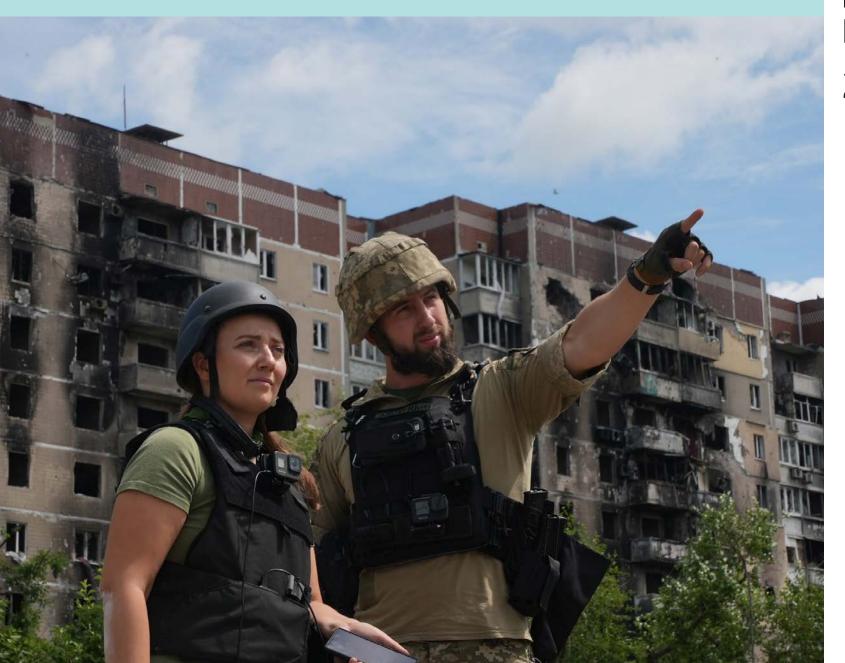
UKRAINE



Vibrant Information Barometer

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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.

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.

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.

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.

OVERALL

SCORF

In 2023, Ukrainians showed remarkable resilience and unity resisting the ongoing war. The Russian government's full-scale invasion in February 2022 caused devastating repercussions: the loss of tens of thousands of lives, undermined livelihoods, millions of relocated citizens, massive breakdown of infrastructure, and further occupation of Ukrainian territories.

Throughout the year, the information space was filled with exaggerated expectations of Ukraine's counteroffensive and an imminent end to the war, but the lack of victorious progress led to a sense of exhaustion and confusion.

The scope and speed of vital news consumption have decreased compared to 2022. People now prefer "fast news media"—brief items delivered quickly, and short video formats.

Ukraine has retained its pluralistic and diverse media landscape, which has adapted to wartime conditions. However, the round-the-clock United News telethon forum, which tends to ignore topics uncomfortable for those in power, damages the balance, as does the budget funding of a growing number of state channels. Ukrainians are increasingly turning to social media, especially anonymous Telegram channels with unverified information and space for pro-Kremlin narratives.

Ukraine's government imposed certain justified restrictions in 2022 in the aftermath of the full-scale invasion. However, civil society and the media are increasingly impatient about the prolonged, decreased access to public information, especially when the war is overused as a

reason. In autumn 2023, disturbances emerged: smear campaigns and law enforcement bodies using intimidation tactics to silence critical journalists and anticorruption activists.

VIBE principle scores did not see any significant change this year. Principle 1 (Information Quality) remained 21 and is the lowest score, as it was in the 2023 VIBE study. Ukrainian media and other content producers have adapted to the war and provided important content. Kremlin information manipulation through social media remains an issue. Media independence based on economics is extremely scarce. Principle 2 (Multiple Channels) received the highest principle-level score of 26. However, panelists stated concern over increased systemic pressure on journalists critical of the government and corruption, decreased access to public information and frontline reporting, and strengthening state broadcasting via the United News telethon and other government-controlled media.

The score of Principle 3 (Information Consumption and Engagement) decreased slightly to 23. Amidst the war, information security and digital hygiene have become even more important, yet media literacy and digital security levels among Ukrainians are still not sufficient for resilience. General society is missing in-depth discourse of the crucial issues. Principle 4 (Transformative Action) maintained a score of 23 from last year. Civil society remains the driver of positive changes, while individuals' use of information remains weak. In 2023, the government's communication and its responses to violations disclosed by the media were inadequate.



Principle 1's score remained the same as the 2023 VIBE study, with the indicator on sufficiently resourced content production receiving the lowest average score of this principle. The Ukraine media infrastructure survived and has adjusted to the war environment. The government maintains a unified information policy through the United News telethon, which is produced and broadcasted by six major TV channels. It was launched at the government's behest at the beginning of the full-scale invasion with the intention to support resistance and unity, and to ensure access to reliable information.

Despite the pool of quality professional media, more than 76 percent of Ukrainians consume news from social media. Consumers favor Telegram channels, which often disseminate unverified content and fall prey to information manipulation by the Kremlin. According to the panelists, the media advertising market is recovering, but media are unlikely to develop an economic model free from owner financing, the state budget, or donor funding.

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

Despite the damage, disruptions, economic tolls, and demographic crises, Ukraine retained its adequate media infrastructure. Broadcast and online media in particular still deliver quality content, and the media sector overall functioned better than in 2022. However, print media have experienced a constant decline in circulation, a drastic shift

of the advertising market to online platforms, and a decay of distribution systems. Additionally, television is losing some prominence as a news source: In 2015, 85 percent of Ukrainians said they used television as an important source of news, but <u>in 2023 this number has dropped to 30 percent</u>.

While some companies established new media outlets and others obtained donor support and diversified content production, some outlets had drops in external funding and subsequent operational cutbacks. De-occupied and frontline regions suffer the most, due to security risks.

An editor on the panel praised the media sector for its persistence: "Evaluating journalism in a war-torn country, which has long grappled with institutional issues in the media sector, some of which have [gotten worse] or faded out amid the war, I would say it performed so incredibly well compared to how terrible it could have been." This is partly due to the tremendous amount of rapidly mobilized donor support to the media, the panelist added.

According to the annual USAID-funded Internews Media Consumption survey, 76 percent of adult Ukrainians relied on social media for news in 2023, while concurrent use of TV and social media dropped to 21 percent. Online news websites are the second-most important source for 40 percent of respondents. The survey showed that 47 percent access news from multiple media types, with social networks the primary choice for single-source users. Fifty-three percent of respondents trust the media, while 31 percent do not. Telegram's popularity rose as a news source, with its user base skyrocketing from 20 percent in 2021 to 72 percent in 2023.

Ukraine has 31 state and eight private universities that offer journalism education, but only a few institutions provide the practical training and up-to-date skills that the industry requires. These schools include the Kyiv-Mohyla Academy, the Ukrainian Catholic University in Lviv, and the Institute of Journalism at Taras Shevchenko Kyiv National University. Donors have increased offerings of informal, short-term courses since 2022, but such programs cannot offset an absent modern academic

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infrastructure. No one offers the types of training in media management or media-tailored communication that could educate search engine optimization (SEO) experts, IT support specialists, social media marketing, advertising, or product managers. Commercial departments within media outlets have few options to build sustainability.

Panelists agreed that professional media outlets are more likely to adhere to ethical standards and correct factual errors, compared to unprofessional players. Ethical violations particularly damage reputations of independent, quality media. Ukraine's scant legal remedies and self-regulatory bodies, such as media watchdogs and the <u>Commission for Journalism Ethics</u>, are ineffective for professional media, and have no impact on unprofessional content producers.

Content diversity has narrowed due to the war and its implications. Media now focus on mainstream, war-related topics, front line reports, human stories, mobilization, taxes, political scandals, and corruption. Many other important issues remain overlooked by the media. Political journalism has decreased, but media are increasing stories on Ukrainian history. Media sufficiently contextualize the importance of news and events for relevant audiences; however, sometimes they optimize for search engines, one panelist revealed.

Unlike in 2022, many journalists resumed anticorruption investigations related to public procurement, reconstruction projects, and assets of officials. "The government became more accountable—it is rare that there is no reaction on publications," noted a representative of a national investigative journalism center.

The news content of the public broadcaster Suspilne and the most reputable private media is editorially independent. Still, the round-the-clock telethon primarily reflects government positions, with pro-presidential speakers dominating interviews. News content on anonymous Telegram channels does not adhere to classic editorial standards, a data journalist said.

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

Misinformation remains an issue in Ukraine, but it is under some control and is not spread massively. In recent years, quality media have progressed well in fact-checking and combating disinformation. Low-quality popular media, social media, and anonymous Telegram channels often spread misleading information. According to a data journalist, many media reports are based on social media posts and Telegram channels, and emotionally charged videos gain viral popularity.

During the war, journalists face challenges in verifying data and government statements. Officials are restricting journalist access to public information and certain areas requiring military accreditation. For the sake of defeating the enemy, journalists often tend to apply a do-no-harm approach, even when suspecting government disinformation.

According to a fact-checker, non-professional content producers, bloggers, and influencers sometimes provide reliable information, but also mix objective reporting with commissioned content. In addition, government spokespersons, politicians, and business owners are "the weakest links who may intentionally disseminate misleading information," a television journalist said.

On platforms such as YouTube, content creators vie for advertising revenue by resorting to clickbait headlines and producing low-quality videos attractive to viewers. Some social media producers, particularly on anonymous Telegram channels, capitalize on trending topics by disseminating distorted and unverified information.

Panelists acknowledged that during wartime, the government and armed forces have the right to engage in counterpropaganda, withhold certain information, or even lie to support military strategies. However, a regional civil society representative offered a dissenting opinion, arguing that the government often uses the war as a pretext to conceal its negligence, incompetence, and corruption, thereby exacerbating societal tensions.

The Institute of Mass Information (IMI) released its annual <u>Whitelist</u> of national online media, crediting nine outlets out of the 50 most popular for 95 percent compliance with professional standards. IMI monitoring of 22 national online media <u>documented</u> a growth of *jeansa* (commissioned stories published as editorial content), with 13 percent of journalists polled <u>admitting</u> involvement. IMI monitoring of jeansa in online media across 20 regions of Ukraine <u>found</u> that it makes up one to six percent of published content, while improperly marked advertising constitutes one to three percent of publications.

Ukraine law grants the rights to reply and refutation. Civil law also allows any person or entity to file a defamation lawsuit against a registered content producer that directly affects the plaintiff. Otherwise, professional consequences for media are minimal.

According to a <u>Telemetrio survey</u>, Ukraine has 33,000 active Telegram accounts, totaling 282 million subscribers. Ukraine ranks sixth globally in channel count (13) with over 1 million subscribers. Almost 81 percent of users prefer Telegram as news source, with 76 percent trusting its content. In addition, Telegram is the <u>most popular</u> news source for 89 percent of Ukrainian respondents abroad. Telegram channels operate outside Ukrainian media regulations, and the platform's management remains unresponsive to this concern.

IMI <u>analyzed</u> ten popular Telegram channels, noting seven as anonymous, two linked to Russian propagandists, and all lacking professional journalism standards. An <u>investigation</u> by NGL.media, an anti-corruption center, revealed the vast audience and influence of Trukha, the most popular Telegram channel. Trukha lacks accountability and factual rigor, relies on reposts, lacks proper sourcing, publishes anonymously, and hosts jeansa and unmarked advertising. The channel also could generate significant revenue and obtain it through cryptocurrency and registered entrepreneurs, which could be leveraged to hide income from taxes.

Numerous fact-checking tools, manuals, and initiatives--such as <u>StopFake</u>, <u>VoxCheck</u>, <u>NotaEnota</u>, <u>Po Toi Bik Novyn</u>, <u>Bez Brekhni--</u>are available online, yet their impact remains limited.

Content moderation mechanisms are imperfect on YouTube, Facebook, Instagram, and X (formerly Twitter), and absent on Telegram and other messengers, often restricted to censorship of violent images. Social networks, particularly Meta's Facebook and Instagram, frequently block sensitive content from challenging Ukrainian media and bloggers. These content producers complain about limited feedback from user platforms, changes in host policies, and poor functionality.

The Centre for Democracy and Rule of Law (CEDEM), an advocate for Ukrainians on Meta, <u>submitted</u> 500 cases of unjustified post blocking or account deletions in 2022, and 300 cases in the first half of 2023. Many Ukrainian media outlets have yellow or red status on Facebook, which restricts monetization and organic reach. With social media traffic constituting 30 percent of their audiences, this substantially affects media businesses, and may encourage self-censorship. Regional media reporting from the frontline zones suffer the most limitations.

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

Russian and pro-Russian media are not allowed to operate in Ukraine. Authorities blocked Russian media outlets and social networks in 2017, followed by the shutdown of pro-Kremlin media channels in 2021. However, controversial pro-Russian websites, such as strana.ua and vesti.ua, are available without VPN. Pro-Russian narratives spread via social networks and messengers, where moderators struggle to fully contain them. Exploiting sensitive issues, Russian propagandists employ factual distortions, manipulations, and lies, and they also use AI algorithms. "They amplify anti-corruption investigations, distorting them to foster internal distrust within Ukraine," a fact-checker said.

According to Ukrainian intelligence <u>reports</u>, the latest and ongoing Kremlin special operation is aimed at inflaming internal tensions in Ukraine, destabilizing the country, and instilling panic among its citizens. The campaign costs \$1.5 billion, with \$250 million spent on Telegram alone, making it the most expensive since the campaign aimed at discrediting the 2014 revolution.

Detector Media reported that since the start of the invasion, the scale of Kremlin "agitational propaganda machine production" and information manipulation has continually grown and evolved, and become more disturbing, focusing on exploiting the war-traumatized and weary Ukrainian society. "Using Telegram, agitational propaganda tries to make Ukrainians lose hope in the further struggle by hyperbolizing existing problems and provoking sensitive topics, such as Western support, mobilization, or economic issues."

As a result of the war and its

implications, media now focus on

such as front line reports, human

political scandals, and corruption,

overlooking many other important

mainstream war-related topics

stories, mobilization, taxes,

issues.

Panelists agreed that the Ukrainian government generally does not create manipulative information, but they were skeptical about any significant professional ramifications.

Most media do not moderate comments, allowing hate speech to spread. Hate speech by Ukrainians, even state officials towards the Russian Federation, is often tolerated and justified as a natural response to the war.

The new media law, which went into force in March 2023, imposes fines and distribution bans on registered and anonymous content producers for severe violations. Such content has included hate speech, support for the Russian government's aggression, and propaganda. However, these measures will be fully enacted only from March 2024.

Manipulative information is spread covertly on platforms where detection and removal are challenging. According to <u>BBC Verify</u>, even verified accounts disseminate manipulative information on X. "Moderation in X worsened globally, and TikTok is also <u>harmful</u> for Ukraine, but there has been successful communication with Meta to improve moderation and remove coordinated Russian campaigns," a data journalist said.

A <u>research</u> report by Texty revealed that YouTube recommendation algorithms fail to consider "Russia's war against Ukraine while offering personalized recommendations to Ukrainians." The analysts suggested

that algorithms should be trained to identify and omit pro-Russian content from recommendations in Ukraine and other countries, and that YouTube should consider Ukraine's ban on disseminating content from individuals deemed national security threats.

Ukrainian law enforcement continues to identify and prosecute the most harmful Telegram channels with clear Kremlin propaganda, as well as bloggers spreading such content or disclosing sensitive military

information. Government authorities admit that Telegram represents a serious threat to cyber and information security, as it is a non-transparent platform with unknown funding sources and data security protocols. Concerns also persist regarding potential collaboration with Russian government security services. Efforts to enforce regulations on Telegram have been unsuccessful thus far, but the government is not yet ready for a complete ban. Telegram remains very popular among state

authorities, who have built extensive networks of channels and bots with thousands of subscribers. Quality media have also turned to Telegram to keep their audiences.

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

According to a <u>survey</u> by the Razumkov Center, Ukrainian is the native language for 78 percent of the population. The government established high quotas for broadcast content in Ukrainian language several years ago. Starting in 2022, online media were required by law to maintain their primary website versions in Ukrainian. In 2023, media complied with this requirement at a factual rate of 99 percent, with Ukrainian songs accounting for 57 percent of radio station playlists. The government funds Russian-language TV channels FreeDom and Dom, targeting Russian-speaking audiences in the occupied territories and abroad. Ukraine law does not set language quotas for social media.

Content producers reach the majority of citizens with viewpoints representing a diversity of genders, ethnic identities, and religious backgrounds. However, with television news unified by the telethon group, media have not presented an array of ideologies or perspectives during the war. Non-professional content producers do offer a variety of alternatives on social media platforms.

In general, the panelists denied any discrimination or exclusion of certain groups from media coverage. Marginalized groups might be absent from mainstream media due to perceived low audience interest, but these citizens have alternative platforms to express themselves. IMI reports that without regular partnerships with relevant organizations, coverage of LGBTQ+ is poor.

IMI's monitoring <u>showed</u> that men dominate as expert commentators in media, comprising 84 percent, and they are the main actors in publications in 81 percent of cases. Woman experts most often comment

on topics related to economics, business, foreign affairs, and weather. Texty's survey of the most popular YouTube interviewees found only two Russian women among the top 30 experts discussing socio-political issues. In addition, IMI's monitoring of the 50 most popular online media outlets showed that almost half of them contained hate speech, sexism, discriminatory language, and stereotypes towards women.

Communities in occupied territories are excluded from coverage. Ukrainian media do not have access to these areas and using local residents as sources risks exposing them to persecution by Russian occupying forces. Media outlets and journalists have relocated from insecure frontline territories, resulting in certain communities being underreported.

A survey conducted by the regulatory body National Television and Radio Broadcasting Council (NTRBC), <u>showed</u> that of 206 media outlets with 4,800 employees, women hold 77 percent of journalism positions

and 52 percent of managerial positions. Women are predominant in creative roles such as journalists, anchors, marketing, or public relations. They constitute the majority in the youngest age group (under 35), but in the oldest age group (61+), they are a minority at only six percent. In the largest middle-age segment, men and women are almost equally represented. Men dominate in technical positions and in media operations, both in television and radio.

Indicator 5: Content production is sufficiently resourced.

According to the <u>All-Ukrainian Advertising Coalition</u>, the advertising market saw a 77 percent increase in 2023, after a 63 percent decline in 2022, and the coalition forecasts a further 28 percent growth in 2024. Radio and internet advertising levels have rebounded to pre-war levels. Television advertising grew by 49 percent to UAH 3.87 billion (\$100.9 million). Digital advertising on streaming platforms has become a new category with UAH 450 million (\$11.7 million). Print advertising saw a

modest four percent increase, primarily in national press, totaling UAH 235 million (\$6.1 million). Radio advertising surged by 160 percent to UAH 865 million (\$22.6 million). Internet advertising grew by 78 percent to UAH 12.81 billion (\$334 million).

Despite these optimistic figures, all socio-political media have experienced a substantial decrease in advertising and other traditional revenues since the full-

scale invasion. People prefer to donate to military or humanitarian purposes rather than pay for media content. Consequently, numerous media outlets have been forced to downsize their operations and reduce staff, particularly in the regions. International donors provide grants—a lifeline for many media organizations—but this type of funding is insufficient and steadily drying up.

Nonetheless, all major media outlets have managed to avoid shutdown from financial problems. Some diversified their profile: two of the largest groups, Starlight Media and 1+1 Media, launched their non-news

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channels and resumed entertainment productions. As Ukrainska Pravda CEO Andrii Boborykin told <u>Detector Media</u>, most media still have higher audience levels than before the full-scale invasion, and businesses are restoring advertising budgets. Even so, the decline in traffic to preinvasion levels is outpacing the return of advertisers.

YouTube news and information channels are experiencing remarkable growth, providing revenues that support other newsroom operations. An <u>analysis</u> of the most popular Telegram channels suggests that it is now one of the most lucrative media businesses, with a wide range of monetization opportunities, but it operates within a shadow economy. A regional publisher noted that national advertising agencies have scaled back their activities in the regions, thus leaving more money locally. However, local advertisers have turned to Google, Instagram, and Telegram for advertising, diverting revenues away from traditional media.

State funding for the United News telethon, state TV channels Rada and Armiya TB, and Russian-language international broadcasting distorts the media market and undermines editorial independence. The government has spent UAH 1.12 billion (\$27.7 million) on the telethon since its launch, allocating UAH 1.7 billion (\$44.3 million) in 2024, while the public broadcaster will be underfunded again. In 2023, the government allocated UAH 60 million (\$1.6 million) for The Gaze, a new Englishlanguage news site, that has yet to achieve significant audience reach.

Local governments can pay media outlets to cover their activities—an outdated and contradictory practice that media experts believe needs to change in the future. Some local media members reported that their communities either lack funds for media coverage or are non-transparent and inefficient in spending on loyal outlets, said a panelist developing hyperlocal newsrooms.

The mobilization of men and relocation of women undermined the labor market, leading to a severe shortage of qualified workers in the media and various industries. Many media organizations had to reduce costs, including journalists' salaries, which has led to a decrease in content quality. While a journalist's salary in the capital might be sufficient to

support a family, it might only amount to two times the subsistence minimum in regions. Consequently, many journalists had to leave the profession, a fact-checker said.



Principle 2 was the highest-scoring principle of this year's Ukraine study, buoyed by higher scores for indicators on access to information channels, channels for government information, and diverse channels for information. Scores for the remaining indicators slightly decreased. Panelists noted a trend of increased pressure on anti-corruption journalists and other voices critical of the government. Intimidation tactics were accompanied by social media discreditation campaigns, especially in anonymous Telegram channels.

This year, panelists were more critical of restrictions on access to public information, citing issues such as closed registers, vague replies or unjustified denials regarding information requests, challenges in reporting from the front line, and restricted access to parliamentary sessions and their broadcasts. A key concern is the continuation of the United News telethon, despite its diminishing relevance and viewership, which reinforces the strength of state-controlled broadcasting. The panelists also lamented the funds allocation to an increasing number of state-controlled channels and observed that controlling editorial policy is easier at state channels compared to the public broadcaster.

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

Ukraine continues to demonstrate strong legislation protecting freedom of speech and press, in line with European norms, a media lawyer on the panel said. Restrictions--such as limited access to frontline zones, accreditation requirements with armed forces, and bans of publishing information on defense and national security--are justified derogations of Article 10 (Freedom of Expression) of the European Convention on Human Rights. Court practice with defamation cases remains in favor of diligent journalists, but some government criticism has led to pressure

Journalists exercise

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on the press. Overall, citizens have enough opportunities for information collection, publication, and discussion. The proper implementation of the new media law, enacted in March 2023, will be crucial for shaping future perspectives and addressing concerns, a lawyer added.

Libel has been a civil law issue since 2011, and previous attempts to criminalize it have failed. Ukrainian law protects journalistic sources, and the precedent set by the case Sedletska versus Ukraine, which was decided in 2021 in the European Court of Human Rights, has positively influenced similar cases in Ukrainian courts. However, issues remain with properly investigating and prosecuting perpetrators that hinder journalists in their professional activities.

The panelists noted that the ongoing telethon can be viewed as a form of partial censorship or media requisition. The illegal shutdowns of Priamyi, 5 Kanal, and Espreso TV channels from the digital broadcasting network in 2022 were major violations but are the only examples of how the government pressured media distribution systems to censor media that year. An editor on the panel stressed that the government has not introduced total war censorship during the two years of conflict; however, the government has significantly eroded the trust it once held.

Journalists exercise self-censorship when covering defense issues,

fearing they might inadvertently jeopardize national security. In addition, they tend to refrain from criticizing the government or investigating misconduct, as it could ignite public outrage and censure towards them.

In 2023, IMI documented 150 freedom-of-speech violations in Ukraine. Russian armed forces committed 67 of them during the full-scale invasion. They killed 27 media workers, two of whom were reporting. The Russian military targeted at least 12 filming crews and journalists, and their shelling damaged eight media offices. Four journalists were reported kidnapped by Russian forces, and 26 Ukrainian media

professionals remain imprisoned by them.

As for Ukrainian perpetrators, IMI recorded 83 freedom of speech violations—a slight decrease from 2022. The main types include obstruction of legal journalistic work (29 cases), denial of access to public information (20 cases), cybercrime, and

death threats (11 cases each).

While Ukraine had only a few cases in the first months of the year, autumn was marked by a series of smear campaigns. The targets were anti-corruption activists, as well as prominent media figures that had criticized the government at the National Media Talk conference. Discreditations were especially <u>prevalent</u> on anonymous Telegram channels and even appeared in some media outlets and YouTube channels. The most notorious incidents involved the attack on the apartment of Yurii Nikolov, an investigative journalist at NashiGroshi, and the surveillance and phone tapping of the investigative team of Bihus.Info in late December 2023.

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

While legal and social norms do not prevent any groups from access to media, Ukraine outlets continue to fall short in providing services for people with hearing and vision disabilities. Digital communication

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regulations do not explicitly restrict users or content producers. Ukraine has been blocking Russian media and social networks since 2017, with 16 media outlets <u>added</u> to the blockage in 2023, but they are available via VPN. In a <u>poll</u> of 10 frontline and de-occupied territories, 16 percent of the respondents said they consume Russian news sources weekly.

Panelists agreed that information channels are accessible across Ukraine, except in the frontline and occupied territories. The war accelerated the decline of print media distribution and delivery systems. Before the invasion, Ukraine's ICT infrastructure was adequate—better developed in larger cities than in smaller towns, rural areas, and regions near the borders, where the media landscape is narrower. The Russian military attacks partially damaged existing infrastructure in many areas, forcing numerous people to relocate.

Since spring 2023, Ukrainians have experienced fewer successful attacks on energy infrastructure. However, frontline territories continue to face interruptions due to frequent shelling, which in turn has increased economic challenges. Business entities and residents have become better prepared for electricity outages and communications interruptions with portable generators, power banks, and other reserve devices. Mobile operators ensure roaming access between their networks nationwide for both calls and internet access. Most people have the economic means to access a variety of media channels, especially online. Ukraine ranks 16th among countries with the lowest mobile data costs.

Panelists could only assume that people in occupied territories have limited access to internet and radio, as they are otherwise cut off from Ukrainian media sources.

Kyivstar, one of the largest mobile operators, serving 25 million users, faced a massive cyberattack in December 2023. Originating from Russia, the attack demonstrated the vulnerability of operators; the threat of personal data theft; and the potential to disrupt to other services, such as payment terminals, ATMs, alarm security systems, and all forms of communication. Residents in larger cities were able to quickly switch to other operators, albeit at inflated prices, but others remained without connectivity and access to digital media.

Smartphones are the <u>primary vehicle for news content</u> for most Ukrainians, with usage by 87 percent overall. Research by Kantar <u>indicates</u> a significant digital shift, with a doubling of Ukrainian-language internet searches from January 2022 to August 2023. Television remains popular, with 85 percent tuning in monthly and showing a 10 percent rise in people who increased their consumption time from 2022. In social media, Telegram leads with 88 percent usage, followed by Viber (77 percent), Facebook (67 percent), Instagram (57 percent), TikTok (40 percent), WhatsApp (19 percent), X (11 percent), and Threads (six percent). Messaging apps are popular, with 70 percent of the population using them, according to a Gradus Research <u>survey</u>. Ukrainians spend more than four hours online daily, with the most active users up to eight hours.

Indicator 8: There are appropriate channels for government information.

Ukraine's 2011 law on access to public information, considered one of the most advanced globally, has remained unchanged despite the invasion. However, martial law has hindered its implementation, a media lawyer argued. Panelists provided plenty of examples of national and local authorities exploiting the state of war as justification for withholding information. At the end of 2023, a parliamentary working group started the process of adapting the law to wartime conditions.

Another significant achievement for civil society was the establishment of numerous public registers and open data sets. By 2023, Ukraine rose to third place in the European Open Data Maturity ranking, with high scores for open data policy, the functionality of the open data portal, and the impact and quality of open data.

Ukraine has a <u>united open data portal</u>, and a <u>public spending portal</u>, while the private <u>Opendatabot</u> offers a free basic version to facilitate public access to open data. Furthermore, the Clarity Project, a private company, launched the Open Data Watchdog service to monitor actions with open data sets on the state portal, with the intent of uncovering any data administrator abuses.

Despite these achievements, the majority of public registers that were closed after the full-scale invasion remain inaccessible. State statistics, reports, and many decisions by state bodies became confidential. Some authorities stopped updating their websites and open registers properly, said a freelance investigative reporter. The government limits citizen access to government sessions and discussions, with the exception of certain public events. Panelists observed a decrease in transparency regarding budgets of public interest.

In December 2023, thanks to a parliamentary vote, the register of asset declarations of public officials became accessible. Only some declarations, primarily those of officials in the armed forces and security services, remain undisclosed. The invasion prompted the suspension of public official e-declarations, but the process resumed in September 2023. In August, the Asset Recovery and Management Agency unveiled the register of arrested assets.

Since the full-scale invasion, journalists have been denied access to the parliament for security reasons, with live broadcast of plenary sessions banned and only available on YouTube with delays. A <u>poll</u> shows that 65 percent of Ukrainians believe that journalists must attend parliamentary sessions during martial law, and 57 percent said that live broadcasts should be required.

Civil society has also called for greater transparency in parliamentary committees. The committee for freedom of speech, led by pro-Russian politician Nestor Shufrych, <u>was ranked</u> in a poll as one of the least transparent. Following his arrest on suspicion of treason, Yaroslav Yurchyshyn, a respected civil society leader, assumed the committee's leadership, and announced efforts to re-accredit journalists for the parliament.

Civil society and media have <u>repeatedly urged</u> the government to open public registers and grant access to public information, including allowing citizens access to parliamentary committees. The government referred to security reasons, but some deputies regularly publish information about the sessions live on their social media accounts.

Since March 2023, Ukrainian war correspondents and the Committee to Protect Journalists have pushed the Ukrainian government to establish clear accreditation rules, and halt pressure on journalists for their reporting. Authorities heavily regulate and limit journalists' access to frontline and neighboring areas marked as "color zones¹." Accreditation from the armed forces can be revoked for alleged misbehavior. Journalists continue to complain about the complexity of reporting from these areas, where their access is often blocked despite local civilians being able to move around with mobile phones. Some journalists said that working in southern regions is totally blocked, and military personnel are banned from speaking to journalists. These obstacles prompt foreign media to reduce staff and lose interest, even aside from the effects on Ukrainian journalists.

According to the panelists, the general population is likely less aware of the peculiarities of accessing public information. Citizens are not intimidated so much as disinterested compared to activists and journalists. The government does not exclude any groups from exercising this right.

Most government agencies employ press officers who will suppress or manipulate information, ignore information requests, and complicate the process of receiving comments. These spokespersons play key roles in preventing officials from disclosing unfavorable information to journalists.

Each state agency has a website and accounts in social media, and staff are obliged to publish numerous public data. Nevertheless, as a fact-checker noted, some media and Telegram channels loyal to the government have exclusive access to information. Even telethon member journalists <u>complain</u> that "courtier bloggers and channels" have priority access to insider information.

Red zones are categorized as the most dangerous areas, and journalists could not access these areas at all in 2023. In 2023, yellow zones were less dangerous but required a military press officer escort; journalists could work freely in green zones.

Indicator 9: There are diverse channels for information flow.

Ukraine has legislation against monopoly ownership of broadcast media, but enforcement was inadequate even before the full-scale invasion, as authorities struggled to identify television market shares and potential monopolies. Internet providers and cable TV operators are not monopolized.

Before the 2022 invasion, the television market was dominated by four major oligarch-owned groups. Since then, many media holdings have undergone changes. In July 2022, Rinat Akhmetov shut down his media business, leading former employees to launch My-Ukraina TV channel. The channel rapidly obtained a digital license and joined the United

5 The most concerning trend in

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The government establishes media

News telethon. The Inter Media Group is under new management, Dmytro Firtash increased his ownership in the group, and Serhii Levochkin relinguished his key shareholder position. Ihor Kolomoyskyi, owner of 1+1 Media, was arrested in a fraud investigation. Its holding corporate rights were transferred to management personnel, leading to the establishment of new legal entities no longer under his control. Viktor Pinchuk's Starlight Media remains unchanged in ownership.

Since 2021, Ukraine law has required disclosure of beneficiary owners of any legal entity, although issues persist with unmasking owners hiding behind proxies. IMI found that transparency of the most popular online media outlets increased to 68 percent, up from 38 percent in 2022. However, only 36 percent publish their editorial policies, 28 percent disclose their beneficiary owners, and 92 percent provide contact information.

The new media law, a prerequisite for Ukraine's EU accession, was enacted in April 2023. It cancelled six outdated laws, and its full implementation will span several years. The law granted the NTRBC extended authority to oversee all types of media, introduced

regulations for online media, and simplified broadcast licensing. The NTRBC has adopted relevant bylaws and initiated print and online media registrations, requiring even existing outlets to re-register. While normally voluntary, registration is mandatory for print media during times of martial law. For online media, registration reduces liability for violations and allows them to participate in co-regulatory bodies. The law simplified the registration process for broadcasters and allowed channels or programs originating from the EU to broadcast without registration. Other foreign media are required to register, while audiovisual content from Russia is blocked.

An estimated 10 new TV channels obtained licenses and digital airwaves in 2023, including the new Armiya TB, run by the Ministry of Defense.

> Many digital frequencies became available following closures in 2022, and no disputes arose over the NTRBC allocation of frequencies. However, the illegal removal of three oppositional digital channels in 2022 raises concerns that a government decision can arbitrarily exclude any media entity from broadcasting.

> The public broadcaster UA: PBC, with national and regional TV channels, radio stations, and social media, is regarded as one of the best in complying with professional standards and contributes to

informative and educational coverage. It stands out as the only media entity within the telethon presenting all political parties proportionally, according to their representation in the current parliament.

Internet service providers do not discriminate based on user, content, or source or destination addresses.

Indicator 10: Information channels are independent.

The overall influence of major media oligarch owners has decreased, as their political ambitions have diminished in the absence of elections in 2023 and probably for the foreseeable future. Therefore, they no longer feel the need to promote their interests, and are constrained from economic control by reduced financial resources, an editor on the panel explained. On the other hand, media with owner support or state subsidies have become more dependent on these funding sources. Many regional media organizations need to establish a clear distinction between newsroom operations and business operations, a panelist argued.

The telethon members unified wartime newscasts and eroded the influence of owners on editorial stances. Still, other channels, online platforms, and social media pages of telethon-producing media groups keep promoting owners' agendas. According to the panelists, most consumers believe that the telethon presents the position of the government, and tends to present optimistic perspectives, provoking disputes in the society.

The most concerning trend in recent years is the state returning to be the dominant media owner, an editor on the panel highlighted. The government establishes media outlets, issues licenses, and indirectly controls content production in major media through state subsidies. United News' inception of the telethon in 2022 was justifiable for consolidating wartime information dissemination, but the government's adherence to this policy contradicts its international obligations. The merging runs counter to the trend of liberalization and destatization reforms pursued before 2020. "It will be difficult to reverse this menacing trend," the editor warned.

The European Commission's <u>report</u> on Ukraine's progress towards EU integration stressed the need to restore an independent media landscape. The report specifically refers to the launch of the telethon following the invasion, and the shutdown of three oppositional channels from digital broadcasting.

Throughout 2023, the telethon experienced a gradual decline in viewership as well as public trust. While in May 2022, 69 percent of respondents trusted the telethon, by February 2024, only 36 percent did, and 47 percent expressed distrust. Across all regions in Ukraine, trust in

the telethon <u>does not exceed</u> 40 percent. Its viewership decreased from 40 percent in March 2022 to 14 percent by the end of 2022; at the end of 2023, it was down to <u>10 percent</u>.

Since its launch in 2017, the public broadcaster, Suspilne, has grappled with underfunding. In 2023, the state budget allocated UAH 1.5 billion (\$39.1 million). That amount is only 30 percent of the legally required funding (a minimum of two percent of expenditures in the previous year's budget). One of its channels, – UA Pershyi, continues to produce and broadcast the telethon. According to media expert Ihor Kulias, Suspilne is a rare example of a channel with an independent editorial line, inviting critics of President Zelensky as guests and challenging official statements.

Panelists noted that non-professional content producers and anonymous Telegram channels have significant informational influence, comparable to professional media.

Panelists saw no evidence during 2023 of political influence on NTRBC; in previous decades, government officials and oligarchs often meddled in its affairs. The new media law has significantly increased NTRBC authority and independence. While its structure remains largely unchanged—four members appointed by the president, four by the parliament—candidates are now nominated by the industry and selected competitively. The law also guarantees funding to ensure NTRBC stays independent. However, constitutional amendments are needed to further improve the appointment procedure and ensure an odd number of members. Such amendments will only be possible after martial law ends.

State media do not enjoy lower barriers to access infrastructure, resources, or sole access to the public information.



Principle 3's overall score decreased slightly over the 2022 VIBE study. The ongoing war increased the risks to information security and digital hygiene. Donor-funded projects and government agencies provide numerous training courses on digital security and media literacy tools, but a relatively small number of people show interest in developing these skills. While cyberattacks and cyberfraud are becoming more

sophisticated, responses to them also improve. The related indicator received one of the higher scores for this principle, although it also decreased slightly in comparison with the 2023 VIBE Ukraine study. The media literacy indicator received one of the lowest scores in this principle, indicating that societal resilience to the challenges of war remains insufficient. Although Ukrainians are increasingly aware

of Kremlin propaganda and tactics, many people still lack adequate critical thinking and understanding of journalism standards and media quality. Amid the war, social media debates are often low-level discourse.

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

Legal protections for data privacy and digital security are in place, along with provisions in the criminal code addressing cyber-fraud, and they do not impinge on personal freedoms. However, some panelists noted that these laws do not address large tech platforms or social media.

Often users must agree to non-negotiable terms of service to use apps or social media platforms, automatically allowing processing their personal data beyond the users' control.

A panelist flagged the growing trend of the state accumulating personal data, which might threaten personal freedoms soon. Due to the war, the government has presented numerous initiatives seeking to combine state registries, consolidate individual data, and expand video surveillance for security reasons.

Also, under the pretext of national security, the government restricts most official registries and the majority of city data portals. According to Transparency International Ukraine, only 25 percent of cities published data in 2022—a trend that continued in 2023.

The Cyber Protection Center of the State Service for Special Connections and Information Security reported 1,105 cyber incidents in 2023, which

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is a 62.5 percent increase from 2022. A digital security expert on the panel revealed security threats of a deeper extent than expected, in particular for media websites. Well-qualified security experts are scarce and expensive, making them out of reach for many media organizations to strengthen digital security audits and responsive protection measures. Some outlets might benefit from donor-funded

digital security services, which are expanding in number and scope. Access remains limited, however.

Digital tools to counter DDOS attacks are available for media outlets, and such attacks are handled. While cyberattacks have become more sophisticated, the methods to scrub them are just as effective. The attack on Kyivstar highlighted the importance of digital and data security, although at a significant cost.

A regional media expert emphasized the limited digital security measures in local media, citing a tendency for newsrooms to neglect proper maintenance after initial introduction. The panelists said local outlets often do not have relevant in-house experts and they fail to prioritize these issues.

A communication manager on the panel noted a concerning trend among media professionals: Many do not use two-step authentication or other protective measures, indicating an even lower level of public awareness. A fact-checker highlighted successful hacking attempts on social media accounts of media outlets and initiatives through phishing, due to poor digital literacy among their staff.

The government and civil society organizations (CSOs) provide digital literacy training. Various online courses on digital and information security are available to the public through the governmental portal Digital Education, and educational platforms like Prometheus, VUM, and EdEra.

According to a <u>survey</u> by the Ministry of Digital Transformation, 59.6 percent of the population have at least basic digital literacy skills, which is a 12.6 percent increase over the last four years. Of these respondents, 38 percent have high-level digital skills. Approximately 91 percent of respondents agreed that internet access is a basic need, with 94 percent having internet access at home, and 50 percent adapt and find alternative internet sources in case of a power outage. Sixty percent of Ukrainians faced at least one case of data security violation in the last year. Among the adults in the survey, 42 percent use digital security tools, with five percent using paid services. The study shows a clear correlation between the level of digital literacy and the use of digital security tools.

The survey also indicates that the digitalization of state services simplifies usage, but some users, especially in higher age brackets, are concerned about the security of personal data. This may become an obstacle to expand state electronic tools. In 2022, Ukrainians lost UAH 1 billion (\$27 million) due to cyberfraud, primarily involving fake schemes that promise payments as prizes from the state, charity funds, and banks.

A digital-security expert highlighted the confusion surrounding social media algorithms, exacerbated by the boom of AI-powered tools that

conduct deeper analysis of audience behavior. Even some developers struggle to explain the results of AI-assisted algorithms.

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

Media literacy is a prominent topic in Ukraine. Debunking manipulative information and fact-checking is widespread and popular in the media. Although some panelists criticized the government for its insufficient, inefficient, or non-strategic efforts, the state does support many activities and agencies focused on media literacy. Since 2021, the Ministry of Culture and Information Policy has run Filter, the national media literacy project, while the ministry's Center for Strategic Communications and Information Security runs Spravdi, aimed at identifying and debunking Kremlin information attacks. The Ministry of Science and Education runs projects targeting various demographics. The Ministry of Digital Transformation runs courses and video tutorials at its Diia. Digital Education platform, and there is the state Center for Countering Disinformation under the National Security and Defense Council.

While media literacy can be taught as elective subject in schools, the complexities arising from the war present a challenge in allocating paid hours and securing qualified teachers. However, the recently adopted basic education standard integrates media literacy across all subjects.

For more than a decade, foreign donors have supported media literacy projects, including IREX's Learn to Discern initiative since 2015. The Academy of Ukrainian Press also contributes to media literacy integration. Most media literacy projects target specific demographics rather than the general population. Many run online courses, fact-check, monitor, and debunk information manipulation, such as NotaEnota, Po Toi Bik Novyn, and How Not to Become a Vegetable. Still, according to an Internews survey, only 33 percent of respondents are aware of fact-checking services, and of those, only 33 percent use them.

In 2022 and earlier, "significant efforts were made to convince society that media can be toxic and dangerous, leading to a general loss of trust,

leading to wartime calls for relying only on official sources," an editor on the panel said. Now, the challenge is to restore trust in quality media, cease labeling anything disliked as "fake," and avoid blindly accepting government statements, especially when they are driven by self-interest, the editor added.

Despite the promotion of media literacy, changes in media consumption habits made the efforts almost obsolete, a panelist with editorial background noted. Teaching people to critically engage with television has been undermined by an unexpected surge among the older

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population consuming content through platforms like TikTok, Viber, and Telegram—which is not covered in media literacy handbooks.

The Media Literacy Index, <u>published</u> by Detector Media in April 2023, showed a significant increase in the general media literacy of Ukrainians between 2020 and 2022. The percentage of the population with above-average media literacy levels increased from 55 to 81 percent, while the

average value of the indicator rose from 4.8 to 5.9 points. The index revealed a correlation between higher education levels and increased media literacy.

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

Journalists and citizens exercise their right to free speech and information. The diversity of news sources, consumption patterns, and the relatively high media literacy index score suggest that people regularly engage with objective information.

In a January 2024 <u>study</u> by the Razumkov Center, 51 percent of respondents reported no change in the level of freedom of speech since the beginning of 2023, while 30 percent perceived a decline. An <u>IMI poll</u> of 164 journalists across Ukraine found that 41 percent believed that the

status of freedom of speech worsened, while 33.6 percent thought that it remained unchanged.

Martial law imposes tighter restrictions on governmental buildings, so some public discussions and hearings required by law are held in public spaces or online. The events appear most frequently on YouTube, on radio stations, or in social media. These discussions typically involve hosts interviewing experts, sometimes live.

Since United News introduced the telethon, traditional talk shows

have mostly ceased airing on television. Some exceptions include the talk show New Count, available since March 2023 on Suspilne local channels; YouTube presenters; Ukrainske Radio; and a talk show of Ukrainska Pravda launched in October. Another example is the oppositional Priamyi channel, which was removed from airwaves in 2022, but launched the show Already Well-Timed on YouTube. Analysts noted that it marks the return of a classic pre-war talk show—

bringing back political PR, imbalance, and manipulations, but also providing the type of platform for critical viewpoints that is absent from the telethon's complacent commentaries.

Ukrainian media interact with their audiences through blogs, streams, and comments. These platforms are also avenues to disseminate unverified information, as moderators often fail to delete such content even after complaints are lodged, a television journalist on the panel said. Online discussions tend to be emotionally charged, not constructive, and full of manipulations, hate speech, personal insults, trolls, and bot activities. Debates in social media are not satisfactory, a fact-checker concluded.

Citizens and journalists may complain about information manipulation online. The Commission of Journalism Ethics, the Independent Media Council, MediaCheck, and NTRBC address relevant complaints, but selfregulatory bodies lack legal power over media outlets or journalists. Moreover, social media platforms respond less effectively to complaints.

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

Major professional media outlets actively survey their audience, have tools for providing feedback, publish corrections and refutations, and build audience trust through clubs and events. A regional publisher confirmed that online media outlets can use numerous tools or audience research, including monitoring reactions to each publication. While the state of marketing is weak among Ukrainian media, most innovative outlets research their audience, a television journalist added.

Following the full-scale invasion in 2022, the television ratings panel was temporarily suspended and then re-launched at the beginning of 2023. The Television Industry Committee, a trade association representing the largest TV companies, commissioned Nielsen to oversee the panel. Market players are confident that data provided by the panel are sufficient for advertising sales and strategic decision-making. Still, these media members criticized the panel for not being able to capture data for smaller channels and short advertisements, and not accounting for the growing segment of IPTV and streaming.

Radio stations have also resumed audience research conducted by Kantar, revealing growth in audience reach, which has contributed to a rapid increase in advertising revenue.

According to a data journalist on the panel, technical tools for audience analysis on online platforms have improved and become more affordable for media outlets. Feedback from the audience has also become more accessible, although its effectiveness depends on platform policies regarding moderation, removal of bots, and the presence of Russian bots which lodge complaints that can influence the availability of a post.

Media organizations are increasingly cooperating with NGOs rather than with the government, a communication expert noted. The panelists

agreed that donor-funded initiatives often foster collaboration and interaction among media, CSOs, and the government, with some stable coalitions based on mutual interests regardless of donor funding. However, some panelists complained about the difficulty in finding media partners in the regions, while others noted that cooperation between CSOs and media is more feasible when CSOs have budgets for media-related activities.

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

Only three of 15 panelists acknowledged the existence of community media—seeing various non-profit media organizations or grassroots media at embryonic stages, often found on social media, as serving community interests. However, other panelists reasoned that since Ukrainian legislation does not define community media, the country has no such sector.

An estimated 82 municipal television and radio broadcasters belong to local governmental bodies. According to the new media law, these outlets are required to undergo transformation into independent community broadcasters. The reform must be completed within six months after the cancellation of the martial law. Currently, only a few media companies are piloting this process.



Principle 4's score is the same as in 2022, although its four of its indicators slightly fluctuated. The panelists expressed concerns over the relatively lower consumption rates of independent and reliable news

sources compared to the telethon forum and Telegram channels, as well as the lack of in-depth discourse. The lowest score in this principle, assessing individuals' use of information, increased by two points from the 2023 VIBE Ukraine study, but the panelists did not elaborate significantly upon the reasons for the change. The indicator examining civil society's contribution to robust information flows remained the highest scoring, but it decreased slightly. The change is likely due to lower-than-desired civic participation in key decisions, and content producers insufficiently engaging with civil society on covering socially important issues. The government's use of quality information remains consistent with the 2023 study, but officials continue to struggle with effectively communicating and justifying important decisions to the public. While the government has somewhat increased reactions to misconduct uncovered by media, its responses remain selective and, at times, inadequate.

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

Various non-partisan and reliable news sources are available in Ukraine, mostly online, and some with audiences numbering in the millions. IMI's whitelist of online media upholding high professional standards has remained largely consistent over the past few years. Panelists even recommended promoting this list to the public in an effort to increase media literacy and counter information manipulation. In 2023, IMI and Detector Media identified trustworthy media across Ukraine, but the published map sparked discussions and objections from regional journalists that contested choices.

The <u>Internews survey</u> shows that quality media tend to attract smaller audiences. Notably, almost half of the population relies on multiple news sources.

Panelists agreed that most opinions are exchanged on social media platforms and in the comments sections of media outlets, but the discussions are usually not constructive. Many newsrooms have established online channels for communicating with their audiences, and some large media outlets organize meetings with their readers.

Discussion in social media can never replace in-depth discourse within traditional media platforms, an editor on the panel argued. The ongoing war limits such discussions due to self-censorship, calls for unity and solidarity, and government resistance to heated political debates or exposing its misconduct. Although the president's decision on the united information policy effectively banned political talk shows and discussion programs, the law has no explicit prohibition. "Nonetheless, if the war and martial law persist for several years, the society has to return to inclusive and comprehensive discussions on pressing issues," the editor added.

"Ukrainians are often confined within information bubbles, choosing media that reinforce their pre-existing views," a television journalist on the panel said. Despite these silos people still find platforms for engaging with opposing viewpoints. Such debates are not restricted, although pro-Russian narratives are largely excluded from this context, and the majority of society generally does not tolerate them, another panelist added.

The panelists had no evidence on whether people usually form their perspectives around fact-based information. "People base their analysis on information they trust, which is not necessarily reliable," one panelist said.

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

Several panelists acknowledged the absence of systematic research providing evidence on the information citizens use for their decisions, leading many to rely on assumptions for their scores and comments. Some panelists held the view that the information sphere contains quality and reliable sources as well as manipulative and false information. People might unwittingly use unreliable information to their personal detriment or to the detriment of the public good, panelists concluded.

Professional media do not always provide quality information, and gaps are filled by non-professional content creators that often disseminate manipulative information, a television journalist said. A fact-checker noted the rapid spread of false and harmful information, influencing decision-making processes, with many examples during the pandemic and previous elections. In 2023, topics rife with Russian government propaganda and populism, such as war, mobilization, corruption, refugees, and internally displaced people, were particularly susceptible to manipulation, panelists claimed.

• Access to public information

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Despite frequent anti-vaccination campaigns by various groups, a <u>survey</u> cited by a media literacy expert showed that 88 percent of respondents exhibited a positive or neutral attitude to vaccination, with 52 percent never having refused vaccination.

VoxCheck, a fact-checking project, <u>documented</u> approximately 1,900 cases of information manipulation between June 2022 and June 2023. The topics focused on chemical and nuclear threats to Ukrainians, US biolaboratories, humanitarian and food crises, grain export, claims of civil hospitals being overloaded with military patients, epidemic infections, and attempts to discredit the Ukrainian healthcare system in general. "These materials would usually refer to certain facts from reputable sources, then add a few false facts, and manipulate all of them to be able to present as evidence," an investigative reporter commented.

IMI <u>analyzed</u> how the Ministry of Health and major media outlets unintentionally misinformed the public about the implementation of electronic prescriptions for medicine that had previously required written prescriptions. This reporting led to long lines of panicking people at pharmacies buying numerous medications. Other IMI articles revealed how Ukrainian media outlets manipulated, fabricated or copypasted from foreign sources dubious medical or everyday advice with no scientific basis. Tsn.ua even <u>created</u> a fictional doctor character, presenting statements or "folk medicine" advice without any evidence.

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

The panelists unanimously acknowledged that Ukraine possesses a robust and professional civil society that uses reliable information, is open to media, and communicates with the public through websites and social media platforms. CSOs are active in the development and implementation of various reforms. They conduct surveys, use quality

information for these endeavors, and engage media. However, the government does not always hold genuine consultations with civil society, often resorting to imitating such discussions, a television journalist noted.

The panelists admitted that there could be some exceptions among quality CSOs--

organizations that might enlist unreliable information or promote their agendas by exaggerating or manipulating certain issues. Furthermore, the panelists did not praise the various marginal groups, trade unions, religious organizations, or quasi-NGOs set up by political interests. Moreover, some CSOs promote conspiracy theories or pro-Russian agenda, a fact-checker said. A data journalist highlighted the trend of politicians <u>promoting themselves</u> through various charity organizations and funds bearing their names, leveraging these platforms to bolster their public images.

Many CSOs are involved in training and supporting media outlets, conducting media analysis and monitoring, countering information manipulation, checking facts, promoting media literacy activities, and providing legal defense and education for media members.

An editor on the panel highlighted the phenomenon of certain media outlets transitioning into CSOs, undertaking various civic functions, and managing donor-funded projects with additional activities beyond their media mission. Conversely, some CSOs develop strong communication arms and investigative journalism capabilities. An editor of a regional investigative reporting center emphasized its reliance on comments from

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competent CSOs, and the benefits of employing a public procurement expert to increase the quality of its investigations.

Panelists offered many examples of media outlets and other content producers actively working with civil society to cover socially important issues, seek expert commentary, sometimes co-produce content, and engage CSOs to spur public engagement on an issue. A communication manager on the panel gave the positive example of a petition prompted by civil society and media to disclose e-declarations of officials. The petition forced the government to change its decision.

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

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Access to public information worsened during the war. Press conferences have become less frequent, and officials often delay or deny requests for comments. According to a director of a national CSO on the panel, the quality of dialogue among the government, public, and media is disputable. Interactions between government officials and civil society members varies from region to region, a data journalist added. Panelists reported

that in the capital of Kyiv, consumers perceive the municipal government as offering weak communication.

Local media face problems with local authorities, noted a local media developer on the panel. Local governments often ignore outlets that systemically cover community issues and that demand accountability. Officials rarely invite these journalists to events; often delay or withhold sharing announcements; and refuse to provide additional comments, claiming that all information has been published online.

President Zelensky held three press conferences in 2023: on the first anniversary of the full-scale invasion in February, on Journalist's Day in June and a year-end wrap up in December. Authorities accredited

approximately 120 media outlets for the last conference, with 15 foreign and 17 Ukrainian journalists asking questions. Officials did not accredit Censor.net, due to a past argument between its editor-in-chief, Yurii Butusov, and the president. However, Telegram channels Trukha and Ukraina Segodnya were accredited. In October 2023, the president held an off-the-record meeting with journalists, including the owner of Trukha. Panelists perceived this as an encouraging sign from the president's office.

Due to the war, political debates or serious discussions are rare, and elections appear unlikely in the near future. Despite the parliamentary majority by The Servant of The People, the president's party, the opposition actively engages in debates, and attempts to influence

political processes.

According to a TV journalist on the panel, the political culture is low quality, with politicians often exploiting stereotypes and social fears. Consequently, they often spread economic and other myths, prod the emotions of audiences, and use populist slogans.

The Ukraine government shows no indications of its actors relying on

evidence-based information for decision making or properly explaining their decisions to the public. Instead, authorities often fail to properly justify and explain their decisions publicly, a media lawyer said.

Journalists from Bihus.info investigated dozens of state-commissioned reports on regular media and social monitoring. They concluded that positive news items about the government exceed negative ones, and the reports often misinterpret criticism from unspecified "oppositional media" as mere "attacks" and "populism," without clear definition. In addition, critics of the telethon were labeled as porokhobots, bots of Poroshenko, a former president of Ukraine. In 2023, the Ministry of Culture allocated UAH 10 million (\$261,000) for reports to the Mediateka company, owned by a deputy of the ruling party.

Indicator 20: Information supports good governance and democratic rights

In contrast to 2022, in 2023 journalists resumed anticorruption investigations, focusing on public asset management, public procurement, and the lifestyle of public officials.

Ukrainian society has a strong demand for publicizing revealed corruption cases, with 84 percent of respondents preferring to expose them rather than silence them until the end of the war. According to the panelists, Ukrainians fear that suppressing such cases could lead to losing unity, Western support, and eventually the war, according to a <u>survey</u> by the Razumkov Center, commissioned by zn.ua.

Propaganda tactics include exploiting the topic of corruption to undermine Ukraine: When Ukrainian reporters publish stories on corruption, it is amplified by numerous channels, actors, and bots. On the other hand, "The argument that all of these [corruption cases] are Russian government propaganda and special operations is used to protect corrupt officials," an editor on the panel said.

Most panelists agreed that corruption cases, when revealed, started to cause a stronger response, with increased public attention and higher-quality investigations. However, proper law enforcement investigations and court sentences are exceptions rather than norms. Journalists often exert more pressure on corruption perpetrators than law enforcement and anticorruption bodies, a leader of a national CSO argued. Another panelist noted that out of 64 investigations in 2023, 16 led to audits, criminal cases, or dismissals—marking an increase compared to previous years. A panelist working with local media provided many examples of how critical media publications forced local authorities to address the issues raised.

A television journalist noted that corruption scandals and mobilization issues have highlighted the media's limited influence in shaping state policy. The outcomes are very much dependent on the involved public figure and the societal response to each case. Despite a series of quality media investigations of the president's office, its chief of staff, and other

top officials, the public saw no reactions from officials, a fact-checker added. According to a media lawyer on the panel, the government might be forced to face journalists' findings, but its reactions often do not include the strategic depth needed to address and prevent violations in the future.

Panelists did not offer enough evidence to assess whether publications on human rights violations and civil liberties prevent or reduce such cases. However, a data journalist provided several examples of publications sparking public outcry and prompting authorities to react, which resulted in the causal events gradually improving.

The panelists refrained from speculating on the impact of quality information on fair elections, as no elections are planned while Ukraine is under martial law. According to a Razumkov Center <u>survey</u> conducted in October 2023, 64 percent of respondents do not support holding national elections in Ukraine before the end of the war, compared to 15 percent who are in support.

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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