



EN

THIS ACTION IS FUNDED BY THE EUROPEAN UNION

ANNEX II

of the Commission Implementing Decision on the Annual action plan in favour of Ukraine for 2021

**Action Document for Media Development and Countering Disinformation Facility Ukraine
(EU4Media Democracy)**

ANNUAL ACTION PLAN

This document constitutes the annual work programme in the sense of Article 110(2) of the Financial Regulation, and action plan/measure in the sense of Article 23(2) of NDICI-Global Europe Regulation.

1. SYNOPSIS

1.1. Action Summary Table

| | |
|---|--|
| 1. Title CRIS/OPSYS Basic Act | Media Development and Countering Disinformation Facility Ukraine (EU4Media Democracy) Annual action plan in favour of Ukraine for 2021 CRIS number: NDICI-GEO-NEAR/2021/043-029 Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe) |
| 2. Team Europe Initiative | No |
| 3. Zone benefiting from the action | The action shall be carried out in Ukraine |
| 4. Programming document | Multi-annual Indicative Programme (MIP) 2021-2027 for Ukraine ¹ |
| 5. Link with relevant MIP(s) objectives/expected results | The action will contribute to Specific objective 2 Supporting the resilience of Ukrainian information space by strengthening sustainability of independent media; by reinforcing the actions reaching out to the conflict affected populations; and by conducive media environment aligned with the EU audio-visual media legislation. under Priority area 5: A resilient, gender-equal, fair and inclusive society |
| PRIORITY AREAS AND SECTOR INFORMATION | |
| 6. Priority Area(s), sectors | MIP Priority area 5: A resilient, gender-equal, fair and inclusive society Media and free flow of information, Government & Civil Society (150) |

¹ Commission Implementing Decision C(2021)9351 of 13.12.2021.

| | | | | |
|--|--|-------------------------------------|--|--|
| 7. Sustainable Development Goals (SDGs) | Main SDG (1 only): Goal 16: Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels | | | |
| 8 a) DAC code(s) | 15153 - Media and free flow of information | | | |
| 8 b) Main Delivery Channel | Private sector institutions – 60000 | | | |
| 9. Targets | <input type="checkbox"/> Migration <input type="checkbox"/> Climate <input checked="" type="checkbox"/> Social inclusion and Human Development <input type="checkbox"/> Gender <input type="checkbox"/> Biodiversity <input type="checkbox"/> Education <input checked="" type="checkbox"/> Human Rights, Democracy and Governance | | | |
| 10. Markers (from DAC form) | General policy objective | Not targeted | Significant objective | Principal objective |
| | Participation development/good governance | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| | Aid to environment | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Gender equality and women’s and girl’s empowerment | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Trade development | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Reproductive, maternal, new-born and child health | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Disaster Risk Reduction | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Inclusion of persons with Disabilities | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Nutrition | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | RIO Convention markers | Not targeted | Significant objective | Principal objective |
| | Biological diversity | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Combat desertification | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Climate change mitigation | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Climate change adaptation | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. Internal markers | Policy objectives | Not targeted | Significant objective | Principal objective |
| | Digitalisation Tags: digital connectivity digital governance digital entrepreneurship | <input checked="" type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |

| | | | |
|---------------------------|-------------------------------------|--------------------------|--------------------------|
| job creation | | <input type="checkbox"/> | <input type="checkbox"/> |
| digital skills/literacy | | <input type="checkbox"/> | <input type="checkbox"/> |
| digital services | | <input type="checkbox"/> | <input type="checkbox"/> |
| <u>Connectivity</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Tags: transport | | <input type="checkbox"/> | <input type="checkbox"/> |
| people2people | | <input type="checkbox"/> | <input type="checkbox"/> |
| energy | | <input type="checkbox"/> | <input type="checkbox"/> |
| digital connectivity | | <input type="checkbox"/> | <input type="checkbox"/> |
| Migration | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Reduction of Inequalities | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| COVID-19 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

BUDGET INFORMATION

| | |
|------------------------------|---|
| 12. Amounts concerned | Budget line(s) (article, item): 14.020111 - Eastern neighbourhood Total estimated cost: EUR 15 000 000 Total amount of EU budget contribution: EUR 15 000 000 |
|------------------------------|---|

MANAGEMENT AND IMPLEMENTATION

| | |
|--|--|
| 13. Implementation modalities (type of financing and management mode) | Project Modality Direct management through: - Grants Indirect management with the Council of Europe |
|--|--|

1.2. Summary of the Action

Media freedom is a critical element of Ukraine's democracy. Ukraine's media landscape has undergone significant reforms since 2014. While the creation of the independent public broadcasting company was meant to improve access to unbiased public information, Ukraine's media space remains fragile. Viewers' ratings of the public broadcasting company remain low despite one of the best coverage in the country. The media market is dominated by a small group of large players, affiliated with oligarchic interests. Changes in the business model of media globally, including the increasing popularity of digital media platforms and challenges related to monetisation of content, have impact also on Ukraine, where the media market is saturated and advertising revenues have declined. Significant discrepancies exist in journalistic standards between central and regional media, with the latter being particularly vulnerable to political and financial pressure. Safety of journalists should be improved. Approximation of media legislation with the EU would create opportunities for the media regulator to fully assume its role. Exacerbated by Russia's illegal annexation of Crimea and the conflict in Eastern Ukraine, disinformation has increasingly emerged as a serious challenge and Ukraine has stepped up its ambitions to counter Russian narratives.

In order to respond to the abovementioned challenges, the action addresses the following areas:

- Enabling media environment: (1) modernising media regulation, including through approximation to EU standards; (2) supporting implementation of Ukraine's commitments to ensure media freedom; (3) enhancing the role of the media regulator; (4) promoting media self-regulation and ethics standards for journalist work.

- Support to the Public Broadcasting Company (UA:PBC): (1) advancing UA:PBC reform at central and regional level, including broadcasting in minority languages; (2) developing traditional media and digital platform; (3) supporting content production including through interaction with private content producers and international partnerships.
- Enhancing, protecting and empowering independent media at regional and local level: (1) increasing financial sustainability of independent media outlets; (2) supporting minority and indigenous language media; (3) improving capacities of independent media to build innovative and learning outlets; (4) linking investigative work of civic groups with quality journalist reporting including support for content development of local civic actors; (4) promoting policies and support to ensure safety of journalists;
- Tackling disinformation: (1) provide support to the development of independent media content, including in minority languages (2) support government initiatives to counter disinformation; (3) outreach to the people living in Non-Government Controlled areas; (4) Scaling civil society, independent media and other work on countering disinformation and increasing media literacy.

2. RATIONALE

2.1. Context

In its 30 years of transition to democracy Ukraine has experienced a fluctuating pace of reforms and recognitions of fundamental freedoms. The peaceful transition of power in 2019, following the landslide election of President Zelensky, was broadly seen as a sign of maturity of democratic institutions in Ukraine. While the destabilising actions of the Russian Federation have continued, Ukraine has made significant progress in many reforms areas since then, including banking reform, land reform, decentralisation and digital transformation. The implementation of the EU-Ukraine Association Agreement is a political priority and in general well on track albeit at varying pace in different sectors. Despite the progress, reforms could still be reversed and more efforts are needed to fully implement them. Challenges that need to be addressed include – fighting corruption, enhancing independence of judiciary and strengthening corporate governance. The role of civil society and independent media in supporting overall resilience of the country is recognised by the authorities, but the space where they operate remains fragile at times. The COVID-19 crisis that has unfolded in 2020 has added another dimension of challenges.

The end of 2020 had seen a rapprochement between the current government and reform-minded civil society. However, the COVID-19 crisis and its aftermath brought polarisation around health policies during the crisis. The repeated lockdowns intended to curb the spread of the virus are generating increased economic pressure, but also possible social polarisation. Aside from 2020 developments, a number of more deeply rooted polarising issues can be noted in Ukrainian society similarly to many other European countries. For example, around gender issues – either on the role of women in society, or on the recognition of rights of LGBTIQ+ persons and the ‘traditional family’ concept. Independent reports estimated that during the COVID-19 lockdown the number of domestic violence cases increased by as much as 40%.

The Ukrainian government is showing initial enthusiasm and high interest in the EU Green Deal and digitalisation – areas high on the agenda of further integration of Ukraine with the EU. Ukrainian government has stepped up the dialogue with the EU and also internally with different stakeholders including private sector, environmental groups etc. Whereas climate scepticism continues to be the challenge, the government intends to address through more proactive strategic communication. Ukraine has a great potential for digitalisation, including the number of well-trained IT professionals and adequate sector policy framework. Good progress has been made in digitalising the government services by launching the single entry point for the provision of public electronic services. This has improved the access to and availability of public services to Ukrainian citizens and their quality. It has also become instrumental in the fight against corruption.

Ukraine is yet to adopt a Law on National Minorities, which is a recommendation made by the Venice Commission on Ukraine's adoption of the Law on State Language in May 2019. Some representatives of minority groups continued to voice concerns regarding the diminishing space for their linguistic identity in the absence of a dedicated law that sets out and regulates these rights. In spite of political commitments that set a fertile ground for media democracy in Ukraine, some issues outlined above create both challenges and opportunities for future development and sustainability. The EU-Ukraine Association Agreement (AA) foresees mutual political commitments in the areas of human rights, fundamental freedoms and rule of law, political dialogue and reform, economic and financial cooperation. Protecting and advancing respect for freedom of expression and the media is among those commitments; regular dialogues at the highest levels draw conclusions on the extent to which sufficient efforts have been made to pursue those commitments. The latest Association Council conclusions (11 February, 2021) reiterated the importance of freedom of expression and of the independence and pluralism of the media, including the important role played by the independent public service broadcasting.

The 2015-2020 national strategy and action plan on human rights has now expired and has been replaced by a new one covering the next 3 years (Decree of the President of Ukraine of March 24, 2021 № 119/2021. The action plan for the implementation of the National Strategy for 2021-2023 has been submitted by the Ministry of Justice of Ukraine to the Cabinet of Ministers of Ukraine for approval. One of the strategic area of these documents is "Ensuring freedom of thought and speech, expression of views and beliefs, access to information." In particular the new human rights strategy plans to ensure freedom of editorial policy, transparency of information concerning property and sources of financing of mass media; protection of professional activities of journalists and human rights defenders; effective investigation of criminal offenses committed against journalists and human rights defenders; availability of information for people with disabilities; mechanisms for exercising the right of access to public information. The former and current strategies underscore a number of elements that are intended to ensure a path to increased media democracy in Ukraine by securing free information exchange and the freedom of expression.

The media policy framework is supported by a complex structure of legal acts that altogether still leave gaps in basic legislation needed to ensure clarity of operations of media outlets in Ukraine. The Law on Media is still under discussion. The Law on the Public Broadcaster was adopted in 2020, with a number of amendments being already proposed the same year. A number of laws are intended to ensure the independence of the media regulator. Lacking a new Law on Media, a Draft Law 'On ensuring the independence of the National Council of Ukraine on TV and Radio Broadcasting' is being discussed in the Ukrainian Parliament with the intention to set clearer governance standards for the media regulator. International community including the EU follows closely the evolution of these laws.

The human rights situation in Ukraine continues to be exacerbated by the ongoing conflict in the eastern part of the country and by the illegal annexation of the Crimean Peninsula. While Human Rights and fundamental freedoms remain generally respected in the territory that falls under the control of the Ukrainian authorities (GCA), the developments in areas not controlled by the Government (NGCA) continue to result in grave violations of human rights and international humanitarian law. The conditions in these areas remain characterised by the total breakdown of the rule of law; several issues on discrimination on various grounds, torture, and ill-treatment, the lack of protection of vulnerable groups, such as Internally Displaced People (IDPs), women and children, continue to persist in NGCA during 2020, of which some exacerbated by the ongoing COVID-19 pandemic.

Nation-wide local elections were held during October 2020. These were the first elections held after the completion of the administrative phase of the decentralisation reform and amalgamation of territorial communities that has devolved significant powers and resources to the local governments across Ukraine. The COVID-19 pandemic affected the ability to campaign and conduct election observation. Due to limitations on

public gatherings, most contestants relied on outdoor advertising, television and social networks to reach out to voters.

Minority rights remain generally upheld but the Education and Language reform continues to spark debates. The Roma Minority continue to face bureaucratic hurdles when accessing social and administrative services. Moreover, domestic violence and gender-based violence continued to be a topic of concern during 2020. The Istanbul Convention has not yet been ratified by the Ukrainian parliament.

Ukraine has ratified most of the core international human rights instruments. Ukraine continues to cooperate well with respective bodies monitoring their implementation. However, ratifications of some of the international instruments, primarily the ICC Rome Statute, continues to remain pending.

In December 2020 the Ministry of Culture and Information Policy announced its strategic priorities. This programme focuses on some of those priorities, particularly on media, strategic communication and information security. In relation to media the Ministry announced its intention to focus on reforming and improving the work of governmental institutions, pursue the adoption on the new draft Law on the Media, support of Public Broadcasting Service reform and promote access to information. In relation to strategic communication and information security the relevant priorities are: information reintegration and security of Donbass and Crimea, special informational campaigns on EU and NATO integration, and launch of the national media literacy project. In addition, in response to the COVID-19 crisis, the government plans to focus on enforcing more resilient and cohesive partnerships for community.

The proposed programme reflects the mutual political commitments made by Ukraine and the EU in the Association Agreement (and the Association Agenda). At the 23rd EU-Ukraine Summit on 12 October 2021, the Parties reaffirmed their continued commitment to strengthening the political association and economic integration of Ukraine with the EU based on the Association Agreement and its DCFTA, including through continued cooperation to increase resilience in Ukraine.

The programme further reflects regional and global EU policies on support to media development and tackling disinformation. Specifically, priority 4 of the renewed Eastern Partnership (EaP) policy – ‘Together for resilient, fair and inclusive societies’ – recognises the importance of the media environment and independent journalism to provide checks and balances and hold governments accountable; the policy further emphasises the need to support independent media outlets to produce high quality and diverse content. Complementary to the Action Plan against disinformation published in 2018, the EaP policy links access to accurate and fact-based information for all with the quality of democratic processes. At a global level, the programme reflects the EU Consensus for Development, EU’s democracy support policy objectives and its strategic action in the area of human rights. Specifically, it reflects the mandate of ‘reinforcing efforts to support and protect free and independent media, offline and online, including through promoting the safety of journalists and supporting an enabling environment’ as outlined in the 2019 Council Conclusion on Democracy and the revised EU Human Rights and Democracy Action Plan .

The ‘MediaFit Programme for building Information Integrity in South & East Ukraine’, part of the larger EU4ResilientRegions programme signed in 2020, aims to support Ukraine and the resilience of Ukraine’s media against hybrid threats, including the consequences of the COVID-19 pandemic. The project aims to achieve higher editorial independence of public media in target regions, contribute to digitalization of their operation to improve their viability, raise their audience through the delivery of trustworthy and relevant content, and facilitate alliance-building of fact-checking initiatives in the target regions. DOM TV Channel also receives support to improve the appeal of its educational programming for a better reach. Complementary, the project ‘Countering Disinformation in Southern and Eastern Ukraine’ (supported via the IcSP), aims to foster popular resilience and build capacity to counter disinformation campaigns in Southern and Eastern Ukraine. The project conducts comprehensive research of the disinformation landscape, conducts trainings,

workshops, masterclasses, and internships/information exchange seminars at Estonian media outlets, as well as workshops for representatives of the local authorities, interactive discussion/debate events for high school and university students and launches information campaigns on social media platforms to raise awareness on topics related to disinformation and Russian propaganda, and development of independent media. EU can share its best practices in countering disinformation and support Ukraine in further aligning with the EU initiatives in this area. A new project on tackling disinformation (supported via the NDICI Rapid Response pillar), is being prepared by the Service for Foreign Policy Instruments (FPI). This action would provide support for effective responses to disinformation to the Ukrainian Centre for Strategic Communications and Information Security, as well as facilitate partnerships with relevant counterparts in the EU.

For the 2021- 2027 programming period there has been a strong increase in joint actions between the EU and MS based on joint assessments and resulting in joint implementation of programmes. The EU programmes on decentralisation, anti-corruption, rule of law, energy efficiency, public finance management and vocational education and training are all being implemented by EU MS. Where possible, such engagements are given priority in order to promote coordination and maximum use of EU and MS expertise often complemented by co-funding. Enhanced in-country coordination with EU MS has been achieved in terms of joint analysis, priority setting and messaging in key policy areas such as conflict response, economic growth, good governance, green transition and human capital development. Implemented under the Heads of Mission's political steer, this approach together with an emphasis on joint implementation of programmes aims to promote the coherence and impact of the EU and MS actions, ultimately promoting a unified European approach to institutional, economic and social reforms in the country.

Foreign donor support to media development in Ukraine comes from multiple sources. USAID has a leading role in capacity building programmes. The ongoing Media Programme in Ukraine is making available USD 35 million from 2018 until 2023. Support is comprehensive ranging from monitoring developments in the media ecosystem, to support to capacity development of journalists and direct granting to outlets and other media support organisations. The Programme also conducts regular assessments of development in the media sector that serve as resources for the larger media community. The Embassy of Sweden is another large supporter of free media in Ukraine. In complementarity with the EU they support the UA:PBC and their efforts to establish as a credible independent outlet. Among other types of support, they are the only actor providing core support to civil society, including media support organisations, based on a programmatic development approach. Regular donor coordination groups are organisation under USAID – Swedish co-leadership; EU representatives attend these meetings. Other key donors and implementing partners are the Netherlands, Czech Republic and the UK. A number of projects are also implemented through the Council of Europe.

2.2. Problem Analysis

Priority Area and sectors: PRIORITY #1: Creating an enabling media environment

Short problem analysis

Freedom of the media is broadly respected in Ukraine, although physical attacks and acts of intimidation on journalists and media professionals still occur and there is a general lack of accountability for these attacks. Violence against journalists continued throughout the COVID-19 crisis in 2020. Shadow reports issued by civil society organisations, but also the Council of Europe count yearly between 20 and 80 violent attacks against journalists (depending on methodology). In 2019 alone 12 cases were brought to court. In the same year Ukraine's Mass Media Institute found 229 violations of freedom of speech, including interference in journalists' work, limiting access to public information, censorship, indirect pressure, and cyberattacks on the media.

The national legal framework is not in line with the EU Audio Visual Media Service Directive, including when it comes to the powers of the independent media regulator. The National Council of Ukraine on television and radiobroadcasting can issue recommendations, which need to be sanctioned by other institutions in order to be enforced. Even so, they are currently facing a large number of lawsuits stemming from an attempt of large media groups to discourage the Council from being more assertive.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action

The Council of Europe, civil society, the General Prosecutor's Office and law enforcement institutions are key stakeholders. A few civil society organisations have the resources and capacity to take a few of these cases forward for strategic litigation. The Council of Europe is closely monitoring issues related to safety of journalists and works with a number of specialised civil society organisations in recording, exposing and analysing these cases. It is also tasked with helping Ukraine to bring protection of journalists to European standards. In 2017 it issued a technical paper that found that Ukraine's criminal law framework is generally fit for implementation of protection standards for journalists, while implementation of the legal framework needs significant improvement. Collection of evidence in the early stages of an investigation, as well as adequate prosecution of these crimes seems to be generally lacking. Moreover, this seems to lead to little accountability or consequences to both law enforcement and the prosecutorial authorities. Investigations generally lack public confidence, which is why recently civil society organisations are offering support for independent evidence collection in the early stages of an investigation (however insufficient). The new human rights action plan has recently been adopted. It is expected that it will include elements aimed at enhanced protection of journalists. In addition to civil society, media trade associations and unions are stakeholders that influence the ecosystem for media functioning; among those, the Independent Association of Broadcasters (regional broadcasters) and the Ukrainian Association of Media Business (major publishers), and the National Association of Ukrainian Media (for newly privatised municipal newspapers). European Union Advisory Mission (EUAM) has also important role to play, particularly in organising trainings for law enforcement institutions.

Priority Area and sectors: PRIORITY #2: Strengthening the public broadcaster

Short problem analysis

The development of an independent media market was a key element of the 30 years of transition to democracy in Ukraine. In 2021 Ukraine has a relatively pluralistic media environment. At the same time, it continues to depend financially on a handful of business leaders whose ambitions are to influence national politics. The level of influence was highlighted during the 2019 presidential elections. Content analysis of the coverage of the 2019 presidential campaign points out links between TV channels, their ownership and the candidate they supported. Currently, the four media groups that altogether dominate the media market in Ukraine (Media Group Ukraine, 1+1 Media, Inter Media Group and StarLightMedia) also control the largest share of revenues stemming from the industry – estimated at USD 330 million in 2020. These four groups, which combined 23 of Ukraine's own TV stations, shape to a large extent public opinion and political preferences. While TV media seems to be largely un-profitable (due to the business administration practices of the companies who own them), radio and print almost break even.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action

Within this landscape, the mainly government funded public media outlet – UA:PBC – lags behind in terms of popularity. The Public Broadcasting Service was set up in 2017 after a major reform of a large post-communist state radio and television company. It has become the leading outlet in adhering to journalistic

standards. Despite underfinancing in 2017-2020 (52% in 2018, 80% in 2020) of the budget stipulated by Ukrainian law, to date the Public Broadcaster has implemented essential reforms such as staff optimisation and improvement of the quality content. In the last years UA:PBC has made progress in making available digital content. At the end of 2020 the new budget of the PBC makes available for the first time the funds required by law to allow for functioning of the UA:PBC, including development needs (for example, investment in equipment and infrastructure). The Office of the President, and to a lesser extent the Ministry of Culture have insisted that as one of the key performance indicators to justify the full allocation from the State budget is the ability of the UA:PBC to attract new TV audiences, particularly through outsourcing part of its content production.

Currently, the public broadcasting network includes 26 TV channels and 28 radio stations, of which only a few air nationally. Internal governance, attempts of political interference and a complicated relationship between Kyiv management and that of local branches have been generating risks for the sustainability of the UA:PBC since its creation. The Ministry of Culture oversees the UA:PBC budget allocation and has been adamant in its unwavering support for the support of the PBC. At the same time, political factions in the Ukrainian Parliament get to nominate members of their party fractions to sit in the UA:PBC Supervisory Board, an important institution for strategic decisions related to the UA:PBC such as appointment of the managing board of the UA:PBC or the implementation of its budget. In late 2020 – early 2021 the elections to the Supervisory Board have revealed a number of issues related to these political appointments, including possibly undermining the strides that the UA:PBC has already made in assert itself as an unbiased source of information. The appointment of the leadership of the Supervisory Board also shown strong resilience of those members of the Board and other stakeholders who stand for the independence of the institution.

Priority Area and sectors: PRIORITY #3: Enhancing, protecting and empowering independent media

Short problem analysis

Sustainability of independent media outlets is a main critical problem, particularly at the regional level, where local large business owners shape the information space. In some regions of Ukraine media of national minorities and indigenous groups needs targeted support. While many other donor programmes continue to provide grant support to independent outlets and journalists, well-targeted additional support is needed. Furthermore, the 2019 Media Sustainability Index identifies recurrent issues on the business management side, while a more recent study looking at media viability found a critically low level of diversification of funding sources for independent media outlets. The most successful funding models, especially at regional level, involve a hybrid form of organisational setup, closer to that of a civil society organisation – where municipal outlets, for example, are coupled with social enterprises (e.g. local cafes, bookstores). Foreign grants are also supporting content production. Donors have experimented less with incentives for business model transition or more innovative funding instruments. In the same vein, outlets seem to be very risk averse to experiment with production of syndicated content and paid subscriptions. The COVID-19 crisis is already shrinking advertising budgets, and independent media outlets are expected to be heavily affected by the crisis and its aftermath.

The 2019 Media Sustainability Index found that professional standards of quality in journalism should also be further advanced. It also indicates that self-regulation mechanisms have so far failed to address issues, among which: lack of objective and well sourced reporting, stronger focus on entertainment content compared to information, and outdated technical equipment and production facilities. In line with ethical standards, diversity could take a more prominent role in reporting. Discussion during media fora organised in Ukraine (Donbas, Lviv) in the past years exposed a high level of interest from journalists in coverage of hate speech and standards for conflict-sensitive reporting.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action

The Independent Media Council and the Commission for Journalism Ethics pushed efforts to agree reporting guidelines on reporting of child abuse and suicide – both rejected by at least one large media group in 2016 and respectively 2017. Self-censorship is another problem that media support organisations in Ukraine highlight. Reporting on heavy issues is left with investigative journalism outlets, thus creating a disproportionate distribution of risks to intimidation and funding diversification. The report also found a general decline in qualifications of journalists, mostly put on the account of lack of in-house training and on-the-job practice. International donors have invested heavily over the years in increasing professional standards of journalism and quality of content, including via media support organisations that are playing an increasingly more important role in fostering self-regulatory practices.

Priority Area and sectors: PRIORITY #4: Tackling disinformation

Short problem analysis

Since 2014 Ukraine is the object of a “hybrid war” that includes disinformation. During the COVID-19 pandemic spreading disinformation and hostile propaganda from Russia has further intensified. In this context, the National Security and Defence Council imposed in early 2021 sanctions on three TV stations that were considered to pose a threat to national security. The EU continues to express its solidarity with Ukraine in countering disinformation. The Ukrainian government has taken a number of steps to address the issue. Ukraine approved an “Information Security Doctrine of Ukraine” in 2016, in order to set an approach to countering external disinformation, and a specific strategy on engaging with the populations of the occupied territories in the Donbass, including the establishment of DOM TV, the TV outlet aiming at populations living in occupied territories and two disinformation centres, one under the Ministry of Culture/Information Policy and the other under the National Security and Defence Council. Both initiatives have reached out to international partners for the support.

Russian language media content continues to be a contentious and divisive issue. A 2015 study on Russian language media content conducted in 6 countries including Ukraine, found a serious problem with the level of fragmentation and capture of Russian speaking audiences. At the same time in Ukraine a law adopted in 2019 requires that a minimum of 90% of airtime on national TV should carry content in the Ukrainian language; local channels can have up to 20%. An exception is made for channels in indigenous languages (Crimean Tatar), which must have at least 30% of Ukrainian language content. Print media may feature other languages if also producing a Ukrainian version of the same content. De facto, this generates a series of self-limitations in reaching out to Russian speaking populations, especially in the NGCA and eastern Ukraine. It affects equally media content in minority languages, other than Russian. At the same time, in 2020 the Ministry of Culture launched the first bilingual TV Channel for Russian occupied Crimea and Eastern Ukraine. Public funding is also made available (legally) to ATR TV, a Crimean media outlet, in exile in mainland Ukraine since Crimea’s annexation.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action

DOM TV which produces content in Ukrainian and Russian is regulated by a different law, which exempts the limits on the channel on the production of content in Russian language. Closer engagement and scaling up the assistance to this media outlet has to be viewed in the context of ensuring overall independence of this publically owned media and the geographic focus which should remain Non-Government Controlled Areas of Ukraine and illegally annexed Crimea.

Ukraine has a very active network of civil society organisations that address disinformation challenge. Many of them are involved in the disinformation centre created by the Ministry of Culture.

EU can share its best practices in countering disinformation and support Ukraine in further aligning with the EU initiatives in this area.

3. DESCRIPTION OF THE ACTION

3.1. Objectives and Expected Outputs

The Overall Objective (Impact) of this action is to foster media democracy in Ukraine.

The Specific Objectives (Outcomes) of this action are:

Outcome 1. Standards for freedom of expression, freedom of media and media regulation (comparable to those in the EU) are enforced

Outcome 2. Ukrainian audiences recognise the UA:PBC as one of their top providers of unbiased and timely information

Outcome 3. Stronger independent media and a more diversified media market

Outcome 4. Higher availability of reliable and accurate content, including in Russian, minority and indigenous languages

The Outputs to be delivered by this action contributing to the corresponding Specific Objectives (Outcomes) are:

Contributing to Outcome 1. Standards for freedom of expression, freedom of media and media regulation (comparable to those in the EU) are enforced

Output 1.1. Law on media adopted

Output 1.2. Increased awareness of all stakeholders on breaches of freedom of expression and the media

Output 1.3. Increased capacity of media professional associations (and other relevant bodies) to promote respect for protection of journalists

Output 1.4. Increased capacities of the media regulator

Output 1.5. Increased capacities of media institutions

Contributing to Outcome 2. Ukrainian audiences recognise the UA:PBC as one of their top providers of unbiased and timely information

Output 2.1. Reform of funding model for UA:PBC is launched

Output 2.2. Increased content production capacity of UA:PBC and its branches, including via its regional content fund

Output 2.3. Enhanced digital platform of the UA:PBC

Output 2.4. Increased audience outreach

Output 2.5. Increased management skills of the PBC

Contributing to Outcome 3. Stronger independent media and a more diversified media market

Output 3.1. Increased capacity of independent media outlets, particularly at regional and local level

Output 3.2. Production of content in Russian, minority and indigenous languages

Output 3.3. Diversified sources of revenues and business models for independent media outlets

Output 3.4. Innovation in the field of media is amplified through increased capacities of media support organisations and enhanced links with European media outlets

Output 3.5. Professional standards for journalists are more widely acknowledged

Output 3.6. Increased capacity to react to breaches in freedom of expression and the media

Contributing to Outcome 4. Higher availability of reliable and accurate content, including in Russian, minority and indigenous languages

Output 4.1. Independent media content is developed by public media, including in order to reach out to conflict affected populations including those living in non-government controlled areas

Output 4.2. Support for production and translation of Ukrainian and Russian language content

Output 4.3. Partnerships between civil society, media and government are established on countering disinformation, including via fact-checking, including supporting the cooperation between the Strategic Communication Division of the Ukrainian Government's bodies and independent fact-checking organisations on analysing and countering disinformation and misleading narratives about Ukraine abroad

Output 4.4. Media literacy tools as promoted by Ukrainian government are more widely available

3.2. Indicative Activities

Linked to Outputs 1.1 - 1.5:

Activity 1. Monitoring compliance of the legal framework with Council of Europe standards in the field of media freedom, freedom of expression and countering disinformation, and fostering policy dialogue linked to the adoption of law; issuing early warnings and analytical papers on the media and countering disinformation, including to the benefit of the work conducted by the Strategic Communication Centre of the Ministry of Culture.

Activity 2. Technical support and capacity development activities aimed at public broadcasting and the media regulation stakeholders.

Activity 3. Fostering dialogue between the media regulator, media support organisations and professional organisations.

Activity 4. Mobilising specialised legal and other relevant assistance to the media regulator.

Activity 5. Support the professionalization of media support organisations: capacity development activities.

Activity 6. Supporting the continuation of print media reform.

Activity 7. Advocating and advancing standards for safety of journalists, in line with the Charter of Fundamental Rights.

Activity 8. Countering impunity of crimes against freedom of expression, in particular offering rapid response to safety of journalists.

Activity 9. Improving access to public information for media and society; organising public consultations for the revision and development of information environment legislation.

Activity 10. Fostering public debate and recognition for development in the media sphere at large.

Linked to Outputs 2.1 - 2.5:

Activity 11. Advance policy dialogue on the need to implement a reformed funding model for the UA:PBC.

Activity 12. Investment in content production technology and qualified technical staff.

Activity 13. Training and increased networking of management and supervisory staff.

Activity 14. Further modernisation of education premises and capitalisation of audio-visual archives.

Activity 15. Implementation of a long term branding strategy.

Activity 16. Content production on EU relevant topics and beyond.

Activity 17. Production of state-of-the-art in house entertainment content.

Activity 18. Scaling up media professionals academy for future talent, with a particular focus on youth outside Kyiv.

Activity 19. Advancing digitalisation and maintaining existing infrastructure.

Activity 20. Financial support to third parties, particularly local branches of UA:PBC, but also other independent media outlets.

Linked to Outputs 3.1. - 3.6:

Activity 21. Financial support to independent media outlets across the country, including for production of media content and investigative journalism.

Activity 22. Setting up and running an independent media accelerator supporting increased capacities for content production and state of the art management and incubation of new business models.

Activity 23. Core financial support to selected media support organisations, including for advancement of self-regulatory media bodies.

Activity 24. Capacity building activities aimed at increased professionalism of journalists, including via internships, coaching, peer-to-peer learning, on-the-job-training, job-shadowing in media outlets in the EU or other EaP countries, and other forms of learning, on topics relevant to media management, journalism, ethics standards, investigation tools, business practice and administration, as well as new forms of revenue generation.

Activity 25. Summer schools (or similar activities) in critical thinking and journalism writing targeting youth, including with a minority/ indigenous background.

Activity 26. Support to collaborations between civil society organisations and investigative media outlets.

Activity 27. Ad-hoc support to EU-relevant content production, analyses and research, short-term visibility actions and media partnerships, tailored (organisation-specific) capacity development support and/ or emergency support for journalists and members of media civil society who may be under threat or attack.

Linked to Outputs 4.1. and 4.2:

Activity 28. Project and core ad-hoc support (services) to a TV channel reaching out to the Non-Government Controlled Areas of Ukraine and illegally annexed Crimea and other outlets to produce content and enhance journalist standards.

Activity 29. Support to security and maintenance of broadcasting capabilities in the NGCA.

Activity 30. Financial support for the translation of Ukrainian content to Russian language.

Activity 31. Supporting internally production capabilities of own entertainment content.

Activity 32. Supporting engagement with independent media outlets in Ukraine on acquisition of content in Russian language.

Linked to Output 4.3:

Activity 33. Policy dialogue and promotion of networks/ platforms/ communities of practice working on disinformation in Ukraine.

Activity 34. Support engagement between civil society and big tech companies on fact-checking capabilities, investigative skills, development of new tools for countering disinformation and reporting of malicious information attacks, including under the umbrella/ in coordination with the Ukrainian government.

Activity 35. Plan, launch and implement a countering disinformation campaign using local influencers, citizen journalism, bloggers, partnerships with local and hyperlocal media, and other micro-influencing tools.

Activity 36. Segmented analyses of disinformation trends, tools and narratives in Ukrainian information space - TV, online media, social media.

Activity 37. Capitalisation of international expertise on programmatic media, open data analysis, use of new investigative tools for fact-checking, as well as successful practices to counter malign narratives.

Activity 38. Supporting disinformation centres created by the Ukrainian government based on the request and the good EU Member States practices, notably capacity development targeting civil society organisations and active citizens in promoting and multiplying the work of the Strategic Communication Centre of the Ministry of Culture.

Linked to Output 4.4:

Activity 39. Integration of media literacy principles into mainstream teaching curricula and professional training for teachers.

Activity 40. Pilot community level critical thinking interventions (including debate clubs for young adults).

Activity 41. Running workshops for journalists on investigation techniques.

3.3. Mainstreaming

Environmental Protection, Climate Change and Biodiversity

Outcomes of the Environmental Impact Assessment (EIA) screening (relevant for projects and/or specific interventions within a project)

The EIA screening classified the action as Category C (no need for further assessment).

Outcome of the Climate Risk Assessment (CRA) screening (relevant for projects and/or specific interventions within a project)

The CRA screening concluded that this action is no or low risk (no need for further assessment).

Gender equality and empowerment of women and girls

As per OECD Gender DAC codes identified in section 1.1, this action is labelled as G0. This implies that gender equality is not a significant objective of this action.

The Action foresees engagement with specific actors and media content development intended to raise awareness on women's and girl's rights, combatting gender-based violence, particularly in the aftermath of the COVID-19 crisis. Mainstreaming gender equality into journalism professionalism standards and including female leadership guidance in the capacity development components are concrete vehicles to achieve this. The Action will also seek to avoid reinforcing gender inequalities and stereotypes by implementing EU's rights based approach.

Human Rights

Gender and minority diversity issues, social and economic rights, fight against corruption, resilience and conflict sensitivity, human rights and other relevant cross-cutting issues are integrated in the design of the action. LGBTI issues, along with other social inclusion issues, will be reflected in content produced. The Action includes multi-stakeholder processes for achieving inclusive, sustainable economic development and post-COVID-19 recovery in the country.

Disability

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D0. This implies that disability is not a significant objective of this action.

Democracy

The action will strive to promote inclusiveness when it comes to internally displaced, conflict affected, ethnic minority and indigenous groups, and vulnerable populations towards community reconciliation. It will support the mobilisation of different local actors for joint efforts for inclusive and sustainable growth.

Conflict sensitivity, peace and resilience

The action will strive to promote inclusiveness when it comes to internally displaced, conflict affected, ethnic minority and indigenous groups, and vulnerable populations towards community reconciliation. It will support the mobilisation of different local actors for joint efforts for inclusive and sustainable growth.

Disaster Risk Reduction

The action will not contribute to disaster risk reduction.

3.4. Risks and Lessons Learned

| Category ² | Risks | Likelihood (High/Medium/Low) | Impact (High/Medium/Low) | Mitigating measures |
|-----------------------|---|------------------------------|--------------------------|--|
| 3 | Low interest from media outlets and journalists in targeted capacity development activities | Low | Medium | The methodology of the activities potentially impacted by this risk will include a rigorous selection of participants, where motivation will carry a high weight. |
| 3 | Turnover of recently trained staff in media outlets | Medium | Medium | The activities potentially impacted by this risk will target a relatively high number of media professionals, of all categories. |
| 1 | Unwillingness of big tech to engage in structured dialogue with civil society working on disinformation | Medium | Medium | Awareness raising on the impact that big tech content management policies affect Ukraine's battle with disinformation. |
| 1 | Political impediments too high for the media law to be adopted | High | High | Policy dialogue on the adoption of the media law and its link to further integration with the EU and possibility to fully benefit from Creative Europe programme will be emphasised. |
| 1 | Overlap of government initiatives on countering disinformation | Medium | Medium | Dialogue through Informal Working Group on Strategic Communication |

Lessons Learned:

² The risk (category) can be related 1-to the external environment; 2-to planning, processes and systems; 3-to people and the organisation; 4-to legality and regularity aspects; 5-to communication and information.

Foreign funded media support programmes have been operating in Ukraine for the past 30 years. Within this period, significant resources have been dedicated to capacity building of journalists and media outlets. Attempts to advance self-regulatory mechanisms for the media sector have seen modest results, but they did encourage the setup of a number of professional associations and standardisation bodies, with limited mandates and capacities for actual regulation. Funds dedicated to civil society, including those pursuing specifically democracy support, trickled to some extent to media support organisations and advocacy minded outlets. Recent assessments of media support and its effectiveness for financial viability of media, as well as capacity development indicated that donors should attempt to diversify to a larger extent their financial support tools, as well as capacity building methodologies. Foreign funding was otherwise unable to support independent media outlets to the extent where it would cause a disruption into the well-established structure and ownership on the media market. A study looking at media viability in Ukraine (2020) found that independent media outlets have a very low level of diversification, relative to the sources of funding that outlets around the world are using to diversify their revenues.

The EU has been supporting the UA:PBC since its creation in 2017. To a large extent the setup of the PBC was a success, however the day to day implementation of this support revealed that the assurance of this success lies in intensive policy dialogue in order to make sure adequate conditions are in place to allow for the independence and the financial sustainability of the UA: PBC.

3.5. The Intervention Logic

Media democracy refers to better regulation of the media market and a healthier ecosystem for media work, increased debate and participation in media processes, stronger media institutions and a central role of the public broadcaster. On this basis, the programme has a wide breadth attempting to more consistently fill the gaps of support to media in Ukraine (both donor and public). All outcomes contribute to various aspects of this concept. In addition, experience in advancing media freedom, media development and tackling disinformation in EU Member States will be considered in the implementation of the action as appropriate.

Outcome 1 is linked to the media environment and the ecosystem for media. The outputs envisioned are meant to ensure freedom of media and increased respect for freedom of expression. The draft media law currently discussed in Ukraine, if adopted, would provide more transparency of media financing and ownership and eventually create a balanced level playing field for all media outlets. A stronger media regulator, with capacities and mandate to regulate content including in line with EU values and standards, is a critical element of a reformed media market. Self-regulatory bodies need to also take on a stronger role in order to prevent increased pressure on the regulator and enforce general standardisation. Evidence available so far shows that media ecosystem could benefit highly from a stronger complementarity between self-regulatory institutions and the media regulator, in particular on enforcing professional journalistic standards. In parallel, freedom of expression needs to be ensured. As part of this outcome, it will be critical to continue contributing to advancing journalism safety standards and their implementation, including via mobilisation of specialised organisations. Political will and increased cooperation between law enforcement, prosecutor's office and civil society will be critical in order to achieve these outputs.

Outcome 2 refers to the capacities of the public broadcaster to become more relevant with the general audience in Ukraine. On the financial sustainability side, it will be critical to implement the reform of the UA:PBC funding model as soon as possible. Looking at internal capacity, management skills, capacity to develop relevant content (where possible in co-operation with private content producers) and the use of digital tools need to be stepped up, if it is for outlets linked to UA:PBC to gain more following from the wider audience in Ukraine. It is essential that the governing bodies of the UA:PBC remain independent from political interference.

Outcome 3 – a more diversified media – is expected to be reached by increasing sustainability and capacities of independent media. A first level is the financial viability of independent media outlets. This can include day-to-day operations, but also by transitioning to new business models or diversifying their revenue sources. Secondly, technical skills and ethical norms need to be reinforced within the journalist community, in order to foster trust in content produced. To ensure sustainability beyond the lifespan of the intervention it will be critical to invest in the media support infrastructure – starting with local media support organisations, that can continue to provide a lifeline to outlets under strain, if need be. Innovative models of funding and content development that have worked in other parts of the world may be relevant in the Ukrainian context, however it will be essential to offer a space for trial and error in order to foster innovation here as well. It will be very important that there is enough openness to collaboration and profound change among targeted independent media outlets.

Outputs linked to Outcome 4 are meant to increase availability of accurate information and support the activities of disinformation centres recently established by Ukraine, notably the Strategic Communication Centre of the Ministry of Culture. A higher availability and distribution of content, including in Russian, minority and indigenous languages can have two-fold benefits: it can help counteract false or thwarted narratives, and thus break through the current audience fragmentation, while it can create new revenue streams from certain categories of outlets. This actions will be undertaken as much as possible in consultation with relevant national and local actors. At the same time, it will be key to involve specialists in disinformation and debunking in building new narratives and tackling the malign ones – including for media content mainstreaming. For this reason, cooperation with civil society on tackling disinformation needs to be equally stepped up. Efforts to increase media literacy need to continue in order to create more favourable conditions for independent content to reach its disinformation objectives.

3.6. Indicative Logical Framework Matrix

| Results | Results chain: Main expected results | Indicators | Baselines (values and years) | Targets (values and years) | Sources of data | Assumptions |
|--|---|--|---|--|--|---|
| Impact | Increased media democracy in Ukraine. | Public information is easily accessible; right of access to information is equally enforced | Low (2021) | Moderate (2026) | Media Sustainability Index | <i>Not applicable</i> |
| Outcome 1 | Standards for freedom of expression, freedom of media and media regulation are enforced (comparable to those in the EU) | Level of implementation of Association Agreement provisions linked to audio-visual legislation, freedom of media and freedom of expression | Key legislation not adopted (2021) | Key legislation adopted and implemented (2026) | Association Agreement implementation reports | Sufficient political will Cooperation of Ukrainian Government, law enforcement and prosecutor's office |
| Outcome 2 | Ukrainian audience recognise the UA:PBC as one of their top providers of unbiased and timely information | Rank in broadcast rankings of UA:PBC | 23 (2021) | In the top 20 (2026) | Television Industry Committee | Ukrainian government continues support to UA:PBC and its mission |
| Outcome 3 | A more diversified media market | Structure of media market in Ukraine | 80% dominated by 4 media companies (2021) | 30% of media companies independent from private interests (2026) | Centre for Media, Data and Society | Ukrainian Government remains committed to AA implementation |
| Outcome 4 | Higher availability of reliable and accurate content, including in Russian, minority and indigenous languages | Rank in broadcast rankings of media available in eastern Ukraine and Crimea | Not available (2021) | Among the top 10 in NGCA (2026) | Television Industry Committee | Media channels are able to broadcast/disseminate in NGCA |
| Output 1.1 related to Outcome 1 | Law on media adopted | Law on media is implemented | No (2021) | Main provisions rolled out (2026) | Council of Europe reports | |

| | | | | | | |
|--|--|--|-------------------------------|--------------------------------------|-------------------------------|--|
| Output 1.2 related to Outcome 1 | Increased awareness of all stakeholders on breaches of freedom of expression and the media | Legal and social protections of free speech exist and are enforced. | Legal provisions exist (2021) | Legal provisions are enforced (2026) | Media Sustainability Index | |
| Output 1.3 related to Outcome 1 | Increased capacity of media professional associations (and other relevant bodies) to promote respect for protection of journalists | Yearly number of public debates organised by media professional organisations on issues related to safety of journalists | 0 (2021) | 10 (2026) | Council of Europe reporting | |
| Output 1.4 related to Outcome 1 | Increased capacities of the media regulator | Media regulator has a mandate to enforce decisions | No (2021) | In most cases (2026) | Council of Europe reporting | |
| Output 1.5 related to Outcome 1 | Increased capacities of media institutions | Strength of media unions and civil society organisations | 2,37 (2018) | Min 2,5 (2026) | Media Sustainability Index | |
| Output 2.1 related to Outcome 2 | Reform of funding model for UA:PBC is launched | Plan for funding reform endorsed by the government | No (2021) | Yes (2026) | UA:PBC reporting | |
| Output 2.2 related to Outcome 2 | Increased content production capacity of UA:PBC and its branches, including via its content fund | Percentage increase in own content production | 0% (2021) | 10% (2026) | UA:PBC reporting | |
| Output 2.3 related to Outcome 2 | Enhanced digital platform of the UA:PBC | Launch of OTT | No (2021) | Yes (2026) | UA:PBC reporting | |
| Output 2.4 related to Outcome 2 | Increased audience outreach | Rank in broadcast rankings of UA:PBC | 23 (2021) | In the top 20 (2026) | Television Industry Committee | |
| Output 2.5 related to Outcome 2 | Increased management skills of the PBC | Stable editorial independence | Yes (2021) | Yes (2026) | Media Sustainability Index | |

| | | | | | | |
|--|--|---|----------------|----------------|--|--|
| Output 3.1 related to Outcome 3 | Increased capacity of independent media outlets, particularly at regional and local level | Financial diversification of sources of revenue for regional local media | Low (2021) | Medium (2026) | Report on financial sustainability of media organisations in Ukraine (USAID) | |
| Output 3.2 related to Outcome 3 | Production of content in Russian, minority and indigenous languages | Number of own production hours-content produced in non-Ukrainian by key media outlets | 4h/ day (2021) | 8h/ day (2026) | Reporting by Ukrainian media channels | |
| Output 3.3 related to Outcome 3 | Diversified sources of revenues and business models for independent media outlets | Availability of alternative sources of funding | Low (2021) | Medium (2026) | Report on financial sustainability of media organisations in Ukraine (USAID) | |
| Output 3.4 related to Outcome 3 | Innovation in the field of media is amplified through increased capacities of media support organisations and enhanced links with European media outlets | Business management quality | 1,48 (2018) | Min 1,6 (2026) | Media Sustainability Index | |
| Output 3.5 related to Outcome 3 | Professional standards for journalists are more widely acknowledged | Level of professionalism of Ukrainian journalists | 1,84 (2018) | Min 1,9 (2026) | Media Sustainability Index | |
| Output 3.6 related to Outcome 3 | Increased capacity to react to breaches in freedom of expression and the media | Crimes against journalists or media outlets are prosecuted vigorously, but occurrences of such crimes are rare. | Low (2021) | Medium (2026) | Media Sustainability Index | |
| Output 4.1 related to Outcome 4 | Independent media content is developed by public media, including in order to reach out to conflict affected populations | Issues related to the most sensitive issues in Ukrainian society are covered in a balanced way | Low (2021) | Medium (2026) | Media Sustainability Index | |

| | | | | | | |
|--|--|---|------------|---------------------|--------------------------|--|
| | including those living in non-government controlled areas | | | | | |
| Output 4.2 related to Outcome 4 | Support for production and translation of Ukrainian and Russian language content | Extent to which original content in Russian is available | Low (2021) | Medium (2026) | Media Consumption Survey | |
| Output 4.3 related to Outcome 4 | Partnerships between civil society, media and government are established on countering disinformation, including via fact-checking | Number of key civil society organisations involved in government efforts to tackle disinformation | 6 (2021) | At least 20 (2026) | MCIP reporting | |
| Output 4.4 related to Outcome 4 | Media literacy tools as promoted by Ukrainian government are more widely available | Percentage of surveyed population expecting to read objective information | 19% (2018) | At least 25% (2026) | Media Consumption Survey | |

4. IMPLEMENTATION ARRANGEMENTS

4.1. Financing Agreement

In order to implement this action, it is envisaged to conclude a financing agreement with the partner country.

4.2. Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is **60 months** from the date of entry into force of the financing agreement.

Extensions of the implementation period may be agreed by the Commission's responsible authorising officer by amending this Financing Decision and the relevant contracts and agreements.

4.3. Implementation Modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures³.

4.3.1. Direct Management (Grants)

a) Purpose of the grant(s)

Grants will contribute to the achievements of Outcomes 2, 3 and 4.

b) Type of applicants targeted

The following potential applicants will be considered:

- Public broadcasters, registered in Ukraine, the European Union/ EEA
- Public institutions conducting relevant work in the field of media development
- Civil society organisations (including media support organisations, press councils)
- International organisations.

4.3.2. Indirect Management with the Council of Europe

A part of this action may be implemented in indirect management with the Council of Europe (CoE). This implementation entails the achievement of Outcome 1 – reflected in Outputs 1 through 5 (described in Section 3.2).

The envisaged entity has been selected using the following criteria:

- Mandate of the Council of Europe to develop and uphold standards in the area of freedom of expression and freedom of media in Ukraine

The proposed actions are in full alignment with the CoE Action Plan for Ukraine.

³ www.sanctionsmap.eu Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

4.3.3. Changes from indirect to direct management (and vice versa) mode due to exceptional circumstances (one alternative second option)

If negotiations with the above-mentioned entity fail under 4.3.2 indirect management, that part of this action may be implemented in direct management in accordance with the implementation modalities identified in section 4.3.1.

4.4. Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply, subject to the following provisions.

The Commission's authorising officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of services in the markets of the countries or territories concerned, or in other duly substantiated cases where application of the eligibility rules would make the realisation of this action impossible or exceedingly difficult (Article 28(10) NDICI-Global Europe Regulation).

4.5. Indicative Budget

| Indicative Budget components | EU contribution (amount in EUR) |
|---|--|
| Outputs 1 - 5 composed of | |
| Indirect management – cf. section 4.3.2 | 2 000 000 |
| Outputs 6 - 20 composed of | |
| Grants – total envelope under section 4.3.1 | 12 500 000 |
| Evaluation - cf. section 5.2 – Audit - cf. section 5.3 | 200 000 |
| Communication and visibility - cf. section 6 | 300 000 |
| Totals | 15 000 000 |

4.6. Organisational Set-up and Responsibilities

The EU Delegation will ensure coherence among all components of the action and engagement of relevant stakeholders. The projects will be further streamlined during regular steering committees in charge of the supervision of the individual projects. The governance arrangements will need to be agreed with each implementing partner, depending on the implementation modality and type of management. Key stakeholders, including the Ukrainian government, will be consulted in the steering of the projects. The government beneficiaries will be involved in coordination of potential work related to the development of legislative and regulatory framework and activities on fighting disinformation as appropriate.

As part of its prerogative of budget implementation and to safeguard the financial interests of the Union, the Commission may participate in the above governance structures set up for governing the implementation of the action.

5. PERFORMANCE MEASUREMENT

5.1. Monitoring and Reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process, and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (Outputs and direct Outcomes) as measured by corresponding indicators, using as reference the logframe matrix.

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

At action level, the logframe is linked to the EU Results Framework and proposes aggregable indicators. Results oriented monitoring will be conducted at portfolio level, employing EU corporate monitoring systems and internal monitoring tools. The action is implemented in direct management. For activities conducted in NGCA, remote monitoring methodologies will also be used. Use of a monitoring framework contract will also be considered.

Roles and responsibilities for data collection, analysis and monitoring:

During the identification of this action, adequate premises were created for monitoring system at portfolio level. Reporting frequency will be agreed at contract level, together with project based logframes, keeping in mind the full portfolio will be implemented in direct management. Sufficient resources are allocated from this action for monitoring, evaluation and learning oriented activities. Preparation of the monitoring, evaluation and learning plans will complete individual risk assessment matrices and capacity assessment of implementing partners to meet the monitoring, evaluation and learning requirements in the context of the specific activities. Steering committees will be foreseen as part of the governance of the individual activities (at project level).

5.2. Evaluation

Having regard to the importance of the action, a final evaluation will be carried out for this action or its components via independent consultants.

It will be carried out for accountability and learning purposes at various levels (including for policy revision).

The Commission shall inform the implementing partner at least one in advance of the dates envisaged for the evaluation missions. The implementing partner shall collaborate efficiently and effectively with the evaluation experts, and inter alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

The evaluation reports shall be shared with the partner country and other key stakeholders following the best practice of evaluation dissemination. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the partner country, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

Evaluation services may be contracted under a framework contract.

5.3. Audit and Verifications

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements.

6. COMMUNICATION AND VISIBILITY

Communication and visibility is a contractual obligation for all entities implementing EU-funded external actions to advertise the European Union's support for their work to the relevant audiences.

To that end they must comply with the instructions given in the [Communication and Visibility Requirements of 2018](#) (or any successor document), notably with regard to the use of the EU emblem and the elaboration of a dedicated communication and visibility plan, to be completed for every action at the start of implementation.

These obligations apply equally, regardless of whether the actions concerned are implemented by the Commission, the partner country (for instance, concerning the reforms supported through budget support), contractors, grant beneficiaries or entrusted entities. In each case, a reference to the relevant contractual obligations must be included in the respective financing agreement, procurement and grant contracts, and delegation agreements.

Communication and visibility measures may be funded from the amounts allocated to the action. For the purpose of enhancing the visibility of the EU and its contribution to this action, the Commission may sign or enter into joint declarations or statements, as part of its prerogative of budget implementation and to safeguard the financial interests of the Union. Visibility and communication measures should also promote transparency and accountability on the use of funds.

Effectiveness of communication activities on awareness about the action and its objectives as well as on EU funding of the action should be measured.

Implementing partners shall keep the Commission and concerned EU Delegation/Office fully informed of the planning and implementation of specific visibility and communication activities before work starts. Implementing partners will ensure adequate visibility of EU financing and will report on visibility and communication actions as well as the results of the overall action to the relevant monitoring committees.

It is envisaged that a contract for communication and visibility may be contracted under a framework contract.

Visibility and communication measures specific to this Action shall be complementary to the broader communication activities implemented directly by the European Commission services and/or the EU Delegations and Offices.