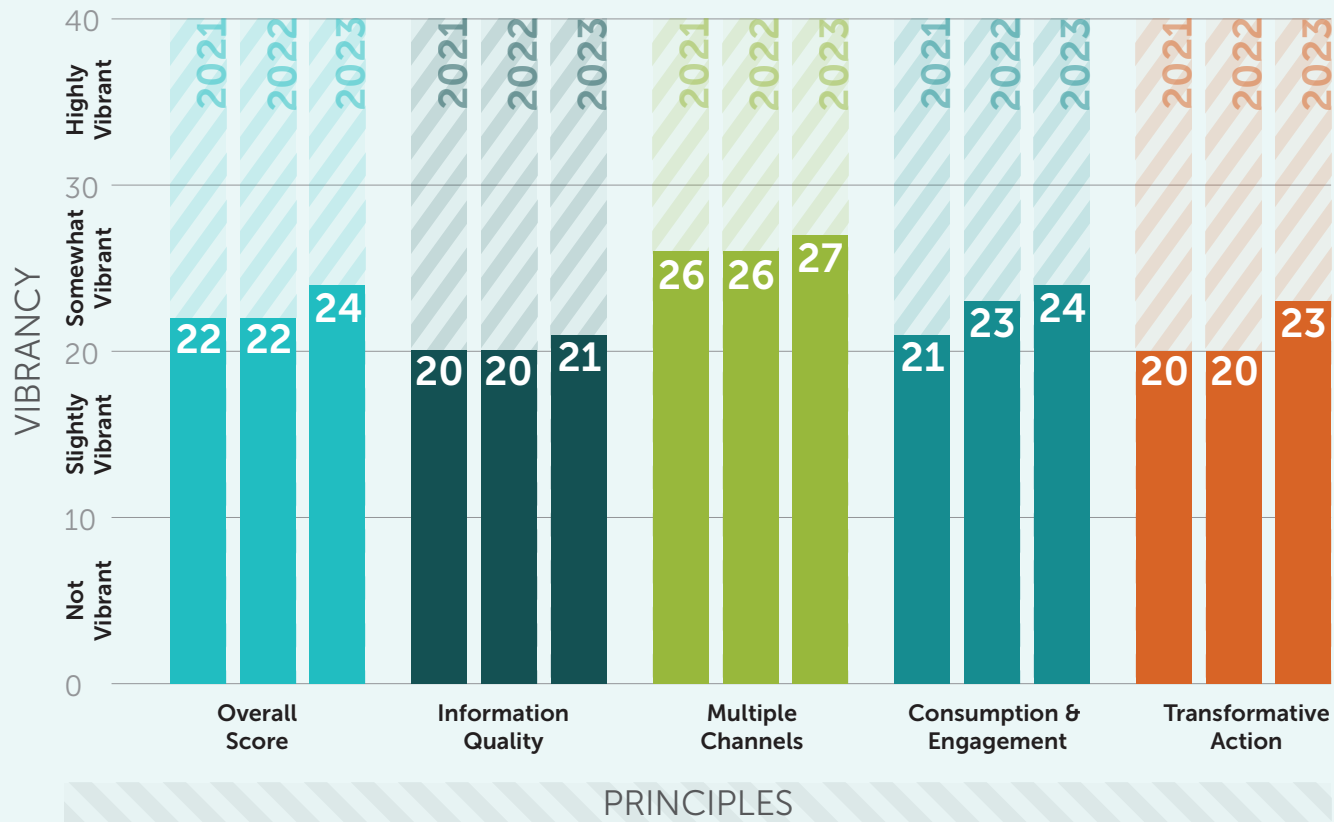


UKRAINE

Vibrant Information Barometer

2 0 2 3





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

24

In 2022, Ukraine amazed and inspired the world by mounting an extraordinary resistance to Russia's full-scale invasion. Within a year, the country withstood the aggression, recaptured more than half of the territory lost, garnered significant international support, and forged a large anti-Kremlin coalition.

As analyzed by Detector Media, particularly noteworthy in this war has been the swift access to information that helped Ukraine win the first battle. Russian propaganda about "liberation," "Nazis," and "military targets" was no match for thousands of amateur videos that showed the truth. Western public opinion could not ignore the suffering and heroism of the Ukrainian people, captured by global media powerhouses and humble smartphones alike. Ukrainians with internet access and smartphones documented and shared protests in the occupied cities, war crimes committed by occupiers, Russian weaponry being towed away by tractors, and interviews with Russian prisoners of war who were saying that they were heading to military exercises.

Martial law allowed the government to curb the media, including suspending operations and introducing wartime censorship. Although the restrictions introduced for the sake of national security were not as onerous as they could have been, the shutdown of three opposition channels from digital broadcasting without proper legal grounds sent a worrisome signal. Ukrainian journalists and media survived and adapted, and they are contributing to the victory. Media outlets focused on delivering vital information, and many journalists became war correspondents. Russian occupiers committed the lion's share of free speech violations. Journalists admit they self-censor to avoid compromising Ukraine's defenses,

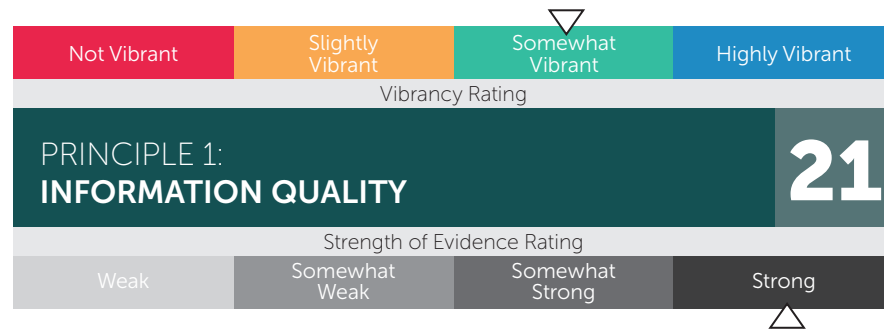
and society has become less tolerant of knee-jerk critics of the government.

Despite tremendous war-related challenges, VIBE principle scores saw modest improvement in this year's study compared to the 2022 edition. However, Principle 1 (information quality) receives this year's lowest score, 21, dragged down by invasion-related mal-information and economic crisis. Ukrainian media and other content creators managed to supply vital and prompt information to citizens, but malign Russian influence via social media remains a challenge.

With a score of 27, Principle 2 (plurality of channels) is the highest rated. Within it, access to public information is the only slightly decreased indicator since much public data is not accessible for security reasons. Government control over the mainstream television channels, via a 24-hour news broadcast to which several channels contribute, is partly justified by the need for a central, wartime information policy.

The score for Principle 3 (information consumption and engagement) improved slightly as media have withstood massive cyberattacks, and all stakeholders have invested in digital- and media-literacy efforts. Citizens' poor media-literacy and digital-security skills remained a major weakness, however, along with a lack of evidence-based debates.

Principle 4 (transformative action) also slightly improved, with panelists praising civil society contributions to a robust information flow, while giving their lowest marks to people's use of that information. Panelists also praised government efforts to inform society but warned it could use war as an excuse to become less accountable and transparent.



Principle 1's score has slightly improved since the 2022 VIBE study. However, the country's well-developed media infrastructure was either damaged by the Russian occupiers or undermined by war-related economic hardships. Hundreds of media closed. Russian air strikes on energy infrastructure led to substantial disruptions of electricity, the internet, and communications that affected both media consumption and media operation. The government carried out a unified information policy through the 24-hour United News Telethon, produced by major national TV channels and rebroadcast by all possible means. More than 70 percent of Ukrainians consume news from social networks, which are also the main source of Russian propaganda. The advertising market stalled at the onset of the invasion but started to revive in the fall.

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

Ukraine had a diversified and well-developed media infrastructure capable of delivering quality content before the war. Then the invasion brought occupation, damage, and disruptions, including widespread electricity cutoffs, interruptions in internet and mobile communications, and an economic crisis that caused more than 216 media outlets to suspend or relocate their operations. In formerly occupied regions, journalists returned to newsrooms and equipment damaged or looted by Russian soldiers. In the Kharkiv, Mykolaiv, and Kherson regions, broadcasting centers and towers were destroyed. The electricity supply was patchy, and artillery shelling was frequent.

In March 2022, the government obliged the major TV channels—private media groups 1+1, Inter, Starlight Media, and Ukraina (followed by November by My – Ukraina); the state parliamentary channel, Rada; and public broadcaster Suspilne—to broadcast the joint, 24-hour United News Telethon. As a result, television broadcasting has become less diversified and independent, a television journalist on the panel said.

The war accelerated the decline of print media due to a shrinking audience, scarce and expensive newsprint, disrupted distribution and delivery, and damaged printing houses, noted a panelist who is developing hyperlocal newsrooms. Still, there is adequate nationwide infrastructure for producing quality online and radio content.

According to the annual USAID-funded Internews Media Consumption Survey, 74 percent of Ukrainians get their news from social networks.¹ While 58 percent of respondents said they trust the media, trust increased only for local and regional online and television sources. The survey's focus group participants were split on how much information on the war they sought out. Many consulted more sources of news, to learn the latest developments as well as confirm other sources, while others eventually hit information fatigue and settled on two or three trusted news channels.

Another survey found declines in social media use across almost all the country, at least partly due to electricity and internet outages, with the largest drops in areas along the front line. As Facebook and, more dramatically, Instagram lost users in Ukraine in 2022, Telegram grew to become the most popular social network.² Although it has accounts for top national and local government officials and opinion leaders and is used by media as a source of information, Telegram is also one of the most prominent and dangerous tools for Russian propaganda.

Panelists named the Kyiv-Mohyla Academy, the Ukrainian Catholic University in Lviv, and the Institute of Journalism at Taras Shevchenko Kyiv National University as the best academic institutions for journalists,

1 2022 Media Consumption Survey, USAID-Internews. November 2022. https://internews.in.ua/wp-content/uploads/2022/11/USAID-Internews_Media-Consumption-Survey_2022_eng-1.pdf

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

while in many other regions outdated journalism teaching offers too little practical training. The number of informal donor-funded training courses, a lower priority during the war, has decreased for safety reasons. More generally, many universities' continued remote instruction has led to a decline in student learning and engagement, and men eligible for mobilization into the army cannot leave the country to attend courses abroad.

Panelists agreed that Ukraine's professional and reputable media tend to behave ethically, with a respect for facts, unlike many nonprofessional content producers on social media.

Serious professional consequences for misbehavior, such as sanctions by the National Security and Defense Council (NSDC) are meted out only for some pro-Russia media and journalists, but not uniformly and not immediately, a regional editor on the panel said. If *jeansa*—the covert practice of taking money to promote a person's or company's interest in the guise of news—was the Ukrainian media's most common infraction before the war, hate speech, counterpropaganda, military censorship, and self-censorship prevailed in 2022, he said.

To some extent, fear of reputational and professional consequences works as an ethical guardrail in Ukraine's professional media, but it is not a factor for amateur content producers, primarily on social networks, most of whom remain anonymous, another panelist said. A media lawyer on the panel said that media self-regulation is developing but professional consequences are lax, even as the [Commission on Journalistic Ethics](#) and the [Independent Media Council](#) regularly name those who breach ethical and other journalism standards.

Panelists said journalists scrutinize government actors to little avail, as some investigations might get attention but do not lead to serious consequences. Moreover, in the current atmosphere, the public sometimes sees criticism of those in power as abetting the Russian

forces. In the face of public outrage, journalists are compelled to apologize for mistakes or disclosures of sensitive military-related information, an investigative journalist from Kyiv said.

👂👂 **With streams of information and disinformation multiplying in the war, it has become more complicated to verify information promptly or at all, and there were instances when many professional media have inadvertently spread misinformation.**

The range of topics covered has narrowed, and niche and thematic reporting has dwindled as regional and local news, especially related to the war and invasion, dominate content. Most international news is related to the war and support for Ukraine.

The most reputable private media and the public broadcaster enjoy editorial independence, and panelists denied that it is inherent to the United Telethon.

Finally, a regional media outlet owner observed that although regional contextualization of coverage became more obvious due to location-related developments, a lot of content has clickbait features.

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

Most media and the government disseminate fact-based information. Nonprofessional content producers, such as anonymous Telegram channels and private interest groups in social networks and messaging apps, are the leading purveyors of intentionally misleading information.

In September 2022, the Institute of Mass Information (IMI) released its annual White List of popular national online media that uphold the highest journalistic standards.³ The nine outlets are largely the same as the 2021 list: [Suspilne](#), [Hromadske](#), [Liga](#), [Ukrainska Pravda \(UP\)](#), [Ukrinform](#), [Radio Free Europe/Radio Liberty](#), [Dzerkalo Tyzhnya](#), [Novoe Vremya \(NV\)](#), and [Babel](#).

³ Nine Online Media That Showed Highest Quality, IMI Monitoring. <https://imi.org.ua/monitorings/dev-yat-onlajn-media-shho-staly-najyakisnishymy-monitoryng-imi-i47998>

IMI monitoring found that Ukrainian online media most frequently got their information from the social media pages of officials or agencies, other social networks, and foreign media, except for Russian media.⁴

With streams of information and disinformation multiplying in the war, it has become more complicated to verify information promptly or at all, and there were instances when many professional media have inadvertently spread misinformation. That is a serious legal violation for broadcasters, which could face prosecution by the National Television and Radio Broadcasting Council (NTRBC).

A media literacy expert on the panel said representatives of the local or national government and various private Telegram channels had frequently reported on Ukrainian military successes well before official confirmation from the General Staff of the Armed Forces of Ukraine, only to have the stories partially or wholly debunked later.

In its immediate aftermath, the Russian invasion led to a drastic drop in online stories commissioned by businesspeople or politicians, but by the fall they had returned to as much as one-third or one-half their previous volume.⁵ No *jeansa* was spotted in IMI's White List media.

“ Ukrainians trust the government, even though it often hides or restricts access to certain information.

Ukrainians trust the government, even though it often hides or restricts access to certain information. Several times, miscommunication among state bodies has resulted in contradictory public messages, which were clarified later. The state makes its own efforts to debunk disinformation—for instance, with the NSDC's [Center for Countering Disinformation](#). One panelist said civil servants disseminate much more accurate information than elected officials and politicians.

News organizations hold officials accountable by pointing out the rare

4 <https://imi.org.ua/monitorings/dzherela-onlajn-media-ofitsijni-osib-neofitsijni-akaunty-ta-inozemni-media-doslidzhennya-imi-i48039>

5 <https://imi.org.ua/monitorings/dzhynsa-v-onlajn-media-monitoryngovyj-zvit-veresen-2022-roku-i48017>

cases of misinformation spread by government actors—but more often by publicizing information that the government would like to keep quiet.

Ukraine has strong fact-checking agencies that debunk disinformation, and simple fact-checking tools and manuals are available online, including [StopFake](#), [VoxCheck](#), Detector Media, Bez Brekhni, Po Toi Bik Novyn, Texty, NotaEnota, Gwara Media, and Brekhunets. [StopFake and VoxCheck](#) are local partners in a Facebook program launched in 2020 to counter disinformation.

In the Internews survey, one-fourth of focus group respondents were aware of services that can be used to verify content.⁶ Around a third said they had used fact-checkers and information resources. Among the listed resources, respondents most often recognized StopFake and Detector Media, while most others were almost unknown to the participants.

In a September report, the Digital Security Lab (DSL), an expert and advocacy group, said Ukrainian content and social media accounts were more frequently being blocked.⁷ Previously, the primary targets had been the accounts of journalists and public figures with large audiences on Facebook, but now anyone who writes about Russian war crimes can be blocked. After the Russians were driven out of the Kyiv region and their atrocities

exposed, there was a massive blocking of posts, accounts, and even the hashtags #buchamassacre and #russianwarcrimes. Meta blamed issues with its algorithms, unblocked most of the posts, and temporarily changed its policy on hate speech for Ukraine. After human rights groups in April asked Meta to improve principles of content moderation for military conflicts, experts found that some content related to Russian war crimes was still blocked. For example, even after an instance of Russians shelling civilians, the popular hashtag #russiaisaterroriststate was hidden in an Instagram search.

6 *2022 Media Consumption Survey*, USAID-Internews. November 2022. https://internews.in.ua/wp-content/uploads/2022/11/USAID-Internews_Media-Consumption-Survey_2022_eng-1.pdf

7 *Report on Security During the War*. Digital Security Lab. September 29, 2022. <https://dslua.org/publications/zvit-bezpeka-v-umovah-viyny/>

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

Russia has long run disinformation campaigns and information operations to discredit Ukrainian values, institutions, and history, as well as to undermine the country's aspirations to join the EU and NATO and the Ukrainian people's trust in their government. It has built networks inside Ukraine through nominally Ukrainian media, proxy politicians, and influence agents among pro-Russia, nonprofessional content creators.

Russian media and social networks have been blocked in Ukraine since 2017. Subsequently, in 2021 officials have shut down or confiscated several domestic, pro-Russia media outlets and sanctioned them or their owners, including pro-Russia television channels 112 Ukraine, NewsOne, and ZIK, associated with close Putin ally Viktor Medvedchuk.

According to a report by the Atlantic Council's Digital Forensic Research Lab, from the start of the war, the Kremlin aimed to demoralize Ukrainian audiences and destroy their will to fight.⁸ Early gambits included so-called deepfake videos giving the impression that President Volodymyr Zelenskyy had fled the country and had urged Ukraine's troops to lay down their arms. Then came the use of forged documents to embarrass Ukrainian officials, as well as fake marketplaces on the dark web suggesting that Ukraine was reselling Western weaponry for profit. Pro-Kremlin narratives also sowed fear and intimidation to make Ukrainians believe Russia was unbeatable and Ukraine's neighbors were untrustworthy.

Despite blocking the major disinformation sources, such as clearly pro-Russia television channels and websites, in 2022 Ukraine faced Russian disinformation via instant messengers and social networks that do little or no content moderation as well as manipulation of popular Ukrainian news aggregators on social media, which do not verify information, a data journalist on the panel said. None has faced any consequences. The Security Service of Ukraine has started to publish lists of Russian Telegram channels, but they include only a small share of those

identified by Ukrainian nongovernmental organizations (NGOs), she said.

Russian propaganda has been especially active in the occupied territories and on social networks, one panelist noted. In a November report, data journalism agency Texty mapped 120 Telegram channels created by Russian information troops starting in the first weeks of the invasion.⁹ Texty claims at least half were part of a coordinated effort and obviously managed from the same location. They mimicked local news feeds to attract real subscribers, but their main goal was to spread Kremlin rhetoric and feign local support for the occupiers. As the Russian army retreated or slowed its advances, the proliferation of new channels also slowed, reflecting the shifting priorities of the Russian military effort. Since early summer 2022, active Telegram channels have been running only in the Kherson and Zaporizhzhia regions.

According to the Digital Security Lab report, many new Facebook and Instagram pages launched advertising campaigns targeted at Russian speakers in southern and eastern Ukraine, with fake stories on the brutality of the Ukrainian army.¹⁰

"Today we can find more than 100 Telegram channels targeting Ukrainian audiences managed from Russia. They're synchronized with special operations of the Russian special services in producing waves of mal-information aimed to fuel panic and discord among Ukrainians and distrust of the Ukrainian government. They include manipulations and hate speech calling the Ukrainian army fascists and accusing it of crimes against civilians," an investigative reporter on the panel said.

Ukrainian government agencies contribute to pro-Ukrainian propaganda and use hate speech to rouse people's fighting spirit and inspire hatred of the aggressor. Ukrainians view this as patriotism, defend it by pointing to the Russian army's horrific war crimes, and do not accuse officials of playing on their emotions. But some manipulative or ambivalent

8 <https://www.atlanticcouncil.org/in-depth-research-reports/report/undermining-ukraine/>

9 Telegram Occupation How Russia Wanted to Breed a Media Monster but Ended up with a Paper Tiger. <https://texty.org.ua/projects/108161/telegram-occupation-how-russia-wanted-breed-media-monster-ended-paper-tiger/>

10 Report on Security During the War. Digital Security Lab. September 29, 2022. <https://dslua.org/publications/zvit-bezpeka-v-umovah-viyny/>

statements by Ukrainian authorities or politicians have caused heated public discussions, sometimes forcing them to provide explanations or details.

Although the public countenances hate speech toward Russia in both professional media and social media due to war crimes, Ukrainian media do not disseminate mal-information. Telegram is awash in anonymous channels disseminating content intended to harm. Ukraine's Security Service has blocked dozens of these kinds of channels, but it is a drop in the bucket. The cyber police have launched a Telegram bot to take complaints from the public about inappropriate social media channels and tell people how to block them. Often, law-enforcement bodies have managed to block these channels by identifying and prosecuting their operators if they are in Ukraine.

Panelists reiterated that Facebook promptly blocks and deletes posts about war crimes committed by the Russian occupiers but allows hate speech toward Ukrainians and other nations. Media self-regulation is weak, and the platforms rely on automation, artificial intelligence, and algorithms, which tend to miss a lot, to prevent mal-information, a television journalist on the panel said.

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

Since the start of the invasion, the Russian language has all but disappeared from Ukraine's media space. The TAVR Media company has renamed its Russkoe Radio to Radio Bayraktar. Megogo, the largest online movie and video platform, refuses to show Russian movies. Many TV shows that used to be presented in Russian or a combination of Russian and Ukrainian are now produced solely in Ukrainian, while others are being dubbed into Ukrainian.

July 2022 was the deadline for online publications to begin posting their content in the Ukrainian language, under a wider law passed three years earlier. The only Russian-language content that remains in Ukrainian media are programs and films ostensibly created to counter propaganda and targeted at Russians, such as *Civil Defense* and *Anti-*

Zombie, produced by Starlight Media.¹¹ The government also supports the Russian-language TV channels FreeDom and Dom, based in Kyiv but intended for Russian speakers in the occupied territories and elsewhere.

Panelists said the media have not presented a wide range of ideologies and perspectives during the war, especially with television news centralized by the Telethon, but amateur content producers offer many alternatives.

Although the panel's media literacy expert said that generally there are media channels for different ethnic groups and there are formats adapted for people with disabilities, there was no consensus throughout the panel on that point. News about marginalized groups might be missing from mainstream media because news managers do not believe there is a sufficient audience for it, a regional media owner said.

The views of the marginalized pro-Russia community, parishioners of the Moscow Patriarchate's Ukrainian Orthodox Church, and Ukrainians who moved to Russia by choice or force are almost absent in the media, the panel's data journalist said.

An IMI survey of 10 national online media in August and September 2022 found that quoted experts were several times more likely to be men than women.¹² Female experts commented most often on the war and military topics (29 percent)—possibly because many women work as press officers for military or defense agencies—and foreign policy (21 percent). Women experts had little presence in business, economics, human rights, and science news. Women were the central figures in 30 percent of stories.

Although Ukraine's media sector traditionally employs more women than men, there are more men in technical and managerial positions—but not because of overt discrimination, a regional editor on the panel said.

11 <https://detector.media/rinok/article/206703/2023-01-05-desyat-nayvazhlyvishykh-podiy-mediarynku-u-2022-rotsi/>

12 <https://imi.org.ua/monitorings/hendernyj-balans>

The gender balance in journalism is much better than in other industries in Ukraine, but among nonprofessional content producers, there is a clear distinction between female (lifestyle, fashion, nutrition) and male (politics, money, technology) realms, the data journalist said.

Indicator 5: Content production is sufficiently resourced.

The war throttled the media industry's finances. After crashing, the advertising market started a cautious rebound in April, reaching 25 percent to 30 percent of its prewar volume by the end of the summer. The situation was a bit better for national media than for local or specialized ones.

During the first three months of the war, several dozen TV channels and radio stations, and several hundred newspapers and online media, closed. Some outlets survived, thanks to their owners' funds or grants from international donors, but even wealthy media owners have seen their fortunes suffer during the war and cut staff and salaries. Signs of a recovery appeared in the fall.

According to the All-Ukrainian Advertising Coalition, the 2022 advertising market shrank by 63 percent from 2021.¹³ The value of television advertising fell by 81 percent to UAH 2.6 billion (\$69.8 million), print advertising by 79 percent to UAH 221 million (\$5.9 million), and radio by 61 percent to UAH 333 million (\$8.9 million). Advertising in online media dropped by 41 percent to UAH 7.19 billion (\$193 million).

The television advertising market began a gradual recovery in August, and by the fall it had reached almost one-third of pre-invasion volumes. Pharmaceutical companies returned first and now dominate in broadcasting. The space for television advertising has also shrunk because the main channels are involved in the advertising-free Telethon-while one of the four largest television groups, Rinat Akhmetov's Media Grupa Ukraina--left the market in July.

Given the wartime uncertainty, the ad coalition did not provide its usual forecast for the coming calendar year (2022), but it optimistically expects

further recovery as Nielsen television panels and ratings-based ad sales resume. It also predicts the television ad market will grow by 40 percent, thanks to the return of spots by fast-moving consumer goods companies, and hopes for a 30 percent rise in product placements in programs and other media products.

The last quarter of 2022 gave reason for cautious optimism for radio, with the return of advertisers in pharmaceuticals, trading, finance, gaming, and mobile operators. Demand for regional advertising remains, boosting ad sales for some radio stations in western Ukraine to 2021 volumes.

A co-owner and executive in online and print media on the panel said his media outlets had regained 80 percent of their advertising volumes and that the strongest and most professional media will survive. Still, many local advertisers have reoriented their budgets toward advertising with Google and Meta. Advertising placement is not politicized, especially because political advertising, which gets placed in loyal media, has shut down during the war.

For the 2023 calendar year, the government has allocated almost UAH 2 billion (\$53.7 million) to produce television content for state purposes, which could include Telethon, international channels FreeDom and Dom, and Ukrinform, the state information agency.¹⁴ Major television groups involved in Telethon lost the chance to sell advertising on their most-watched, flagship channels. Later, two of them established duplicate channels where they could run ad spots.

Previous media experiments to create new sources of revenue, including readers' clubs and crowdfunding, have been sidelined, as many people can no longer afford them or prefer to send their donations to military or humanitarian efforts.

A media-literacy expert on the panel lamented the chronic underfunding of the public broadcaster, Suspilne, since 2017. In 2022, the state budget provided UAH 1.87 billion (\$233.5 million), which was UAH 526 million

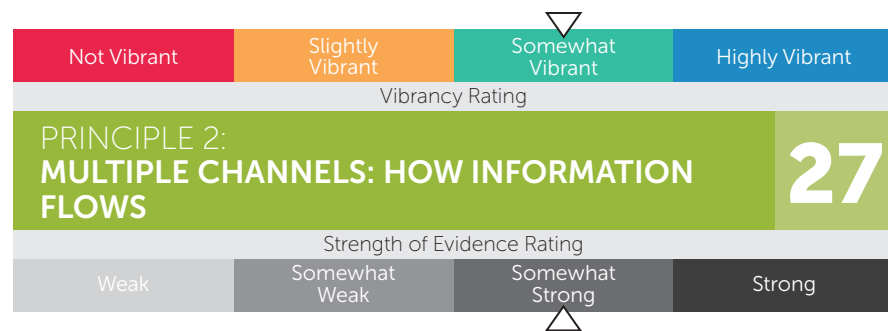
13 <https://vrk.org.ua/images/AdVolume2022.pdf>

14 <https://detector.media/infospace/article/204414/2022-11-01-u-byudzheti-na-2023-rik-na-14-mlrd-grn-zbilshylos-finansuvannya-inomovlennya-marafonu-ta-ukrinformu/>

(\$14.12 million) below the level required by law (no less than 0.2 percent of the previous year’s state expenditures). For calendar year 2023, the state budget allocates UAH 1.5 billion (\$40.26 million), even less than it had in 2022.¹⁵

Government funding of media and government contracts for coverage of official activities remain, but their distribution is opaque and could be distorting the market, a media lawyer on the panel said. An effort to reform the privatization of state and municipal media has not ended up securing reliable sources of revenue for them, and many have had to shut down, she said.

Journalists’ salaries vary widely, depending on the type and location of media. Television journalists may earn UAH 50,000 to UAH 80,000 (\$1,342 to \$2,147) per month, while regional journalists may make one-tenth of that. For context, the average monthly salary in Ukraine was UAH 14,857 (\$400) in 2022.



Overall, Principle 2’s high score remained the same as in the 2022 VIBE study. Information and communications technology (ICT) infrastructure has been damaged in the war, and access to information has been further hindered by electricity and communications outages. The lion’s share of free speech violations were committed by the Russian occupiers, though journalists self-censor for patriotic reasons.

The indicator on access to information is the only one to decrease,

15 https://stv_detector.media/suspilna-korporatsiya/read/7449/2022-09-14-u-proiekti-derzhbyudzhetu-na-2023-rik-na-suspilne-vydilyly-15-mlrd-grn/

with panelists citing groundless denials of access to certain public information. Another key issue within this principle is government control over mainstream television channels through the United News Telethon. Though this extraordinary measure is warranted by the need for a unified information policy during the war, it raises questions about the independence of the news media, narrows the range of voices and views in major media, and could undermine future democratic processes in Ukraine. Three opposition channels have been switched off digital broadcasting with no legal basis. On the other hand, the government has refrained from introducing true wartime censorship, which is permitted under the state of martial law declared on the day of the invasion.

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

Ukrainian law protects the freedoms of speech and press, in line with European norms. A panelist with a law background said that sometimes journalists suffer setbacks in court, but those with good cases stand a chance to be vindicated in a higher court. Moreover, even if all appeals at the national level fail, Ukrainian journalists can still turn to the European Court of Human Rights (ECHR). Libel law has been a civil law issue since 2001. Since then, all 11 attempts of legislators to criminalize libel have failed.

Ukrainian law protects journalists’ sources, but the guarantees do not go far enough. A media lawyer on the panel recalled the 2020 ECHR ruling in the case of *Sedletska versus Ukraine*; this case supported journalists in not disclosing their sources, establishing a precedent that helped to win a number of similar cases in Ukraine’s court system. Proper investigations and prosecutions of perpetrators of crimes that prevent journalists from performing their professional duties remains an unresolved issue which needs to be systematically addressed after the end of the war.

The government does not attempt to restrict the freedoms of speech and press, but some journalists are wary of a law adopted in December 2022 that allows the National Television and Radio Broadcasting Council (NTRBC) to block online media without a court hearing, “issue binding

orders to the editorial offices of media, regulate the work of cable and online television operators, and cancel the registration of print media,” among other things.¹⁶ The lawyer panelist saw no issues with the law itself but said much would depend on its application and the independence of the NTRBC.

“Even with introduction of martial law upon the full-scale invasion, direct wartime censorship has not been applied by the government,” stressed a media lawyer. Panelists agreed that some wartime restrictions were legitimate, including requiring accreditation for journalists traveling to front-line areas, banning the publication of photos or videos of particularly recognizable places after recent shelling or firing, and the closure of public registers, such as for business licenses, land titling, and politicians’ assets disclosures.¹⁷ Some panelists noted a few instances of conflict between journalists and top military authorities over access to recently liberated Kherson, frequent interference by territorial defense units who seem not to know journalists’ rights to cover the conflict and are skeptical of their credentials, an official preference for foreign journalists to cover shooting and destruction, and accusations that some journalists are supporting the enemy.

The government has blocked Russian media and social networks through ICT providers in Ukraine for years, but consumers can access them via proxy servers. In addition, the opposition-linked Channel 5, Pryamyi Channel, and Espresso were kicked off the digital airwaves in April, after having been excluded from the Telethon for months. No government agency took responsibility for the action.

More Ukrainian journalists are censoring their work during the war. “Colleagues avoid publishing information about corruption or misdeeds of the Ukrainian military or volunteers for fear that Russian propaganda

will use it to disgrace Ukraine internationally and thus diminish support,” a freelance investigative journalist on the panel said. Those articles also might get a journalist blowback from the public, including insults, cyberattacks, and intimidation to disclose sources, she said. However, a media lawyer on the panel said well-documented probes into actions of corrupt officials and well-founded criticism of the government get a lot of public support.

In a poll of 229 journalists in December 2022 by IMI, 43.4 percent said freedom of speech had declined in Ukraine, 21 percent saw no change, and 5.3 percent said it had improved.¹⁸ They cited major issues as Russian aggression and its consequences for the media and journalists (82.5 percent), problems with access to information and the shutdown of public registers (63.2 percent), problems with access to facilities and denials of accreditation (57.5 percent), restrictions on publishing certain content under martial law (48.2 percent), and such cybercrimes as DDoS attacks and phishing (38.6 percent).

“The only sources of information from Ukraine in the occupied territories were social networks and radio, panelists said.”

Although violence against journalists has spiked during the war, most violations have been by the Russian army in occupied territories. Reporting is far safer in territory under the control of Ukraine’s government. The panelists said Ukrainian journalists

cannot work in the occupied territories.

In 2022, the IMI documented 567 violations of press freedom in Ukraine, 470 of them by the Russian soldiers, who killed, kidnapped, and shot journalists; destroyed TV towers; attacked newsrooms; committed cybercrimes; switched off Ukrainian broadcasting; and misappropriated media brands and launched fakes of local publications and channels to spread Russian propaganda.¹⁹ Eight media professionals were killed

¹⁶ <https://www.ifj.org/media-centre/news/detail/category/press-releases/article/ukraine-ifj-calls-on-the-government-to-revise-new-media-law.html>

¹⁷ <https://zn.ua/eng/how-the-closure-of-registries-affects-business-media-and-ngos.html>

¹⁸ More than 43 percent of journalists believe that freedom of speech declined in Ukraine, IMI’s poll. <https://imi.org.ua/monitorings/ponad-43-zhurnalistiv-vvazhayut-shho-stan-svobody-slova-v-ukrayini-pogirshyvsya-opytuvannya-imi-i50582>

¹⁹ IMI documented 567 free speech violations in 2022 in Ukraine, with more than 80 percent committed by Russia. <https://imi.org.ua/news/567-porushen-svobody-slova-imi-zafiksuvav-u-2022-rotsi-v-ukrayini-ponad-80-vchynyla-rosiya-i50050>

on the job, while 35 journalists died at the front line as soldiers or from Russian shelling while not working.

Of the 97 violations that the IMI attributed to Ukrainian actors—fewer than half the number in each of the previous two years—32 were cases of journalists prevented from carrying out their professional activities, 21 were denials of access to public information, and 21 were cybercrimes. A major violation was switching off the Pryamyi, Channel 5, and Espresso television channels from the digital broadcasting network.

On March 17, after the NDSC warned that Russian subversive groups were posing as Western correspondents, many people became suspicious of all journalists.

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

Before the invasion, Ukraine's ICT infrastructure was adequate—better developed in the larger cities, and poorer in smaller towns and rural areas with a narrower choice of media. Legal or social norms do not preclude any groups from access. Internet governance and regulation of the digital space have provided open and equal access to users and content producers. Most media do not provide adaptations for people with hearing and sight disabilities.

In Russia's attack and occupation, the infrastructure was partially ruined, even as delivering news was sometimes crucial to saving lives. Most technical infrastructure—including television towers, mobile operators' equipment, and newsroom equipment—were devastated in the occupied territories. People in the liberated Kharkiv and Kherson regions did not have access to the internet and telecommunications. The only sources of information from Ukraine in the occupied territories were social networks and radio, panelists said.

In May, NetBlocks, which monitors internet service disruptions, said Russia had rerouted internet traffic in the occupied Kherson region

through Russian communications infrastructure.²⁰ After Russia's attack on Ukraine's energy infrastructure in November, internet service dropped by 33 percent across the country, according to NetBlocks.

Mainstream television channels that had encoded their signals and became paid services in 2021 became freely available via satellites on March 7, 2022. The government also ensured access to the Telethon channels via all alternative means, including over-the-top (internet based) platforms.

About 80 percent of Ukrainians use the internet, and half have smartphones.²¹ Despite all the hardships, people with smartphones have shared real-time reports and posted photos and videos of the true situation across Ukraine, playing a tremendous role in covering the war accurately.

Newage Agency estimated that in May and June 2022, 19 million, or about 86 percent, of the 22.1 million Ukrainians aged 14 to 70 living in unoccupied territories used the internet.²²

By December 2022, almost half of Ukraine's energy systems had been damaged by 126 missile and drone attacks, disrupting telecommunications and power, water, and heating supplies all over the country.²³ Missile attacks on energy and other civilian infrastructure stepped up in October 2022, as winter approached. "Once the blackout in districts on the left bank of Kyiv lasted for about 24 hours, and to get news from the internet, one would have to travel to another part of the city," said a panelist from Kyiv. Other locations have reportedly endured months without electricity.

20 <https://www.reuters.com/world/europe/russia-reroutes-internet-traffic-occupied-ukraine-its-infrastructure-2022-05-02/>

21 Usage of Internet by Ukrainians: Results of Telephone Poll Conducted May 13–18, 2022. Kyiv International Institute of Sociology. <https://www.kiis.com.ua/?lang=ukr&cat=reports&id=1115&page=1>

22 Digital in Ukraine 2022. Trends of Ukrainian Internet and Influence of War. <https://cases.media/article/digital-v-ukrayini-2022-trendi-ukrayinskogo-internetu-ta-vpliv-viini>

23 <https://www.ukrinform.ua/rubric-economy/3617307-majze-polovina-energosisitemi-ukraini-vivedena-z-ladu-vnaslidok-raketnih-udariv-rf-smigal.html>

Foreign governments and international donors sent equipment for use in Ukraine's energy and power facilities to support vital public utilities. The government, along with energy and telecommunications companies, and residents made huge efforts to adapt. Ukrainian mobile operators introduced "national roaming," allowing users to connect to other providers' networks for free, and they are quickly restoring their facilities in the liberated territories. Broadband internet provider Ukrtelecom, which operates in all government-controlled regions of Ukraine, said in late February 2023 that service had been restored to 87 percent of the settlements in its area.

Through public, private, and foreign efforts, tens of thousands of Starlink satellite terminals have been brought to Ukraine, originally for military communications but later also to support internet access in public spaces. However, most people cannot afford the system's setup costs or its monthly fees for personal use. Many Ukrainian businesses bought generators or portable power stations to secure an electricity supply and internet service.

Along with the martial law measures on a unified information policy and informational security, the Zelenskyy administration also decreed in March that Zeonbud, a private digital broadcaster with opaque ownership, would be subordinate to the state-owned Broadcasting, Radiocommunications, and Television Concern, which owns all transmitter facilities.²⁴ Given Russia's strikes on TV and radio towers, Zeonbud was tasked with various duties to ensure broadcasting continued, including backup digital transmission with the involvement of an alternative satellite operator.

Indicator 8: There are appropriate channels for government information.

Before the invasion, Ukraine had a well-developed and resourced system of access to public information. The country's 2011 law on access to public information and subsequent amendments is one of the most

advanced in the world. In 2016, the Supreme Administrative Court issued helpful guidance and explanations for lower courts' approach to the law, noted the panel's media lawyer.

Another civil society victory over the past decade was the opening up of registers on companies' beneficial owners, real estate titles, officials' asset declarations, court cases, and the electronic public procurement system. Most of these registers were closed during the war to stop the enemy or its allies from making use of the information. "State decisions and budgets became less transparent and accountable. A number of data sets at a [united open data portal](#) and their updates have become scarce for no reason," the data journalist panelist said. A civil society activist on the panel said journalists complain that restrictions on certain data, such as asset declarations of public officials, had a thin justification. It is also crucial to have access to systematized information on foreign financial aid to Ukraine and how it is being used in order to prevent abuse.

Many local authorities have begun to abuse wartime restrictions and use martial law as an excuse to refuse to provide information. "Lawyers have a lot of work, to [once again help develop court practice] and advocate for opening public registers. Civil society has plenty of tools and opportunities to [restore the] level of information openness to before the invasion," the lawyer said.

In early March 2022, the military's General Staff listed the types of information whose release could compromise Ukraine's defense. These restrictions have been interpreted broadly, with results ranging from close cooperation with and exclusive access for certain reporters to special operations at the front to a ban on taking photos or video, enforced by camera confiscations, deep in Ukraine-controlled regions.²⁵

On March 27, the parliament criminalized the publication of unofficial data on the movements of weapons or troops. Later, it also banned immediate reporting on the effects of air strikes, lest the enemy use these open sources to correct its aim in real time.

24 <https://detector.media/infospace/article/197677/2022-03-20-rnbo-pidporyadkuvala-tsyfrove-telebachennya-derzhavi-ta-zobovyzala-telekanaly-translyuvaty-spilnyy-marafon/>

25 <https://www.dw.com/uk/yak-i-chomu-ukrainska-vlada-obmezhuie-svobodu-zmi-na-viini/a-61438886>

Panelists said a few military and law-enforcement press offices were particularly wary of journalists in 2022. In one high-profile scandal, several Ukrainian and foreign media, including CNN and Sky News, were denied accreditation to enter and cover the recently liberated Kherson.²⁶

Citizens are not intimidated or threatened for seeking public information, visiting official websites, meeting officials in person, or filing information requests. No groups are excluded from exercising this right, and civil society organizations actively pursue public information.

Most government agencies have a press office or press secretary, who too often function more as public relations representatives or advocates than as conduits for information, especially if the information could be damaging to their agencies. Some press offices maintain blacklists of journalists who criticize them and “whitelists” of those who report only positive information, said a freelance investigative reporter on the panel.

Indicator 9: There are diverse channels for information flow.

Ukraine has a law against monopoly ownership of broadcast media, but the country’s Anti-Monopoly Committee has admitted that it cannot measure the country’s television market or determine relevant shares of television companies, thus making it challenging to identify potential monopolies.

Since 2021, Ukrainian law has required the disclosure of beneficial owners of any legal entities, but that leaves out nonprofessional content producers. In addition, the owners of many websites and online media

²⁶ How the Press Service of the United Command “South” for a Long Time and Systematically Doesn’t Allow Journalists to Work. Other Parts of Front Do Not Have Similar Problems. <https://texty.org.ua/articles/108271/pres-sluzhba-ok-pivden-davno-i-systemno-ne-daye-pracyuvaty-zhurnalistam-na-inshyh-chastynah-frontu-podibnyh-problem-nemaye/>

are anonymous, a television journalist on the panel said, and a 2015 law on disclosure of broadcast media ownership has failed to unmask owners who hide behind proxies.

Internet providers and cable television operators are not monopolized.

Before the 2022 invasion, the four largest oligarch-owned television groups attracted more than 75 percent of Ukraine’s television audience. Those groups are Viktor Pinchuk’s Starlight Media (the ICTV, STB, and Novyi channels); Ihor Kolomoyskyi’s 1+1 Media (six channels, including 1+1; the UNIAN news agency; and TSN.ua, one of the most popular online media outlets); Rinat Akhmetov’s Media Grupa Ukraina (most notably the Ukraina and Ukraina 24 channels, and Segodnya.ua); and Inter Media Group, owned by Dmytro Firtash and Serhiy Levochkin.

In July 2022, Akhmetov, the richest Ukrainian oligarch, shut down his media businesses—10 TV channels, a satellite TV platform, and an over-the-top provider—which employed 4,000 people. In October, 200 former employees of Akhmetov’s companies launched the My – Ukraina (We Are Ukraine) TV channel, which promptly obtained digital and satellite broadcasting licenses from the National Television and Radio Broadcasting Council without a competition. In November 2022, the new venture became one of the producers of the United News Telethon and in early 2023 is eligible to receive funds from the state budget. Without speculating on who was behind the deal, skeptics point out that the UAH 11 million to 19 million (\$295,000 to \$510,000) estimated monthly operating costs are steep for employee-owners, and longtime observers suspect the president’s office had a hand in the channel’s quick licensing procedure and integration into the Telethon.

Left out of the Telethon were Channel 5, Pryamyi Channel, and Espresso, all linked to the opposition European Solidarity Party. Instead, the

“Colleagues avoid publishing information about corruption or misdeeds of the Ukrainian military or volunteers for fear that Russian propaganda will use it to disgrace Ukraine internationally and thus diminish support,” a freelance investigative journalist on the panel said.

three channels ran their own marathons and partly rebroadcast the telethon—until April 4, when they were kicked off the digital airwaves. No state agency has taken responsibility for the decision, which the channels have appealed unsuccessfully to various national bodies, and even finally to the EU. Meanwhile, the state-owned Rada TV channel uses their frequencies, while the operator of the digital television network, Zeonbud, continues to charge them fees for their place in the multiplex. The three channels continue to broadcast online and via satellite.

The panel’s media lawyer said this case is dangerous, a short step to manual control of the media where access to airwaves can be cut at the flip of a switch. Although it is not clear who the defendant would be, the case could be appropriate for the ECHR.

Hindered by the war, the NTRBC did not run competitions when it awarded licenses for the frequencies freed up by the prewar shutdown of channels suspected to be owned by close Putin ally Viktor Medvedchuk and the July switch-off of Akhmetov’s channels.²⁷ It gave temporary licenses in 13 regions to several-dozen local companies, as well as the state-owned Armiya FM – Military Radio and channels of the public broadcaster. It also relicensed two media groups to launch ICTV2 and 1+1 Ukraine channels, duplicating those companies’ flagship channels, which were tied up with the Telethon, enabling them to earn advertising revenue.

Launching and promoting online media is easy and accessible. The cases of Trukha (a Telegram channel that went from 100,000 to 2 million subscribers in 2022) and Lachen (another Telegram channel by a 23-year-old man that has gained more than 750,000 subscribers since January 2022) show how quickly nonprofessional channels that distribute sensationalistic content with frequent updates can win hundreds of thousands of subscribers, the data journalist said.

These issues might be better regulated under a new law coming into force 2023 that broadens the NTRBC’s authority to oversee all

27 <https://detector.media/monitoring/article/206393/2022-12-27-voiennyy-chas-novi-kanaly-y-rozpodil-mists-u-tsyfrovyykh-multypleksakh-monitoryng-roboty-natsrady-u-drugomu-pivrichchi-2022-roku/>

types of media, introduces regulation of online media, and simplifies broadcasters’ licensing, among other things.

The Suspilne public service broadcaster provides varied formats and content. In the annual Internews Media Consumption survey, the share of respondents who said they most often watch its main television channel for news doubled, from 4 percent to 8 percent, over 2021. The share for its Ukrainske radio station increased from 16 percent to 19 percent.²⁸ In October 2022, a top executive at the public broadcaster cited a survey in which 87 percent of respondents said they trust news from Suspilne. She said public broadcasting’s social media audience has multiplied 2.5 times during the crisis, to six million subscribers, mostly on Telegram.²⁹ Panelists said the public broadcaster’s coverage remains nonpartisan. Its online coverage appears on IMI’s White List, and despite UA Pershyi being a part of the government-friendly Telethon, the panel had no particular criticism of its news production.

Internet service providers do not discriminate against any specific type or source of communications, with the exception of blocked Russian media and social media.

Indicator 10: Information channels are independent.

Typically, only a handful of outlets in Ukraine have prioritized operating as a business to support their operations. The national television market especially has been dominated by the largest media groups, owned by oligarchs pursuing their political and economic goals. Repeated media monitoring over the years has made it clear that these owners influence editorial policy, although that kind of influence happens in regional media, too. The Telethon has put a lid on that kind of behavior in wartime newscasts, but these companies’ online outlets still back their owners’ interests.

Panelists were unanimous that the state monopolized news on the national channels through the Telethon. They said the government

28 *2022 Media Consumption Survey*, USAID-Internews. November 2022. https://internews.in.ua/wp-content/uploads/2022/11/USAID-Internews_Media-Consumption-Survey_2022_eng-1.pdf

29 <https://www.prostir.ua/2022/10/rol-nezaleznyh-media-u-vidbudovi-ukrajiny/>

used the Telethon to promote itself, and they cited instances of biased coverage from the participating channels, especially Rada and My – Ukraina, allegedly influenced by different groups in the Zelenskyy administration.

In the Internews Media Consumption Survey, focus groups said the Telethon has ended competition, and therefore differences, among the channels and that the war has eroded owners' influence on editorial policy.³⁰

However, the panel's television journalist said the government and owners obviously have a great deal of influence on media companies, which has been exacerbated by the extraordinary demands of the war. In addition, many media outlets have no firewall between the newsroom and the business offices, another panelist said.

Private advertising contracts rarely influence editorial independence, but so-called information coverage contracts may dictate the content and favorable tone of reporting on local government.

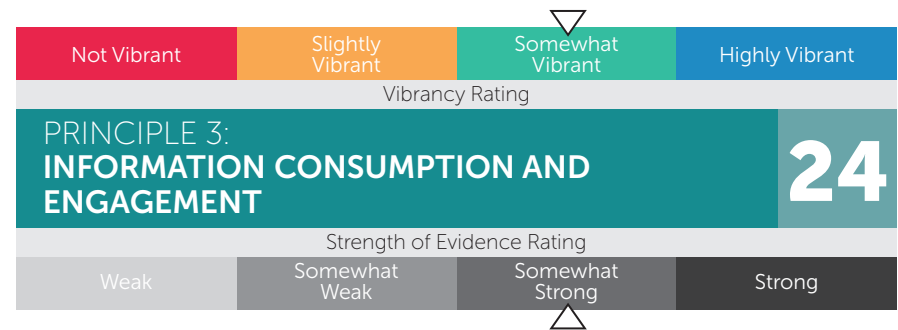
While in television news major media groups follow the same policy, the influence of owners is more obvious on their online resources and in social media. The media-literacy expert pointed to the Podrobnosti.ua website's favorable coverage of its owners. In addition, Channel 5, which is traditionally associated with former President Petro Poroshenko, regularly covers the activities of his charitable foundation. A journalist from Kherson said local media there have contracts to cover the activities of the council and the mayor, and their content is full of *jeansa*. Their chief social media editor is also a cheerleader for the mayor, he said.

As already noted, public broadcaster Suspilne is consistently underfunded, but there were no apparent cases of political interference with its editorial policy in 2022.

³⁰ 2022 Media Consumption Survey, USAID-Internews. November 2022. https://internews.in.ua/wp-content/uploads/2022/11/USAID-Internews_Media-Consumption-Survey_2022_eng-1.pdf

In 2022, there were no new appointments to the NTRBC, whose members are chosen by the president and parliament, or disputed allocations of broadcasting licenses or frequencies.

Overall, the few state media in the country do not enjoy special privileges, such as better access to equipment or services, lower taxes, or sole access to certain information, although Rada did get exclusive access to the newly liberated Kherson in 2022.



Principle 3's overall score increased slightly over the 2022 VIBE study. Panelists said there are plenty of digital and media literacy tools and training opportunities available in Ukraine for media workers and ordinary citizens alike, and people are increasingly using them. The government continues to promote digital and media literacy efforts, as well as the country's information security. The media have withstood repeated cyberattacks, secured the necessary help and expertise, and gotten back up and running. The lowest-scored indicator, media literacy, also rose, thanks to a major increase in media literacy initiatives from the government, many media outlets, and civil society. Amid the war, platforms for debates are limited to social media, where a low level of discourse prevails. Television ratings measurement was paused due to the war, but online media need to use measurements to survive. Content producers and civil society collaborate, but the government can be an unwilling partner. The presence of community media is negligible in Ukraine.

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

Ukrainian laws ensuring data privacy and digital security, as well as criminal code provisions on cyber-fraud, do not violate personal freedoms. Due to Russia's many cyberattacks on the eve of and during the invasion, the National Cyber Security Coordination Center under the National Security and Defense Council has stepped up its work, and the state has run more campaigns on information-security skills, incorporating online educational materials, contests, and quizzes, and in-person events.

Reports in January 2022 of leaks from a government portal that citizens must use to perform some administrative tasks were denied by Ukraine's cyber-police, but panelists still questioned how secure it is. Furthermore, the partly outdated personal data of millions of citizens are for sale on the dark web, a freelance investigative journalist said.

From February 24 through the end of 2022, Detector Media reported that the government's team for computer emergencies, CERT-UA, registered and investigated more than 1,500 cyberattacks on Ukraine, primarily from Russia, targeted at state agencies and information and energy infrastructure. Detector Media further related that the State Security Service of Ukraine neutralized 4,500 attacks from the start of the invasion to the end of 2022.

A digital security expert on the panel said many media organizations had lax digital security in 2022, and demand for those services grew fast. Spurred by cyberattacks on their websites and their employees' email and social media accounts, many media turned to Cloudflare services. On March 17, a major attack hit many Ukrainian media when a shared advertising network was hacked.

Last year saw more attacks on messenger apps and a change in the aims

of phishing attacks, according to the Digital Security Lab.³¹ The DSL said that when Russia invaded, journalists and activists increasingly took their communications from Telegram to the better-encrypted WhatsApp and Signal. Hackers then started to phish for access to these apps. The aims of Russian hackers' phishing attempts also started to expand from stealing data to spreading malware for deleting information, spying, leaking information, and gaining remote access to devices.

A manager of a national civil society organization said many training courses and online materials on digital security for journalists and the general public are promoted or offered by groups such as hers or media-support organizations, such as the DSL, Internews Ukraine, and IMI.

Internews Ukraine has launched [Nadiyno](#), a free interactive platform for Ukrainians to get real-time advice on protecting their personal data and gadgets. Crucially, it also serves the occupied territories, where Ukrainian mobile operators do not work and people must present their passports to get Russian SIM cards, making it easier to track their phone activity. The platform covers how to protect communications over messenger apps and to prepare for smartphone checks by the occupation authorities. In an Internews Ukraine poll in October 2022, 64 percent of respondents faced issues with digital security, and 55 percent had below-average digital-security skills.

According to Detector Media's 2021 Media Literacy Index, 13 percent of respondents showed the lowest level of digital literacy, 32 percent below average, 45 percent above average, and 8 percent the highest level.³² Seventy percent deemed the issue of protecting personal data on the internet urgent, and 44 percent viewed the practice of tailoring news on social media to each specific user as a manipulation.

“ Awareness of Russian propaganda's narratives and methods has increased, as the subject has become one of the most frequently covered by Ukrainian media.

31 Report on Security during the War. Digital Security Lab. September 29, 2022. <https://dslua.org/publications/zvit-bezpeka-v-umovah-viyny/>

32 <https://detector.media/infospace/article/201662/2022-05-01-indeks-mediagramotnosti-ukraintsiv-druga-khvylya-doslidzhennya-detektora-media/>

Citizens have free access to training and tools, but many do not realize that they need it. A regional editor noted skeptically that an article his outlet had run on digital literacy during the war was among the least-read.

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

Ukraine's government continues to promote media literacy. Since 2021, the Ministry of Culture and Information Policy has run [Filter](#), pulling together the best ideas on immunizing society against misinformation. Another project, [Svravdi](#), is run by the ministry's Center for Strategic Communications and Information Security to monitor and counter Russian disinformation and respond to enemy information attacks. The panel's data journalist said it has been a success: "Through cooperation of the state with the civic sector, there have been more online and offline ways to spread the word about information threats." Less successful, she said, have been efforts to educate people about journalism standards and what constitutes quality information.

Recently adopted state standards for basic education, which envision media literacy education as cutting across all subjects, are promising. Until now, the subject could be taught only as an elective if extra hours were available, or as part of civic education.

Ukraine has benefited from donor-funded media literacy projects since 2010, including IREX's Learn to Discern initiative, launched in 2015. The Ministry of Science and Education runs projects targeted at people from certain sectors, such as education, culture, youth, and business, and some projects are reaching out to a growing population of displaced people. In addition, NGOs and media run online courses, fact-checking initiatives, quizzes, and games, such as [NotaEnota](#), [How Not to Become a Vegetable](#), and Gwara Media's [Perevirka](#) (Verification) bot. Media literacy courses, including some that focus on digital security, are available at the [state digital education portal](#), [Prometheus](#), and [EdEra](#) platforms.

Online training is well developed, diversified, and high quality, but access to it is complicated by wartime conditions and internet disruptions,

one panelist said. The panel's media literacy expert said that despite numerous media literacy projects available across Ukraine through libraries and education facilities, they are not really geared towards adults.

A fact-checker on the panel said she and her colleagues get more requests for verification now, but people under stress still tend to believe unverified news. "When the invasion began, even people with a security service background and after numerous media literacy courses were spreading false information," she said. Other panelists were skeptical that people, in general, can discern distortions or lies from reliable news.

In the Internews Media Consumption Survey, 83 percent of respondents said they are aware of the existence of disinformation, and almost three-quarters said they know how to distinguish unreliable content from truthful.³³ Only 37 percent of those aware of the problem consider it urgent. Of respondents who were asked to say which of three texts were true or false, 14 percent got them all right, and 72 percent correctly identified one or more.

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

Journalists and citizens still have many opportunities to exercise their right to free speech and information, and journalists use them more actively than the wider public.

The war has made Ukraine the single-deadliest country for journalists, according to the International Federation of Journalists.³⁴ Notably, 80 percent of 567 free speech violations documented by the Institute of Mass Information were committed by Russian occupiers. Civilians in the occupied territories consulted Ukrainian media or social networks or interacted with government-controlled areas of Ukraine only at great personal risk.

33 2022 Media Consumption Survey, USAID-Internews. November 2022. https://internews.in.ua/wp-content/uploads/2022/11/USAID-Internews_Media-Consumption-Survey_2022_eng-1.pdf

34 <https://www.ifj.org/media-centre/news/detail/category/press-releases/article/67-journalists-killed-so-far-in-2022-ifj-demands-immediate-action.html>

Plentiful and diverse sources of information and consumption patterns suggest that most Ukrainians engage with reliable information on a weekly basis, panelists said.

The war has made it more difficult to have constructive debates or raise other topics, the data journalist said. For instance, a heated debate over a Channel 5 fundraiser for the armed forces—a calendar featuring the outlet’s nearly naked female journalists—was squelched to avoid criticism of any efforts to raise donations for Ukraine’s military.

Awareness of Russian propaganda’s narratives and methods has increased, as the subject has become one of the most frequently covered by Ukrainian media. As a result, efforts to defend against hate speech spread by Russia have intensified, the data journalist said. Many people have joined Ukraine’s informal “cyber-troops,” who try to block or file complaints against Russian propaganda campaigns on social media.

It is difficult to analyze the status of public debate platforms under martial law, which, for instance, restricts the right to assemblies. Traditional political talk shows on national TV channels disappeared upon the invasion, but some talk shows, such as *Govoryt Velykyi Lviv* (The Great Lviv Talks), appear on YouTube. Most city councils stream their sessions online. Academic discussions take place. Ukrainian-language YouTube grew rapidly last year, and vloggers debate with one another, one panelist said. Facebook is also a place for public debate, but it often limits visibility of a page or blocks or deletes the content. Moreover, bots and trolls are ubiquitous on Facebook and YouTube, she added.

The panelists stressed that open platforms for discussion--such as Telegram channels, Viber chats, and Facebook groups--which are either poorly moderated or not moderated at all, are the perfect place for lies, distortions, and hate speech. The media lawyer said people complain about disinformation or manipulations, but there are no effective

bodies to deal with such complaints. For instance, the Independent Media Council is a civic initiative with no legal power over the media or journalists and is unregulated by the government. The government does not have instruments to influence social media platforms.

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

Before the invasion, the Television Industry Committee, a trade association of the key oligarch-owned media companies, commissioned a periodic television ratings panel affordable only to the largest media. In March 2022, the Nielsen audience research had to pause as the movement of people across the country made it impossible to assemble a representative panel, but it will relaunch in 2023.

A regional media owner said major online media and content producers actively use Google Analytics, Meta, or their own metering tools to inspire trust and engage their audience. Those who do not do this risk disappearing from the market. Media often run polls on their websites or engage

their audiences with targeted advertising. Panelists said Ukrainian media have made progress in using measurement data to improve their coverage or engage audience segments, but they questioned the quality of certain types of research and the interpretation of data.

Generally, media have feedback mechanisms, but sometimes they use these vox populi tools to present public opinion with a slant. Methods such as live or online voting and quoting viewers’ comments and questions during talk shows disappeared as talk shows went off the air during the war. Some media maintain chats and clubs to communicate with readers and Telegram channels to respond to their questions, and they hire managers for community building.

“Feedback from readers became the source of many media reports on

“The panelists stressed that open platforms for discussion--such as Telegram channels, Viber chats, and Facebook groups--which are either poorly moderated or not moderated at all, are the perfect place for lies, distortions, and hate speech.”

occupation and de-occupation. In other cases, feedback helped relay information immediately, often without verification, and that caused sharp increase in the popularity of news aggregators on Viber and Telegram as sources of prompt and unique news,” the data journalist said. If a report turns out to be false, corrections are made to the initial publication only, and they are not necessarily picked up by the aggregators.

On media transparency, straight news items often have no byline, unlike longer articles. The Institute of Mass Information found in 2022 that 38 percent of Ukraine’s 50 most popular online media publish contact information for the newsroom, the top content manager, and the beneficial owner.³⁵ Thirty-four percent publish their editorial policies, and 20 percent publish information about their funding sources or financial reports.³⁶ Seventy percent publish the name of a chief editor, and 94 percent place links to their social media pages.³⁷

Although the Telethon is referred to as a government and private-television venture, a panelist said, the government typically resists cooperating with the media or civil society. “Journalists interact and network with each other but have not yet created an effective mechanism for self-regulation,” the television journalist said. Closer networking has become obvious during the war, when many media had to relocate, another panelist added. There are partnerships of hyperlocal publications, investigative reporters, and Ukrainian and foreign media.

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

Ukrainian legislation does not define community media. Most panelists refrained from assessing this indicator, saying that Ukraine does not

35 <https://imi.org.ua/monitorings/38-onlajn-media-demonstruyut-prozorist-v-2022-rotsi-doslidzhennya-imi-i47997>

36 <https://imi.org.ua/monitorings/vlasni-redpolityky-publikuyut-led-bilshe-tretyny-providnyh-onlajn-media-doslidzhennya-imi-i47866>; <https://imi.org.ua/monitorings/20-providnyh-onlajn-media-oprylyudnyuyut-dani-pro-svoye-finansuvannya-doslidzhennya-imi-i47749>

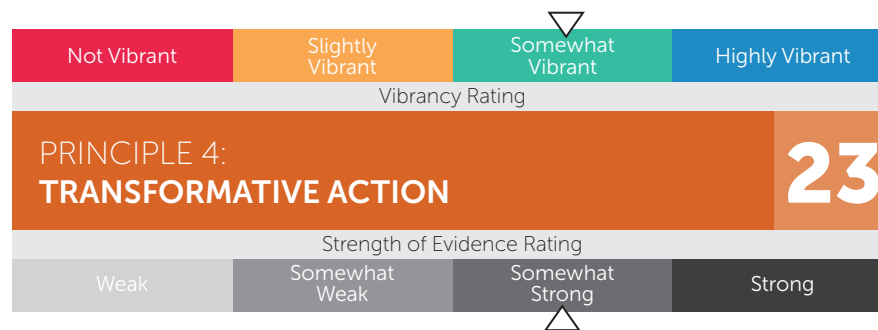
37 <https://imi.org.ua/monitorings/zbilshylasya-kilkist-onlajn-vydan-yaki-oprylyudnyly-na-sajtah-dani-pro-golovrediv-doslidzhennya-imi-i47462>

have community media as conventionally defined.

Grassroots media are at an embryonic stage, and Ukrainians are not accustomed to supporting community media through donations or volunteering. A regional editor who considers his media NGO community media said people donate—of course less now due to the war—but not enough to sustain normal operations. Such media survive only with the aid of international donors.

Some panelists named nationwide Hromadske TV and Detector Media as NGOs operating media. They are primarily supported by donors, along with some crowdfunding, but they do not enjoy broad community support.

Various local or thematic community initiatives on social networks or messenger apps are not transparent about funding sources or income distribution, and they may lack editorial oversight and policy. The fact-checker said many regional Telegram channels search for news and cover important topics, but it is impossible to know who is behind them, whether a group of passionate people or a local political or business figure using the current climate to attract an audience.



Principle 4’s score increased modestly from the 2022 VIBE study, along with all five indicator scores. The Ukrainian media landscape remains diverse and pluralistic, but panelists could not say whether the consumption of quality news media outweighs the damage done by unreliable social media sources. Panelists again gave the lowest score in this principle to individuals’ use of information. The highest score in this principle went to civil society’s contributions to vibrant information

flows. Panelists praised the government's efforts to inform society on war-related issues, but they also complained that the government has become more closed-off and less transparent on other issues, using the war as an excuse. Government responses to wrongdoing uncovered by the media remain selective and incomplete.

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

As the Institute of Mass Information's White List of trustworthy online media shows, Ukraine has many nonpartisan and reliable news sources, especially online, some with audiences several-million strong. Many have had great success diversifying their formats. For instance, Novoe Vremya operates as website nv.ua, a print magazine, Radio NV, a YouTube channel, and a podcast, allowing it to consolidate audiences and set discussion platforms for people with various views, said a panelist representing a national civil society organization.

The data journalist noted that Strana.ua, which had spewed Russian propaganda before the occupation, had dropped out of the five most popular online news sources, according to SimilarWeb ratings. On the other hand, Obozrevatel, famous for clickbait, *jeansa*, and low-quality content, is still there. The growing popularity of social media as a news source has helped create information bubbles and degraded discussion culture. Social media exchanges are more emotional and often personal, and are inflamed by bots, she said.

As the Internews Media Consumption Survey shows, media with dubious reputations remain popular, while quality media that play it straight and do not engage in *jeansa* struggle for a wider audience.³⁸ The more trustworthy Ukrainska Pravda is consumed by 8 percent of respondents, Hromadske TV 5 percent, and Liga.net 3 percent. On the other hand, the oligarch-owned 1+1 is both the most popular television channel (62 percent) and the most popular website (21 percent), second only to

online news services. However, the survey also found that, if before the war, respondents mainly relied on one or two sources of news, after the escalation, respondents say they use three to five different sources to ensure they have a complete picture of events and to check the news for disinformation.

There are few platforms for exchanging information across ideological lines, as society is divided into information silos, a television journalist on the panel said. In the first months of the invasion, the Telethon facilitated an ideological rapprochement among many Ukrainians on several issues, especially Russian aggression, but it did not hold, he said.

Another panelist said Ukrainians choose media that confirm their pre-existing views.

The panelists did not find evidence that people generally base their perspectives on fact-based information.

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

As the war shattered people's quality of life, it made them more susceptible to populist appeals against injustice and outlandish, sometimes mystical, views of social problems and their solutions, a journalist on the panel said. For a time, they became more vulnerable to enemy propaganda narratives, sensationalistic news aggregators, and other disreputable sources of information. Even in so fertile an information space, though, Russia's overall propaganda campaign failed.

The media literacy expert from Mykolaiv said that at the beginning of the invasion people tended to believe "their sources close to the front" and spread conspiracy theories that Mykolaiv or the whole south would be handed over to Russia in exchange for Kyiv or other areas, despite the government's assurances to the contrary. In another case, when the city's water supply was damaged by the occupiers, people blamed the city government for not making what they said were cheap and easy repairs, which actually had to be done in the neighboring, occupied Kherson region. A Kherson journalist said that the reliability or falsity

38 2022 Media Consumption Survey, USAID-Internews. November 2022. https://internews.in.ua/wp-content/uploads/2022/11/USAID-Internews_Media-Consumption-Survey_2022_eng-1.pdf

of information—for example, whether Russia would attack civilians and where it was safe to flee to—greatly determined whether individuals did or did not become victims of war crimes.

Most panelists said they doubt that people are guided primarily by quality information. For example, the fact-checker on the panel recalled that in the early days of the invasion, many people looked for marks, such as arrows, on walls or streets, or lights on roofs and in windows, erroneously believing them to be signals left by collaborators to help guide Russian missile strikes or troop movements.³⁹

The regional editor bemoaned people’s media illiteracy, citing the unequal audiences for quality and inferior media and a lack of knowledge about how to deal with authorities and local officials. As an example, he said inertia and baseless fear had stopped most parents from complaining about unsanitary conditions in a school in the northwestern Rivne region. Only five parents complained to officials, and only one mother dared to speak to the media publicly.

There were no elections in 2022, and Ukraine’s next parliamentary elections are scheduled in 2023. One panelist, however, said that in light of the seismic impact of war on all aspects of Ukrainians’ lives, it would be meaningless to consider the role of misinformation or quality information in the upcoming vote. Another panelist noted that the ban on 13 pro-Russia parties had not caused any outrage, possibly a sign that people had stopped believing their rhetoric.

Health care is another area rife with misinformation, although that has become less true in war-affected areas. And electricity disruptions have not sparked protests or eroded the government’s support, contrary to Russian propaganda, she added.

39 <https://www.bbc.com/news/world-60879945>

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

Ukraine has an active and robust civil society that uses reliable information and knows how to interact with the media and use social media, the television journalist said. These groups communicate with the public, engage influencers, and produce their own content, raising public awareness of important social issues.

Many civil society groups are involved in training and supporting media outlets, fact-checking and media literacy activities, and fighting disinformation. The list includes Detector Media, the Institute of Mass Information, Internews Ukraine, the Regional Press Development Institute, StopFake, VoxUkraine, NotaEnota, Bez Brekhni, and many others.

A civil society manager said civil society organizations in Ukraine have produced plentiful analytical materials despite the war. For example, they worked closely with the national anticorruption agency, cohosting public hearings on an anticorruption strategy and helping determine how to implement it, as well as collecting data on entities and people related to the Russian aggression for further sanctions. Civil society has also produced analytical materials for the public and the government on Ukraine’s implementation of requirements for EU membership.⁴⁰

Donor-funded programs often envisage close cooperation between media and civil society in conducting research, including investigations, and sharing it with the public, one panelist said. During the war, volunteer groups and charities helping the army or children have gained greater sway in society as the media have covered their efforts to support and restore Ukraine. Civic participation in policymaking is stronger in Kyiv than elsewhere.

40 https://rpr.org.ua/wp-content/uploads/2022/12/Koalitsiia-RPR_Vstupnyy-ispyt-dlia-Ukrainy.pdf

Panelists praised the country's influential and genuine civil society organizations, contrasting them with the plethora of registered but inactive NGOs, politically focused groups, pro-Russia organizations set up specifically to spread the Kremlin's agenda, or fronts for local politicians or officials, religious groups, and trade unions. Civic participation in key decisions increases every year but is still minimal, a policy analyst said. Some regional media demand payment to cover civil society activities.

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

In some ways, the war has made the government less accessible and transparent. There is no broadcast of parliamentary sessions, much information is kept secret, and journalists often do not know what debate lays behind the government's decisions.

Otherwise, government agencies and officials have developed robust methods for reaching people, as information has become vital for most Ukrainians. The president briefs citizens through video addresses on official communications channels every day. Similarly, ministries and other agencies conduct regular press briefings and frequently update their social media pages and websites. Since the invasion, ministries that work with various industries (i.e., agriculture, transportation and industry) have had to suspend their usual analytical and research functions, as they and their constituents have had to move to a war footing, the civil society representative said.

As in the pandemic, wartime press conferences have become a key way to disseminate government information. Regular live broadcasts of public officials have functioned well, although they have sometimes descended into political self-promotion, one panelist said; additionally, the policy analyst said the video addresses may deliver selective facts and distortions, because the government does not have to debate or answer questions. Some regional local governments are weaker

communicators. For instance, Kharkiv residents were surprised and perplexed when the local government started dismantling tram rails and renovating the streets without notice during the frequent bombardments.

Government representatives primarily use and publish reliable information, but those close to them, such as advisers who could be perceived as official voices, may have presented misleading information on the course of war, a regional panelist said. Before the escalation, political misinformation—such as twisted or commissioned opinion polls, distorted statistics, false interpretations, or facts pulled out of context—that was spread on behalf of Russia or its proxies often steered the political discourse. Today, straightforward propaganda bears no political or ideological fruit.

Many civil society groups are involved in training and supporting media outlets, fact-checking and media literacy activities, and fighting disinformation.

At the national and local level, appointed officials of the executive branch tend to base their policies on facts, but elected bodies are less consistent. Individual deputies often take a populist tone, the television journalist said. The opposition is largely squelched under the pretext of avoiding discord. Debates on social media are plagued by distortions and bots.

Indicator 20: Information supports good governance and democratic rights.

The government is less transparent and accountable now that public registers have been closed, some public procurement information has been restricted, and public data are barely updated, with the war as a pretext. Exposing corruption has become more complicated, and the government's response to it remains selective and incomplete. A journalist on the panel cited a few successful cases of corruption-busting in 2022. In one, the Skhemy investigative project (run by Radio Free Europe/Radio Liberty) and the Ukrainska Pravda online magazine ran simultaneous exposés on the alleged misuse of UAH 1.5 billion (\$40 million) in road construction funds by the Dnipropetrovsk region's

governor. In response, the Special Anticorruption Prosecutor's Office has filed charges against him, and investigators conducted multiple searches in the regional capital, Dnipro. The governor was dismissed in January 2023.

In October 2022, an investigation by the Bihus.info project--which brings together journalists, tech experts, and activists--revealed that a top aide to Zelenskyy, Kyrylo Tymoshenko, had taken for his own use an SUV donated by General Motors to Ukraine for humanitarian missions and evacuating residents from front-line areas. Tymoshenko had to give up the car and in late January 2023 quit his post.

In addition, activists managed to reverse the irregular appointment of a new director with thin qualifications to the state film archive, and others protested in the street against a change to urban development procedures. At the close of 2022, that measure had passed parliament and was awaiting Zelenskyy's signature, although a citizen petition has urged him to veto it.

In some cases that draw great public ire, investigations drag on until people are no longer paying attention and then "dissolve," a journalist said. For example, activists managed to stop a new owner from demolishing a famous Kyiv building, Kvity Ukrainy, in 2021, but an appeals court later overturned a ruling that deemed it an architectural landmark.

The government does not respond appropriately to media reports revealing human rights violations and is reluctant to punish officials for corruption. A panelist said violations of the rights to assembly, speech, and religious freedom usually elicit a strong public response, and another agreed that the public has little tolerance for human rights violations.

Panelists were not able to assess during the war how quality information contributes to free and fair elections. Generally speaking, they said that although the war had put people on their guard, they can still be easily manipulated by politicians and support populism.

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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