



Platform regulation, disinformation and FIMI in Ukraine

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Platform regulation, disinformation and FIMI in Ukraine

**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 Monastyrskiy and Igor Rozkladaj.

Enjoy the read!

Maja Cappello

IRIS Coordinator

Head of the Department for Legal Information

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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 Yanukovych'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 Yanukovych 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 зросла 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 Zelenskyy, [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 Ukrayini”](#) [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.