[UA] : Regulator provides criteria to identify propaganda of russian aggression

IRIS 2026-9:1/9

Andrei Richter
Comenius University (Bratislava)

On 3 September 2026, the National Council on Television and Radio Broadcasting, the Ukraine's national regulatory authority (NRA), approved a new act, entitled "Criteria for Classifying Information as Containing Propaganda of the Russian Totalitarian Regime and the Armed Aggression of the Russian Federation – as a Terrorist State – Against Ukraine, as well as Symbols of the Military Invasion by the Russian Totalitarian Regime, for Audiovisual Media Entities."

It is the result of the workof 12 experts, including those from the NRA itself, who have been working on the text since January 2025. The draft has been preliminarily approved by the board of the audiovisual co-regulatory body (see IRIS 2024-4:1/15). The document serves as binding rules interpreting the legal ban on disseminating such information, as stipulated in the Law of Ukraine on Media (Art. 36 "Limitations on content of information", para 1, subpara 12).

The actprovides a detailed description of the specific information regarding the aggressor state, including its bodies and officials, that is prohibited from dissemination (para 2.2.3). It explains:

- how to identify information aimed at supporting or justifying the criminal nature of the Russian Federation's activities;

- how to determine whether or not the information is of a criminal nature;

- what types of bodies of the terrorist state can actually engage in criminal activity.

These bodies include media outlets in which a terrorist state (aggressor state) holds an ownership share (corporate rights), either directly or through third parties, including state authorities, local self-government bodies, state-owned enterprises, etc.

The prohibited propaganda includes the following categories (para 2.1.1):

- dissemination of information aimed at supporting or justifying the criminal nature of the activities of the Russian Federation, the bodies of the terrorist state (aggressor state), and their officials, employees, staff (including military

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personnel), and/or their representatives acting openly or covertly on behalf of the Russian Federation from the territory of Ukraine or from the territories of other states against Ukraine;

- popularization and glorification of the activities of the bodies of the terrorist state (aggressor state) and the actions of their officials, employees, staff (including military personnel), and/or their representatives;

- public denial – including in the media or the internet – of the criminal nature of the Russian Federation's armed aggression against Ukraine;

- popularisation of the "Russian World" ideology by any means and/or in any manner;

- public use of symbols, associated with the military invasion of Ukraine by the Russian Nazi totalitarian regime, as well as the use, creation, or dissemination of products containing such symbols, whether in Ukraine or abroad.

The criteria specifically focus on the need to consider the context in which information is presented (in particularly, humour), the method of its dissemination, its purpose and consequences (paras 2.2.6; 2.3.3; 2.4.2; 2.5.3).

Критерії віднесення інформації до такої, що містить пропаганду російського тоталітарного режиму, збройної агресії Російської Федерації як держави-терориста проти України, а також символіку воєнного вторгнення російського тоталітарного режиму, для суб'єктів у сфері аудіовізуальних медіа

https://webportal.nrada.gov.ua/wp-content/uploads/2026/09/R-2026-02188-D.pdf

Criteria for Classifying Information as Containing Propaganda of the Russian Totalitarian Regime and the Armed Aggression of the Russian Federation—as a Terrorist State—Against Ukraine, as well as Symbols of the Military Invasion by the Russian Totalitarian Regime, for Audiovisual Media Entities, Resolution of the NRA of 3 September 2026, No. 2188

акон України "Про медіа"

https://zakon.rada.gov.ua/laws/show/2849-IX#Text

Statute of Ukraine "On Media", No. 2849-IX, 13 December 2022

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