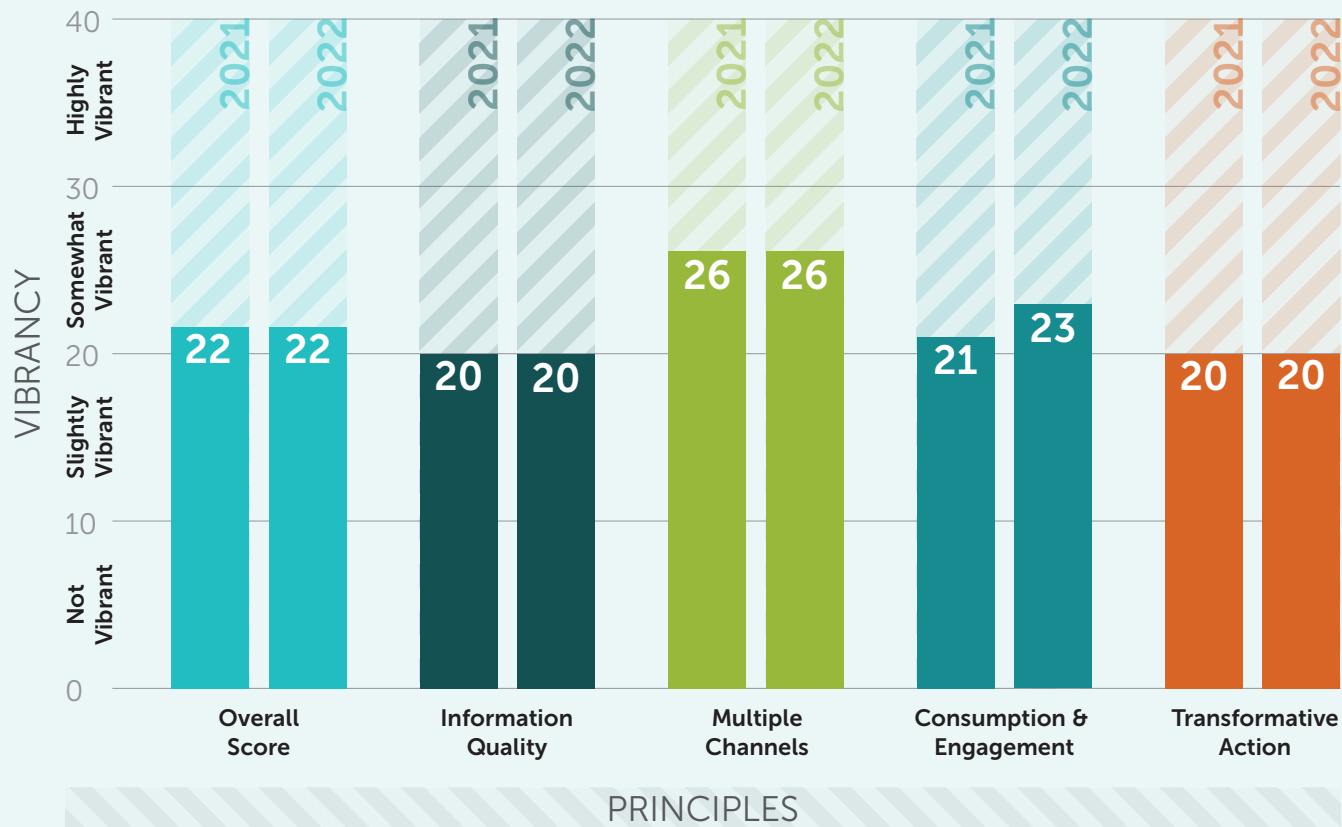


UKRAINE

Vibrant Information Barometer

2 0 2 2





Highly Vibrant (31-40): Quality information is widely available in this country. People have the rights, means, and capacity to access a wide range of information; they recognize and reject misinformation.

Somewhat Vibrant (21-30): Quality information is available in this country and most of it is editorially independent, based on facts, and not intended to harm. Most people have the rights, means, and capacity to access a wide range of information, although some do not. Most people recognize and reject misinformation, although some do not.

Slightly Vibrant (11-20): Quality information is available on a few topics or geographies in this country, but not all. While some information is editorially independent, there is still a significant amount of misinformation, malinformation, and hate speech in circulation, and it does influence public discourse. Most people do not recognize or reject misinformation.

Not Vibrant (0-10): Quality information is extremely limited in this country. The vast majority of it is not editorially independent, not based on facts, or it is intended to harm. People do not have the rights, means, or capacity to access a wide range of information; they do not recognize or reject misinformation; and they cannot or do not make choices on what types of information they want to engage with.

Highly Vibrant

Somewhat Vibrant

Slightly Vibrant

Not Vibrant

OVERALL
SCORE

22

Preface: On February 24, 2022, Russia launched a multi-pronged invasion of Ukraine. Since the 2022 VIBE chapter on Ukraine covers events in the media and information space during 2021, the war between Russia and Ukraine is mentioned in this chapter as a threat, but it does not discuss the impact of the current conflict. However, it provides an overview of the pre-war media environment in Ukraine, including the rise and influence of Kremlin propaganda efforts.

Introduction

In 2021, Ukraine celebrated 30 years of independence — with the threat of a full-fledged invasion looming large in the background, as Russia built up its military along Ukraine’s borders in spring and the end of the year. Moreover, Ukraine proved ill prepared for two waves of COVID-19. Immunization campaigns started late and intensified only in autumn, then were undermined by widespread anti-vaccination sentiments and information space manipulations.

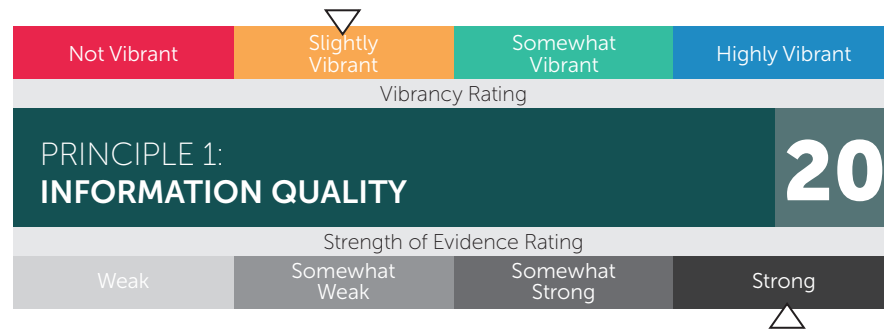
In February 2021, the National Security and Defense Council (NSDC) imposed sanctions on the pro-Kremlin proxy Viktor Medvedchuk and his television channels. The blocked channels claimed to be merely oppositional, but they disseminated the most toxic and influential Russian propaganda narratives in Ukraine.

Aspiring to limit oligarch influence, President Volodymyr Zelensky ensured that the state adopted a populist, anti-oligarch law in September 2021. The law’s passage led the presidential administration into fierce political confrontation with oligarchs — with the exception of Ihor

Kolomoyskyi — and other opponents. However, beginning in autumn, Zelensky’s relations grew tense with media, especially with media controlled by billionaire Ukrainian businessman Rinat Akhmetov. Media experts noticed attempts to build a pool of media loyal to the president, which may have further implications closer to the next elections. The media group includes representatives from private media, but the more threatening trend was the state-owned media gaining strength in the media market. This development included attempts to re-position niche state-owned television channels Dom and Rada for a national audience.

Principle 1 (information quality) tied with Principle 4 (transformative action) both received this year’s study’s lowest score of 20, with mal-information and scarce media business prospects the ongoing major issues. The score for Principle 2 (on plurality of channels) received the highest score of all the principles. Panelists gave press freedom, access to information, and media infrastructure higher scores. Mainstream media owners’ editorial interference continues to be the key challenge.

The score for Principle 3 (information consumption and engagement) increased slightly. However, citizens’ poor media literacy and digital security skills remained a major weakness, along with a lack of evidence-based debates. Although Principle 4 tied for the lowest scored, panelists praising civil society contributions to a robust information flow; while giving their lowest scores to the utilization of information by individuals. Panelists also questioned the government’s reliability in communications and officials’ reactions to media reports exposing violations.



Principle 1's score remains on par with its 2021 VIBE study score. The diversity of mainstream media owners ensures pluralism. The population has shifted to seek news online; however, half of consumers still follow news from oligarch-owned television groups. These conglomerates dominate the narrow advertising market, further constraining business prospects for other media actors. Although the government has substantially reduced mal-information sources by blocking key pro-Russian television channels, Russian narratives still reach and influence Ukrainians.

Indicator 1: There is quality information on a variety of topics available.

Ukraine has adequate infrastructure to produce abundant, varied, and quality content in all types of media, and technology has grown more affordable. Mainstream media are divided between several oligarch groups of influence, whose aim is to shore up their political and economic interests. The top television groups are Viktor Pinchuk's StarLightMedia (ICTV, STB, and Novyi channels); Ihor Kolomoyskyi's 1+1 Media (six channels, including 1+1 channel; UNIAN news agency; and 1plus1.ua); Rinat Akhmetov's Media Group Ukraine (Ukraina channel, Ukraina 24 channel, and Segodnya.ua); and Inter Media Group, owned by Dmytro Firtash and Serhiy Levochkin.

According to the Media Literacy Index by Detector Media (DM),¹ the

1 *Media Literacy Index of Ukrainians*. Detector Media. March 2021. https://detector.media/doc/images/news/archive/2021/186437/REPORT_MEDIALITERA%D0%A1Y_INDEX-DM_EN.pdf.

leading sources of information on sociopolitical topics are national entertainment television channels (STB, 1+1, Inter, Ukraina, etc.). Fifty-seven percent of the Ukrainian audience watches them to that end. DM reported that 50 percent of respondents use social networks, 28 percent of respondents watch national news television channels, 24 percent refer to news websites, and 19 percent of the Ukrainian audience learns sociopolitical news from messengers. A mere 12 percent of respondents use public-service channels.

The journalism training sub-indicator scored relatively high, ensured by plenty of informal donor-funded training workshops and internships (often media-supportive NGO programs), on-the-job training options, and some paid opportunities. The academic journalism system is outdated, with the exception of the Kyiv-Mohyla Academy and the Ukrainian Catholic University. Many practitioners in the profession work without any formal journalism education. A panelist involved in higher education for journalists noticed increases in practical skills training, industry practitioners engaging in teaching journalism students, and persecuting journalists for plagiarism.

Panelists noted that monitoring by DM and Institute of Mass Information (IMI)², resolutions of the [Commission of Journalism Ethics](#), and the [Independent Media Council](#) regularly document ethical and other professional journalism standards violations, as well as the many media outlets publishing jeansia (paid content disguised as legitimate news). In September, IMI announced the national online media White List. These outlets are credited for 96 percent compliance with professional standards: [Suspilne](#), [Hromadske](#), [Liga](#), [Ukrainska Pravda \(UP\)](#), [Ukrinform](#), [Radio Liberty](#), [Dzerkalo Tyzhnya](#), [Novoe Vremya \(NV\)](#), [Espresso](#) and [Babel](#).

The media sector has started developing the institution of reputation, one panelist observed. An example is the serious car accident allegedly caused by Oleksandr Trukhin, a member of parliament (MP) from The Servant of the People ruling party. Soon after the accident report

2 *Content of Ukrainian Media in 2021: Monitoring Results*. Institute of Mass Information. January 5, 2022. <https://imi.org.ua/monitorings/kontent-ukrayinskyh-media-u-2021-rotsi-pidsumky-monitoringiv-imi-i43114>.

was initially published, more than 30 media outlets deleted the story. Meanwhile, thousands of Facebook users disseminated lists of outlets which deleted stories about Trukhin's car accident, urging others not to consume these media. Moreover, journalists were the investigators persistently chasing the case, and Trukhin, for months after the incident.

One editor noted that the journalism community expresses more consensus in censuring colleagues who violate professional standards, while non-professional content producers do not face professional ramifications.

A data journalism expert commented that most media are obsessed with covering national political events. National media cover local news only when there are scandals or emergencies, and they do not offer consistent coverage of regional issues or changes. International journalism and economic journalism are also poorly represented, according to a media analyst on the panel.

The panelists agreed that media publications and opinion leaders hold the government to account and force it to respond, and they lamented that more serious consequences happen only rarely. One panelist stated that editorial independence is threatened and said that media feed the audience with what brings bonuses, rather than what consumers need.

Indicator 2: The norm for information is that content is based on facts.

Fact-based information is the norm for a majority of professional content producers and the government; it is rare for the media and the government to disseminate false information intentionally. A media law expert said that spreading false information is a serious legal infringement for broadcasters, and the National Television and Radio Broadcasting Council (NTRBC) had been reacting forcefully to broadcaster violations. However, courts apply sanctions with varied outcomes. In 2021, a majority of broadcasters complied with

the standards, but several — such as Nash and Maksi TV television channels — continued to systematically disseminate disinformation and hate speech.³

Non-professional content producers publish most of the intentionally misleading information, as one panelist who works as an editor observed. Bloggers, influencers, anonymous Telegram channels,

and private interest groups in social networks and messaging apps have long disseminated unverified information and manipulated facts, or they have served as tools of the Russian hybrid war against Ukraine. According to a Radio Liberty report in February 2021, the State Security Service of Ukraine disclosed a network that Russian security services is managing and

that contributes to a dozen anonymous Telegram channels popular in Ukraine.

The panelists pointed to officials in the president's office making odious false statements on Wagnergate (a failed special operation to arrest members of Russia's Wagner mercenary force), and they called out the Ministry of Health for encouraging vaccination through false statements. The panelists reported that while most national and local authorities do not systemically push misinformation, they do tend to obscure information on sensitive issues. Often officials will place information in irrelevant website sections and will not disclose information fully or accurately. They will also manipulate facts or distort them with inappropriate interpretations.

Ukraine has many strong fact-checking agencies that debunk Russian and local disinformation, and simple fact-checking tools and manuals are available online. Since March 2020, [StopFake](#) and [VoxCheck](#)

“ Russia works inside Ukraine through formally Ukrainian media, proxies among Ukrainian politicians, and influence agents among pro-Russian non-professional content creators.

3 “The results of inspections of “Maksi-TV” and “OUR” - a fine and a lawsuit to revoke the license due to the spread of hostility and biased information,” National Council of Ukraine on Television and Radio Broadcasting. November 4, 2021. <https://www.nrada.gov.ua/rezultaty-perevirok-maksi-tv-nash-shtraf-zvernennya-sudu-pro-anulyuvannya-litsenziyi-cherez-poshyrennya-vorozhnechi-neob-yektyvnoyi-informatsiyi/>.

have been the local partners of a Facebook program countering disinformation. However, many initiatives of social networks to moderate content are reactive and ineffective, according to one media researcher on the panel. Another panelist added that Facebook applies moderation mechanisms, but they are not always fair, and Telegram does not have any form of moderation.

Indicator 3: The norm for information is that content is not intended to harm.

Consistently and over many years, the Russian Federation has been generating disinformation and hate speech intended to harm Ukraine. Russia works inside Ukraine through formally Ukrainian media, proxies among Ukrainian politicians, and influence agents among pro-Russian non-professional content creators. Russian-imposed narratives traditionally focus on discrediting Ukrainian values and institutions; undermining trust in the Ukrainian government; claiming “external” governance of Ukraine; and criticizing Ukrainian laws, reforms, and aspirations for joining the EU and NATO. Russia enhances anti-Western narratives and uses information for military and diplomatic pressure.

In early February 2021, the president endorsed the NSDC decision to shut down television channels 112 Ukraine, NewsOne, and ZIK. The closures were part of the sanctions imposed on lawmaker Taras Kozak of the Opposition Party for Life (OPFL) for terrorism financing. Kozak’s assets are widely believed to be controlled by Viktor Medvedchuk, an MP of the same party and the Kremlin’s closest ally in Ukraine. Later, NSDC imposed sanctions on Medvedchuk and his wife.

Also in 2021, Ukraine hampered Medvedchuk’s media company in its attempts to reincarnate. About former 100 employees of Medvedchuk’s channels rapidly set up Mediaholding Novyny and quickly bought Pershi Nezalezhnyi, an existing television channel which had a satellite

license. However, the government quickly put a stop to this. In April 2021, YouTube blocked access to three Medvedchuk channels’ regular accounts, but they quickly pivoted to reserve accounts to distribute their content. The Supreme Court of Ukraine refused to cancel the sanctions, and the case is currently being considered at the cassation instance of the Supreme Court.

In 2020, Texty research indicated that 9,200 news stories at clickbait websites with anti-Ukrainian propaganda referred to the source — Medvedchuk channels. Emotional and manipulative quotes from pseudo-experts and virtual sociologists prevailed among the reposts, which Russian media used widely. According to DM research, this content amounted to more than half of all pro-Russian propaganda in the Ukrainian information sphere.

In the panelists’ view, Ukraine has been unable to take any serious action using its media legislation or long democratic procedures. One

“One regional editor on the panel said that most local communities, such as districts and villages, do not have media based in their communities and do not hear their voices presented in the national outlets.”

panelist insisted that NSDC sanctions became the last resort exactly because no other professional ramifications worked. “Those journalists and public figures have not become outcasts in the community,” the same panelist observed. Moreover, with such shaky legal grounds, there is a risk of Medvedchuk media appealing this decision in the European courts in the future.

According to an IMI and DM joint study, the broadcasting share of pro-Russian and anti-Western information campaigns and their audiences decreased considerably. Some of the speakers who pushed these narratives on Medvedchuk channels moved to Nash and Ukraina-24 channels. Upon the Medvedchuk channel closures, Nash TV experienced the largest audience increase — vaulting from seventh to second place in news channels ratings. However, the online audience of all major pro-Russian websites decreased only by 25 percent; these websites had 11 million visits per month, while the other three anti-Ukrainian websites (strana.ua, vesti.ua, and golos.ua) clocked 31 million visits per month.

In August, the Ukrainian government imposed sanctions on Anatoliy Shariy, a provocative pro-Russian video blogger, and Ihor Guzhva, chief editor of strana.ua, along with their respective websites and YouTube channels.

For nine months of 2021, Medvedchuk's channels broadcast via internet and through a number of regional channels – Odesa's Zdorovie, and Sumy's Akadem TV and TRK Vidikon, which then obtained NTRBC warnings. In the fall, OPFL MP Nestor Shufrych became the major stakeholder of Mediaholding Novyny; and in November, Mediaholding Novyny bought Ukrlive television channel to broadcast Pershyi Nezaleznyi via satellite and cable networks. On December 28, NSDC introduced sanctions against Ukrlive, Pershyi Nezaleznyi, and Mediaholding Novyny.

Texty counted Ukrainians residents' monthly consumption of anti-Ukrainian content. The results showed 118 million visits to websites with anti-Ukrainian content (Russian news sites for Ukraine, Russian mainstream media, and Ukrainian manipulative websites), 2 million subscribers to pro-Russian Telegram channels, more than 120 million views of videos on pro-Russian YouTube channels, 2 anti-Ukrainian websites within the top 10 preferred news websites, and 61 percent of Ukrainian Facebook users reposting “dustbin” media. Analysts stressed that the key principle of Russian propaganda is information flows to an excess, when frequency of a certain message becomes an argument for its truthfulness.

Indicator 4: The body of content overall is inclusive and diverse.

Panelists noted an increase in the variety of formats and experiments to boost audience engagement. Online media have no limits on languages for presenting information, while television and radio have to comply with a quota of 75 percent Ukrainian language content.

A panelist who works with an NGO pointed out that diverse content is more available to city dwellers who use the internet frequently, rather than rural inhabitants and the aged, who cannot use the internet easily.

People with disabilities still are not given enough accommodations, but some broadcasters deliver current affairs with sign-language interpretation or subtitles. A panelist involved in media literacy training found a few channels with sign language and even some national internet media streaming services (also known as over-the-top or OTT) offering audio description functions.

Media do not exclude ethnic and social communities, and marginalized groups do not face obstacles in running their own niche or thematic media, given the array of online tools. However, one regional editor on the panel said that most local communities, such as districts and villages, do not have media based in their communities and do not hear their voices presented in the national outlets.

Panelists noted that LGBTQ issues do not garner enough attention in media, and silencing and a certain indifference are widespread. According to journalism students' research, however, Ukrainian society is steadily moving towards tolerance. Ukrainian media are showing positive dynamics with newsrooms, gradually rejecting stereotypes and homophobic slants. Very often, the more progressive publications give rise to intolerant language in their social media comments, especially in the regions with more traditional cultural stances.⁴

Male experts still prevail in media, and female images are stereotyped, said one media education expert on the panel. This panelist pointed to a Vox Ukraine study⁵ analyzing the largest online media, which indicated that the share of female experts interviewed fluctuated from 13 to 35 percent.

A UNDP gender expert, Mykola Yabchenko, commented that the research conducted by Vox Ukraine highlighted that, in the newsrooms studied, beat distribution reflects gender bias. Female journalists often cover culture and social topics, while men more frequently get assignments

4 *How Do Ukrainian Media Write about LGBT?* Povaha, December 27, 2021. <https://povaha.org.ua/yak-ukrayinski-zmi-pyshut-pro-lgbt-doslidzhennya/>.

5 “Male World of Experts' Comments,” VoxUkraine. November 23, 2021 <https://voxukraine.org/cholovichyj-svit-ekspertnyh-komentariv/>.

related politics, economics, and finance.⁶ Traditionally, men hold more managerial positions at media outlets, but women outnumber men overall in the media's workforce.

Indicator 5: Content production is sufficiently resourced.

Most Ukrainian media are subsidized by owners, and a relatively small number are self-sustainable. Despite the advertising market's formal growth, its size is not enough to support the number of media outlets operating in Ukraine, one panelist emphasized. Moreover, the transnational tech giants take a substantial part of digital advertising budgets.

The four largest television groups have been monopolizing the television advertising market for decades, uniting into sales cartels that dictate their conditions. Since 2021, the alliances' configuration has changed, but this has only re-distributed revenue between the groups. The advertising company Ocean Media is now a sales house for StarLightMedia, which claims 38 percent of television advertising, and for 1+1 Media, which holds 30 percent of the market. With these companies, Ocean Media now controls more than two-thirds of the market.

Little has changed, one panelist commented, since the VoxUkraine study in 2019 that showed media usually have just one or two main income sources: advertising and media owners' funds.⁷

Since 2020, national and local media outlets have seen a boom in launching various membership models, according to a study by [The Membership Puzzle Project](#). The project's research covered 11 online media outlets and showed that newsroom budgets from membership models might include 1 percent (for large media) to a maximum of 30

6 Up to 35 Percent of Experts: There Is No Gender Balance in Media – VoxUkraine, Povaha. December 6, 2021 <https://povaha.org.ua/do-35-ekspertok-u-zhodnomu-zmi-nemaye-gendernogo-balansu-voks-ukrayina/>.

7 "How to Improve Business Models: Advice to Ukrainian Media Managers," VoxUkraine. February 26, 2020. <https://voxukraine.org/yak-pokrashhiti-biznes-model-poradi-kerivnikam-ukrayinskih-media/>.

percent (for very small media). For many outlets, these funds do not influence the broader market or provide a significant source of income. Rather, the memberships present an opportunity to engage readers in newsroom activities, increase loyalty, and popularize the brand.

According to the annual USAID-funded Internews Media Consumption Survey (MCS),⁸ 20 percent of Ukrainians are ready to pay for access to their favorite online news media.

The economic state of local media is worsening, and soon parts of Ukraine might face so-called "news deserts," a media analyst on the panel said. In a positive development, a media growth agency has facilitated the launch of The City, a collective of 50 hyperlocal online publications. About 80 percent of the publications originated from former municipal newspapers, often in strong communities. However, a few members shut down last year, and more can be expected due to the lack of advertising funds.

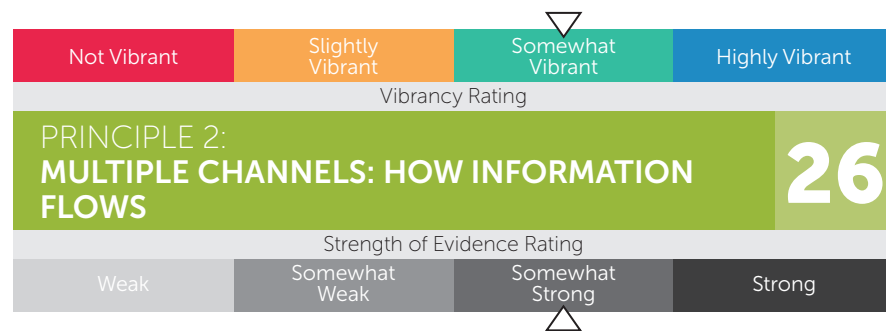
Budget-funded municipal broadcasters create unfair competition for private media and usually remain loyal to local governments. Meanwhile, so-called "municipal jeans," budget funding to cover government activities, also distorts the market in the regions where the allocations are substantial. A panelist with expertise in political analysis noted that the government splits the funds into smaller sums among departments, in order to avoid competitive tenders through ProZorro, the electronic public procurement system. The government tends to allocate funds to more loyal media in exchange for positive coverage. Often these outlets are former municipal media that were privatized under destatization reform a few years earlier.

Journalists earn low salaries, especially in the regions, keeping them in constant search of additional income. Moreover, media managers are not paid enough to stay in the industry.

Panelists agreed that major advertisers that form the market are not politicized, instead caring about audiences and the cost effectiveness of

8 2021 Media Consumption Survey, USAID-Internews. November 2021. <https://internews.in.ua/wp-content/uploads/2021/11/USAID-Internews-Media-Consumption-Survey-2021-ENG.pdf>.

their advertising budgets. They noted cases in which advertisers tend to avoid politically odious media outlets, due to risks to brand reputation and image.



Overall, Principle 2's score was the same as its score in the 2021 VIBE study. Indicators 7 (channels of information), 8 (channels of government information) and 9 (diverse channels of information flow) remained well above average, while indicator 10 (independence of information channels) obtained a score of 19. Panelists gave lower scores to issues for some sub-indicators, including: illegal forms of pressure on journalists; perpetrator immunity; low trust in government press offices; the handful of oligarchs with a considerable concentration of the television market; and the politicized process of NTRBC licensing and membership.

Indicator 6: People have rights to create, share, and consume information.

For many years, Ukrainian legislation protecting free speech and free media has been in line with European norms. As with many other laws in Ukraine, authorities can be selective in media law application and enforcement, and some legal techniques are imperfect. However, one panelist with a law background held the view that the overall legal situation is positive. Ukrainian law protects journalists' sources. Libel law has been a civil law issue since 2001.

Another panelist said that Ukraine does not have systemic pressure on journalists, but pointed to sporadic incidents. They included the still-

unresolved case of the attack on the Skhemy television crew during an interview in the state-owned Ukreximbank; an attempt to disrupt the premiere of the Slidstvo.info investigative film "Offshore 95" about the president's offshore companies; and pressure on the Suspilne talk show, Zvorotniy Vidlik, to invite certain ruling-party representatives.⁹

Another panelist underscored self-censorship, seen with oligarch-owned media with editorial policies in favor of certain political forces. Fear of retribution is more common in the regions; one panelist confirmed a sense of not only self-censorship, but more overt censorship at the urging of regional media owners.

A strategic communications consultant pointed to an increase in cases of certain media not being invited to key events or off-record meetings with top governmental officials. Another panelist said that only 30 media received invitations to a recent presidential press conference; other journalists protested his forming a pool of favorite media.¹⁰

Although the panelists supported blockage of pro-Russian propagandist media, they viewed NSDC sanctions as riskier tools to restrict freedom of speech than legal methods and court proceedings. Since 2017, Ukraine has also restricted access to Russian television channels, news sites, and social networks through ICT providers.

Panelists agreed that investigating crimes against journalists, and further consideration of the cases in courts, need improvement. In 2021, IMI monitoring documented 197 press-freedom violations in Ukraine, excluding occupied territories, compared to 229 cases in 2020: 99 cases of journalists prevented from carrying out their professional activities, 24 beatings, 18 instances of denied access to public information, 16

⁹ "Council for Freedom of Speech on the scandal between the OP and the Public: "there was no" direct "pressure, but the interaction between the government and the media should be regulated," Detector Media. November 3, 2021. <https://detector.media/community/article/193475/2021-11-03-rada-zi-svobody-slova-pro-skandal-mizh-op-ta-suspilnym-pryamogo-tysku-ne-bulo-ale-vzaiemodiyu-mizh-vladoyu-ta-zmi-treba-reglamentuvaty/>.

¹⁰ "Journalist comes uninvited": Media outlets not allowed on Zelensky's press marathon went on protest," Public Radio. November 26, 2021. <https://hromadske.radio/news/2021/11/26/zhurnalist-prykhodyt-bez-zaproshehennia-zmi-iaki-ne-pustyly-na-presmarafon-zelens-koho-vyshly-na-aktsiiu-protestu-foto>

cyber-crimes, 13 threats, and 27 other violations (property damage, censorship, legal and indirect pressure).¹¹ According to IMI, 27 cases investigated by law-enforcement bodies were submitted to courts, compared to 16 cases in 2020. IMI counted 10 sentences on crimes against journalists in 2021.

Of the 248 cases involving crimes against journalists initially registered in 2021, 128 were dismissed. IMI regularly reports monitored violations to the general prosecutor's office, which does not investigate the offenses itself but can push other law enforcement authorities to investigate.¹²

Indicator 7: People have adequate access to channels of information.

Ukraine's ICT infrastructure is improving gradually. The infrastructure is more developed in the cities, and internet service is poor in small towns with less than 50,000 inhabitants and in many rural areas. According to Compare the Market, Ukraine enjoys the world's cheapest broadband internet fees.¹³

Panelists noted that the Ministry of Digital Transformation of Ukraine (MDTU) has launched [the Internet Subvention Program](#). Through this program, local communities can obtain government support to procure fixed internet infrastructure in locations that are not lucrative for private

“**Fear of retribution is more common in the regions; one panelist confirmed a sense of not only self-censorship, but more overt censorship at the urging of regional media owners.**”

providers. More than 6,000 social institutions (hospitals, schools, libraries, etc.) in more than 3,000 villages gained internet connectivity in 2021. 4G is available to 8.4 million Ukrainians in almost 14,000 locations.¹⁴ MDTU has arranged internet access at 1,000 administrative service centers for Ukrainians to overcome digital gaps with governmental e-services and MDTU's Diia governmental services portal and mobile app, launched in 2020.¹⁵

Internet penetration in Ukraine hit 67 percent, or 30 million people, in early 2021.¹⁶ GlobalLogic estimated an increase in social media audience by 7 million people in 2021, up to 26 million (60 percent of the population).¹⁷ According to Plusone surveys,¹⁸ YouTube had 23.5 Ukrainian users by January 2022; while Facebook, Instagram, and TikTok had 16.8 million, 17.3 million, and 12 million users, respectively.

Meanwhile, many print publications closed, concurrently with a decline in their distribution and delivery infrastructure. The wired radio system is in ruins. Analog television is switched off, with the exception of the Joint Forces Operation zone. Mainstream television channels have encoded their signal at satellite and become paid-for services. Rural inhabitants have limited choice of media. Consumers can receive blocked Russian

11 *Barometer of Freedom of Speech for December 2021*, Institute of Mass Information. December 30, 2021. <https://imi.org.ua/monitorings/barometr-svobody-slova-za-gruden-2021-roku-i43165>.

12 *Reaction of the Government on Violations of Journalists Rights: 2021 Results*, Institute of Mass Information. January 24, 2022. <https://imi.org.ua/monitorings/reaktsiya-vlady-na-porushennya-prav-zhurnalistiv-pidsumky-2021-i43450>.

13 Taras Mishchenko, Taras. "Ukraine has the cheapest leading Internet, Ethiopia - the most expensive," *Mezha*. March 12, 2021. <https://mezha.media/2021/12/03/ukraina-maie-naydeshevshyy-providnyy-internet/>.

14 "Mincifia: more than 116,000 Ukrainians first received 4G in March," Ministry and Committee of Digital Transformation of Ukraine. April 9, 2021. https://thedigital.gov.ua/news/mintsifraponad-116-tis-ukraintsiv-vpershe-otrimali-4g-v-berezni?fbclid=IwAR12n0Sj_m_8007iXmrVcXewmbFglCVSHGyu4-Ypsf52pSeR7EpO37Aw4hc

15 <https://thedigital.gov.ua/news/ukraintsi-yaki-ne-mayut-gadzhetiv-chi-dostupu-do-internetu-zmozhut-otrimati-poslugi-v-dii-u-spetsialno-oblashtovanih-mistsyakh-tsnap>.

16 "Plus 2 Million Users: What Ukrainians Do Online in 2021," *Focus*. August 31, 2021 <https://focus.ua/digital/491571-plyus-2-mln-polzovateley-chem-ukraincy-zanimayutsya-v-internete-v-2021-godu-infografika>

17 "Over a Year of Quarantine, the Number of Ukrainian Social Media Users Increased by 7 Million and Reached 60 Percent of Population." *Global Logic*. <https://www.globallogic.com/ua/about/news/social-media-during-quarantine/>

18 <https://plusone.com.ua/research/>

channels via satellite and access blocked online resources using virtual private networks (VPNs).

Legal or social norms do not preclude any groups from access, but geography can be a challenge. Viewers in the Ukraine border regions mostly access the television channels of neighboring countries — and widely available Russian stations. While one panelist pointed to an improvement to the situation in the districts of the Sumy region, about 5-10 km from Russia, an online journalist in the region reported rising challenges in Bahmut, Donetsk oblast, which borders occupied Donbas territories. With support from donors, the Ukraine government installed transmitters in that area to spread Vilne Radio to the occupied zone. But Russian actors installed more powerful towers that dampen Ukrainian signals and spread Russian broadcasting to Ukrainians in Ukraine.

Indicator 8: There are appropriate channels for government information.

Ukraine's 2011 law on access to public information and subsequent amendments is one of the most advanced in the world. Moreover, in 2020 Ukraine ratified the Council of Europe's Tromsø Convention on access to official documents. Ukrainians can submit information requests, appeal denials in courts, attend local government sessions, and find extensive information on governmental websites. The government maintains a [united open-data portal](#), allowing Ukrainians to search in numerous open-data information sets.

Still, citizens and journalists who request access to public information from the government often experience roadblocks, inaccurate or vague replies, or even denials. One journalist on the panel commented that his outlet filed, and lost, a lawsuit to obtain staff salaries and biographies of certain officials. In an IMI poll, 68 percent of 160 editors and journalists named quarantine restrictions as cause to deny access to journalists. Fifty-nine percent cited problems with access to governmental bodies,

obtaining accreditation, and access to public information among the key challenges in 2021.¹⁹

Viewers in the Ukraine border regions mostly access the television channels of neighboring countries — and widely available Russian stations.

Donors support media lawyers who help journalists properly request information and appeal denials. Courts tend to rule in favor of journalists or citizens in cases related to public information. Ukraine has a web service, [Dostup Do Pravdy](#) (Access to Truth), to help people file information requests. According to the panelists,

citizens might be reluctant to learn how to file requests, but they do not fear seeking public information. No groups are excluded from exercising this right. CSOs actively exercise their right for public information.

Government bodies have spokespersons and press offices, but usually they function to shield officials from the media, suppress information, and even lie, rather than help journalists. Some panelists confirmed that a number of Kyiv-based authorities systematically ignore journalists. Another panelist added that local government press offices might not invite journalists to briefings, or they might publish an online announcement right before a press conference, to increase the likelihood that only “suitable” journalists attend. The panelists presumed that citizens' trust in government spokespersons is low, judging by their level of trust toward other government authorities.²⁰ The public has a presumption of distrust in government information, according to an editor on the panel.

Indicator 9: There are diverse channels for information flow.

The four largest oligarch-owned television groups hold more than 75

¹⁹ *Access to State Authorities and Quarantine Restrictions are Key Challenges to Freedom of Speech in 2021*, Institute of Mass Information. December 20, 2021. <https://imi.org.ua/monitorings/dostup-do-derzhavnyh-organiv-ta-karantynni-obmezheniya-osnovni-vykyky-dlya-svobody-slova-u-2021-i42982>.

²⁰ *Trust in the institutions of society and politicians, electoral orientations of the citizens of Ukraine (July-August 2021)*, Razumkov Center. August 10, 2021. <https://razumkov.org.ua/napriamky-sotsiologichni-doslidzhennia/dovira-do-instytutiv-suspilstva-ta-politykiv-elektoralni-orientatsii-gromadian-ukrainy>.

percent of Ukraine's overall television audience. Online media, which are part of their media holdings, are also among the most popular outlets. Ukrainian lawmakers are helpless to restrict the ownership concentration of television and radio broadcasting. One panelist noted that the Anti-Monopoly Committee of Ukraine admitted that it was unable to measure the television market or relevant shares of television media companies. A law expert on the panel explained that laws foresee monopoly status for a legal entity but cannot regulate its holdings or complicated ownership schemes. Ukrainian anti-monopoly law has no provisions for media other than broadcast.

In 2015 Ukraine adopted very advanced legislation on broadcasting media ownership transparency, but in practice, the law does not work, according to some of the panelists. They explained that establishing and proving specific ownership is difficult if someone wants to hide it; as a result, NSDC has had to intervene with sanctions on media companies. According to a provision entered into force in 2021, other media types must disclose beneficial owners, along with all other legal entities. But anyone can be behind online media, which Ukrainian laws do not regulate.

In autumn 2021, the parliament adopted a law on oligarchs, including those who have substantial influence on media. How the law will work is not yet clear, according to the panelists, but it brings a risk that oligarchs will mask their ownership of media through proxies.

According to the Media Literacy Index by DM,²¹ only a third of respondents (34 percent) indicated that knowing a media outlet's ownership is important to them, while 59 percent do not care. A majority of respondents could name the owners of the following television channels: Channel 5, 1+1, Ukraina, and Rada. No more than a quarter could say who controls such television channels as Inter, 112, Priamyi, STB, NewsOne, ICTV and ZIK. Only 21 percent of Ukrainians know that UA:Persnyi channel is a public broadcaster.

Internet providers and cable television operators are not monopolized,

21 *Media Literacy Index of Ukrainians*, Detector Media. March 2021. https://detector.media/doc/images/news/archive/2021/186437/REPORT_MEDIALITERA%D0%A1Y_INDEX-DM_EN.pdf.

but Zeonbud, a private digital television broadcasting transmitter, remains a monopoly with opaque ownership. Concern RRT, the state monopoly for analog broadcasting, provides Zeonbud with transmitter facilities. A prospective broadcaster could possibly reach a similar audience without a digital license and Zeonbud, one media director commented, but only at a much greater expense.

Rapid growth of OTT into full-fledged competitors of traditional television channels marks a significant trend. OTT services invest in expensive projects and production of television series and programs, buy rights for broadcasting sport events, etc. Netflix has launched a local Ukrainian version. Some Ukrainian viewers have transferred to OTT services, mostly from cable networks.

Certain media, such as web portals and low-cost outlets, can be very easily established in Ukraine. But some panelists held that media find it impossible to freely launch when required to obtain a broadcasting frequency and a license. The process for allocating broadcasting frequencies is not fair or transparent, panelists said. In autumn 2021, after a long quarantine pause, NTRBC conducted three radio competitions and a contest for digital frequencies. The competition nearly completed the transfer of local broadcasters from analog to digital broadcasting, but NTRBC did not allocate all frequencies. One panelist commented that NTRBC decisions do not raise any red flags, but it is hard to interpret why the agency is preferential towards certain broadcasters during competitions.

The public service broadcaster Suspilne – along with its regional affiliates, online platform, and radio service – provides varied formats and content, but it does not enjoy a high rating among viewers. In the Rivne region, Suspilne is the most independent and democratic broadcaster, and the only television channel without jeansa, according to one panelist with knowledge of the region.

Indicator 10: Information channels are independent.

Only a limited number of media outlets in Ukraine operate for the purpose of financing their operations. It is far more common that media

owners have outlets to pursue their political and economic interests. In these cases, media company owners can influence and interfere in editorial policy, with rare exceptions, according to the panelists. IMI proved that political coverage of 10 online media correlated to their owners' political affiliation and current interests,²² and shared that 1+1 Media silenced a Pandora Papers investigation about President Zelensky's offshore companies.²³ Liga studied how different media covered the risk of rolling blackouts in Ukraine and also identified owners' interests behind the coverage. Most of the negative news came from political opponents' media.²⁴

In autumn 2021, Adnan Kivan, the owner of the English-speaking Kyiv Post since 2018, fired the whole newsroom — allegedly because of business losses. Its journalists believed the real reason was their resistance to his interference with editorial policy. Thirty ex-employees launched a new online media newsroom, The Kyiv Independent, within a few weeks.²⁵

In the Rivne and Volyn regions, only the Public Broadcasting Company of Ukraine (UA:PBC) and a few local media NGOs avoid owner influence, according to one panelist. If some topics do not relate to owners' or funders' political interests, newsrooms at those institutions can produce such content independently.

The Media Literacy Index by DM²⁶ found that two thirds of Ukrainians (67 percent) believe that media serve the interests of their owners. Whereas 81 percent of western Ukraine residents think that media owners and investors control media content, only 55 percent in the eastern parts of the country hold this point of view.

Private advertising contracts from businesses and shops rarely influence editorial independence. Few media separate business and content production, and journalists often deal with advertising, help develop campaign ideas, or write advertorials. Local government subsidies or so-called “information coverage contracts” substantially influence editorial policy and may dictate the content and favorable tone of local government coverage.

President Zelensky's actions indicate an investment in renovating and strengthening the state and budget-funded television channels. For example, Parliament's television channel, Rada, relaunched as a national news channel on December 15. The government is also transforming the television channel Dom into a national general interest channel for internally displaced people across Ukraine. In 2021, Dom obtained almost UAH 1 billion (\$33.7 million). Dom is a former foreign-broadcasting outlet that was repositioned into a Russian-language channel for occupied territories.

President Zelensky has made moves to reposition and strengthen state budget-funded television channels. In one example, Dom TV— which used to be Ukraine's foreign broadcasting service and has been repositioned to provide Russian language channel for the occupied territories, is being transformed to the national general interest channel for internally displaced people across Ukraine. Although Russian-language broadcasting contradicts Ukrainian law, in 2021, Dom obtained almost UAH 1 billion (\$33 million) from the state budget. In a second case, parliament's TV channel Rada was re-launched as a national news channel in late 2021. Both have been transformed without relevant

22 “The Pool of Loyal and Disappointed by Zelensky. How Positions of the Owners Influence the Attitudes of the Media to Politicians?” Institute of Mass Information. December 29, 2021. <https://imi.org.ua/monitorings/pul-loyalnyh-ta-rozcharovani-zelenskym-yak-pozytsiya-vlasnykiv-vplyvaye-na-stavlennya-media-do-i43111>.

23 “Which Online Media Have Not Noticed Pandora Papers Investigation about Zelensky.” Institute of Mass Information. October 4, 2021. <https://imi.org.ua/monitorings/hto-z-onlajn-media-ne-pomityv-rozsliduvannya-pandora-papers-pro-zelenskogo-i41627>.

24 “Shufrich and Poroshenko Channels Scare Ukraine with Blackout. Akhmetov Will Save! Research.” Liga. November 23, 2021. <https://biz.liga.net/ua/ekonomika/tek/article/kanaly-shufricha-i-poroshenko-pugayut-ukrainu-blekautom-spaset-ahmetov>.

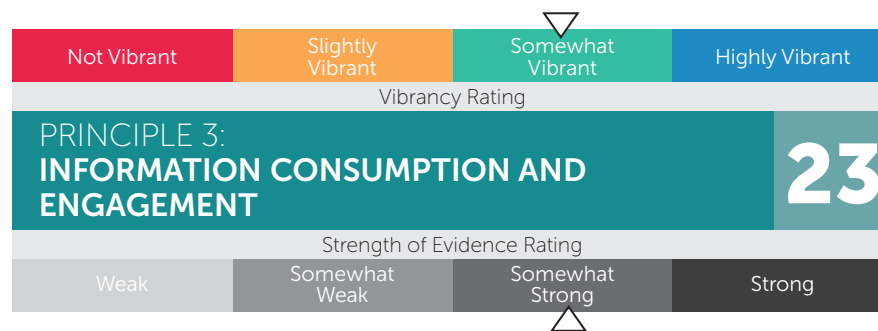
25 “The released Kyiv Post team launches new media, the editorial board will be headed by ex-deputy editor-in-chief Olga Rudenko.” Interfax. November 15, 2021. <https://ua.interfax.com.ua/news/telecom/779838.html>.

26 *Media Literacy Index of Ukrainians*. Detector Media. March 2021. https://detector.media/doc/images/news/archive/2021/186437/REPORT_MEDIALITERA%D0%A1Y_INDEX-DM_EN.pdf.

legislative authorization.²⁷

Since its establishment in 2017, UA:PBC has endured chronic underfunding, below the level set out by law (no less than 0.2 percent of the previous year’s state budget spending). In previous years, UA:PBC has never received more than 60 percent of that funding. However, in 2021, it obtained UAH 1.874 billion (\$63,153, or about 82 percent of the legal requirement). The 2022 budget for UA:PBC is expected to be underfunded by UAH 0.5 billion (\$16.8 million).²⁸

The parliament appoints four NTRBC members, and the president names another four, without any specific criteria. In December 2021, the parliament re-elected three council members. Access to frequencies — one of the serious barriers for private media — has eased for UA:PBC, one panelist commented, reflecting a sense that NTRBC officially prioritizes its development.²⁹ One panelist with knowledge of UA:PBC board developments said that members appointed from political party quotas cannot act in their political interests, because so far they are in the minority.



Principle 3’s overall score increased modestly, with indicator 12 (media literacy) receiving the lowest score. Overall, media literacy education is progressing but still does not reach many population segments. Some media care little about their digital security and fail to take advantage of training opportunities and available tools. The government began to more obviously promote digital and media literacy efforts, as well as the country’s information security. Media companies research their audiences and engage with their needs to the extent they can afford such efforts. Content producers, civil society, and the government do not collaborate systematically. Community media presence is negligible in Ukraine.

Indicator 11: People can safely use the internet due to privacy protections and security tools.

Ukrainian laws protect data privacy and digital security, criminal code articles cover cyber fraud, and 2021 saw no serious attempts to enhance security provisions that could violate personal freedoms. However, current laws and practices lag behind modern malware challenges, according to a digital security expert on the panel. That panelist added that governmental bodies too often tout personal data protection when requested to provide more detailed or disaggregated public information.

Media members and citizens have access to training and tools, including free online courses. Tools have become less complicated for average people, one panelist claimed. This panelist pointed to the increase in demand for digital security training and tools, which was probably

27 How Does Zelensky Build Media Empire. Detector Media November 13, 2021 <https://detector.media/withoutsection/article/193795/2021-11-13-yak-zelenskyy-buduie-mediaimperiyu/>

28 Komissarov, Alexander. “Shmygal stated that the funding of the Public is in full. But this is not the case,” Ukrainian Public Broadcaster News. October 22, 2021. <https://suspilne.media/174029-finansuvanna-suspilnogo-vidbuvaetsa-u-povnomu-obsazi-odnak-e-zapitanna-do-rejtingiv-kmu/>.

29 “According to the results of the competition, three radio programs of the public broadcaster received 55 FM frequencies,” National Council of Ukraine on Television and Radio Broadcasting. November 4 ,2021. <https://www.nrada.gov.ua/try-radioprogramy-suspilnogo-movnyka-otrymaly-55-fm-chastot-za-rezultatamy-konkursu/>.

forced by the pandemic-related shift to online services. Another panelist voiced skepticism over most media being able to afford to pay charges for cross-cutting digital security services. Some are too anxious about their newsroom secrets to invite external IT support, another added. Panelists were unanimous that most Ukrainians' digital security skill level is quite low, and that algorithms of social networks and various marketing tricks are confusing.

In 2021, the investigative news website Chetverta Vlada came under DDOS attack, after it published an investigation about a Rivne official. The outlet managed to cope with the consequences, thanks donor funding for an IT expert. Other local media also publish critical content that triggers attacks, despite having no such funding. For example, the Mykolayv Center for Investigative Journalism's website was attacked, with hackers replacing some investigative stories with irrelevant content. The center was able to restore original content and filed a case with the police

MDTU is launching more training courses on digital skills for Ukrainians, and [its digital education portal](#) offers 70 video series on digital literacy for various target audiences. According to its 2021 survey, the Ukraine population with digital skills below the basic level fell by 5.2 percent (1.42 million people) over two years, and now stands at 47.8 percent. Since 2019, the number of Ukraine residents who have experienced at least one type of fraud on the internet has increased by 11 percent to 45.7 percent. As in 2019, the most common illegal actions that people currently face are receiving fraudulent messages, redirection to fake websites requesting personal information, and fraudulent use of credit or debit cards.

According to DM's Media Literacy Index,³⁰ only 15 percent of Ukrainians do not use the internet, while 71 percent are active, everyday users. Its sub-index of Digital Competence shows that 22 percent of respondents

30 *Media Literacy Index of Ukrainians*, Detector Media. March 2021. https://detector.media/doc/images/news/archive/2021/186437/REPORT_MEDIALITERA%D0%A1Y_INDEX-DM_EN.pdf.

have low-level internet skills; only 11 percent show a high level of skill.

Indicator 12: People have the necessary skills and tools to be media literate.

Ukraine's government became more active in promoting media literacy in 2021. In March, NSDC established the Center for Countering Disinformation. The center aims to protect the information sphere for the national security of Ukraine, counteract destructive disinformation campaigns, and prevent the manipulation of public opinion. In October, NSDC approved the Information Security Strategy of Ukraine until 2025.

Also in March, the Ministry of Culture and Information Policy of Ukraine launched [the Center for Strategic Communications and Information Security](#). The ministry began ["Filter," a national project](#) to unite efforts of different stakeholders in popularizing critical reasoning skills. This project marks the first time that media literacy became part of state policy. The project collects available approaches for and research about media literacy.³¹ Media literacy courses, including some focused on pandemic disinformation, are available at [the state digital education portal](#), [Prometheus](#), and [EdEra](#) platforms.

Ukraine has benefited from a number of donor-funded media literacy projects since 2010. Launched in 2015 with the support from the Canadian Embassy before getting funding from the US Embassy in Ukraine and the UK's Foreign and Commonwealth Office in 2018, IREX's Learn to Discern initiative on media literacy has involved 1,548 secondary schools, 25 post-graduate institutions for teachers, and 21 higher education institutions. NGOs and media run online courses, fact-checking initiatives, tests, and games. The Ministry of Science and Education runs a number of projects, focusing on people from certain sectors such as

31 *Development of Media Literacy in Ukraine: 2021 Analytical Report*, Ministry of Culture and Information Policy. https://filter.mkip.gov.ua/wp-content/uploads/2021/11/231121_medialiteracy.pdf.

Panelists were unanimous that most Ukrainians' digital security skill level is quite low, and that algorithms of social networks and various marketing tricks are confusing.

education, culture, youth, and business. Although the number of literacy efforts increased, they are not systemic and do not reach a large part of the population. At schools, media literacy has not yet been included in the basic curriculum. It can be taught only as an elective if extra hours are available, or as part of other subjects, such as civic education.

Panelists expressed doubt that in general citizens use tools for fact-checking and disinformation debunking websites or have enough skill to discern high-quality news from poor-quality information. Most of the media literacy courses are presented online, but socially vulnerable groups of people do not have regular internet access.

DM's 2021 Media Literacy Index³² found that 15 percent of Ukrainians have a low level of media literacy. The study showed that 33 percent are below average in literacy, 44 percent are average level, and just eight percent are deemed to have a high level. Media literacy levels are especially high among young people aged 18-25 (due to their digital competence) and low among older people aged 56-65. The lower the educational status, the lower the level of media literacy, according to the study.

The study also found that rural residents show the least media literacy, while those of cities with a population of over 500,000 have the highest level. Regionally, residents of northern Ukraine have the highest level of media literacy, while those living in the southern part demonstrate the lowest level. Of those with only enough income to cover food, 72 percent show low or below-average levels of media literacy. Results also showed that 75 percent of respondents have never heard of any media literacy training or education, and 23 percent are aware of available means of improving media literacy, while just two percent participated in such training events.

According to the MCS,³³ Ukrainians grew more media literate and resilient to disinformation in 2021 compared to 2020. The biggest progress is in

32 *Media Literacy Index of Ukrainians*, Detector Media. March 2021. https://detector.media/doc/images/news/archive/2021/186437/REPORT_MEDIALITERA%D0%A1Y_INDEX-DM_EN.pdf.

33 *2021 Media Consumption Survey*, USAID-Internews. November 2021. https://internews.in.ua/wp-content/uploads/2021/11/USAID_Internews-Media-Consumption-Survey-2021_ENG.pdf.

their ability to distinguish a true message from a false one when tested (24 percent, up from 11 percent in 2020).

Indicator 13: People engage productively with the information that is available to them.

Panelists gave high scores to the efforts of journalists, civil society, and the public to exercise their freedom of speech and rights, apart from attacks against journalists and activists.

Although they could not point to specific research as proof, many panelists expressed the belief that most Ukrainians engage with reliable information on a weekly basis. The panelists speculated that the plentitude and diversity of news sources, as well as consumption patterns, provide such opportunities. Still, many people choose to remain in information bubbles that support their world view and do not seek reliable sources, some panelists observed.

According to Thomson Reuters Foundation – Ukraine research,³⁴ most adult Ukrainians get their information from online sources. Of the sample of 515 persons, 80 percent of respondents use search engines, 72 percent social networks, and 70 percent information media sites and internet media. The percentage of respondents who turn to television at least once a week is just a little lower, at 67 percent; while only 32 percent listen to radio and 23 percent read print publications.

The study found that almost half of respondents read headlines only. Meanwhile, 73 percent claim to verify television and social media news by checking other sources, and 67 percent tend to select the media that share similar opinions — and believe they consume neutral media, but name bloggers, influencers, or partisan media as examples. In addition, Ukrainians trust specific journalist brands, regardless of the reputations of the media outlets for which they work.

Ukraine has plenty of platforms for debate and exchange of opinion. Although all cannot be called inclusive or independent, they do offer

34 *Ukraine: Media Consumption and Perceptions Research*, Thompson Reuters Foundation. 2021. https://epim.trust.org/application/velocity/_newgen/assets/TRFUkraineReport_ENG.pdf.

choices for consumers, some panelists maintained. A panelist who works for an NGO noted that restrictions related to COVID-19 led to citizens reducing their offline interaction—for instance, at public hearings. With the shift to online, many older people no longer participate in debates. Various television talk shows tend to be politically manipulated, featuring preset guests and manageable scenarios — with the exception of “Zvorotnyi Vidlik,” a Suspilne talk show.

Social networks and comments on news, especially political content, are hotbeds for hate speech and manipulation. Panelists noted a lack of adequate content moderation online and in social media platforms. One underscored an increase in hate speech, manipulations, and false information related to vaccination and quarantine measures, with people crushing each other in comments.

Indicator 14: Media and information producers engage with their audience’s needs.

Quality research is affordable only for the largest media. Exceptions include the Television Industry Committee, a trade association of the key oligarch-owned channels and media agencies that holds a regular television panel, and the Radio Committee, which manages radio measurement.

Smaller national channels, let alone regional broadcasters, do not have access to audience measurement. From 2017 to 2019, the National Association of Media conducted local television audience research for a dozen regional centers, partly with foreign donor support. Since then, due to sinking advertising revenues tied to the pandemic, regional broadcasters have been unable to afford even partial costs.

Online media have a variety of online tools, although the panelists had doubts about the extent to which media take feedback into account. Some panelists working with local media noticed progress in their use of measurement data to improve coverage or engage audience segments. One panelist noted that broadcasting and print media have started

to treat their online audiences more seriously, request search engine optimization for their websites and adapt storytelling, and promote their editors and key journalists as trustworthy ambassadors of the outlet. Still, these media companies lack skills to interpret the data obtained and tend to believe that they know audience needs better.

“Grassroots media are at a very embryonic level, and Ukrainians are not accustomed to supporting community media through donations or volunteering.”

Another panelist noticed several success stories from the regional media and an increase in content quality, consumers, and public trust. Chetverta Vlada, for example, conducted online polling of its loyal readers, thanks to a donor’s funding.

Media do interact within readers’ clubs, organize chats with loyal audiences, publish authors’ names, and refer to their sources. Panelists also noted that some media use feedback mechanisms, including live or online voting and quoting viewers’ comments and questions during talk shows. However, sometimes hosts use these vox populi tools to present public opinion with a manipulated filter, and pre-moderation is virtually absent, several panelists agreed.

Regarding corrections, most often media correct text on websites without additional remarks or apologies.

Other panelists called out insufficient strategic collaboration between content producers, civil society, and government. Donor-funded projects encourage productive cooperation between media and civil society, but the connections often end after a short-term project closes. In other cases, the government might announce some reforms, without any further details, and media do not follow up about progress. All stakeholders lack solution-oriented approaches to drive social changes.

Indicator 15: Community media provides information relevant for community engagement.

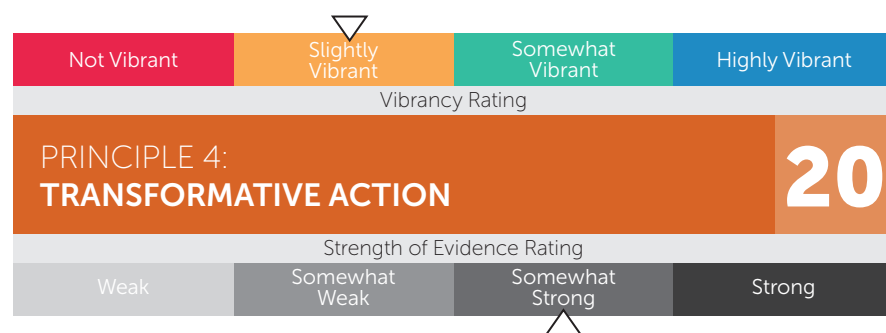
Half of the panelists refrained from scoring this indicator, stating that Ukraine does not have community media as conventionally defined. Moreover, Ukrainian legislation does not define community media.

There are about 50 municipal television stations across the country that continue to depend on local government, which funds their major expenses. Various local or thematic community initiatives in social networks or messengers are not transparent in terms of funding sources or income distribution, and they may lack editorial oversight and policy.

Some panelists said that journalists’ initiatives operating like NGOs might be considered community media by their mandates. They include nation-wide Hromadske TV and Hromadske Radio, along with national and regional investigative journalism centers. These entities are primarily supported by donor funding and a certain share of crowdfunding; however, they do not benefit from broad community support.

Ukraine has some media linked to religious and ethnic communities, but they are likely managed differently than standard community media. Grassroots media are at a very embryonic level, and Ukrainians are not accustomed to supporting community media through donations or volunteering.

Those panelists who did score community media assessed their mandate and performance slightly above average and gave below-average scores for the dissemination of false and harmful information, assuming that grassroots organizations are less professional.



The overall score for Principle 4 remained the same as it was in the 2021 VIBE study. The Ukrainian media landscape is diverse and pluralistic, but quality news sources do not attract extensive audiences. People

prefer staying within their information bubbles, consuming content and expressing opinions to prove themselves, making robust discussions rarer than floods of accusations. Panelists gave the lowest score to the utilization of information by individuals. The highest score was given to civil society contributions to vibrant information flows. The panelists were skeptical about the government sufficiently using quality information for decision-making and quality information supporting good governance and democracy. Ruling and opposition politicians frequently manipulate information in the public space.

Indicator 16: Information producers and distribution channels enable or encourage information sharing across ideological lines.

According to the panelists and numerous media monitoring data, Ukraine has many non-partisan and reliable news sources, especially online, some with audiences several-million strong. However, politically engaged media remain more popular. As the MCS findings show, the oligarch-owned 1+1 is both the most popular television channel (66 percent) and the most popular website (24 percent), second only to online news services. The more trustworthy Hromadske TV online and Liga.net each are consumed by just 6 percent. The pro-Kremlin Vesti is consumed online by 5 percent of respondents; its print version, 15 percent.³⁵

One panelist commented that people are divided by their electoral preferences and seek news at the biased sources that confirm their prejudices. In this way, the channels solidify their target groups rather than attract new audiences. Another panelist, referring to various surveys, said that Ukrainians tend to consume different television channels but do not trust any.

After the closure of the Medvedchuk channels, its audiences migrated partly to Nash, with a similar pro-Russian posture; partly to Ukraina; and partly to the absolutely contrary Pryamyi channel. According to the

³⁵ 2021 Media Consumption Survey, USAID-Internews, November 2021 https://internews.in.ua/wp-content/uploads/2021/11/USAID_Internews-Media-Consumption-Survey-2021_ENG.pdf

panelists, the Pryamyi audience likely watches pro-Kremlin media only out of dissatisfaction with the current government.

One panelist held out hope that information bubbles have not been fully cemented. Another did not see serious ideological confrontation inside Ukraine, maintaining that the hot polarization seen earlier between supporters and opponents of President Zelensky cooled when his approval rating began to decrease, and people seemingly returned to their traditional cynicism and distrusting politicians. The same panelist, however, pointed to more manipulative divides within the Russian propagandist narratives.

With COVID-19 restrictions, people found fewer opportunities for offline communication, but they do feel free to express themselves online, the panelists agreed. Very often debaters do not seek truth but rather stay within their comfortable spaces and express their positions with animosity to opponents. When quarantine restrictions increased, so did the share of virtual communication and sources, one panelist commented — a phenomenon that positively contributed to a higher-quality exchange of information than traditional media allow.

Indicator 17: Individuals use quality information to inform their actions.

Most panelists questioned whether people are guided primarily by quality information. The panelists said that Ukrainians tend to base their decisions on stereotypes and are susceptible to populism based on incorrect data and simple solutions, manipulations, and emotional headlines. One panelist explained that people fail to distinguish between reliable and manipulative information, and, judging by local elections, vote for scandal-prone, corrupt candidates — either because they disregard such information, or just do not care to learn.

The pandemic and controversy over vaccination showed how people easily accept information that could be detrimental to their health.

👂👂 **Another panelist, referring to various surveys, said that Ukrainians tend to consume different television channels but do not trust any.**

As of December 2021, only 37 percent of Ukrainians had obtained two doses of vaccines, which are widely available. Many people support conspiracy theories and trust manipulative news about vaccines and share “secret protocols” on COVID-19 treatment and titles of helpful drugs. An August 2021 poll³⁶ showed that 56 percent of adults did not plan to get vaccinated in the near future. The respondents primarily cited their beliefs that the vaccines have not been sufficiently examined or do not protect against COVID-19, that they are afraid of side effects, or that they disagree with state vaccination enforcement.

According to MCS,³⁷ the majority of Ukrainians had encountered the common disinformation narratives tested in the survey, and between a third to a half of respondents gave the ideas some credence. In particular, 68 percent of those surveyed heard that side effects of vaccines are more dangerous than COVID-19 itself, and 49 percent believed this to be true. Focus group participants evaluated narratives from the perspective of their own beliefs (e.g., confirmation bias). Those with “pro-Russian” views showed a greater tendency to find believable the news that criticizes the West and the Ukrainian government.

The participants that favor media critical of the European trajectory of the country indicated more trust in news reports about the “external governance” of the country.

Indicator 18: Civil society uses quality information to improve their communities.

Panelists praised genuine civil society organizations, as opposed to Ukraine’s many phony organizations, religious groups, and trade unions. Many influential organizations use and produce quality information,

³⁶ *At the beginning of “Delta”: what Ukrainians think about the coronavirus epidemic and what they expect from the health care system*, Ilko Kucheriv Foundation for Democratic Initiatives. September 13, 2021. <https://dif.org.ua/article/na-pochatku-delti-shcho-ukraintsi-dumayut-pro-epidemiyu-koronavirusu-ta-chogo-ochikuyut-vid-sistemi-okhoroni-zdorovya>

³⁷ *2021 Media Consumption Survey*, USAID-Internews. November 2021. https://internews.in.ua/wp-content/uploads/2021/11/USAID_Internews-Media-Consumption-Survey-2021_ENG.pdf

transparently share their findings and methodology of research, accompany reforms in Ukraine, carry out fact checking and media literacy activities, fight disinformation, and raise public awareness on important social issues. Civic participation in key decisions is evident but not sufficient for change.

According to the 2021 Disinformation Resilience Index for 10 Central and Eastern European countries,³⁸ which measures three areas of resilience to foreign-led disinformation (societal, legal, and institutional, and media and digital), Ukraine demonstrated the highest level of resilience, especially societal. All 10 countries suffer mostly in their institutional and legal framework fields, which are unable to effectively counter the foreign information threats.

With exception of the largest CSOs, medium-size and local CSOs seem to underestimate the importance of communication and information campaigns about their successful activities. Many lack budgets for media outreach, which is just as important as their project implementations. Moreover, they have to nurture their brand and public “faces” of their organizations, which in the long term will give them greater influence and presence.

Additionally, CSO’s limited public communication efforts undermine their results, as without media coverage, governmental officials tend to ignore their findings. One panelist confirmed that media do report on CSO activities, but large mainstream media prefer to contact politicians rather than civil society experts, even when those people were engaged in joint work with the government.

Regional media pay sufficient attention to leading CSOs, according to one panelist with regional expertise. Regional coalitions of the national Reanimation Package of Reforms Coalitions work effectively in some regions. The Rivne Council of Reforms is influential, providing comments, working with media, and building dialogue with the government.

Local CSOs are highly mistrusting of local municipal broadcasters. The

supervisory councils that local outlets are mandated to convene are often imposters, though this is hard to prove formally.

Indicator 19: Government uses quality information to make public policy decisions.

The government engages with civil society and media through press briefings, official websites, and governmental officials’ social media pages. One panelist confirmed some improvement in communications at the national government level, which she credited to regular staff training. She also pointed to the ruling party’s general trend of silencing alternative positions from voices inside the government, which has led to narrowed cooperation with the media.

Nonetheless, civil society experts are more involved in joint activities with the government and often present at the press briefings. The Center for Democracy and the Rule of Law has published a handbook that describes best practices of interaction between the civil society and the government across Ukraine from 2016 to 2020.³⁹

Regions have more closed-off authorities, according to one panelist, which drives local media to resort to silence or vague general comments. However, one panelist shared a positive example. Since the start of the pandemic, the Rivne regional state administration has been conducting daily briefings, with questions from journalists collected in advance, and officials replying to them live online. Part of the information from the state bodies may be incomplete or manipulated, though.

Government officials tend to announce their decisions without proper explanation or reference to evidence, and ruling and opposition politicians frequently manipulate information presented in the public space. Political discourse is steered by misinformation, including twisted or commissioned opinion polls, politically motivated statements, false interpretations, pulling facts out of context, and personal accusations.

Slovo I Dilo and VoxCheck fact-check Ukrainian politicians’ statements and promises. VoxCheck analysts also verify the statements that

38 *Disinformation Resilience Index in Central and Eastern Europe in 2021*, East Center. <https://east-center.org/wp-content/uploads/2021/09/DRI-report-2021.pdf>

39 https://cedem.org.ua/wp-content/uploads/2021/02/ZBIRNYK_ISTORIJA_2020.pdf

speakers make on Suspilne’s talk show “Zvorotnyi Vidlik.” As one panelist noted, televised debates are the easiest place to manipulate information, because even if the facts are monitored and corrected later, few viewers see such results.

Indicator 20: Information supports good governance and democratic rights.

The government does not respond appropriately to media reports revealing corruption and other violations by officials. Dismissals, policy changes, proper law-enforcement investigations, and court sentences are rare exceptions rather than the rule. The panelists provided several examples of such consequences: in one case, the court ruled to confiscate the illegal income of the opposition MP Illya Kiva; in another incident, the board chair of the Ukreximbank retired after the attack on the Skhemy crew in the bank.

The risk of media publishing violations constrains the number and severity of infractions, but the government does not punish its representatives — at least not publicly. At the time of publication, journalism investigations were raising public attention and indignation, but further attempts to hold the perpetrators accountable had failed.

One panelist said she is certain that media investigations of violations keep the government in check, and she believes journalist efforts are more effective at the national level. However, even at the city level, with Kyiv, she saw that media publications do not imply further consequences for the wrongdoers. The political sympathies of the voters often prevail over the facts of violations. The tension around appointment of a new member of the Suspilne supervisory board proves that politicians feel the influence of independent media. Significant effort went into the dozens of applications submitted from phony CSOs to win the appointment.

“ Government officials tend to announce their decisions without proper explanation or reference to evidence, and ruling and opposition politicians frequently manipulate information presented in the public space.

One panelist shared the example of a strong media campaign that managed to stop to development deal at the recreational Sovski Ponds in Kyiv. Another positive is the attention that quality media pay to elections, which does help make the processes more transparent. At the local level, governments have reacted to some local investigations, such as discrepancies in health care institutions and schools, that were more or less corrected. In the words of one panelist, the stronger civil society is, the more quality information publications contribute to positive changes in society. He added, though, that he does not feel that Ukraine’s civil society is strong enough yet to provide sufficient public pressure to drive change.

Another panelist noted that quality information on elections is available; for instance, from the OPORA civic network monitoring. People tend to vote for populists, though, who play on emotions with - unrealistic promises for a brighter future. Quality information on elections is drowned out by the noise of manipulated information and does not influence most

voters’ decisions, another panelist concluded.

The panel was convened on December 6-7, 2021. Given the ongoing conflict, IREX is treating this year’s study of Ukraine as a sensitive country and for security reasons is not publishing panelists’ names.

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This study is made possible by the support of the American People through the United States Agency for International Development (USAID). The opinions expressed herein are those of the panelists and other project researchers and do not necessarily reflect the views of USAID, the United States Government, or IREX.