

Conclusions and recommendations

based on the results of the conference “The Right
to Truth: New European Regulations and
Multidimensional Threats During Wartime”

The conclusions and recommendations were prepared with the support of the OSCE Support Programme in Ukraine and do not necessarily reflect the views of the OSCE.

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On 2 September 2026, Kyiv hosted the annual conference advocating for adequate funding for Suspilne, Ukraine's public broadcaster. This year's event was titled "The Right to Truth: New European Regulations and Multidimensional Threats in Wartime". The conference sought to identify the legal, institutional, financial, security and ethical conditions needed to preserve an independent and sustainable media ecosystem in Ukraine during the war and support its further integration into the European information space.

The conference was organised by Suspilne Ukraine, the Centre for Democracy and Rule of Law, and the Verkhovna Rada Committee on Humanitarian and Information Policy. The event was supported by the OSCE project "Strengthening the Role of Media by Ensuring Journalists' Safety, Promoting Critical Media Consumption, Encouraging Ethical and Self-Regulated Journalism, and Institutionalising Gender-Sensitive Media Practices" and the Council of Europe project "Safeguarding Freedom of Expression and Freedom of Media in Ukraine – Phase II".

The conference brought together representatives of the Verkhovna Rada of Ukraine and executive authorities, the Ukrainian Parliament Commissioner for Human Rights, the national media regulator, Suspilne Ukraine, the European Union, the OSCE and the Council of Europe, international partners, media groups, newsrooms, civil society organisations and industry experts.

The substantive programme comprised three panel discussions that explored the conference's overarching theme from legal, institutional, technological and industry perspectives.

- The first panel, **"European Regulations for Freedom of Expression: From Journalists' Safety to the Role of Public Service Media in the Media Ecosystem"**, focused on implementing European media freedom standards in Ukraine, safeguarding Suspilne's independence, and protecting journalists from physical, legal, digital and other threats. Particular attention was given to the European Media Freedom Act and its significance for the further development of Ukraine's media policy.
- The second panel, **"Measuring Media Consumption in the Interests of Society, the State and the Media Market: Market Practices and Development Scenarios"**, examined the need for comprehensive and independent measurement of media consumption. Participants discussed how reliable data on audience behaviour could contribute to media market development, improve the effectiveness of state information policy, provide a better understanding of the information needs of different social groups, and support evidence-based editorial decision-making.
- The third panel, **"What About AI? Ethical Challenges and New Opportunities"**, focused on the impact of artificial intelligence on media operations, trust in information and adherence to journalistic standards. Participants considered the opportunities offered by AI tools in editorial work, as well as the associated risks: the spread of synthetic and manipulative

content, algorithmic opacity, copyright infringement, loss of control over personal data and the erosion of editorial accountability.

The conference combined discussion of the European regulatory agenda with practical questions concerning the operation of Ukraine's media ecosystem during the war. Recurring themes included the physical and professional safety of journalists, media accountability to audiences, the need for reliable media consumption data, the ethical and transparent use of new technologies, and the independence of Suspilne.

This document summarises the principal positions, conclusions and proposals presented during the opening remarks and the three panel discussions. The recommendations are based on the conference discussions and do not necessarily represent the consolidated position of every participant or the institution they represented.

Key Findings

1. The right to truth requires an independent and sustainable media ecosystem

Conference participants emphasised that the right to truth is not limited to formal access to information. Its realisation depends on professional and independent media capable of verifying information, reporting from the scene, documenting the consequences of the war, countering disinformation and enabling public scrutiny of government action. To perform these functions, newsrooms need professional teams, safe working conditions, adequate funding, editorial autonomy and statutory guarantees of independence.

European Union Ambassador to Ukraine Katarína Mathernová stressed that independent journalism performs an indispensable democratic function: it asks difficult questions, holds public institutions to account and helps citizens distinguish verified facts from manipulation.

Petr Mareš, Special Representative of the OSCE Chairpersonship – Project Co-ordinator in Ukraine, noted that Ukrainian journalists continue to uphold citizens' right to truth despite the difficult conditions of war. He emphasised the need for the state, the media community and international partners to join forces in supporting responsible journalism, professional standards, media literacy and the resilience of Ukrainian media.

Hilde Haug, Deputy Head of the Council of Europe Office in Ukraine, noted that the right to truth encompasses access to reliable information, freedom of expression and journalists' safety. During the war, Ukrainian media not only inform the public and counter disinformation, but also document war crimes and record evidence needed to establish accountability.

The conference also addressed Russia's hybrid aggression, which seeks to destroy trust, disorient society and weaken democratic institutions. Cybersecurity, information security and media security must therefore form part of a unified system of democratic resilience. Amid the proliferation of disinformation and AI-generated content, the right to truth increasingly means citizens' right to know the actual facts rather than fabricated content or manipulative interpretations.

Suspilne's work was highlighted as a specific example. Svitlana Ostapa, Chair of Suspilne's Supervisory Board, reported that the broadcaster's research found that 84% of its audience trusted its news. Suspilne operates an extensive regional network, reports from the sites of Russian attacks and, since April 2022, has provided the Office of the Prosecutor General with more than 5,600 items documenting Russian war crimes. Over the previous year, it also shared approximately 2,500 items with international broadcasters through the European Broadcasting Union's news exchange system.

Speakers on the first panel described professional media and Suspilne as "anchors" of reliable information. Their ability to fulfil this role requires legal protection, predictable funding, independent governance and support from civil society and international partners. The right to truth therefore depends on the sustainability of the media ecosystem as a whole.

2. Journalistic ethics remain the foundation of trust in the media, regardless of the technologies used, including AI

Conference participants emphasised that the emergence of new technologies does not alter journalists' fundamental responsibility to their audiences. In the context of war, disinformation and the growing volume of generated content, particular importance attaches to accuracy, verification, consistency between reporting and actual events, the protection of confidential data, transparency in editorial decision-making, and the media's willingness to accept responsibility for published content.

The principal discussion of this issue took place during the panel on the ethical challenges and opportunities associated with artificial intelligence. Participants noted that the question was no longer whether AI should be used in the media, but what rules should govern its use. Proposed editorial principles included a "human first, human last" approach, a working principle that places human thought, judgement and oversight at the beginning and end of any AI-assisted process, along with compliance with core journalistic standards, transparency and explainability, fitness for purpose, confidentiality and data protection, legality, and editorial accountability.

Andrii Kulykov, Chair of the Commission on Journalistic Ethics, stressed that the right to truth is inseparable from journalists' duty to ensure the accuracy of information. He observed that technology does not in itself determine whether a piece of content

is ethical; what matters is whether it is used to provide accurate information or to create and disseminate falsehoods. The emergence of AI therefore neither invalidates established standards nor transfers responsibility for content from the journalist or newsroom to a technological tool.

The BBC experience presented during the panel likewise demonstrated the need for mandatory human involvement at both the beginning and the end of the editorial process. Automated translations, for example, are reviewed by staff for both fidelity to the source and the quality of the target-language text. AI can accelerate individual tasks and help journalists comply with internal editorial rules, but final verification and the decision to publish remain the responsibility of people.

Participants also discussed the use of generated images to illustrate real events. They concluded that the media must not create a false impression of an event or replace documentary evidence with an artificially generated visualisation. When a story concerns an actual attack, a statement by a public figure or another factual event, the newsroom should prioritise authentic photographs and video and make every effort to engage directly with sources and people. Journalists' contact with physical reality was identified as a critical prerequisite for trust in the media.

The discussion therefore demonstrated that journalistic ethics must apply throughout the editorial process, regardless of the technologies used to produce content. Adherence to professional standards, a firm grounding in reality, transparency and editorial accountability are what give audiences reason to trust the media.

3. Journalists' physical safety must be ensured at every stage of the editorial process

Conference participants emphasised that, amid the full-scale war, physical safety has become an integral part of the daily work of Ukrainian newsrooms. Journalists report from the sites of Russian attacks and from frontline communities, documenting the aftermath of strikes, survivors' testimonies and war crimes. Risk management must therefore cover the entire editorial process: preparation for assignments, threat assessment, provision of the necessary equipment, compliance with safety protocols in the field, communication with the newsroom, and response procedures in the event of an attack or other incident.

At the same time, the direct source of these threats is Russia's armed aggression and Russian attacks affecting journalists, newsrooms and media infrastructure. Safety protocols, training and protective equipment can reduce risk but cannot fully protect media workers from missile and drone strikes. Improvements to internal safety systems must therefore be accompanied by documentation of Russian crimes against journalists and efforts to ensure accountability for them. Reference was made to the work of the Verkhovna Rada's Temporary Special Commission investigating violations of the rights of journalists and media workers, including its

regional visits and visits to Suspilne branches. Representatives of international organisations stressed the need to document violations and bring those responsible to justice.

The conference heard examples of attacks on Suspilne reporting crews in Dnipropetrovsk and Kharkiv regions, including an FPV drone pursuing journalists and a missile exploding near their location. Such cases demonstrate that a “Press” marking does not guarantee protection and that journalists may be deliberately targeted in Russian attacks.

Particular attention was paid to the safety of media infrastructure. According to data presented at the conference, 37 Suspilne properties in Kyiv and the regions had been damaged, prompting 26 criminal investigations. Participants also referred to Suspilne employees who had been killed and to one colleague being held in Russian captivity. This demonstrates that newsrooms must prepare not only for risks arising during individual assignments, but also for damage to premises, equipment, vehicles and other infrastructure required for operational continuity.

The first panel also discussed relocated media outlets and newsrooms affected by Russian strikes or the physical destruction of infrastructure. Participants stressed that legal guarantees, including access to compensation or reparations, are insufficient if media outlets lack the human, technical and financial resources needed to continue operating. Another practical problem is ensuring that women journalists working in combat zones have protective equipment adapted to the female anatomy. This requirement should be taken into account in procurement and international assistance programmes.

Journalists’ physical safety therefore cannot be treated solely as the individual responsibility of a media worker or be reduced to issuing protective equipment before an assignment. Editorial protocols, preparedness, insurance and secure infrastructure are necessary to mitigate risks, but they do not eliminate their root cause: Russia’s ongoing aggression and attacks on civilians, journalists and media facilities. The response must therefore combine practical protection measures with documentation of Russian crimes, international support, and work to hold both Russia and the individual perpetrators accountable.

4. Media organisations’ financial capacity and editorial independence are interconnected

Conference participants stressed that editorial independence requires not only statutory safeguards but also sufficient resources to put them into practice. Without adequate funding, media organisations cannot retain their teams, maintain regional networks, protect journalists, restore damaged infrastructure, develop digital platforms or produce content in the public interest. At the same time, funding must be predictable and structured so that it does not create opportunities for political or economic influence over editorial decisions.

Hilde Haug, Deputy Head of the Council of Europe Office in Ukraine, noted that institutional independence cannot be sustained without predictable funding. Public-interest journalism requires long-term investment that allows media organisations to operate in the contemporary economic and technological environment. She called on the authorities to continue supporting independent broadcasters in accordance with European standards and practices.

Particular attention was paid to the financing of Suspilne ahead of preparations for Ukraine's 2027 State Budget. Svitlana Ostapa, Chair of Suspilne's Supervisory Board, recalled that the law requires state funding for the broadcaster to amount to no less than 0.2% of the previous year's general-fund state budget expenditure. In view of the priority accorded to defence expenditure, Suspilne proposed a compromise approach: applying the same formula while excluding defence spending. According to figures presented at the conference, funding calculated on that basis would have amounted to UAH 3.6 billion in 2026, whereas the broadcaster received almost UAH 2.5 billion. Its estimated requirement for 2027 under the same formula was UAH 3.8 billion.

The first panel also discussed the situation of regional, relocated and frontline media outlets. Participants noted that some newsrooms had been affected by Russian strikes and the physical destruction of infrastructure, while shortages of human, technical and financial resources constrained their ability to continue working. Nataliia Movshovych, Deputy Minister of Culture for European Integration, identified the underfunding of frontline media as one of the greatest challenges. She also noted that existing grant programmes assist individual newsrooms but do not constitute a systemic support mechanism.

Transparent support mechanisms that are neutral with respect to editorial content should be developed specifically for regional, frontline and relocated media outlets that provide communities with information in the public interest but cannot restore their operations through market revenue alone.

The economic dimension of independence was also discussed during the panel on cross-media measurement. Participants noted that transparent, generally accepted audience data influence the allocation of advertising revenue. The fair distribution of financial flows creates an economic foundation for independent media and reduces their dependence on large platforms and companies capable of imposing their own terms.

Financial capacity is therefore a practical prerequisite for editorial independence, staff safety and the stable operation of media organisations. Yet the availability of funding does not by itself guarantee independence if its distribution is opaque or contingent on attitudes towards editorial content. State, donor and market-based support mechanisms must therefore be long-term, predictable, based on clear criteria and protected against interference in editorial policy.

5. European media freedom standards must be implemented as a coherent system of practical safeguards

Conference participants stressed that European integration in the media sector must not be reduced to the formal transposition of EU legislation into Ukrainian law. Successful implementation should be judged by whether the new rules can effectively protect journalists and their sources, editorial independence, media pluralism, the independence of the regulator, the proper functioning of Suspilne, and transparency in relations between the state, the media and digital platforms.

The main discussion focused on implementing the European Media Freedom Act (EMFA). Participants noted that the Act covers a broad set of interconnected issues: protecting journalists and the confidentiality of their sources; safeguarding the independence of public service media and media regulators; ensuring transparency of media ownership and state advertising; assessing concentration in the media market; measuring audiences; engaging with online platforms; and ensuring appropriate prominence for content in the public interest. Its implementation will therefore require not a single law, but a coordinated package of amendments to various legislative acts and codes.

Tanja Kerševan, an international expert and Council of Europe consultant, noted that candidate countries cannot simply copy the provisions of the EMFA without regard to their national context. It is necessary to model in advance how the new rules will operate in practice: who will appoint governing and supervisory bodies, who will oversee the use of funds, which institutions will conduct monitoring, and who will take corrective action in the event of violations. She also stressed the cumulative effect of the EMFA: individual changes may have limited impact, but together they create a system of safeguards capable of protecting media freedom.

Lithuania was cited as an example of the EMFA's practical impact, where reference to the Act helped halt legislative changes that could have adversely affected the public service broadcaster. The case demonstrated that European standards can serve not only a regulatory but also a preventive function by restraining decisions that could weaken media independence. Participants further stressed that predictable funding for Suspilne should not be viewed in isolation from the other EMFA safeguards, as it forms part of the broader system protecting its autonomy and democratic resilience.

A second important area was the implementation of anti-SLAPP standards designed to protect journalists, media outlets, civil society activists and other participants in public-interest debate against the abuse of judicial proceedings. Yaroslav Yurchyshyn, Chair of the Verkhovna Rada Committee on Freedom of Speech, stated that the relevant draft law was being prepared with the participation of representatives of parliament, public authorities, civil society and law enforcement agencies, and had already received a preliminary expert assessment from the Council of Europe. The proposed mechanisms should enable courts to dismiss claims

whose purpose is not to protect an infringed right but to pressure journalists, block publication or exhaust newsrooms through protracted litigation.

Institutional capacity to enforce the new rules was another key topic. Representatives of public authorities and the regulator observed that even well-drafted legislation will not work without sufficient human, financial and technical resources, clear procedures and proper coordination among the institutions responsible. This is particularly relevant to monitoring the online environment, assessing media ownership concentration, overseeing transparency in state advertising, engaging with digital platforms and ensuring the regulator's independence.

The implementation of European standards must therefore be approached as the creation of a coherent system rather than compliance with isolated legislative requirements. The adoption of laws must be accompanied by the development of procedures, the allocation of powers and institutional responsibilities, adequate resourcing, independent monitoring and evaluation of practical outcomes. Only under these conditions can the EMFA, anti-SLAPP mechanisms and other European standards provide real rather than merely declaratory protection for media freedom in Ukraine.

6. Independent cross-media measurement is essential to the development of media pluralism and evidence-based media policy

Conference participants stressed that media consumption data are not merely a commercial tool, but also a component of media freedom. Independent measurement makes it possible to understand what content different population groups consume, through which channels and on which devices. Media organisations need these data to develop content; advertisers need them to allocate budgets; and the state needs them to formulate media and information policy based on actual audience behaviour.

Panel participants noted that the available picture of media consumption in Ukraine remains fragmented. Individual media organisations, platforms, research companies and advertising-market actors hold their own datasets, but these are compiled using different methodologies and do not provide a comprehensive view of audiences. The existing television panel mainly covers cities with populations exceeding 50,000 and does not fully capture content consumption on digital platforms, OTT services, smartphones and other devices. As a result, each market participant sees only one part of the overall picture.

Svitlana Kalinina, Managing Partner at Kwendi Media Audit, noted that European markets are gradually moving beyond television-only audience measurement towards comprehensive analysis of video and other media content consumed across platforms and devices. In her assessment, Ukraine need not recreate an outdated television panel model and could move directly to a more modern system, including

the use of mobile technologies. Doing so will require a shared vision, a technological solution, funding and cooperation among market participants.

Representatives of Suspilne stressed the need for a common methodological framework that could be used by commercial and public service media, public institutions, researchers and advertisers. Suspilne already conducts research aimed at developing a comprehensive understanding of its audience and provides other market participants with access to some of its findings. However, studies commissioned by a single broadcaster cannot replace a nationwide system whose results are accepted by all stakeholders.

The economic dimension of the discussion concerned the effect of measurement on the allocation of advertising revenue. In the absence of a unified system, advertisers must rely on disparate metrics, while media organisations and platforms may present their own data in ways that serve their interests. Transparent and generally accepted measurement, by contrast, can become a common market “currency” that enables results to be compared and advertising budgets to be allocated on a sound basis. Participants stressed that the fair distribution of financial flows strengthens the economic foundations of independent media and reduces their dependence on large companies and digital platforms capable of dictating their own terms.

For the state, cross-media measurement is also significant in the context of information security. Participants noted that public authorities need to understand which sources citizens use to obtain information, which groups remain beyond the reach of professional media, and where information vulnerabilities arise. Without such data, it is difficult to assess policy effectiveness, anticipate changes in content consumption and plan measures to counter hostile information influence. These objectives, however, must not be used as a pretext for political control over measurement.

Ukraine needs a nationwide cross-media measurement system covering the whole country, different social and age groups, media types, platforms and devices. Its methodology, governance and funding must be transparent, and its results must be independent and accessible to the various actors in the media ecosystem. Such a system would contribute to a fairer allocation of resources, the development of media pluralism, the economic resilience of professional media and data-driven public decision-making.

7. Implementing the recommendations requires sustained cross-sectoral coordination

Conference participants emphasised that protecting journalists, implementing European standards, ensuring the financial capacity of media organisations, establishing a cross-media measurement system and developing rules for the use of artificial intelligence all extend beyond the remit of any single institution. They require sustained cooperation among public authorities, the regulator, media

organisations, civil society and professional associations, researchers, technology companies and international partners.

Examples of such cooperation include thematic subgroups working to align Ukrainian legislation with the European Media Freedom Act, the working group implementing anti-SLAPP standards, and the AI Alliance established with the participation of Ukrainian media organisations. The discussion on cross-media measurement also demonstrated that a shared vision among the state, the media market, research organisations, advertisers and digital platforms must precede the selection of technology and a funding model.

Petr Mareš, Special Representative of the OSCE Chairpersonship – Project Co-ordinator in Ukraine, noted that international partners and Ukrainian institutions cannot operate in isolation. Support should be shaped around the requests and actual needs of Ukraine's media community rather than through the imposition of external solutions.

Cross-sectoral coordination must produce concrete results: legislative amendments, editorial standards, shared methodologies, funding mechanisms or cooperation protocols. Each process should specify the responsible participants, timelines and a method for evaluating results, so that working groups do not become a substitute for practical decisions.

Recommendations

1. To public authorities and the Verkhovna Rada of Ukraine

Ensure comprehensive implementation of the European Media Freedom Act and anti-SLAPP standards. Prepare a coordinated plan of legislative and institutional reforms with defined timelines, responsible authorities and required resources. Pay particular attention to protecting journalists and their sources, safeguarding the independence of the media regulator and Suspilne, ensuring transparency of media ownership and state advertising, and preventing the use of judicial proceedings to pressure journalists and newsrooms.

Ensure predictable funding for Suspilne that is protected from political influence. When preparing the State Budget, take account of the statutory funding guarantees and the compromise approach presented at the conference, under which the amount of funding is calculated excluding defence expenditure. Funding decisions must not depend on the broadcaster's editorial policy or the content of its reporting.

Establish a systemic mechanism to support the safety of journalists and newsrooms working in high-risk conditions. It should cover the provision of protective equipment, including equipment adapted to the needs of women journalists; insurance; training in first aid and work in hostile environments; support for relocated and frontline newsrooms; and the proper documentation and investigation of crimes against journalists.

Initiate the establishment of an independent nationwide cross-media measurement system. Involve media organisations, the advertising market, research organisations, operators, digital platforms and civil society in designing its model. The state may contribute to funding the system or purchasing data, but must not control its methodology, governance or results.

2. To Suspilne Ukraine

Continue improving the comprehensive staff safety system. Regularly update risk assessments and operating protocols to reflect FPV-drone attacks, follow-up strikes and other emerging threats; provide teams with appropriate equipment, insurance, training, continuous communication with the newsroom, and medical and psychological support following dangerous assignments.

Strengthen transparency and industry cooperation. Report regularly on the use of public funds, regional reach, staff safety and the broadcaster's public impact, and continue sharing experience with other newsrooms on safety protocols, the ethical use of AI and media consumption research.

3. To international partners

Provide long-term, coordinated support to Ukrainian media operating in the most difficult conditions. Priority should be given to the needs of frontline, regional and relocated newsrooms: protective equipment, insurance, training, psychological assistance, restoration of damaged infrastructure and operational continuity.

Provide expert and technical assistance for the practical implementation of the EMFA and anti-SLAPP standards. Support not only the preparation of legislative amendments, but also the development of procedures, training for judges and public officials, capacity-building for the regulator, and independent monitoring of how the new safeguards operate in practice.

Support the development and launch of independent cross-media measurement. Facilitate pilot studies, access to international expertise and the identification of a sustainable funding model, subject to transparent methodology, independent governance, and appropriate representation of regional and small media outlets.

4. To civil society organisations, professional associations and media organisations

Finalise, publish and implement shared principles for the responsible use of AI in the media. They should cover verification of AI outputs, protection of personal and confidential data, non-discrimination, the use of generated images, content labelling, error correction and editorial accountability. The recommended rules should be adapted to the practical capacities of newsrooms of different sizes.

Strengthen the joint system of safety support for journalists. Organise training and the exchange of protocols; provide advice on insurance and equipment procurement; document attacks; and establish accessible referral mechanisms for legal, medical and psychological assistance.

Conduct independent civil society monitoring of media reform implementation.

Regularly assess the implementation of the EMFA and anti-SLAPP standards, the status of investigations into crimes against journalists, compliance with guarantees of the independence of the regulator and Suspilne, and the transparency of their funding.

Contribute to the development of an independent cross-media measurement system. Represent the interests of regional, local and small media outlets and help align the principles governing the system's management, methodology and access to results, so that it supports media pluralism rather than reinforcing the advantages of the largest market participants.

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