, *Ruling on securing the claim in Case No. 320/36779/25* [in Ukrainian] of 30 September 2025; *Order No. 651/3452 of the NCU* «Про призупинення дії розпорядження НЦУ» [“On the suspension of the order of the NCU”] of 1 September 2025.

²⁰¹ Such platforms may include Telegram, Facebook, X, etc.

²⁰² For more details on the general issues related to platform regulation, see Chapter 1 of this report.

²⁰³ UML, Article 63(1)(4) and (15).

²⁰⁴ For further information, see Chapter 2.2 of this report.



results of such complaint reviews; ensure a transparent, simple and effective mechanism for appealing against actions taken by providers of VSPs in response to such user complaints; implement effective media literacy measures and tools, and raise user awareness of such measures, etc.²⁰⁵

If a VSP does not comply with its obligations under the UML, the National Council may apply relevant fines.²⁰⁶ VSP users have the right to appeal against unlawful decisions, actions and inactions of VSPs to the National Council and/or to a court,²⁰⁷ while VSP providers may establish a co-regulatory body.²⁰⁸

As of 1 November 2025, only two VSPs had been registered in Ukraine.²⁰⁹ Other VSPs that do not fall within Ukrainian jurisdiction, as well as online platforms, are not obliged to comply with Ukrainian legislation. Some of them (especially Telegram, X, TikTok, etc.) are currently considered to be key channels for the dissemination of FIMI.²¹⁰ Nevertheless, Ukraine can only use “soft” mechanisms to interact with foreign VSPs and online platforms. This means that the National Council and other state bodies are empowered to cooperate with them, for example, by concluding relevant agreements or memoranda.²¹¹ Although negotiations with some companies, such as Meta and Google, have been underway for about a year, no memoranda or agreements have yet been concluded.²¹² By the end of 2024, there were still no effective legal mechanisms in place to influence online platforms operating within Ukraine outside Ukrainian jurisdiction.²¹³ As of December 2025, there had been no changes in this regard.

The need to counteract the dissemination of disinformation and propaganda via foreign VSPs and online platforms has prompted Ukraine to restrict access to online resources on the basis of the Law on Sanctions. However, this mechanism is constantly

²⁰⁵ UML, Articles 23(1) and 25.

²⁰⁶ UML, Articles 114 and 116(19). For significant violations, VSP providers are subject to a fine of between 5 and 25 minimum wages as of the date of the violation. When determining the fine, the National Council must consider the technology used to provide the service, the territory of service provision, audience reach and other circumstances that affect the level of public danger posed by the violation.

²⁰⁷ UML, Article 23(3).

²⁰⁸ According to the UML, co-regulatory bodies are established by representatives of the media industry who, together with the National Council, are entitled to develop codes (rules) for the creation and dissemination of certain information, criteria for prohibited information (e.g. hate speech, discrimination, calls to terrorism, child pornography), criteria for classifying persons as subjects in the online media sector, criteria for classifying advertisements as harmful, etc. This mechanism envisages that subjects in the media sector voluntarily undertake to comply with the respective codes (rules), while the National Council recognises that these requirements are sufficient to protect the public interest (UML, Articles 36(2), 90(1)(23), (24), (26) and (51), and (2), and 92).

²⁰⁹ The National Council of Ukraine on Television and Radio Broadcasting, [Реєстр суб'єктів у сфері медіа](#), [Register of entities in the media sector] of 1 November 2025, pp. 6287, 6534.

²¹⁰ See, for example, European External Action Service, [The 3rd EEAS Report on Foreign Information Manipulation and Interference Threats - Exposing the architecture of FIMI operations](#), March 2025, pp. 5, 9, 10, 21, 27.

²¹¹ UML, Articles 2(15), 90(1)(13) and (14), 91(1)(3), (11) and (13), 99(3) and 124(5).

²¹² Opryshko D. (2025), [Monitoring Media Pluralism the European Union: Preliminary Study to the Implementation of the Media Pluralism Monitor 2025 in Ukraine](#), op. cit., p. 13; National Television and Radio Broadcasting Council of Ukraine press release, [Регулювання платформ та хто фінансує компанії, які реєструють медіа: Національна рада провела зустріч з Американською торговельною палатою](#) [Platform regulation and who funds media registration companies: National Council meets with American Chamber of Commerce], 15 April 2025.

²¹³ Opryshko D., op. cit.



criticised by human rights lawyers, experts and industry associations, *inter alia*, due to its lack of transparency and foreseeability.²¹⁴

In general, the UML is aligned with the AVMSD with regard to the regulation of VSPs.²¹⁵

Like the Digital Services Act (DSA),²¹⁶ the UML obliges VSPs to publish their terms of service, and to put notice and action mechanisms in place. It also requires them to guarantee the effective consideration of submitted complaints and inform complainants of the results of their consideration, and ensure a transparent, simple and effective appeals mechanism for challenging actions taken by VSP providers regarding the handling of users' complaints.²¹⁷

However, Ukrainian legislation does not regulate issues relating to VSPs' transparency reporting obligations, recommender system transparency, obligations regarding risk assessment and mitigation of risks, independent audit, etc. Nor does it contain any provisions regarding out-of-court dispute settlement or trusted flaggers. Issues related to online platforms also remain unregulated.

Therefore, Ukrainian legislation in this area still needs to be aligned with EU legislation, including the DSA and EMFA.

3.4. Political advertising through platforms and online services

3.4.1. Current Ukrainian legislation

In Ukraine, the Electoral Code of Ukraine (ECU)²¹⁸ regulates general issues related to pre-election campaigning and political advertising. Issues arising in connection with campaigning for the all-Ukrainian referendum are regulated by the Law on Referendum.²¹⁹

According to the Law on Referendum, if the National Council concludes agreements and memoranda with VSPs and online platforms,²²⁰ it must provide them with a list of

²¹⁴ Opryshko D., op. cit., pp. 15-17.

²¹⁵ Council of Europe, the [Law "On Media" of Ukraine](#), DGI, Opinion of the Information Society and Action against Crime Directorate, prepared by experts Eve Salomon and Tanja Kerševan, pp. 5, 7, 14, 18.

²¹⁶ European Parliament, [Regulation \(EU\) 2022/2065](#) of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act).

²¹⁷ DSA, Recitals 52 and 54, Articles 14, 16, 17 and 20; UML, Article 23(1)(1) and (4).

²¹⁸ Ukrainian Parliament, Law of Ukraine No. 396-IX, [Виборчий Кодекс України](#) [[Electoral Code of Ukraine](#)], 19 December 2019.

²¹⁹ Ukrainian Parliament, Law of Ukraine No. 1135-IX, [Про всеукраїнський референдум](#) [Law on Referendum], 26 January 2021.

²²⁰ Ibid. The Law on Referendum empowers the media regulator to conclude agreements and memoranda with foreign online platforms. These documents may set out requirements and restrictions on distributed information



subjects of the all-Ukrainian referendum and information on how they are funded. If it receives information about the dissemination of campaign materials relating to an all-Ukrainian referendum which are not financed from sources specified by law, the online platform concerned must take measures to stop their dissemination.²²¹

The aforementioned provisions were added to this law by the UML. It is worth mentioning that similar rules were planned to be introduced simultaneously in the ECU.²²² However, they were excluded from the text just before the final parliamentary vote and it was proposed that a separate draft law regulating these issues should be registered.²²³

This resulted in a situation in which only some of the ECU's general rules could potentially be applied to VSPs under Ukrainian jurisdiction. Therefore, VSPs are not responsible for the content of pre-election campaigning carried out under a contract with a customer. The only exception to this rule concerns the distribution of materials calling for the end of Ukraine's independence, a change of the constitutional order by force, the violation of the sovereignty and territorial integrity of the state, the undermining of its security, the illegal seizure of state power, the propaganda of war, violence and the incitement of interethnic, racial or religious hatred, encroachment on human rights, freedoms and the health of the population.²²⁴

The ECU prohibits pre-election campaigning through foreign mass media operating in Ukraine.²²⁵ However, this prohibition does not apply to foreign VSPs and online platforms that do not exercise editorial control over the creation, selection, organisation and distribution of programmes or other mass information (and are not considered media under the UML).

Additionally, "soft" mechanisms²²⁶ of cooperation with foreign VSPs and online platforms may be employed during pre-election campaigning.²²⁷ However, as mentioned above, no relevant agreements or memoranda had been concluded as of December 2025.

available on the territory of Ukraine, mechanisms for co-regulation and cooperation aimed at countering the spread of disinformation during the preparation and conduct of a referendum, ensuring the transparency of campaigning on platforms, in particular by introducing campaign marking and special notifications containing information about the purchaser of the campaign, the period of its placement, the funds spent for this purpose and information about the possibilities of appealing against illegal campaigning within the framework of the mechanisms provided by the platforms, the introduction of open campaign libraries, and compliance with other requirements of the legislation by users. Additionally, the Law on Referendum requires internet and online platform users to comply with the requirements of the legislation on information provision and campaigning for an all-Ukrainian referendum when distributing any relevant materials (Article 89(5) of the Law on Referendum).

²²¹ Ibid., Article 94(9).

²²² [Comparative table](#) to the draft Law of Ukraine "On Media" [in Ukrainian], registration number 2693-d (second reading), pp. 724-726, 732-733, 738.

²²³ Ukrainian Parliament, IX convocation, eighth session, [Bulletin No. 1, part 13](#) [in Ukrainian]. Transcript of the plenary session of 13 December 2022. Editorial Department of the Main Department of Documentary Support of the Apparatus of the Ukrainian Parliament, p. 80; [Transcript of the plenary meeting of 13 December 2022, meeting 1 \(continuation\)](#) [in Ukrainian], published 13 December 2022. [Timeline](#): 17:06:08,

²²⁴ ECU, Article 57(3) and (19).

²²⁵ ECU, Article 57(10).

²²⁶ These measures include establishing cooperation with foreign VSPs and online platforms, for example by concluding relevant agreements and memoranda.

²²⁷ UML, Article 2(15).



3.4.2. Convergence with EU standards

In 2019, the Law on Advertising²²⁸ was supplemented by the definition of “political advertising”. This term was subsequently excluded from the law in 2022, when the UML was adopted. The ECU prohibits the inclusion of pre-election campaign materials from candidates or parties (party organisations), and political advertising in informational television and radio programmes. Political advertising must be separated from other programme material and labelled as such.²²⁹ However, as of December 2025, no Ukrainian legislative act defined this term. References to political advertising can only be found in the ECU, where it is mentioned as a type of election campaigning.

In the context of Ukraine’s obligations to align its legislation with the EU *acquis*, the regulation of political advertising plays an important role. The relevant definition provided by the Regulation on the transparency and targeting of political advertising (TTPAR) is “broader than political messages confined to elections and referenda”.²³⁰ This means that Ukraine must not only align its terminology with that of the TTPAR but also change its overall approach to regulating this issue. To this end, a number of legal acts need amending, including the ECU, the UML, the Law on Referendum, legislation regulating the financing of political parties and candidates, etc.

²²⁸ Ukrainian Parliament, Law No. 270/96-BP, [Про рекламу \[Law of Ukraine on Advertising\]](#), 3 juillet 1996.. This law does not apply to election campaigning (Article 2(4)).

²²⁹ ECU, Article 57(8).

²³⁰ Council of Europe, [Legal Opinion](#) on the Draft Law of Ukraine “On Amending the Law of Ukraine “On Advertising” and Other Laws of Ukraine”, prepared by Deirdre Kevin, 3 February 2025, LEX_2025_4, p. 19.



4. FIMI in Ukraine: experience to be studied and challenges to be addressed

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4.1. FIMI in Ukraine: main actors and challenges

Like many countries in Europe, Ukraine is a constant target of FIMI, the extent and intensity of which are closely tied to politics, international relations and various social issues. When talking about disinformation in general and FIMI specifically in Ukraine, the leading malicious actor that has always been the source, producer and director of these phenomena is the Soviet Union and, later, the Russian Federation. Rather than provide excessive analysis of methods, ideas and other approaches to the conduct of FIMI campaigns, this chapter will briefly summarise the tools that the Soviet and Russian political regimes have used for many years to promote their interests, spread disinformation and influence the state of affairs in neighbouring countries such as Ukraine. These tools and approaches remain relevant today, as Russia continues to exploit the same vulnerabilities in human nature, psychology and societal cohesion.

To begin with, it is important to clarify the definition of the term “active measures” introduced by KGB specialists. Although it is difficult to provide a clear explanation, the goals of this approach can still be outlined: to exert influence on the adversary and weaken their political, economic, scientific, technical and military positions.²³¹ Since declaring its independence in 1991, Ukraine has undergone numerous informational attacks orchestrated by Russian security services. One of the first and most commonly recognised attacks was an operation called “Kolchuga”, which took place in the early 2000s. The initial goal was to undermine Ukrainian authority in the international arena and accuse it of intentionally selling a radar system to Iraq²³² under the regime of Saddam Hussein. Later, similar accusations appeared in connection with missile sales to North Korea. Russia did not miss the chance to take advantage of this opportunity and was actively fueling this topic with disinformation to label Ukraine as a supporter of authoritarian regimes and undermine trust and support from the collective West. Since then, it has been actively working in this direction through its state media, pro-Russian media and political actors based in Ukraine, pseudo and biased experts, etc.²³³ Two additional milestones that should be highlighted are the annexation of Crimea and occupation of Donbas in March 2014 and

²³¹ Leventhal T., “[Soviet vs. Post-Soviet Russian Disinformation](#)”, *American Diplomacy*, Chapel Hill, February 2024.

²³² “[US Wants to Know More on Alleged Ukrainian Radar Sale to Iraq - 2002-11-05](#)”, *Voice of America*, updated 27 October 2009.

²³³ “[How the directions of Kremlin propaganda have changed](#)”, *Center for Countering Disinformation*, 8 February 2023.



the start of the full-scale invasion on 24 February 2022. The year 2014 is also commonly recognised as the period of the beginning of hybrid warfare,²³⁴ since not only were ground troops used to invade Ukraine, but active FIMI operations were also conducted. Russian disinformation also became more aggressive and spread narratives about the “Neo-Nazi regime in Ukraine”, civil war, pseudo-historical narratives and pseudo-legal justifications for the Crimean occupation.²³⁵ Some of these ideas even contradicted each other. For instance, on the one hand, they claimed that Russia had nothing to do with events in Ukraine,²³⁶ since this was a civil war and there were no Russian soldiers there,²³⁷ while on the other they accused NATO and its expansion to the East as the reason to invade Ukraine and “protect” themselves.²³⁸ However, these efforts did not yield the desired results, as Ukraine demonstrated its ability to withstand and begin a gradual recovery.

Russia began preparing the ground for its 2022 invasion in 2021. Its preparations included intense psychological operations (PSYOPS) to create a perception of Russia as an undisputed and unstoppable power that could conquer Ukraine effortlessly.²³⁹ It seems that the goal of these FIMI operations was to frame the perception among the population and political elite that any kind of counter-offensive measures would be suicidal and lead to inevitable defeat. As noted by F. Bechis, the underlying goal of these tactics was to alter the enemy’s perceptions, causing them to think what the Russian Federation wanted them to think and do what it wanted them to do.²⁴⁰ These tactics also highlight the other methodology that Russia has been using actively for decades, mixing facts and disinformation to confuse the public and create a feeling of uncertainty, anxiety, fear and distrust. Then, via so-called “disinformation laundering”, a person is more likely to perceive disinformation better and trust unverified sources. These methods were widely used in 2025 when hybrid warfare reached its peak. Analysing and understanding the reasons behind FIMI is therefore vital not only for Ukraine as a direct participant in the war, but also for EU countries, which are at significant risk of further war escalation, including informational, digital and other dimensions.

²³⁴ Sirinyok-Dolgaryova K. G., “[Key narratives of Russian propaganda in Russian-Ukrainian war: analysis of aggressor’s media discourse](#)”, *Scientific Notes of Taurida National V.I. Vernadsky University*, series “Philology. Journalism”, Vol. 36 (75), No. 4, part 2, Taurida National V.I. Vernadsky University, Kyiv, 2025, pp. 189-194.

²³⁵ Balaban M. and Zhukov S., “[What we have learnt about FIMI after three years of full-scale war in Ukraine](#)”, *EUvsDisinfo*, 12 March 2025.

²³⁶ “[Disinfo: There has never been Russian forces in Ukraine, Russia is not a party in the conflict in Ukraine, it is a civil war](#)”, *EUvsDisinfo*, 14 January 2019.

²³⁷ Kazdobina, J., Hedenskog, J. and Umland, A., [Why the Donbas War Was Never “Civil”](#), Stockholm Centre for Eastern European Studies, SCEEUS Report No. 6, 12 April 2024, pp. 4, 8.

²³⁸ Soloviova A., “[Narratives of Russian Propaganda in the Ukrainian Media Space in the Context of Implementation of European Values](#)”, *Petro Mohyla Black Sea National University*, Mykolaiv, 2024, p. 37.

²³⁹ Yuskiv B. and Karpchuk N., “[Russian Federation’s FIMI prior to its Intervention in Ukraine](#)” in Echeverría M., García Santamaría S. and Hallin D.C. (eds.), *State-Sponsored Disinformation Around the Globe: How Politicians Deceive their Citizens*, Routledge, New York, 2024, pp. 251-269.

²⁴⁰ *Ibid.*, p. 253.



4.2. FIMI in Ukraine: platform evaluation and usage

Platforms used by malicious actors to spread disinformation and conduct FIMI campaigns in Ukraine include Telegram, TikTok and Facebook.

The platform that requires special attention is Telegram. Founded by Pavel Durov, the former owner of VK (a Russian social media app), this app gained immense popularity among Ukrainian citizens, particularly after 24 February 2022. According to various data, more than half of Ukrainians rely on it as their primary source of information.²⁴¹ Some studies show that 72% of respondents use it as a news source and 82% use it as an app for chatting and other types of communication.²⁴² The key to its success lies in the fact that, during the Russian invasion, its channels posted information about the current state of affairs and updates from the frontline, which ultimately helped people stay informed and react accordingly. As well as media and bloggers, state institutions and officials use Telegram as a means of communicating with the public, which also lends it legitimacy.

Another reason for the app's popularity is the lack of content moderation. Although Telegram claims to actively moderate and block content that violates its rules,²⁴³ most explicit content remains easily accessible. During the full-scale invasion, images of violence, dead bodies of soldiers, hate speech, etc., were commonly shared on the platform in Ukraine, attracting large numbers of users. There was little chance that such content would be removed. On account of information about the app's lack of security, the possibility that Russian security services could access chats and even deleted messages, and other links between the app and Russia, measures were taken to limit use of the app for professional reasons in state institutions, critical infrastructure and universities.²⁴⁴ Even so, Telegram remains a crucial player in Ukraine's informational space and shapes it in various ways. One major challenge is the way anonymous Telegram channels disseminate unverified, manipulated information or spread disinformation and propaganda. Most of these channels behave like media actors, disseminating news, publishing articles and performing other media and journalistic functions. However, unchecked and uncontrolled behaviour leads to the violation of standards; authors are not identifiable, while posts promoting fake content, corrupted and manipulated information or disinformation are common.²⁴⁵ Moreover, anonymous channels are actively used by Russian security services like GRU (Russia's military intelligence agency) and FSB (Russia's principal security agency and the main successor to the Soviet Union's KGB) to exploit issues that have been worrying people and creating tensions in Ukrainian society: army mobilisation, peace negotiations, injustice of certain laws, corruption, support from the EU and the USA, EU and NATO

²⁴¹ Rating Group and EUAM Ukraine, [Trust, reforms, and EU integration: what Ukrainians think in 2025](#), Kyiv, 25 September 2025.

²⁴² ["Ukrainian Media: News Consumption and Trust in 2025"](#), *Internews Ukraine*, Kyiv, September 2025, p. 16.

²⁴³ Telegram, [Telegram Moderation Overview](#).

²⁴⁴ Balovsyak N., ["Анонімні та офіційні Telegram-канали в Україні: аналіз популярності під час гібридної війни"](#) [[Anonymous and Official Telegram Channels in Ukraine: Analysis of Popularity during the Hybrid War](#)], *Current Issues of Mass Communication*, Issue 37, p. 33.

²⁴⁵ Ibid.



accession,²⁴⁶ etc.²⁴⁷ During blackouts caused by attacks on energy plants and distribution sites, anonymous channels are exploited by individuals seeking information about power cut schedules to advertise gambling, increase traffic on other channels through redirection or simply manipulate feelings of uncertainty and fear. Further evidence of how Telegram remains one of Russia's favourite tools to spread its soft power is the way it is used in the occupied territories of Ukraine. Almost as soon as a territory is occupied, Telegram channels are established there to shape the informational environment.²⁴⁸ Russia also actively uses bot farms to promote its propaganda and disinformation in comments under posts on Telegram channels covering occupied territories, thereby cementing its influence over the residents of those areas.²⁴⁹

To sum up, Telegram has become a central pillar of Ukraine's media environment. Its widespread use by the public, media and even state institutions has created fertile ground for anonymous channels that spread manipulation, disinformation and Russian influence. As a result, Telegram simultaneously serves as a vital communication tool and a major vulnerability in Ukraine's information security landscape.

TikTok also plays a role in FIMI operations. Although its role is thought to be smaller than that of other platforms (6% use it as a source of news and 30% as a means of communication),²⁵⁰ it must still be taken into account. Using short video formats that instantly capture users' attention, it enables malicious actors to make a significant impact. Thanks to TikTok and the shift in format of information consumption, the use of deep fakes (videos generated or corrupted via AI technologies, which are commonly used to spread disinformation) has become common among malicious actors. The latest analysis²⁵¹ reveals how this tactic can be employed to sow distrust and spread misinformation. In these videos, AI is used to clone the voices and faces of trusted female journalists, creating realistic deep fakes that say things that the real person never said. These manipulated videos are distributed on TikTok through accounts that mimic official news outlets, effectively bypassing critical thinking by exploiting the audience's trust in familiar media figures. The content usually involves sensationalist claims, such as fake government decrees or promises of financial aid, designed to trigger an immediate emotional

²⁴⁶ ["Information chaos around the Kursk operation: how telegram channels are manipulating their readers"](#), *Behind the News*, 11 August 2024.

²⁴⁷ Ryaboshtan I. and Iliuk K., ["A 'Telegram Empire' run by Russian intelligence during the big war"](#), *Detector Media*, 20 June 2022.

²⁴⁸ Drozdova Y., Dukach Y. and Kelm N., ["Telegram Occupation. How Russia Wanted to Breed a Media Monster, but Ended up with a Paper Tiger"](#), *Texty.org.ua*, 15 November 2022.

²⁴⁹ Dukach Y., Adam I. and Furbish M., ["Digital occupation: Pro-Russian bot networks target Ukraine's occupied territories on Telegram"](#), *Atlantic Council*, Washington DC, 16 July 2025.

²⁵⁰ ["Ukrainian Media: News Consumption and Trust in 2025"](#), *Internews Ukraine*, op. cit.

²⁵¹ ["Штучний інтелект і ТікТок: як відомих журналісток перетворюють на фейку"](#) [[Artificial intelligence and TikTok: how famous journalists are being systematically used for undisclosed AI generated content](#)], *Texty.org.ua*, 28 October 2025.



response. Once the viewer is hooked, the videos often direct them to malicious links for data theft or spread political disinformation to sow internal discord.

This strategy weaponises the reputation of legitimate journalists to spread scams and propaganda at alarming speed and low cost.²⁵² TikTok is widely used as an entry point for FIMI operations, especially where the topic of Ukrainian soldiers is concerned. Malicious actors employ a multi-level tactic that begins with the creation of anonymous TikTok accounts for the initial seeding of AI-generated videos featuring fake military personnel. Once published, this content is rapidly disseminated via Telegram, X (formerly Twitter) and Facebook, where manipulative text descriptions are added to transform vague complaints into specific calls for mutiny or disobedience. Subsequently, large Russian propaganda networks and so-called “war correspondents” distribute the videos to legitimise them, presenting them as verified “official” news. This strategy allows the enemy to transform dubious, anonymous social media content into a powerful tool for discrediting Ukraine’s defence forces and demoralising society. Active use of various platforms, including Telegram, Facebook and TikTok, is a perfect example of the complexity and multi-layered nature of Russian FIMI operations. In this case, a brief review of TikTok, which is commonly used as the entry point for conducting disinformation campaigns, is necessary and helps us to comprehend these tactics.

Finally, it is crucial to examine the role of Facebook in Ukraine’s informational landscape and its use within the context of FIMI. According to the latest statistics²⁵³ on media usage and consumption, Facebook remains one of the top three most popular apps for communication and news, used by 53% and 17% of respondents respectively. It is also worth mentioning that, among the platforms described here, Facebook has the strictest content moderation and compliance rules. Except for classic disinformation campaigns closely monitored by fact-checkers and platform administrators, there is also concern about AI-generated content, specifically groups that post emotionally driven and manipulative images designed to capture users’ attention and encourage them to interact with such content, thereby gaining promotion from the algorithm. Even though it is hard to directly tie these groups to Russian FIMI campaigns or any other groups of actors, some of them have been spotted spreading Soviet nostalgia content, Russian disinformation and fakes.²⁵⁴ Due to strict moderation, these pages often attempt to redirect users to alternative platforms such as Telegram or WhatsApp to avoid being blocked. In this case, Facebook also serves as an example of an entry point for such content to gain attention and spread its message, narrative or idea.

²⁵² Ibid.

²⁵³ “[Ukrainian Media: News Consumption and Trust in 2025](#)”, Internews Ukraine, op. cit.

²⁵⁴ Burdiak P., “[Небезпека У Стрічці Facebook: клікбейт і таргетована реклама як знаряддя маніпуляцій та шахрайства](#)” [Danger in the Facebook Feed: Clickbait and Targeted Advertising as Tools of Manipulation and Fraud], CEDEM, Kyiv, 24 October 2025, pp. 30-33.



In conclusion, the evident complexity of FIMI in Ukraine demonstrates how Russia systematically exploits the full spectrum of social media, prioritising platforms with less stringent moderation such as Telegram to shape the informational environment. While this chapter outlines the core mechanisms of these multi-platform operations, their evolving sophistication and scale require more extensive analysis.

4.2.1. The Ukrainian Media Law

The Ukrainian Media Law (UML) was adopted in December 2022 and has been in force since March 2023. It is a core piece of legislation that regulates all types of media and sets the framework for countering FIMI in Ukraine's information space. It incorporates all relevant regulations enacted in Ukraine since 1992, when the first law on printed media was introduced. The development of different technologies, information and media environments required a more proficient and complex approach that could address current challenges. Implementation of the UML was also a crucial part of Ukraine's EU integration process, bringing it into line with the EU *acquis* and standards (e.g. the AVMSD, DSA and DMA).

The innovations and broader scope of regulation introduced by the UML have given Ukraine a clearer overview of its informational environment, enhancing its internal resilience to Russian hybrid warfare. This chapter will focus on those that are directly linked to FIMI and national resilience.

The most important innovations are as follows:

- The Soviet term “means of mass communication” was replaced with “media”. Although the previous terminology is no longer used in legal documents, some media, journalists and citizens clearly do not recognise the difference and continue to use “means of mass communication”. Further educational efforts are required in this regard.
- mandatory registration list was introduced, providing a list of cable channels and on-demand video platforms that require registration as legal entities.
- Online media outlets were invited to voluntarily register in order to obtain certain benefits, such as official journalist status, although they are still subject to regulation if they do not register.
- To avoid the constant fear of sanctions in the event of any violations, a mechanism for consultations and warning procedures involving the national regulatory authority (the National Council on Television and Radio Broadcasting) was introduced. This tool is used to inform media subjects or other relevant actors about violations that have taken place and prevent further sanctions.
- A system of structured fines (for minor, serious and gross violations) was introduced.
- The national regulatory authority was empowered to terminate the activities of certain actors in the event of severe violations or threats to national security.



- Co-regulation between the state and the media was introduced, enabling different actors to develop rules and codes of conduct together.²⁵⁵

These regulations saw the informational environment shift towards a more trust- and reputation-based approach, providing media actors with greater autonomy while, at the same time, contributing to the transparency, responsibility and reliability of procedures and actors within the informational environment in Ukraine.

4.2.2. Regulatory framework regarding information specifically related to Russia

Measures to restrict the influence of actors that have been disseminating Russian propaganda and disinformation have been in place since 2014, a period that has included the active phase of Russian aggression, the Crimean annexation and the partial occupation of the Donetsk and Luhansk regions. The first restrictions on Russian TV channels were introduced in March 2014 following claims by the National Council on Television and Radio Broadcasting, and the number of banned channels had grown to 80 by 2017.²⁵⁶ In 2017, a presidential decree²⁵⁷ was enacted, restricting Russian services including Vkontakte, Odnoklassniki, Kaspersky Lab, Yandex and Mail.ru. In February 2021, three additional channels (112, ZIK and NewsOne) that were spreading Russian disinformation and propaganda, and serving the interests of the Kremlin, were added to the list and subsequently removed from access to public broadcasting.²⁵⁸ In addition, a document setting out the information security strategy for Ukraine and outlining the main vectors and priorities for Ukrainian information resilience was published.²⁵⁹ The goal of the strategy is “to strengthen capabilities to ensure the information security of the state and its information space, supporting social and political stability, national defence, the protection of state sovereignty, the territorial integrity of Ukraine, the democratic constitutional order, and the rights and freedoms of every citizen through information resources and measures”. The strategy also identifies Russia as the primary threat in terms of information warfare and designates it as the leading actor responsible for FIMI operations. The prevailing capacity and informational domination of Russia are cited as significant challenges to Ukrainian information resilience. Lack of resilience, a poorly developed strategic communications system, imperfections in the regulation of relations in the field of information activities and the protection of journalists’ professional activities, and an

²⁵⁵ “[Top 10 Novelties of the Media Law](#)”, CEDEM, Kyiv, 28 February 2023.

²⁵⁶ Maksak H. and Chyzhova O., [FIMI as part of Russian war machine: Ukraine’s fight](#), Foreign Policy Council “Ukrainian Prism”, 2024, p. 6.

²⁵⁷ President of Ukraine, Decree No. 133/2017 on the decision of the National Security and Defence Council of Ukraine of 28 April 2017 “[Про застосування персональних спеціальних економічних та інших обмежувальних заходів \(санкцій\)](#)” [On the application of personal special economic and other restrictive measures (sanctions)], 15 May 2017.

²⁵⁸ Maksak H. and Chyzhova O., [FIMI as part of Russian war machine: Ukraine’s fight](#), op. cit., p. 6.

²⁵⁹ President of Ukraine, Decree No. 685/2021, [Про рішення Ради національної безпеки і оборони України від 15 жовтня 2021 року ‘Про Стратегію інформаційної безпеки’](#) [On the decision of the National Security and Defence Council of Ukraine of 15 October 2021 ‘On the Information Security Strategy’], 28 December 2021.



inadequate level of information culture and media literacy in society to counteract manipulative and informational influences, are identified as major factors affecting Ukraine's information resilience.

Starting in 2022, when Russia launched its full-scale invasion, new legislative initiatives were introduced as part of Ukraine's defence strategy. In March 2022, amendments to the Criminal Code were adopted,²⁶⁰ prohibiting any kind of glorification, justification and denial of Russia's aggression against Ukraine. In May 2022, the Law "On the Prohibition of Propaganda of the Russian Nazi Totalitarian Regime, the Armed Aggression of the Russian Federation as a Terrorist State against Ukraine, and the Symbols of the Military Invasion of Ukraine by the Russian Nazi Totalitarian Regime" was adopted.²⁶¹ Last but not least, in August 2024, the Law "On the Protection of the Constitutional Order with regard to the Activities of Religious Organisations" was introduced. This law²⁶² was also part of a broader effort to counter the Russian hybrid warfare approach, which included FIMI operations conducted via the Russian Orthodox Church and its communities.²⁶³ Demonstrating Ukrainian courage in countering Russia's influence, it is worth noting that, on 10 December 2025, a petition on the prohibition of websites with Russian-language versions reached 25,000 signatures. Since the Law "On Citizens' Appeals"²⁶⁴ states that electronic petitions addressed to the President of Ukraine that have collected at least 25,000 signatures must be considered by the Office of the President of Ukraine, the Cabinet of Ministers must now draft an appropriate bill and pass it to the legislative organ for consideration and voting.

4.2.3. The role of national authorities in the fight against FIMI under the Ukrainian Media Law

According to Chapter I, Article 33 of the UML, the National Council on Television and Radio Broadcasting is an independent, permanent collegial state body operating in accordance with the Constitution of Ukraine, the UML and other laws of Ukraine, and exercises state regulation, supervision and control in the media sphere.²⁶⁵ It works directly with media and other bodies regulated by the UML to ensure freedom of speech and the responsible and professional functioning of media and journalists, etc. The National Council also operates a binding mechanism for preventing violations, informing, warning and consulting media

²⁶⁰ Ukrainian Parliament, Law No. 2110-IX, [Про внесення змін до деяких законодавчих актів України щодо посилення кримінальної відповідальності за виготовлення та поширення забороненої інформаційної продукції](#) [On Amendments to Certain Legislative Acts of Ukraine Regarding Strengthening Criminal Liability for the Production and Distribution of Prohibited Information Products], 3 March 2022.

²⁶¹ Maksak, H. & Chyzhova O., [FIMI as part of Russian war machine: Ukraine's fight](#), op. cit., p. 9.

²⁶² Ukrainian Parliament, Law No. 3894-IX, [Про захист конституційного ладу у сфері діяльності релігійних організацій](#) [On the Protection of the Constitutional Order with regard to the Activities of Religious Organisations], 20 August 2024.

²⁶³ Maksak H. and Chyzhova O., op. cit., pp. 9-10.

²⁶⁴ President of Ukraine, Decree No. 523/2015 [Про Порядок розгляду електронної петиції, адресованої Президентові України](#) [On the Procedure for Considering an Electronic Petition Addressed to the President of Ukraine], 28 August 2015.

²⁶⁵ Ukrainian Parliament, Law No. 2849-IX, [Про медіа](#) [Ukraine Media Law - UML] of 13 December 2022.



entities about violations before imposing sanctions. In the event of serious violations, a system of fines is in place and fines can be doubled if the media subject fails to respond appropriately. Finally, for the most serious violations, the heaviest sanctions can be imposed, including revocation of a licence, cancellation of registration, prohibition of publication and distribution of print media, as well as a temporary or complete prohibition of online media distribution.²⁶⁶ However, to understand the whole picture, it is necessary to mention all the state institutions and other organisations responsible for countering FIMI:

- Ministry of Culture and Strategic Communications:²⁶⁷ one of the ministries that received its current name in September 2024, it represents the executive branch and is responsible for policy development and strategic vision, including strategic communications and countering FIMI.
- The Center for Countering Disinformation:²⁶⁸ part of the National Security and Defence Council, it actively monitors the information environment, the media landscape and the latest trends in disinformation and propaganda. It also actively informs the public through its social media pages, articles and website. Since the full-scale invasion, it has also carried out fact-checking and debunking functions.
- The Security Service of Ukraine:²⁶⁹ the main security body among Ukraine's state institutions, it focuses in particular on countering cyber and terrorist threats. During a recent FSB campaign to recruit Ukrainian teenagers to detonate home-made bombs in public places, it was one of the main agencies involved in finding the recruits and countering Russia's efforts to create panic, fear and chaos in Ukraine.
- The National Security and Defence Council:²⁷⁰ the top-level coordinator of state policy against FIMI, working under the President as the main body for national security and defence planning.
- The Center for Strategic Communication and Information Security:²⁷¹ operating under the jurisdiction of the Ministry of Culture and Strategic Communications, its primary goal, apart from efforts to counter disinformation and propaganda, is to serve as a platform for broader cooperation between civil society actors and state institutions.

4.3. Alignment of the legal framework with EU standards

The UML was one of the main pieces of legislation that had to be adopted as part of Ukraine's EU accession process. In most respects, it mirrors major EU regulations covering topics relevant to FIMI. Two laws in particular are worthy of mention.

²⁶⁶ Litvishchenko H, "[Відповідальність За Порушення Законодавства У Сфері Медіа: Аналіз, Наслідки Та Шляхи Врегулювання](#)" [Liability for violation of media legislation: analysis, consequences and ways of settlement], CEDEM, 29 November 2023.

²⁶⁷ Ministry of Culture and Strategic Communications of Ukraine, [official website](#), 2025.

²⁶⁸ Center for Countering Disinformation, [official website](#), 2025.

²⁶⁹ Security Service of Ukraine, [official website](#), 2025.

²⁷⁰ National Security and Defence Council of Ukraine, [official website](#), 2025.

²⁷¹ Center for Strategic Communication and Information Security (SPRAVDI), [official website](#), 2025.



First, the Law “On Digital Content and Digital Services”²⁷² sets out rules and procedures for online platforms, consumer protection and liability for harmful content. It follows the DSA’s intermediary obligations and VLOP risk mitigations.

Second, the Law “On Cyber Protection of State Resources” establishes a national Computer Emergency Response Team (CERT), a group of cybersecurity specialists responsible for tackling attacks and countering threats, and an incident response system mirroring the DSA’s systematic risk reporting system. It also regulates public-private cybersecurity cooperation, formalises the sharing of information and follows the DSA’s provisions on cooperation obligations.²⁷³

In view of the role played by AI agents in FIMI operations, Ukraine is also actively working on alignment with the EU AI Act. The Ministry of Digital Transformation has presented a white paper²⁷⁴ outlining its strategic vision for AI regulation in Ukraine, including efforts to comply with current and future EU standards. This document praises a bottom-up approach comprising three main steps: the formation of state capacities and the preparation of the industry for future requirements, the predictability of future needs and measures that need to be taken now (e.g. voluntary codes of conduct, recommendations).

However, proper alignment with EU standards will not be possible until Ukraine is fully integrated into the Union. Meanwhile, all the legislative efforts being made by Ukraine’s MPs and civil society experts are vital in preparing for its accession and ensuring that proper reforms are carried out in order to guarantee Ukraine’s equal participation.

²⁷² Ukrainian Parliament, Law No. 3321-IX, [Про цифровий контент та цифрові послуги](#) [On Digital Content and Digital Services], 10 August 2023.

²⁷³ Ukrainian Parliament, Law No. 4336-IX [Про внесення змін до деяких законів України щодо захисту інформації та кіберзахисту державних інформаційних ресурсів, об’єктів критичної інформаційної інфраструктури](#) [On Amendments to Certain Laws of Ukraine Regarding Information Protection and Cybersecurity of State Information Resources and Critical Information Infrastructure Facilities], 27 March 2025.

²⁷⁴ Ministry of Digital Transformation of Ukraine, [Біла книга з регулювання ШІ в Україні: бачення Мінцифри](#) [*White Paper on Artificial Intelligence Regulation in Ukraine: Vision of the Ministry of Digital Transformation of Ukraine*], 26 June 2024, p. 14.



5. Platform regulation

Igor Rozkladaj, deputy director of the Centre for Democracy and Rule of Law

5.1. General overview

Ukraine is a democratic state with a non-linear historical development, shaped by a totalitarian legacy and long-term exclusion from pan-European processes in the 20th century, particularly in the fields of freedom of expression, personal data protection, media regulation and internet governance.

The emergence of independent media in the early 1990s occurred during a period of rapid legal and institutional transition. Although the first media laws were adopted in 1992 and 1993, the media market developed in a largely unsystematic manner before a stable regulatory framework was consolidated.

During this period, private actors and civil initiatives attempted to establish alternatives to state-controlled television, radio and print media. Before 2022, the media regulatory framework underwent several amendments. However, these changes did not alter its underlying structure, which remained focused on traditional media and did not adequately address emerging digital and online media services. A comprehensive reform was introduced only with the adoption of the Ukrainian Media Law (UML),²⁷⁵ which established a unified legislative framework for all types of media and implemented elements of the EU regulatory approach to user-generated video-sharing platforms.

The development of the internet in Ukraine began as a grassroots initiative in the early 1990s. For a prolonged period, state involvement remained limited due to economic constraints, underdeveloped telecommunications infrastructure and conservative policy approaches. Despite this, Ukraine underwent several rapid technological transitions. Analogue terrestrial television was replaced by the DVB-T2 standard with MPEG-4 encoding, while internet access evolved from dial-up connections to high-speed broadband networks. Third-generation (3G) mobile networks were introduced in 2015, followed by fourth-generation (4G)²⁷⁶ networks in 2018. In early 2025, the government initiated the gradual phase-out of 3G networks, with completion planned by the end of 2030,²⁷⁷ in order to facilitate the deployment of fifth-generation (5G) infrastructure.

Since the start of the full-scale invasion by the Russian Federation, Ukraine's energy and telecommunications infrastructure has been subject to systematic attacks. In response, the National Centre for Operational and Technical Management of Telecommunications

²⁷⁵ The Ukrainian Media Law ([Про медіа](#) - UML) was adopted on 13 December 2022 and entered into force on 31 March 2023.

²⁷⁶ "[Mobile operators launch 4G in Ukraine](#)", *Ukrinform*, 30 March 2018.

²⁷⁷ Cabinet of Ministers of Ukraine, Resolution No. 976, [Постанова Про внесення змін до плану розподілу і користування радіочастотним спектром в Україні](#) [On amendments to the plan for the allocation and use of radio frequency spectrum in Ukraine], 13 August 2025.



Networks adopted binding measures requiring mobile network operators to ensure autonomous power supply capable of maintaining network operation for at least 10 hours per day.²⁷⁸ Local internet service providers also upgraded their infrastructure, including the deployment of passive optical network (PON) technologies that enable continuous internet access during power outages.

Technological developments, combined with the widespread availability of affordable smartphones, low-cost internet access, the Covid-19 pandemic and the full-scale invasion in 2022, have significantly altered media consumption patterns. According to annual research conducted by Internews,²⁷⁹ 91% of news consumers in Ukraine use smartphones to access news content, while 86% use social media as a source of news. Among them, 37% rely exclusively on social media, whereas 49% combine social media with other media sources, including television, radio and online media (online press).

The share of social media as a source of news increased from 51% in 2015 to 86% in 2025. Meanwhile, consumption of online media declined from 60% in 2018 to 31% in 2025. Television consumption decreased from 85%²⁸⁰ in 2015 to 30% in 2023/24, with a slight increase to 33% in 2025. The internet is now used daily by 92% of the population, nearly double the 2015 figure of 48%.

Ukraine's historical background, rapid technological development, shifts in media consumption and obligations arising from the EU–Ukraine Association Agreement, as well as Ukraine's status as a candidate country for EU membership, create a need for comprehensive regulation of online platforms and digital services, particularly with regard to the implementation of the EU *acquis*. At the same time, challenges related to jurisdiction and foreign information manipulation and interference (FIMI), combined with the ongoing armed aggression of the Russian Federation, significantly limit the practical effectiveness of platform regulation, as formal alignment with the EU *acquis* does not, in itself, ensure effective enforcement in practice.

5.2. Platform regulation in Ukraine: legislative evolution and current challenges

Ukraine's media legislation has historically developed under the influence of Soviet legal traditions and, subsequently, Russian regulatory approaches. As a result, its regulatory policy was primarily designed around a state-centric and positivist approach, focusing not only on control over information flows but also on the regulation and authorisation of

²⁷⁸ National Communications Commission of Ukraine (NCCU), Order No. 539/2344 [Про внесення змін до розпорядження НЦУ 154/1959 Про забезпечення сталості електронних комунікаційних мереж в умовах воєнного стану](#) [On Amendments to Order No. 154/1959 on Ensuring the Stability of Electronic Communication Networks under Martial Law], 15 July 2024.

²⁷⁹ Askold and Dir Foundation, [Українські медіа: споживання новин та довіра у 2025 році](#) [Ukrainian Media: News Consumption and Trust in 2025], July-August 2025.

²⁸⁰ The percentages represent the proportion of respondents within the survey sample (approximately 1 600 respondents). Respondents were asked: "Which media did you use to obtain news during the last 30 days?"



media actors themselves, rather than on safeguarding business freedom or fostering a competitive media market.

This approach was reflected in early sectoral legislation. The 1992 Law on the Press²⁸¹ established a complex and burdensome registration system requiring publishers to disclose extensive information concerning the publication's profile, target audience and periodicity. Similarly, the 1993 Law on Television and Radio Broadcasting relied exclusively on a licence-based access model. Comparable regulatory approaches were at times proposed for the internet. In 2005, the Ministry of Transport and Communications attempted²⁸² to introduce mandatory registration of websites through a ministerial order. Following fierce public criticism, the order was repealed within six months. Advertising has traditionally been regulated by a dedicated Law on Advertising, while political advertising remained subject to electoral legislation. This fragmented regulatory landscape resulted in differing standards and enforcement mechanisms across media sectors and platforms.

The revised Law on Television and Radio Broadcasting adopted in 2006 did not alter the underlying regulatory philosophy. However, it triggered extensive sectoral debate and, ultimately, the establishment of a parliamentary working group²⁸³ under the Parliamentary Committee on Freedom of Speech in 2012. This initiative marked the beginning of a decade-long legislative reform process, initially focused on drafting a new version of the broadcasting law, later evolving into a draft law on audiovisual media services and, eventually, culminating in the adoption of the UML. For the first time, this legislation addressed aspects of online platform regulation: video-sharing platforms and structured cooperation between the media regulator and online intermediaries.

The need to regulate social media and online platforms in Ukraine is driven by a combination of legal, societal and security-related factors. These include, in particular:

- **the protection of fundamental rights**, including the right to information, personal data protection, intellectual property rights, electoral rights, and protection against defamation, hate speech and incitement to violence;
- **the protection of vulnerable groups**, such as minors, national minorities and indigenous peoples, as well as LGBTQ+ persons;
- **the prevention of harmful and illegal activities**, including terrorism-related content, the promotion of narcotics, online fraud, phishing and similar practices;
- **the transparency of commercial and political advertising**, including online advertising practices.

A distinct and particularly complex set of challenges relates to protection against information operations conducted by the aggressor state. These include the use of bot

²⁸¹ Ukrainian parliament, Law No. 2782-XII, [Про друковані засоби масової інформації \(пресу\) в Україні](#) [On print mass media (press) in Ukraine], 16 November 1992.

²⁸² Ministry of Transport and Communications of Ukraine, Order No. 528/10808, [Про затвердження Порядку проведення державної реєстрації електронних інформаційних ресурсів](#) [On approval of the procedure for state registration of electronic information resources], 27 April 2005.

²⁸³ "Концепція нової редакції Закону України «Про телебачення і радіомовлення». [Concept of the new edition of the Law of Ukraine "On Television and Radio Broadcasting"], *Detector Media*, 13 June 2012.



networks, artificial intelligence tools and the misuse of online advertising infrastructure to disseminate disinformation and promote deceptive content and services.

In addition to rights-based and security-related considerations, the need for platform regulation in Ukraine is also driven by the growing economic significance of online platforms, particularly in the advertising market. According to data²⁸⁴ from the All-Ukrainian Advertising Coalition, the internet advertising market – including banner advertising and advertising on video-sharing platforms – amounted to approximately UAH 16.8 billion in 2024, with projected growth to UAH 19 billion in 2025. The broader digital advertising market shows even stronger dynamics, increasing from UAH 33 billion to a projected UAH 53 billion in 2025.

These figures indicate that online marketing has become one of the most dynamic segments of the Ukrainian media and advertising market. As a result, issues related to transparency of advertising, allocation of responsibility, protection of consumers and fair market conditions increasingly arise in a platform-based environment, further reinforcing the need for an appropriate regulatory framework.

5.3. Baseline legislative framework applicable to online platforms

In order to assess the possible regulatory models for social media and online platforms in Ukraine, it is necessary to identify the existing legislative baseline. Although Ukrainian law does not yet provide a comprehensive and standalone framework for platform regulation, a number of constitutional and statutory provisions *de facto* apply to online activities and digital environments.

5.3.1. The Constitution of Ukraine (1996)

The Constitution of Ukraine incorporates core principles derived from the European Convention on Human Rights. Several of its provisions are directly relevant to the regulation of online platforms and social media.

Article 32 guarantees the right to respect for private and family life, including the protection of confidential personal information.²⁸⁵ It explicitly prohibits the collection, storage, use and dissemination of confidential information about an individual without consent, except in cases provided by law and only in the interests of national security, economic well-being or the protection of human rights.

²⁸⁴ Polosmak I., “[Об’єм рекламно-комунікаційного ринку України 2024 і прогноз об’ємів ринку 2025](#)” [The volume of the advertising and communications market of Ukraine in 2024 and the forecast of market volumes in 2025], *VRK*, 23 December 2024.

²⁸⁵ [Конституція України](#) [Constitution of Ukraine], Articles 32; 34.



The same provision establishes the right to protection against defamation by guaranteeing judicial remedies to refute inaccurate information concerning an individual or members of their family, to demand the removal of such information and to seek compensation for material and non-material damage caused by its dissemination.

Article 34 guarantees the right to freedom of expression and freedom of information. Restrictions on this right are permitted only where prescribed by law and necessary in the interests of national security, territorial integrity or public order, for the prevention of disorder or crime, the protection of public health, the protection of the reputation or rights of others, the prevention of the disclosure of confidential information, or the maintenance of the authority and impartiality of the judiciary.

In addition, a number of other provisions of Chapter II of the Ukrainian Constitution provide safeguards relevant to online environments. These include Article 36, which guarantees freedom of association and participation in political life and elections; Articles 41 and 54, which protect property rights and intellectual property rights; and Article 52, which establishes special protection for children against discrimination.

5.3.2. The Civil Code of Ukraine (2003)

As of December 2025, the Civil Code of Ukraine is undergoing comprehensive reform. Amendments to Books One (“General Provisions”)²⁸⁶ and Two (“Personal Non-Property Rights”)²⁸⁷ have been registered in parliament and were adopted at first reading in early November 2025. Draft revisions to Books Four (“Intellectual Property Law”), Six (“Inheritance Law”) and Eight (“Private International Law”) are currently subject to public consultation.²⁸⁸

The current version of the Civil Code already provides a range of rights applicable to online contexts. These include the right to compensation for non-pecuniary damage (Article 23), the right to information (Article 302), the secrecy of correspondence (Article 306), the right to self-image, including control over photography and filming (Articles 307-308), the protection of honour and dignity (Article 297), and the right to refute inaccurate information (Article 277).

The proposed revised version of the Civil Code significantly expands the coverage of digital and online environments. In particular, it introduces explicit provisions on the refutation of inaccurate information disseminated on the internet, requiring that such

²⁸⁶ Ukrainian Parliament, Draft Law No. 14056, [про внесення змін до Цивільного кодексу України у зв'язку з оновленням \(рекодифікацією\) розміщення книги першої](#) [On amendments to the Civil Code of Ukraine in connection with the update (recodification) of Book One (“General Provisions”)], adopted at first reading in November 2025.

²⁸⁷ Ukrainian Parliament, Draft Law No. 14057, [Проект Закону про внесення змін до Цивільного кодексу України у зв'язку із оновленням \(рекодифікацією\) положень книги другої](#) [On amendments to the Civil Code of Ukraine in connection with the update (recodification) of Book Two (“Personal Non-Property Rights”)].

²⁸⁸ Ukrainian Parliament, press service, [Оприлюднено для громадського обговорення проекти Книг 4, 6 і 8 Цивільного кодексу України](#) [Draft Books 4, 6 and 8 of the Civil Code of Ukraine published for public consultation], 1 November 2025.



refutation be carried out in the same manner as the original dissemination or in another way ensuring effective access for users who were exposed to the inaccurate information.

In addition, the draft reform proposes the introduction of new rights, including the right of reply (Article 277-1), the right to be forgotten (Article 302-2), the right to personal notes (Article 303), the right to privacy (Article 306-1) and the right to digital privacy (Article 306-3). These provisions are intended to apply across both offline and digital environments and therefore constitute an important element of the legal framework relevant to online platforms and social media services.

5.4. Sectoral legislation relevant to online platforms and social media

5.4.1. The Law on Information (1992/2011)

The Law on Information was originally adopted in 1992 and comprehensively revised in 2011, concurrently with the adoption of the Law of Ukraine on Access to Public Information. It constitutes a horizontal framework for the entire information sphere and contains a number of provisions that are directly applicable to online environments and digital platforms.

The law establishes the right to information (Article 5), defines categories and types of information (Articles 11 to 19-1), and regulates matters related to media and journalistic activity (Articles 22 to 26). It also sets out rules concerning the dissemination of information of public interest (Articles 29 and 30). Although adopted prior to the emergence of modern social media, the Law on Information continues to provide a general legal basis applicable to the dissemination of information in online and platform-based contexts.

5.4.2. The Law on Advertising (1996)

The Law on Advertising regulates the production, distribution and consumer protection in respect of advertising disseminated by any means and on any media. Its scope explicitly covers advertising distributed through online platforms and digital services.

The law requires clear identification of advertising (Article 9), as well as specific identification of product placement (Article 5-2) and sponsorship (Article 5). In 2023, it was amended to introduce a dedicated provision on advertising disseminated via user-generated video-sharing platforms and the concept of user-generated information-sharing platforms (online platforms) (Article 14-2). This provision requires the identification of such advertising and the development of codes of conduct (assimilated to rules) establishing requirements for the placement of all forms of advertising on platforms. In addition, the



law contains provisions on the protection of children, applicable to all forms and methods of advertising dissemination (Article 20).

5.4.3. The Ukrainian Media Law (2022)

The Ukrainian Media Law (UML) was adopted with the aim of comprehensively modernising Ukraine's media legislation and implementing the EU Audiovisual Media Services Directive. At the same time, it goes beyond traditional broadcasting regulation and anticipates elements later reflected in the European Media Freedom Act, as it applies not only to television, radio and video-sharing platforms, but also to other categories of media.

In the context of social media, the UML introduces the concepts of user-generated video-sharing platforms and user-generated information-sharing platforms. With regard to the latter, it defines the objectives of state media policy, which include, inter alia, the representation of the interests of the state of Ukraine, as well as natural and legal persons acting within its jurisdiction, in relations with the owners of information-sharing platforms, and the establishment of co-regulatory and other mechanisms of interaction (Article 5).

The UML further provides that individuals, media and bloggers who maintain accounts on social networks may register as online media under the voluntary registration procedure applicable to online media outlets (Article 16). In addition, the national regulatory authority (National Council of Ukraine on Television and Radio Broadcasting) is empowered to engage in negotiations with authorised representatives of providers of information-sharing platforms and on-demand audiovisual media services that do not fall under the jurisdiction of Ukraine, and to conclude agreements or memoranda of understanding with such providers (Article 90).

References to video- and information-sharing platforms also appear in the 2014 Law on Public Service Media, in particular in relation to the distribution of public service media content via online platforms.

In practice, attempts by the regulator to formalise cooperation through memoranda have so far been unsuccessful.

5.4.4. The Electoral Code of Ukraine (2019)

The Electoral Code distinguishes information materials from pre-election campaigning, prohibiting the use of information support mechanisms for campaign purposes.

Chapter VIII governs pre-election campaigning and establishes the legal framework for campaign activities conducted by candidates, political parties and other authorised subjects. The Electoral Code defines the permissible forms of campaigning, regulates the use of mass media for campaign purposes and sets rules on the timing, identification and financing of campaign materials. While the rules apply irrespective of the means of dissemination, the code does not contain specific provisions addressing social media services or online platforms as distinct actors.



5.4.5. Resolution No. 1 of the Plenum of the Supreme Court

An additional element of the national regulatory framework relevant to the internet and online platforms is provided by judicial practice. In this context, particular importance is attached to Resolution No. 1 of the Plenum of the Supreme Court of Ukraine of 27 February 2009²⁸⁹ on judicial practice in cases concerning the protection of the honour and dignity of individuals, as well as the business reputation of individuals and legal entities.

The resolution establishes that defendants in cases concerning the protection of honour, dignity or business reputation are the natural or legal persons who disseminated the inaccurate information, as well as the authors of such information. This formulation does not expressly distinguish between content creators and intermediaries, nor does it provide specific guidance on the liability of online platforms or hosting providers.

In practice, as reflected in decisions published in the Unified State Register of Court Decisions, claimants have frequently attempted to involve the Ukrainian subsidiary of Google (LLC “Google”), established by Google International LLC, as a co-defendant in defamation cases related to content disseminated via online services. This litigation practice illustrates the absence of a clear legal framework defining the role and liability of online intermediaries in defamation disputes and highlights the resulting legal uncertainty for platform operators.²⁹⁰

5.4.6. The Association Agreement and subsequent obligations to align with the European *acquis*

The Association Agreement between Ukraine and the European Union entered into force on 1 September 2017. Pursuant to Article 397 of the Agreement, Ukraine undertook to progressively approximate its legislation to EU law and the EU regulatory framework, including the implementation of the AVMSD.

In 2018, Directive (EU) 2018/1808 amended the AVMSD by extending its scope to video-sharing platforms and introducing specific regulatory obligations applicable to such services. These EU legal acts subsequently served as the normative basis for the adoption of the UML.

At the same time, the Association Agreement did not establish direct obligations for Ukraine with regard to EU legal acts adopted after its entry into force. As a result,

²⁸⁹ Ukrainian Parliament, [Верховна Рада України Про судову практику у справах про захист гідності та честі фізичної особи, а також ділової репутації фізичної та юридичної особи](#) [Legislation of Ukraine on judicial practice in cases concerning the protection of the honour and dignity of individuals, as well as the business reputation of a individuals and legal entities], adopted on 27 February 2009.

²⁹⁰ For example, see [Київський Апеляційний Суд Унікальний номер справи No. 758/15759/24](#) [Kyiv Court Of Appeal proceedings No. 22-ц/824/12827/2025]. In its decision, the court held that the Ukrainian legal entity LLC “Google” could not be considered a proper defendant, as it did not constitute a representative office of Google International LLC or exercise control over the operation of the relevant online service.



instruments such as Directive (EU) 2018/1808,²⁹¹ as well as later EU digital regulatory acts, did not formally fall within the scope of mandatory approximation under the Agreement. Nevertheless, legislative alignment with the European *acquis* has become a necessary and integral element of Ukraine's EU accession process.

The EU Digital Decade Policy Programme 2030²⁹² establishes a strategic framework for the development of digital infrastructure, digital skills, business transformation and digital public services within the European Union. A key component of this framework is the implementation of the Digital Services Act (DSA) and the Digital Markets Act (DMA), which together form the core of the EU's horizontal regulation of digital platforms.

Following the recognition of Ukraine as a candidate country for EU membership in 2022,²⁹³ the accession process formally commenced under the negotiating framework approved by the European Commission in June 2024. Within this framework, Chapter 10 (Digital transformation and media) explicitly envisages the development of national legislation aligned with the DSA.

At the end of 2025, a draft Law on Digital Services intended to implement Regulation (EU) 2022/2065 on a Single Market for Digital Services (Digital Services Act), Regulation (EU) 2022/1925 on contestable and fair markets in the digital sector (Digital Markets Act), and Regulation (EU) 2019/1150 on promoting fairness and transparency for business users of online intermediation services (P2B Regulation) is being prepared by the Ministry of Digital Transformation of Ukraine. This draft legislation has not yet been made publicly available.²⁹⁴

5.4.7. Draft Law no. 11115 on information-sharing platforms

In March 2024, Draft Law no. 11115²⁹⁵ on amendments to certain laws of Ukraine concerning the regulation of information-sharing platforms through which mass information is disseminated was submitted to the Ukrainian Parliament. The initiative was prompted by the perceived absence of specific regulation applicable to information-sharing platforms, in particular Telegram, which, according to the authors of the draft law, was not sufficiently addressed by the Law on Media and is additionally associated with the aggressor state.²⁹⁶

²⁹¹ [Directive \(EU\) 2018/1808](#) of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities.

²⁹² EU, European Commission, [Digital Decade Policy Programme 2030](#), 5 January 2023. Last update 25 August 2023.

²⁹³ EU, [European Council conclusions](#), 23-24 June 2022.

²⁹⁴ See [Ministry of Digital Affairs](#).

²⁹⁵ Ukrainian Parliament, Draft law No. 11115, [Проект Закону про внесення змін до деяких законів України щодо регулювання діяльності платформ спільного доступу до інформації](#) [Draft Law on amendments to certain laws of Ukraine on the regulation of shared access information platforms], 25 March 2024.

²⁹⁶ *Ibid.*



The draft law proposes the introduction of a new category of media actor – *the provider of an information-sharing platform through which mass information is disseminated* – as a distinct subject within the media regulatory framework.

Under the draft law, such providers would be required to publicly disclose, in a manner easily accessible to users directly on the platform and across all related services, their contact details for the submission of complaints concerning mass information disseminated via the platform that allegedly violates Ukrainian legislation.

In addition, upon a request by the National Council of Ukraine on Television and Radio Broadcasting, platforms would be required to restrict the dissemination, within the territory of Ukraine, of programmes and/or user-generated information that violates the UML.

The draft law further envisages a number of obligations for providers of such information-sharing platforms through which mass information is disseminated, including:

- the implementation of transparent, comprehensible mechanisms for assessing and forwarding user complaints to page or account holders regarding content that may violate legal requirements or terms of service, as well as effective procedures for reviewing such complaints and informing users of the outcomes, combined with accessible and effective appeal mechanisms;
- the inclusion in the platform's terms of service of procedures governing the exercise of the right of reply or the refutation of inaccurate information;
- the introduction of effective media literacy measures and tools.

Providers of information-sharing platforms disseminating mass information that do not fall under the jurisdiction of Ukraine or a member state of the European Union would be required to appoint an authorised representative (natural person or legal entity) in Ukraine for the purpose of communication with the National Council and other public authorities.

Furthermore, such platform providers would be obliged, upon request by the National Council, to disclose their ownership structure and sources of financing.

The draft law also proposes restrictions on the use of information-sharing platforms by public authorities, local self-government bodies, their officials, as well as banks and other financial institutions, payment service providers and payment system operators, where the ownership structure of the platform provider is non-transparent or does not comply with statutory requirements. Although the draft law was included on the parliamentary agenda in September 2025, it has not been considered by parliament to date. It has also been subject to expert review by the Council of Europe, as discussed below.



5.4.8. Draft Law no. 8310: legislative background and platform-related provisions

Draft Law no. 8310²⁹⁷ originated from provisions initially developed within the broader draft Law on Media and was registered as a separate legislative initiative in December 2022. Its main purpose is to align terminology, definitions and the scope of regulated actors with the Law on Media, particularly in the area of political advertising and election-related communication.

Unlike the Electoral Code, the draft law explicitly refers to user-generated information-sharing platforms, relying on definitions already established in media legislation. It empowers the National Council of Ukraine on Television and Radio Broadcasting to conclude agreements and memoranda of cooperation with foreign platform providers. Such arrangements may cover compliance with content restrictions applicable in Ukraine, co-regulatory mechanisms, cooperation in countering disinformation during the pre-election period and measures to ensure transparency of election campaigning on platforms, including labelling of campaign content, disclosure of sponsors and funding, and complaint mechanisms.

The draft law also requires users of information-sharing platforms to comply with electoral rules on information support and pre-election campaigning when disseminating election-related materials online.

For supervisory purposes, the National Council may provide platform providers with official lists of candidates and political parties, and information on their electoral fund accounts, supplied by election commissions. Where pre-election campaigning is financed from unlawful sources or otherwise violates electoral law, platform providers are required, upon request of the National Council, to take measures to terminate the dissemination of such content, including, where necessary, restricting access to it until the end of the electoral process.

Although the draft law was included on the parliamentary agenda, it has not yet been considered by Parliament.

5.5. Special alignment requirements in the light of the EU accession negotiations: DSA, EMFA and TTPAR compared with Ukrainian law

The process of aligning the legislation of a candidate country with the European *acquis* may be compared to two trains running on parallel tracks. While the tracks may be brought closer through legislative approximation, sectoral preparedness and institutional reforms,

²⁹⁷ Ukrainian Parliament, Draft law No. 8310, [про внесення змін до Виборчого кодексу України щодо вдосконалення регулювання інформаційного забезпечення виборів та здійснення передвиборної агітації](#) [On Amendments to the Electoral Code of Ukraine to Improve Regulation of Information Support for Elections and Election Campaigning].



the trains can only converge once they operate on the same track. This metaphor illustrates the structural nature of the EU accession process: preparatory alignment can significantly reduce future adjustment costs, but full functional integration becomes possible only upon accession.

Ukraine's experience demonstrates this distinction clearly. Legislative preparation, sectoral due diligence by businesses, planning of governmental processes, as well as education, training and public awareness initiatives constitute essential elements of pre-accession alignment. However, the example of the UML shows that even where national legislation closely mirrors EU norms, the absence of access to EU institutional and enforcement infrastructure limits the practical effectiveness of such norms. This is particularly evident in the lack of access to European regulatory coordination mechanisms overseen by the European Board for Media Services (EBMS).

The European Commission is a key institutional actor across the DSA, the EMFA and the Regulation on the transparency and targeting of political advertising (TTPAR). Under these instruments, the Commission exercises central powers that are unavailable to third countries prior to accession. These include, in particular, the designation of online services as Very Large Online Platforms (VLOPs), the conduct of supervisory investigations and audits, the imposition of sanctions and the adoption of binding enforcement decisions. In addition, under the EMFA, the Commission designates a representative to the EBMS, participates in its deliberations without voting rights, is kept informed of its activities and provides its secretariat, ensuring its adequate resourcing.

In the context of the TTPAR, the European Commission also performs a central standard-setting and coordination role, including the adoption of implementing acts defining the formats of transparency notices, labelling requirements for political advertising, access to political advertising repositories and oversight of the uniform application of the regulation across the internal market. These functions are intrinsically linked to EU institutional procedures and cannot be exercised in relation to a candidate country prior to accession.

Similarly, the EBMS, as a supranational body of media regulators, will not include a representative of Ukraine until it becomes a member state. As a result, Ukraine does not yet have access to the structured cooperation mechanisms established under the EMFA, and any engagement by Ukrainian authorities falls outside the framework of mandatory consideration provided for, *inter alia*, in Article 13 EMFA.

This limitation is particularly significant in relation to Article 18 EMFA on the treatment of media service providers' content by very large online platforms. Ukrainian media outlets, such as the national public service media, Suspilne, have faced repeated challenges related to the blocking or restriction of content on online platforms since the start of Russia's full-scale invasion, including attempts to label war-related content as terrorist material. In situations of conflict between media service providers and VLOPs, media established in member states may rely on the EMFA mechanism allowing them to notify the outcome of their dialogue with a platform to the EBMS and the European Commission and to request an opinion containing recommended actions. Ukrainian media providers, by contrast, are unable to access this mechanism prior to accession, illustrating the practical limitations of pre-accession alignment in the absence of EU institutional participation.



The adoption by Ukraine of a Law on Digital Services, together with targeted amendments to the UML and the Electoral Code, would make it possible to initiate the development of a DSA-based regulatory infrastructure at national level, including the establishment of a national Digital Services Coordinator. At the same time, effective interaction between Ukrainian institutions and EU bodies cannot be ensured through unilateral legislative alignment alone and would require a bilateral framework, such as pilot arrangements or a comprehensive cooperation plan for the transitional period. Such solutions are of particular importance in the context of Ukraine's wartime and post-war recovery and should be developed in advance of the first post-war elections, in order to ensure that the institutional and procedural framework is fully operational when electoral processes resume.

Empirical evidence from Ukrainian research further illustrates the use of paid advertising as a vector of information manipulation.

Taken together, these findings demonstrate that political advertising and platform advertising infrastructures constitute a critical vulnerability in the pre-accession regulatory framework, reinforcing the need for harmonised transparency standards (at this moment there are no transparency reports for Ukraine), access to advertising repositories and cross-border enforcement mechanisms of the kind envisaged under the TTPAR.

5.6. Existing Council of Europe recommendations

5.6.1. Opinion of the Directorate General Human Rights and Rule of Law DGI (2023)03

The Council of Europe expert opinion²⁹⁸ on the UML recognises that the regulation of video-sharing platforms (VSPs) broadly follows the framework of the Audiovisual Media Services Directive (AVMSD), in particular with regard to the protection of minors, the prevention of hate speech and the promotion of media literacy. In this respect, the law is considered to be largely compatible with European standards applicable to VSPs.

At the same time, the experts stress that VSPs must not be treated as entities exercising editorial responsibility. In line with Article 28a AVMSD and the principles of the E-Commerce Directive,²⁹⁹ platforms should not be subject to a general obligation to monitor content or to proactively search for illegal material (the same principle present in the DSA). Their role is limited to taking appropriate measures in response to notifications or decisions by the competent authority, rather than engaging in continuous or preventive content control.

²⁹⁸ Council of Europe, [Opinion](#), op. cit.

²⁹⁹ European Union, [Directive 2000/31/EC](#) of the European Parliament and of the Council of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market.



The opinion raises concerns that certain provisions of the UML, particularly those related to the restriction of access to content originating from entities linked to the aggressor state, could be interpreted as imposing *de facto* active monitoring obligations on VSPs. It recommends clarifying the law to ensure that any content restrictions imposed on platforms are triggered by decisions of the national regulator, and not by autonomous platform assessments.

Finally, the Council of Europe acknowledges that the wartime context may justify temporary and exceptional measures affecting platforms. However, it underlines that such measures should remain strictly proportionate, time-limited and subject to future review, especially in the post-war period.

5.6.2. Legal Opinion on the Draft Law of Ukraine “On Amendments to Certain Laws on Media Activity”

The Council of Europe’s Legal Opinion³⁰⁰ on the Draft Law of Ukraine “On Amendments to Certain Laws on Media Activity” (Register No. 12111³⁰¹) confirms that the UML is already broadly aligned with European standards regarding the regulation of VSPs as defined in the AVMSD, and that the proposed amendments do not introduce a shift towards platform liability for user-generated content.

From the Council of Europe’s perspective, VSP regulation must remain function-specific and risk-based, focusing on the organisation of platforms, transparency obligations and safeguards for users, rather than on editorial control over content. The opinion notes that amendments affecting VSPs are primarily technical and procedural, including alignment of terminology, clarification of registration data and consistency of liability provisions with other media categories, without extending the regulator’s powers into general content moderation or prior control of user expression.

The opinion underlines that enforcement measures applicable to VSPs should respect proportionality, legal certainty and procedural safeguards, particularly in the context of sanctions, registration revocation or monitoring. While the National Council’s supervisory powers are being clarified and strengthened, the Council of Europe stresses that such powers must not result in indirect pressure on platforms to exercise excessive content control, nor undermine freedom of expression protected under Article 10 ECHR.

Finally, the Council of Europe explicitly situates Ukrainian VSP regulation within a transitional pre-accession context, recommending stronger emphasis on European and bilateral regulatory cooperation, notably with future EU-level structures such as the European Board for Media Services. Since, as a candidate country, Ukraine cannot yet participate fully in these mechanisms, domestic VSP provisions should anticipate – but

³⁰⁰ Council of Europe, [Legal Opinion](#) on the Draft Law of Ukraine “On Amendments to Certain Laws on Media Activity”, 10 January 2025, LEX_2025_1.

³⁰¹ Ukrainian Parliament, Draft law No. 12111, [Проект Закону про внесення змін до деяких законів України щодо діяльності медіа](#) [Draft Law on amendments to certain laws of Ukraine regarding media activities], 3 September 2025.



cannot replace – EU-level coordination and dispute resolution mechanisms foreseen under the EMFA and related EU instruments.

5.6.3. Legal Opinion on the Draft Law of Ukraine “On the Protection of Citizens’ Rights to Reliable Information and Ensuring Information Security, Carried Out by the National Regulator”

The Council of Europe³⁰² notes that Ukraine’s current regulatory approach to online platforms remains fragmentary and transitional, with VSPs being the only category partially covered under national law following the implementation of Article 28b of the AVMSD via the 2022 UML. However, due to jurisdictional limitations, no VSPs currently fall under Ukraine’s effective regulatory jurisdiction, which significantly constrains enforcement.

The analysed draft legislative initiatives seek to extend AVMSD-style obligations beyond VSPs to a broader range of online platforms, without clearly distinguishing between the *lex specialis* regime applicable to VSPs and the horizontal due-diligence framework of the EU (DSA). The opinion underlines that such an approach risks blurring regulatory categories, leading to legal uncertainty and incompatibility with European standards.

The Council of Europe further stresses that blocking of entire platforms, including VSPs, may only be used as a measure of last resort, subject to strict legality, necessity and proportionality tests. Blocking based on repeated non-removal of content or ownership-related criteria without individualised assessment and judicial safeguards is incompatible with the ECHR, even in the context of heightened national security concerns.

Finally, the opinion recalls that effective regulation of VSPs requires alignment with the EU DSA framework, including clear jurisdictional criteria, procedural safeguards and structured cooperation mechanisms. Until such alignment is achieved – including through Ukraine’s EU accession process – national measures should remain narrowly tailored, transparent and rights-compliant, avoiding the premature extension of enforcement powers beyond what European standards permit.

5.6.4. Legal opinion on the Draft Law of Ukraine “On Amendments to the Electoral Code of Ukraine regarding the improvement of the regulation of information

³⁰² Council of Europe, [Legal Opinion](#) on the Draft Law of Ukraine “On the Protection of Citizens’ Rights to Reliable Information and Ensuring Information Security, Carried Out by the National Regulator”, 11 February 2015, LEX_2025_6.



provision for elections and the conduct of pre-election agitation”

The Council of Europe³⁰³ notes that, while this draft seeks to improve transparency of electoral communication, it does not adequately address the role of online platforms, including VSPs, which have become the primary channels for the dissemination of political advertising and election-related information in Ukraine.

The opinion highlights a structural inconsistency between Ukrainian law and European standards: the draft law refers only to “platforms for shared access to information”, while the UML clearly distinguishes these from video-sharing platforms, a category that covers major services such as YouTube, TikTok and Instagram. As a result, VSPs are effectively excluded from the scope of the draft law, despite being the primary channels for distributing political advertising, which is an obvious shortcoming.

The Council of Europe further underlines that the draft law relies predominantly on dispositive mechanisms, such as memoranda and cooperation agreements between the regulator and platforms, without establishing clear, enforceable obligations. Such an approach is considered insufficient to counter disinformation, hidden political advertising and manipulation conducted via platform advertising tools, especially where targeting and micro-targeting techniques are used.

In addition, the opinion stresses that Ukrainian electoral legislation continues to regulate political communication primarily through the concept of pre-election agitation, which is limited to formal electoral periods. This narrow approach leaves a substantial part of platform-based political advertising outside regulatory oversight, including paid or coordinated activity on VSPs outside election campaigns, a gap that is explicitly addressed in EU law through the Regulation on the transparency and targeting of political advertising.

Finally, the Council of Europe concludes that, in the absence of explicit rules on targeting, transparency of platform advertising systems and accountability of large online platforms, the proposed amendments do not provide effective safeguards against manipulation and foreign interference conducted through VSPs. It therefore recommends aligning national legislation more closely with the EU *acquis*, including the concepts and mechanisms of the TTPAR and DSA, while ensuring respect for freedom of expression and proportionality.

³⁰³ Council of Europe, [Legal Opinion](#) on the Draft Law of Ukraine No. 8310 “On Amendments to the Electoral Code of Ukraine regarding the improvement of the regulation of information provision for elections and the conduct of pre-election agitation”, 9 December 2025, LEX_2025_16.



6. Conclusion

This report shows that, throughout its post-independence history, Ukraine's media sector has been shaped by several interlinked structural trends that have intensified under conditions of war. Most notably, Ukraine has pursued a gradual yet decisive consolidation of its communication sovereignty, marked by sustained separation from Russian media infrastructure, markets and narratives. This process forms part of a broader independence process for the media system and has been accompanied by the successful development of a digital communication infrastructure that serves a highly mediated society.

Today's Ukrainian media landscape is characterised by the interaction between the state, media holdings and independent journalism. This balance has historically determined both the structure of the media sector and the informal "rules of the game" governing it. Independent, investigative and activist journalism has played a particularly decisive – yet often underestimated – role at critical political moments. Following Russia's full-scale invasion in 2022, however, this configuration was profoundly disrupted. Wartime conditions have triggered unprecedented shifts in media production, distribution and consumption, while simultaneously exposing long-standing vulnerabilities in infrastructure, human resources and financial sustainability. The role of the state has expanded significantly in this context, producing both stabilising effects and new risks for pluralism.

In this vein, media policy and regulation have been central to Ukraine's ability to adapt to the very special conditions it is experiencing, including FIMI. The Ukrainian case demonstrates how regulatory decisiveness, combined with a strong commitment to communication autonomy, can help sustain a pluralistic media environment under extreme pressure. Importantly, Ukraine has sought to defend its democratic information space from FIMI without formally introducing censorship or abandoning core freedoms. Nevertheless, major challenges remain, particularly in relation to war fatigue, the long-term sustainability of independent journalism and the potentially chaotic dynamics of the post-war period. Addressing these challenges will require early coordination between Ukraine and its international partners.

A major turning point in Ukraine's media governance framework followed the granting of EU candidate status in June 2022, conditional upon the implementation of key reforms, including alignment with the AVMSD. In response, Ukraine adopted a new Media Law (UML) in December 2022, which entered into force in March 2023. This law functions as a comprehensive media code, significantly reforming the regulatory landscape and amending several existing statutes. The UML establishes a unified framework governing media subjects, public interest media, content restrictions, licensing and registration procedures, co-regulation, sanctions and specific wartime restrictions.

Crucially, the UML introduces new features to the Ukrainian legal framework. As seen in the report, it aligns Ukrainian media law with the AVMSD by distinguishing between legal entities that operate media outlets and the services they provide, and by harmonising media categories and definitions with EU standards. The law covers a wide range of actors, including providers of linear and non-linear audiovisual services, print and online media services, video-sharing platforms (VSPs) and other platforms offering common access to



information. This alignment reflects Ukraine's broader commitment, formalised in EU accession roadmaps, to approximate its legislation to additional EU instruments such as the EMFA, DSA, DMA and Anti-SLAPP Directive.

However, Ukraine's approach to countering FIMI predates the full-scale invasion. Initial legal mechanisms, including the Law on Sanctions and restrictions on Russian audiovisual content, were introduced as long ago as 2014. Since 2015, individuals and entities from Russia have been prohibited from establishing or participating in broadcast media organisations in Ukraine. Despite these measures, by February 2022 Ukraine still lacked sufficiently robust legal tools to protect its information space from large-scale information warfare.

Following the 2022 invasion, additional measures were introduced in response to the heightened threat environment. These included criminal liability for justifying or denying Russian armed aggression, expanded blocking of online resources, restrictions on the public use of invasion symbols and the launch of the United News Telemarathon as a wartime information coordination mechanism. Notably, these measures were implemented without the formal introduction of censorship. At the same time, Ukraine has faced persistent challenges linked to the role of major digital platforms – particularly Telegram, but also TikTok and Facebook – which have been widely used for the dissemination of disinformation and hostile influence campaigns.

Enforcement under the UML is primarily exercised by the NBC, which operates a graduated system of prevention and sanctions. This includes mechanisms for informing, warning and consulting media actors prior to imposing penalties, followed by fines for serious violations and, in extreme cases, licence revocation, deregistration or bans on distribution. While Ukraine does not yet have a comprehensive standalone framework for platform regulation, constitutional and statutory provisions apply *de facto* to online and digital activities.

Finally, the Ukrainian experience highlights a structural limitation of regulatory approximation without full EU membership. Even where domestic legislation closely mirrors EU norms, the absence of access to EU-level institutional and enforcement mechanisms – most notably those coordinated by the European Board for Media Services (EBMS) – significantly constrains practical effectiveness. This gap underscores the importance of deeper integration and cooperation if Ukraine's media reforms are to deliver their full democratic and resilience-building potential.

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