[UA] The Broadcasting Code on Memorial Days for linear services enters into force

IRIS 2025-10:1/21

Yevheniia Burmahina
Independent expert and media lawyer

On 1 September 2025, members of the Co-regulatory body for audiovisual media services signed the first Broadcasting Code (hereafter: the Code) created by this body. The Code sets out rules on the broadcasting of content by linear services on memorial days. The document is the first to have been created on the basis of the law "On Media", which regulates the work of the media on memorial days.

Ten out of twelve members of the co-regulatory body have signed the Code, which entered into force on 1 September. Since then, all linear audiovisual media services in Ukraine (television channels) have been obliged to adapt their broadcasting content on memorial days in accordance with the new rules.

The main purpose of the Code is to ensure due respect for tragic events in history, honour the memory of the deceased, and prevent the dissemination of entertainment and other content that may be considered inappropriate or offensive in the context of commemoration dates. The Code therefore establishes uniform and ethical standards.

The document was approved by:

- The Board of the Public Association “Co-regulatory Body in the Sphere of Audiovisual Media Services” (as per minutes dated 17 July 2025, No. 13);

- The National Council of Ukraine on Television and Radio Broadcasting (decision dated 21 August 2025, No. 1692).

Representatives of the industry, the media regulator, and public experts were involved in developing the Code.

The broadcasting Code aims at establishing uniform and ethical standards for all linear services. According to the national regulatory authority (the National Council), it is important that compliance with the rules is not limited to graphic images on screen. Instead, it is important for the media to create programmes explaining why Ukrainians commemorate certain dates. When monitoring television channels, the National Council will now be guided by the Code. The rules establish exactly how broadcasting policy should adapt on memorial days. In particular, television channels are required to:

© European Audiovisual Observatory (Council of Europe) 2026

- stop broadcasting comedy films and humorous programmes (not mandatory for children's television channels);

- inform viewers of the memorial day at least once every two hours between 6 a.m. and midnight (not mandatory for children’s, music and adult television channels);

- include information about the memorial day in each news bulletin between 6 a.m. and midnight (not required where the news is a repeat from a previous period and carries the title “repeat”).

The National Council will also monitor the creation and placement of content dedicated to memorial days in the news.

A minute of silence is mandatory only when it is expressly provided for by law:

- if the regulatory act establishing the memorial day provides for a minute of silence, but does not specify its time, the minute of silence on that day is to be at noon.

- if the exact hour is specified in the regulatory act establishing the memorial day, the broadcaster must announce a minute of silence at that specified time.

Therefore, the service provider should focus not only on introducing the memorial day, but also on the content of the regulatory legal act establishing it (the Law of Ukraine, resolutions of the Verkhovna Rada of Ukraine, decrees of the President of Ukraine, and so on).

In addition to the new rules, broadcasters should also establish a unified stylised image concerning the following four days:

- the Holocaust Remembrance Day (on January 27) – a stylised image of a menorah;

- the Day of Remembrance and Victory over Nazism of the Second World War 1939-1945 (on 8 May) – a stylised image of a poppy flower;

- the Day of Remembrance of the Defenders of Ukraine who died in the struggle for independence, sovereignty and territorial integrity of Ukraine (on 29 August) – a stylised image of a sunflower;

- the Day of Remembrance of the Victims of the *Holodomor* (on the fourth Saturday of November) – a stylised image of a burning candle.

Such stylised images are not mandatory for children's media, music formats and channels for adult audiences.

© European Audiovisual Observatory (Council of Europe) 2026

At the same time, on other memorial days, broadcasters are encouraged to independently place graphic elements that are appropriate for honouring that day.

Broadcasting Rules on Memorial Days for linear audiovisual media services

© European Audiovisual Observatory (Council of Europe) 2026

© European Audiovisual Observatory (Council of Europe) 2026