

FROM RESILIENCE TO RECOVERY

SECURING THE FUTURE
OF UKRAINIAN MEDIA





Cover picture: Journalists and residents stand as smoke rises after an attack by the Russian army in Odessa, on 3 April 2022.
@ BULENT KILIC / AFP

INTRODUCTION

BUILDING THE FUTURE OF UKRAINIAN JOURNALISM

by **Thibaut Bruttin**,
Director General of Reporters Without Borders

Since the Russian invasion on 24 February 2022, RSF has conducted over a dozen missions to Ukraine and I, personally, joined three. I am impressed at how, throughout the country, Ukrainian journalists and media workers fight to continue their tremendous work of providing the national and international public with reliable information.

Ukraine has shown admirable resistance in the face of the current war. Numerous journalists have been killed while doing their job, yet Ukrainian media outlets have impressed the world with their resilience. Despite the large-scale invasion, Ukraine has made significant progress on the right to information: a new law strengthening media transparency was adopted in 2022; Russia's crimes against Ukrainian journalists have been systematically subject to judicial investigations, staving off impunity; and, in July 2024, Ukraine joined the [International Partnership on Information and Democracy](#), a project initiated by Reporters Without Borders (RSF). Independent and public media have gained unprecedented audiences, won public trust, and may be major players in the journalism landscape from now on.

All of these accomplishments helped Ukraine rank 61st out of 180 countries in RSF's [2024 World Press Freedom Index](#).

Yet Ukraine's impressive gains in upholding press freedom and media pluralism are fragile, and risk crumbling due to multiple war-related factors. The safety of journalists is under threat, with no fewer than [12 media workers killed by Russian forces](#) since February 2022. Air strikes on media infrastructure continue, as do the Kremlin's aggressive propaganda campaigns. Investigative journalists are under political and military pressure from Ukrainian authorities, and the whole media industry suffers from a severe lack of human capital.

On top of these obstacles, the economic impact of the invasion has created enormous, often overlooked, challenges for the media. The collapse of the advertising market and Russia's frequent shelling of television towers and editorial offices have led to the closure of at least 235 Ukrainian media outlets since the war began. A lack of stable financial resources is now a primary threat to the sector and the donations that provided emergency financial aid at the start of the war have waned.

It is time to look towards a future where Ukrainian media are financially self-sufficient, well-versed in journalism's best practices and free from the grip of Russian propaganda and Ukrainian oligarchs. To achieve this, like-minded international media support groups should unite their strengths to establish a long-term financial aid programme that will free the Ukrainian media landscape from its economic stranglehold and allow it to flourish.

To this end, RSF advocates for an initiative proposed in October 2023, in a [white paper](#) published by the Global Forum for Media Development: "the development of a well-defined and transparent funding framework, such as the establishment of a Ukrainian Media Support Fund with international donor involvement. Such a fund could serve as a centralised mechanism for equitably channelling financial support to media organisations. Instead of project-based assistance, funding should provide institutional support, aim to align with

market principles, consider the size and quality of audiences, and reward outlets based on reach, impact and adherence to ethical standards.”

This International Fund for the Reconstruction of the Ukrainian Media (IFRUM) will support independent media, from the local to the national level, through direct, long-term grants. It will cover the daily costs of newsrooms and allow outlets to rebuild their destroyed infrastructure. It will be a pulled fund, mixing foundation grants, development aid, reconstruction bank funds and private donations. This strategic financing will provide relief, recovery and reform – the three “R”s inherent in any [New Deal for journalism](#).

The following report analyses the Ukrainian media landscape and presents RSF’s recommendations for the creation of an IFRUM along with concrete measures to strengthen press freedom during and after the war. I would like to take this opportunity to highlight the commitment of RSF’s past and present staff on the ground in Ukraine: immediately after the full-scale invasion, RSF opened two Press Freedom Centers, in Lviv and Kyiv. More than 1,600 journalists and 150 Ukrainian media outlets have benefitted from safety and energy equipment, financial grants, and access to psychological and legal assistance provided by RSF. As the media’s needs have evolved, so have RSF’s solutions. Today, the media require an ad hoc fund to survive long term.

I would also like to thank the team from The Fix, our partner in this report, for the friendship and expertise they’ve shared with RSF in the past few years. Ukrainian reporters have shown impressive resilience, and we must give them the means to carry on. Their job is to continue providing us with the best possible journalism; ours is to ensure that their media can survive, progress and thrive.

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EXECUTIVE SUMMARY

UKRAINE BUILT A STRONG INDEPENDENT MEDIA SECTOR DESPITE THE ODDS

After Ukraine's independence in 1991, the media sector played a critical role in building democracy, creating an example of civil society that challenged the region's authoritarian countries. Today, Ukrainian journalism excels in covering corruption, debunking propaganda and investigating war crimes.

SINCE FEBRUARY 2022, UKRAINIAN JOURNALISM HAS BEEN SEVERELY THREATENED

- > **At least 235 Ukrainian media outlets have closed.** Hundreds of media workers have joined the Armed Forces of Ukraine, including some of the country's leading editors and investigative journalists.
- > **Journalists have become targets.** Twelve media workers in Ukraine have been killed by Russian forces due to their work, at least 43 have been injured, and at least 20 are currently held prisoner. RSF has brought 8 complaints to the International Criminal Court concerning Russian crimes against journalists in Ukraine.
- > **Government pressure on journalists has increased.** In 2024, at least 5 journalists were targeted by Ukrainian authorities due to their investigations on corruption linked to war efforts.
- > **Disinformation has proliferated.** Seventy-two percent of Ukrainians now use Telegram, an unregulated platform, to get their news, and 25 of Ukraine's 30 most-followed Telegram news channels are run by anonymous users.

THE MEDIA'S CURRENT CRISIS IS LARGELY ECONOMIC

- > **Advertising revenues fell by 61% between 2021 and 2022.**
- > **The media depend on donors and increasingly compete for funding.** The budget of Ukraine's public broadcaster *Suspilne* dropped by 44% between 2021 and 2023. Without other sources of revenue, *Suspilne* risks monopolising a large portion of donor funds.
- > **Information deserts grow as local outlets suffer.** Seventy percent of the local outlets surveyed reported they were over 90% self-sufficient in 2021, yet only 14% declared a similar level of self-sufficiency in 2023.

ESTABLISHING A FUND IS THE ONLY WAY FORWARD

- > **At least \$96 million must be raised to fill the media market's budget gap.** Without this funding, many media outlets will inevitably die off.
- > **The International Fund for the Reconstruction of the Ukrainian Media (IFRUM) will rebuild the media landscape.** This ad hoc structure will strategically finance Ukrainian outlets demonstrating journalistic rigor through direct grants.
- > **The IFRUM should be accompanied by reforms.** New measures are needed to ensure the media's independence and economic viability.

The Backstory

Ukrainian journalism's legacy of remarkable resilience

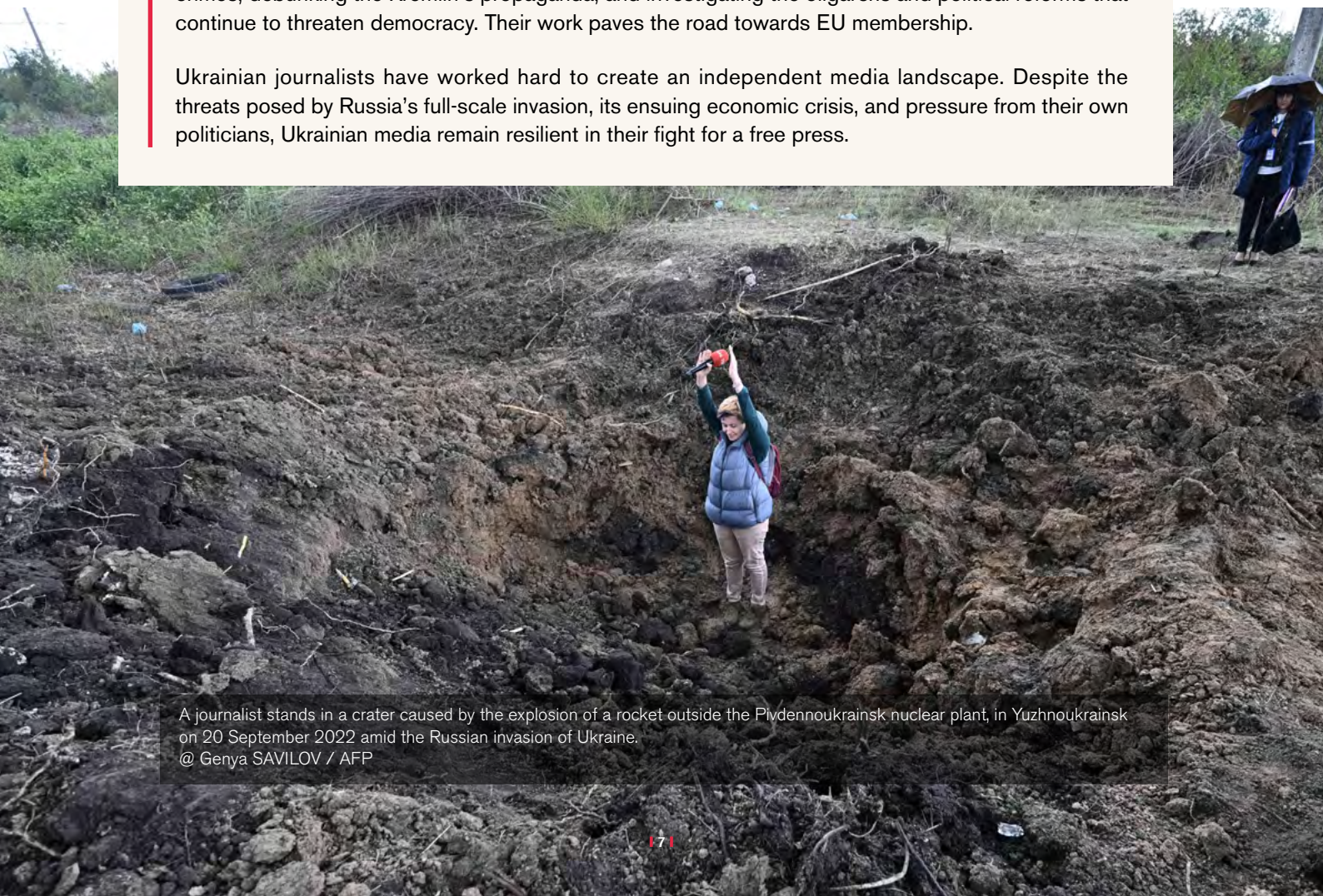
Since its independence in August 1991, Ukraine has gradually cultivated a strong, independent and pluralistic media sector that, to this day, sharply contrasts with the lack of press freedom in its authoritarian neighbours.

In the aftermath of Soviet rule, Ukraine created a legal framework for a private media sector, allowing diverse outlets to proliferate. It also established its media regulator, The National Council of Television and Radio Broadcasting. Numerous organisations defending press freedom and journalistic ethics were born. Yet despite this initial progress, Ukraine's post-Soviet elite held a political and economic stranglehold on the media in the first two decades following independence. This period was marked by censorship and [deadly attacks](#) on journalists, as the media market had fallen under the control of oligarchs – top company owners and high officials – who used it to advance their own interests and wield political influence.

In 2013, the Revolution of Dignity, a widespread movement to bring Ukraine closer to the European Union (EU) and end corruption, marked a turning point in the battle for democracy and press freedom. More online, investigative and independent outlets emerged, led by a new generation of journalists covering corruption, political reform, court cases, economics, and the 2014 Russian invasion. As online journalism grew stronger, Ukrainian reporters started fact-checking using open source intelligence (OSINT) methods. The organisations defending press freedom grew, and outlets specialising in diverse topics multiplied, a telltale sign of a pluralistic sector. Additionally, Ukraine bolstered its media landscape with the transformation of its public broadcaster, which became *Suspilne* in 2019, a reliable news source with high trust among audiences.

Today, this accrued investigative and fact-checking expertise is pivotal in documenting Russia's war crimes, debunking the Kremlin's propaganda, and investigating the oligarchs and political reforms that continue to threaten democracy. Their work paves the road towards EU membership.

Ukrainian journalists have worked hard to create an independent media landscape. Despite the threats posed by Russia's full-scale invasion, its ensuing economic crisis, and pressure from their own politicians, Ukrainian media remain resilient in their fight for a free press.



A journalist stands in a crater caused by the explosion of a rocket outside the Pivdenoukrainsk nuclear plant, in Yuzhnoukrainsk on 20 September 2022 amid the Russian invasion of Ukraine.
@ Genya SAVILOV / AFP

1

THE MEDIA MARKET SINCE FEBRUARY 2022: NAVIGATING POST-INVASION SECURITY RISKS AND OPERATIONAL CHALLENGES

Since February 2022, Ukrainian media have faced not just the physical hardship of war, but major operational difficulties. At least [235 outlets](#) suspended their operations due to the Russian invasion. The challenges facing the independent and pluralistic media landscape that Ukraine has carefully constructed over the past two decades can be roughly grouped into five categories:

1/THE SAFETY OF MEDIA WORKERS AT HIGH RISK

Following Russia's invasion, Ukraine ranked 179 out of 180 countries in the "security" category of RSF's 2023 [World Press Freedom Index](#), followed by Myanmar. Journalists who have not been killed or injured labour under the constant threat of air raids, which interrupt sleep and operations. In Ukraine's occupied territories, media workers who refuse to collaborate with Russian forces are hunted down: according to RSF's investigations, some have been [tortured](#), imprisoned and essentially [enslaved](#). Many local news journalists have fled to unoccupied areas and are forced to cover their region remotely. Digital safety is also an issue: not only have Russian cyberattacks disrupted TV programmes and temporarily brought down websites, but Ukrainian journalists have reported online harassment and threats – in particular via Telegram channels – coming from Russian, Ukrainian and anonymous perpetrators.

THE WAR'S IMPACT ON UKRAINIAN JOURNALISM

RSF [counts](#):

12 media workers
killed since
February 2022

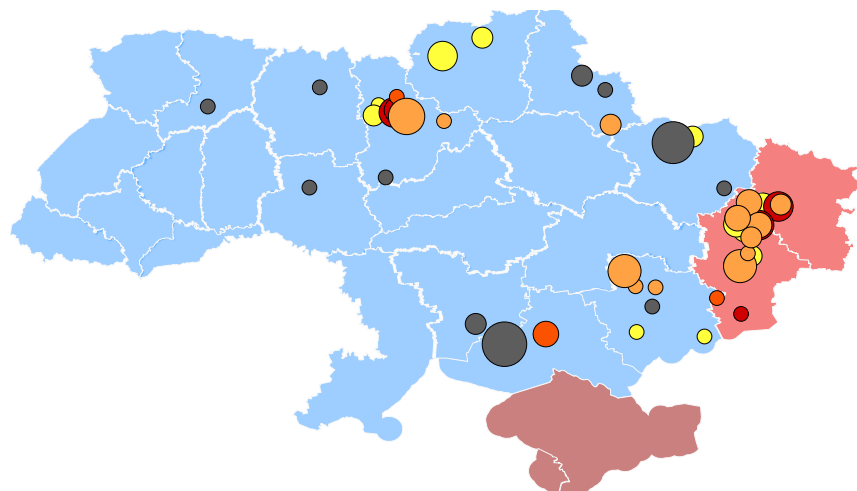
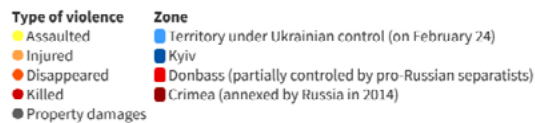
At least
43 media
workers injured

22 Russian shells
hitting Ukrainian
TV towers

At least
20 Ukrainian
journalists currently
held by Russia

12 reporters killed and 43 injured by gunfire

Summary of attacks on journalists and media in Ukraine since 24 February 2022



2/ STAFFING SHORTAGES

The full-scale invasion exacerbated the widespread staffing shortages [already plaguing Ukraine](#). The impact of these [shortages](#) on the media sector's survival should not be underestimated.

The overall number of graduates in Ukraine has fallen from 640,000 in 2008 to 360,000 at present. Well before February 2022, media outlets reported [difficulties](#) competing for the dwindling number of graduates, especially compared to sectors with better job prospects, like the tech industry. Key non-editorial roles were worryingly vacant before the invasion due to increased skill requirements, and Ukrainian media companies surveyed for this report noted challenges finding product developers, marketing and distribution specialists, and commercial staff.

The situation has sharply deteriorated not only due to safety concerns inherent to the invasion, but also the number of staff drafted to fight against Russia. Hundreds of media workers [have joined](#) the Armed Forces of Ukraine, including some of the country's [leading editors](#) and [investigative journalists](#). Others have fled abroad.

As a result, many outlets are looking for new ways to recruit employees, such as launching [journalism schools](#) and campaigns that aim to excite people about journalism as a [profession](#). It should be noted that despite some successful cases – such as CID Media Group, which experimented with a summer school for [new hires](#) – these methods tend to be difficult for smaller, local media with limited resources.

3/ GOVERNMENT PRESSURE AND RESTRICTIONS

Ukrainian media have also faced political and [military pressure](#) from their own government. Current martial law, including curfews and limited access to certain zones, has restricted the overall work of journalists. While more access was recently [granted](#) to certain areas of free Ukraine, some authorities continue to uphold these bans.

According to RSF's information, between January and May 2024 at least five Ukrainian investigative journalists were [targeted](#) by Ukrainian officials in the form of surveillance, online threats, physical threats and conscription threats due to their coverage of corruption.

The government has also tightened its control of the state media, *Ukrinform*, which had preserved its editorial independence prior to the full-scale invasion. In May 2024, a military officer was appointed editor-in-chief, and an investigation into the previous editor-in-chief revealed the existence of a list of “banned speakers,” which included activists and [opposition politicians](#).

4/ SHIFTING MEDIA CONSUMPTION TRENDS

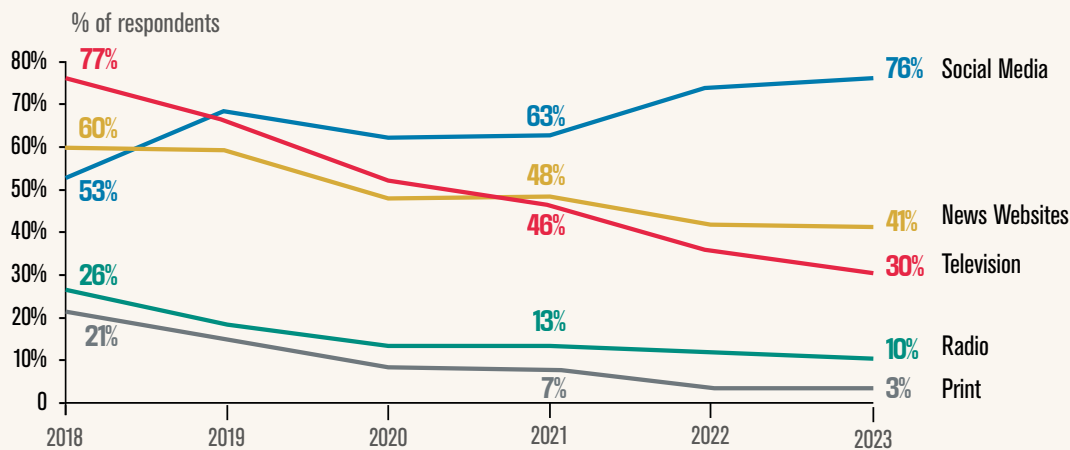
Audience behaviour has changed dramatically since the invasion. Social media – specifically Telegram and YouTube – are now Ukrainians' primary source of news information, ahead of media websites, television, radio and print, which were already in decline before the war. This drop in traditional mediums and rise of less-regulated platforms has provided fertile ground for mis- and disinformation.

I THE LOSS OF CONFIDENCE IN THE TELEMARATHON

The launch of the United News format, also known as the United News Telemarathon, on February 24, 2022, may have contributed to the decline in [television consumption](#). Co-produced by Ukraine's leading TV channels, this programme was intended to provide reliable news reporting in the face of Kremlin propaganda during the confusion that followed Russia's large-scale invasion. Despite initial positive reactions, it soon recorded a [decline in audience and trust](#) due to its lack of pluralistic content and a general decrease in TV consumption. The share of people who said they “do not trust” the United News Telemarathon rose from 12% in March 2022 to 47% in [February 2024](#).

Social media: Ukraine's primary news source

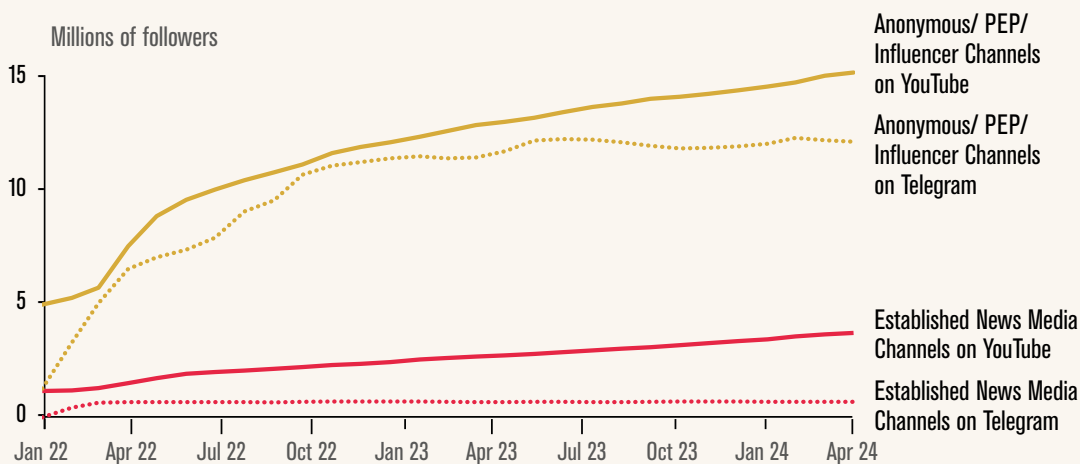
Monthly news consumption in Ukraine by medium between 2018 and 2023.



Source: USAID-Internews Media Consumption Survey 2023

Established media are no longer the leading sources of information

The social media performance of established news media vs. anonymous, PEP-linked and influencer channels since January 2022.



Source: Tgstat, SocialBlade. Anonymous channels include Trukha Ukraine, Lachen, Serhii Sternenko, Real War, Insider UA, Battalion "Monaco", Top News, Ukrainian Telegram, The Joker Ukraine, Anatolyi Sharyi; News media include Hromadske, Ukrainska Pravda, Forbes Ukraine, Novosti Donbasa, Ukrinform, Suspilne, Ukrainer, Shotam, Dumskaya, The Village Ukraine



Telegram: Ukraine's biggest social media platform

Ukraine comes second in the list of countries with the highest Telegram use – after Russia and before Belarus – with more than 88,000 active channels and almost 431 million cumulative subscribers as of August 2024. The platform boomed after the full-scale invasion and 72% of Ukrainians use Telegram to get news information, according to an USAID-Internews Media Consumption survey published in November 2023. Telegram-based media benefit from the platform's low costs, easy content distribution and ability to maintain operations under severely limited internet bandwidth (e.g. during electricity outages).

The full-scale invasion also caused an increase in politically affiliated Telegram channels and “anonymous channels,” whose owners are ultimately unknown, although some of their copywriters may be identified. As of August 2024, 25 of Ukraine's 30 most-followed Telegram news channels were anonymous, and had a cumulative audience of 29.2 million followers. It is nearly impossible to source the information in the content of anonymous accounts, and there is no regulation curbing the spread of disinformation on the platform. Russian propaganda is currently proliferating on Telegram through anonymous channels, as well as the channels of pro-Russian public figures and Russian state media.

In the early weeks of the full scale-invasion, channels run by national politicians, their surrogates and influencers were often quicker than news media to react to developing events, due to lax editorial standards that resulted in less reliable, easier-to-publish content, which was often biased. This high content turnover created huge follower growth. Worryingly, it appears Ukrainian authorities have embraced and accentuated this trend, inviting anonymous Telegram channels – such as Trukha, an anonymous channel with 2.57 million subscribers as of August, 2024, making it the second most popular channel in the country – to both official and off-the-record press briefings.

While these challenges around Telegram are not unique to Ukraine, they're particularly urgent given Telegram's massive influence in the country. Yet progress may be on the horizon as members of Ukrainian parliament called for a law to combat disinformation on online platforms, including Telegram, in January 2024.

Top 30 Ukrainian Telegram Channels covering Politics, and News and Media, by number of subscribers (as of August 8, 2024)

Rank*	Channel name	# of subscribers	Description
1	Мир сегодня с "Юрий Подоляка"	2 983 502	Pro-Russian blogger**
2	Труха 🇺🇦 Україна	2 574 823	Anonymous news channel
3	Николаевский Ванёк	2 482 124	Anonymous opinion blog
4	Лачен пише	1 522 606	Neutral blogger
5	Times of Ukraine	1 480 647	Anonymous news channel
6	Украина Сейчас: новости, война, россия	1 425 332	Anonymous news channel
7	Инсайдер UA Україна Новини	1 366 608	Anonymous news channel
8	Реальна Війна Україна Новини	1 331 638	Anonymous news channel
9	Реальний Київ Україна	1 237 699	Anonymous news channel
10	Анатолий Шарий	1 222 760	Pro-Russian blogger
11	Всевидающее ОКО ua Новини і Політика	1 148 327	Anonymous news channel
12	Україна Online: Новини Політика	1 095 889	Anonymous news channel
13	Телеграмна служба новин - Україна	1 049 569	Anonymous news channel
14	Легитимный	1 019 406	Anonymous news channel
15	Резидент	1 011 502	Anonymous news channel
16	НОВИНА ua Україна	978 854	Anonymous news channel
17	Новини Україна ua	977 258	Anonymous news channel
18	Top News (Війна, Україна, Новини)	920 384	Anonymous news channel
19	Український Телеграм ua	892 667	Anonymous news channel
20	Батальйон «Монако» Україна Новини	878 374	Anonymous news channel
21	Аутсайдер UA	869 898	Anonymous news channel
22	TCH новини / TCH.ua	864 439	News Media Channel
23	Карта повітряних тривог ua	862 753	Anonymous news channel
24	Київ INFO Новини Україна ua	858 922	Anonymous news channel
25	І.ШО? Новини	823 053	Anonymous news channel
26	Хувая Одесса	798 202	Anonymous news channel
27	ППО - NewsuaНовини	797 265	Anonymous news channel
28	STERNENKO	794 746	Nationalist blogger
29	Одесса INFO 🇺🇦 ua Новини	788 359	Anonymous news channel
30	Україна 🇺🇦 Новини 🇺🇦 Війна	768 757	Anonymous news channel

*Excludes channels with non-news or political focus (e.g., crypto, pets);

**Pro-Russian figure of Ukrainian origin (classification as Ukrainian is disputable)

Source: TGStat

5/ FINANCIAL CHALLENGES

The Russian invasion has devastated the Ukrainian economy; the country's gross domestic product fell by around [29%](#) in 2022. This has severely impacted the press, as advertising revenues fell by a staggering 61% between 2021 and 2022. The media's other sources of revenue, such as event organisation and crowdfunding, have also been hit hard (*see page 16 for a breakdown of revenue sources*).

At the same time that revenue dried up, media spending increased. General inflation pushed up prices while new war-related costs arose, such as moving staff to another region and purchasing equipment to mitigate the effects of power cuts. As a result, the Ukrainian media experienced deep and painful budget deficits in 2022.

At the start of the war, donor funding helped fill a large part of this deficit, as did crowdfunding. Yet international attention has dwindled since 2023, jeopardising these new sources of revenue. Online traffic has fallen, reducing important advertising revenues from YouTube. What's more, in recent months, Yahoo News dropped *Ukrayinska Pravda* and other media, citing unspecified "[quality issues](#)," thus eliminating a source of revenue that used to reach up to \$55,000 a month for certain outlets.



Protective equipment from RSF's press freedom centers given to journalists working in Ukraine. @ RSF

TIMELINE: The war's impact on the media in key dates

Russia launches a full-scale invasion of Ukraine. All major Ukrainian TV channels join to form the United News Telemarathon.

24
February
2022

1
March
2022

The first Ukrainian journalist to be killed by the Russian invasion, **Yevhenii Sakun**, dies when Russian shells hit Kyiv's TV tower.

RSF refers Russia's bombing of TV towers in Kyiv, Lysychansk, Kharkiv and Korosten **to the International Criminal Court (ICC)** and to the General Prosecutor of Ukraine.

4
March
2022

Three channels linked to the opposition to the current government, *Espresso*, *Channel 5*, and *Priamyi*, are taken off air. Their offer to join the United News Telemarathon is rejected.

The Perugia Declaration for Ukraine, launched on 9 April 2022, returns to the spotlight when over 200 international organisations – including media outlets, unions and press freedom organisations – call on the international community to increase support for journalists and independent media in Ukraine.

4
April
2022

3
May
2022

At least eight journalists and media professionals have been killed while covering the invasion.

Russia's shelling of Ukraine's energy infrastructure causes **mass blackouts**, interrupting reporting and broadcasting. Ukrainian media are forced to adapt their work.

August
2022

Winter
2022-
2023

The new media law is signed by the President of Ukraine and enters into force in [March 2023](#).

29
December
2022

The one-year anniversary of the invasion. [Two hundred and seventeen media outlets](#) have shut down.

24
February
2023

French reporter for *AFP* **Arman Soldin** is the 11th journalist killed in Ukraine due to their work. RSF files its [8th complaint](#) of Russian crimes against journalists working in Ukraine with the ICC and with the General Prosecutor of Ukraine.

9
May
2023

[Launch](#) of the **Journalism Trust Initiative's** emergency protocol in Ukraine.

May
2023

European Leaders decide to open **accession negotiations** with [Ukraine and Moldova](#).

14
December
2023

At least five investigative journalists are targeted by Ukrainian authorities due to their work on corruption. The editorial independence of *Ukrinform*, the state media, is threatened by government interference.

January-
May
2024

Ukraine [joins the](#) **International Partnership for Information and Democracy**.

July
2024

Reuters security advisor, **Ryan Evans**, is the 12th media professional killed in Ukraine while working.

24
August
2024






2 | CURRENT MEDIA MARKET ECONOMICS: ASSESSING THE CRISIS

Media needs and business models have greatly evolved due to the direct economic consequences of the Russian invasion. Not only did the advertising market crash, but many individuals who supported the media via subscriptions or crowdfunding pivoted to funding the armed forces and war-related charities. While all media felt this economic disruption, it impacted each of them differently. Any initiative to reconstruct Ukraine's media landscape must take these changes into account.

To fully understand the economic challenges facing Ukrainian media, it is necessary to outline the differences in their cost base, as well as their options for monetisation.



Categories of Ukrainian media according to their cost base in 2024

Media category*	Description	Est. number
 Large multimedia outlets	Large national media with 50-150 employees that use expensive multimedia formats and/ or provide complimentary services (see list of business models on page 16).	Approximately 6 to 8 media
 National media and “specialised” media	This category includes two types of media with a similar cost base: 1) large, national, text-centric outlets with little multimedia output 2) smaller outlets that specialise in expensive formats (e.g., video, data or investigative journalism, digital magazines).	Approximately 10 to 15 media
 Large regional multimedia outlets and groups	Regional multimedia outlets and media groups that have multiple offices or outlets across their zone.	Approximately 10 to 15 media and media groups
 Large local newsrooms	Municipal and regional media with a significant presence that produce less expensive, text-centric content. They are generally based in mid-sized cities with teams that typically count 5-15 people.	Approximately 40 to 60 media
 Small local and micro-publications	Smaller outlets (typically 1-7 people) based in small towns and cities that use inexpensive content formats. Print maintains a significant role.	Approximately 400 to 600 media**










* Note: the categorisation above focuses on independent news media, which is defined according to the following criteria: has never been run by oligarchic groups, can not be an influencer channel or an account on social media centered around a handful of creators, and must have a tangible interest in news content. Small media are harder to categorise, as many have low levels of activity or are often on the limit of what would be defined as journalistic activity. The list does not include media used primarily for political purposes, but may include some media with deeper ties to political groups than is generally preferable.

** National Council on Television and Radio Broadcasting technically has a register that includes 2,115 print media, 290 online media and 163 radio stations registered in Ukraine. However, a majority of these are dormant in practice and/ or do not qualify as news media. It is worth noting that UNIAN's press monitoring service offers to cover 600 publications, a share of which has likely closed since the full-scale-invasion: <https://www.unian.ua/static/monitoring/services>

Larger national media with more expensive content production operations – especially media producing video or other high-value content – have the highest cost base, yet they also have the most options for monetisation. Outlets with big audiences can capitalise on event organisation, especially if the media are located in major cities. Media with sizable archives can monetise the publishing or sale of their content.

On the other end of the economic spectrum are small, local media, often run by teams of less than seven people, which make up the bulk of overall media outlets but account for a significantly smaller share of the market in financial terms.

Key business models

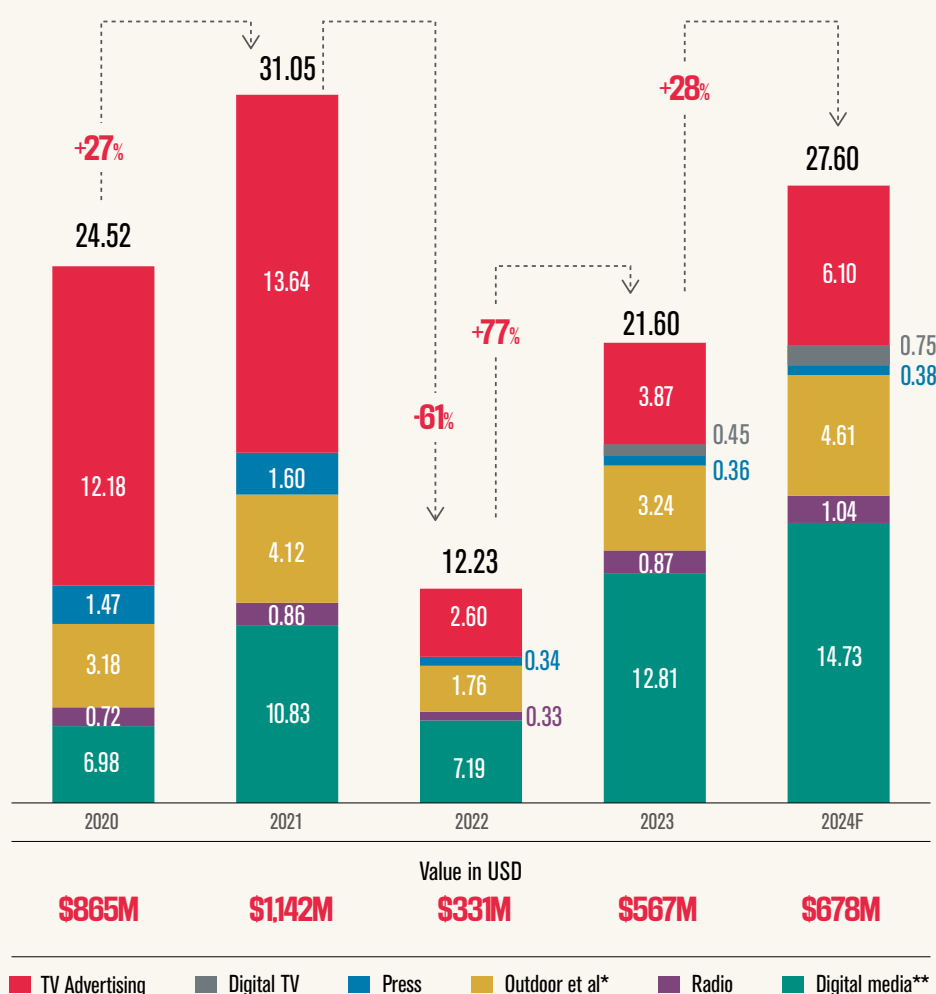
Revenue stream*	Commercial significance	Expected trends**
 Donor Contributions	Used by ~95% of media from all cost-base categories. In 2023, it accounted for the average of 50% of respondents' budgets.	Most respondents expect support to stay stable, but worry that interest may shift to other regions of the world.
 Programmatic/Banner Ads	Used by ~30% of media and accounts for 7% of their budget on average.	While there was some recovery of the local advertising market in 2023, participants do not expect growth going forward.
 Reader Revenues	Used by approximately ~30-40 media, mostly large and niche publications. Typically accounts for 1-10% of budget	Slow growth in the number of paying readers, but with a declining average ticket, resulting in continued slow stagnation
 YouTube Ads	Used by ~15% of media, and accounts for 5% of their budget on average.	Works for a very small minority, but some media have shut down or plan to close accounts to limit expenses.
 Native Ads	Used by around half the media surveyed, and accounts for 17% of their budget on average.	This stream is dependent on the electoral cycle and economy, and is unlikely to grow for news media due to competition from social media influencers.
 Trainings	Almost no reported use of this model among respondents (less than 10%). Accounts for 6% of the budget of 2 respondents.	Decreased by around 4% since 2021 and is projected to continue decreasing per most of the respondents.
 Event organisation	A very rare revenue stream, used by a handful of media in Kyiv and major cities, where they have stepped into a vacated market.	Successful for a small group of media, primarily based in Kyiv, and has potential for growth.
 Production Services	Used by around 20% of the media, and accounts for 11% of their budget on average.	Decreased by around 4% since 2021 and is projected to decrease further by most respondents.
 Printing and syndication	Used by around a fourth of surveyed media, and accounts for an average of 35% of their budget.	Generally declining, due to lower interest and closure of local printing presses (with some exceptions).

Source: Media survey; *Includes only main categories, **Perspective of media managers

1/ THE ADVERTISING CRASH

Advertising has historically played a central role in financing Ukrainian media. This has caused some problems, particularly for regional media dependent on local firms, which created conflicts of interest (note: this is further exacerbated by “unmarked advertising” or paid-for stories, known as *jeansa*, particularly ahead of elections). Yet advertising was nonetheless a critical element of the media economy and a huge gap appeared in the market when it collapsed in 2022.

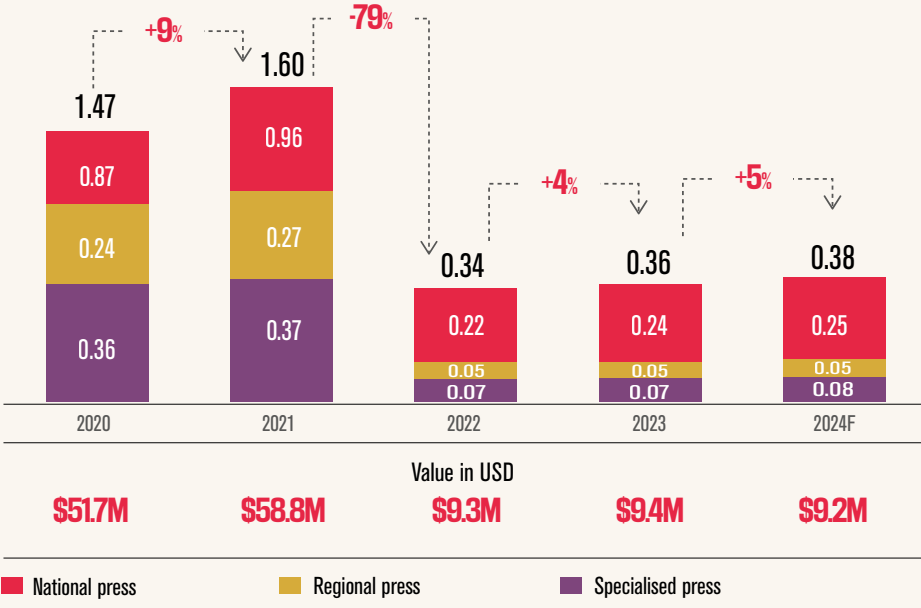
Ukraine's advertising market (2020-2024F), billions of Ukrainian hryvnia



Source: All-Ukrainian Advertising Coalition; USD values based on end-year exchange rate (June 15 rate for 2024 forecasts)
 * Includes indoor banners and cinema advertising
 ** Includes social media posts and videos prepared and posted by independent media

While Ukraine's advertising market has largely recovered from the 2022 crash – forecasted spending for 2024 is already ahead of 2020 values in Ukrainian hryvnia, although it will still be down by about 22% in US dollars – the distribution has not been equal. Notably, press advertising has collapsed, falling almost 80% in 2022 in Ukrainian hryvnia and 84% in US dollar terms.

Press advertising (2020-2024F), billions of Ukrainian hryvnia



Source: All-Ukrainian Advertising Coalition; USD values based on end-year exchange rate (June 15 rate for 2024 forecasts)

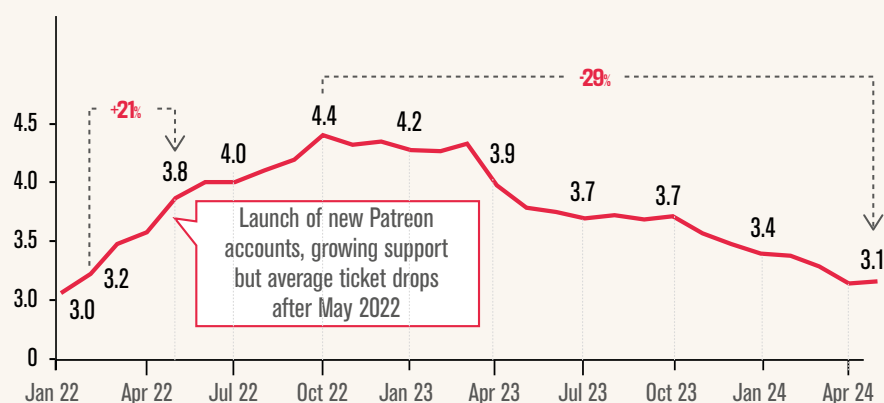
This has hobbled the Ukrainian media's ability to sustain themselves. Although the crash was somewhat mitigated by growth in digital advertising – a portion of which lands in media budgets – most of the media managers interviewed do not believe in growing ads as a reliable revenue stream without full-scale reconstruction, which is almost impossible without a ceasefire.

2/ READER REVENUE AND CROWDFUNDING

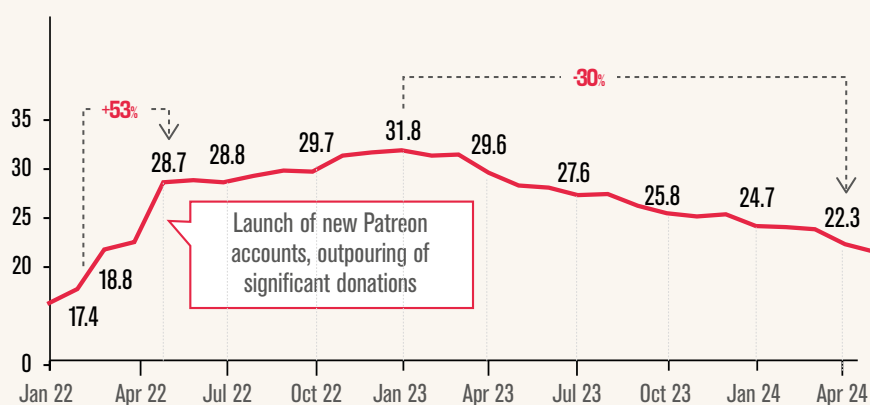
Reader support has become a growing source for media revenue in recent years, yet remains symbolic for a vast majority of outlets. The culture of media support is fairly new and marginal in Ukraine and, above all, Ukrainians' incomes have dropped significantly – close to a third of the country now lives [below the poverty line](#).

Nevertheless, many media have turned to reader monetisation, primarily via third-party services like Patreon. A study of 19 media that launched Patreon accounts both before and since the full-scale invasion demonstrates a sharp spike followed by a gradual decline in support.

Total Patreon supporters, selected media (# '000s, monthly; n=19)



Total Patreon earnings, selected media (\$ '000s, monthly; n=19)



Source: Graphtrone. Note several media (n=4) had gaps in data available, which were filled by assuming proportional changes to remaining market participants. Also note that Ukrayinska Pravda does not disclose earnings, only contributor numbers. Earnings are estimated by multiplying earnings per contributor of its sister-publication, Europeiska Pravda.

In addition to Patreon, some media feature “in-house” reader contribution systems, meaning [visitors pay directly](#) via a media's website rather than an external service, which reduces commission fees – or they use a mix of in-house and external systems. For example, *Hromadske* has both an in-house system and an on-site integration of Buy Me a Coffee, a lower-cost alternative to Patreon. In 2023, the outlet received 1.6 million hryvnias (roughly \$40,000) in reader contributions, [covering about 3% of that year's expenses](#). Media who decide to build in-house solutions have more substantial earnings via this channel, and it is therefore reasonable to assume the actual market size of Ukrainian reader revenue is 2-3 times bigger than the revenue from Patreon alone

(about \$44,000-\$66,000 per month, or \$0.5 to \$0.8 million annually)¹. In-house solutions, however, require time and funds to build, and typically need more maintenance and management.

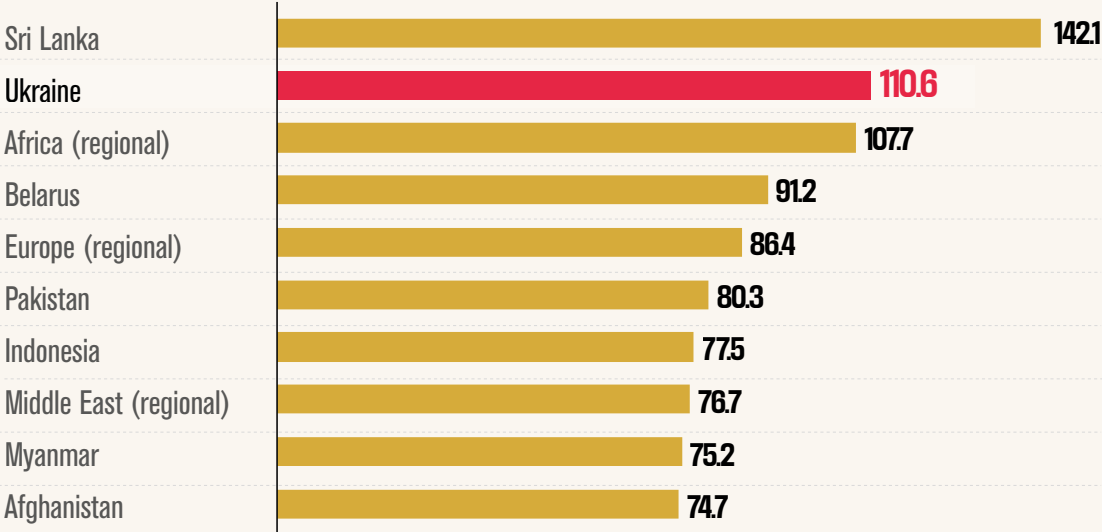
Crowdfunding, which is typically based on one-off donations rather than regular monthly contributions, remains a constant presence on the Ukrainian market, and was [particularly significant](#) during the first few months of the full-scale invasion. Yet media managers are increasingly de-prioritising this solution, as the amount of effort needed to convince a single supporter to pay for a one-off contribution is roughly the same as finding a new regular patron, but the lifetime earnings are significantly lower.

3/ THE IMPORTANCE OF DONOR FUNDING

Despite the breadth of revenue streams used by Ukrainian media, donor funding has played a central role in the past decade, especially since the war. Ukraine already relied on international support to sustain its media well before the 2022 invasion, and was the second-biggest recipient of OECD-member media aid in 2010-2019, averaging \$11 million a year. Today, one of the main challenges facing Ukraine's media landscape is dependency on donor contributions.

Previous levels of donor funding serve as an effective benchmark for assessing the financial support currently required, a number which will likely need to be at least a multiple of prior funding to avoid deep market consolidation and expanding [news deserts](#).

Biggest recipients of OECD member media aid in 2010-2019 (cumulative values, \$ millions)



Source: Data provided to the OECD by Development Assistance Committee members; Statistical analysis by Coral Milburn-Curtis. See full report at <https://www.cima.ned.org/publication/are-donors-taking-the-journalism-crisis-seriously/>

¹ It should be noted that these calculations do not include the Kyiv Independent, a major English-language publication covering Ukraine, which had peak earnings of \$87,500 on Patreon in February 2023 and has been moving reader contributions in-house, as it serves primarily international audiences. It also does not include Forbes Ukraine, NV and other paywall-based models.



Suspilne: The public broadcaster in need of donor funding

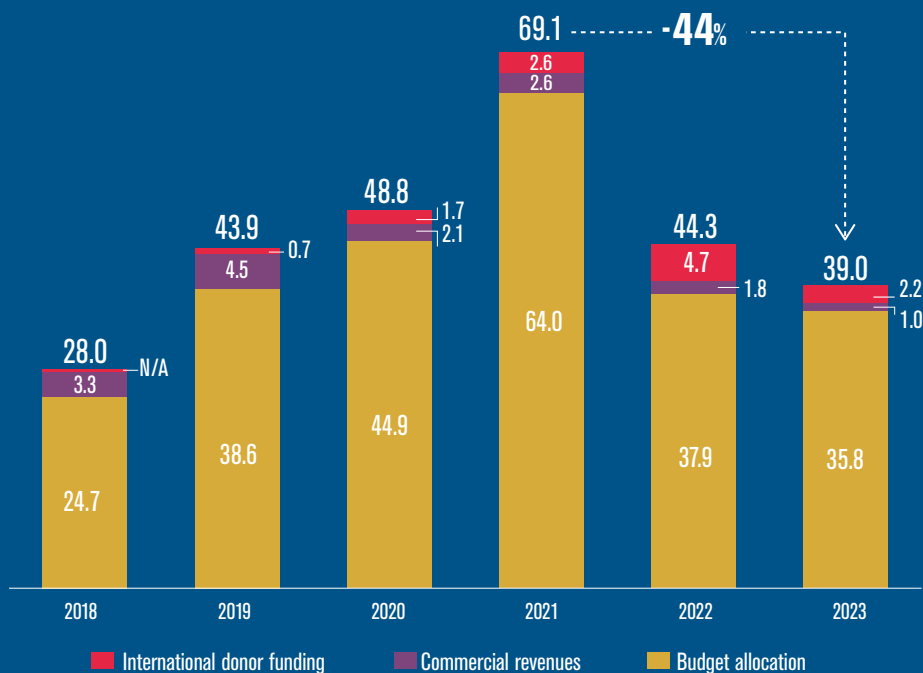
The funding of Ukraine's public broadcasting company, *Suspilne*, impacts the country's entire media market. *Suspilne* was launched in 2015 to fill a gap in the Ukrainian media landscape, namely the absence of a public television player that would act in the interests of Ukrainian society, most notably by increasing the media representation of minority groups. *Suspilne*'s primary mission is to "defend freedoms in Ukraine."

The company operates an extensive network of national and regional channels that broadcast news on television, radio and the internet. Despite this wide reach, the TV audience share of *Suspilne*'s main channel has been hovering around 1-2% for many years. The company's online presence, however, has grown considerably.

According to the law, *Suspilne* should receive 0.2% of state budget expenditures of the previous year. Yet this level of funding has never been reached, and *Suspilne* has subsequently received substantial financial support from donors, particularly in 2018-2020, and again in 2022. Given the planned reduction in state support for *Suspilne* in 2024, and the Ukrainian hryvnia's fall in value against major currencies, it is reasonable to expect that *Suspilne* will return to the fundraising market. This creates a risk for other media, as *Suspilne* would absorb a large proportion of donor budgets and reduce the funding available to local media.

Suspilne budget breakdown (2018-2023), millions of EUR

(end of year exchange rates)



Source: *Suspilne*

4/ THE ADDITIONAL DIFFICULTIES FACING LOCAL MEDIA

Municipal and regional outlets have suffered particular hardships. Massive displacement and refugee flows, particularly in the early months of the full-scale invasion, meant that many media teams were scattered within the country and abroad, as was much of their audience.

With much smaller budgets – typically ranging from \$10,000 to \$40,000 a year for small local media, and up to \$110,000 for larger local media – and less ability to reach foreign donor organisations than national media, [hundreds of local outlets suspended operations](#).

While 70% of the local media outlets surveyed nationwide for this report were more than 90% self-sufficient² in 2021, only 14% declared a similar level of self-sufficiency in 2023. “If the war continues for a long time and donors remain less active, small and regional media will be forced to close their doors,” summed up one media manager.

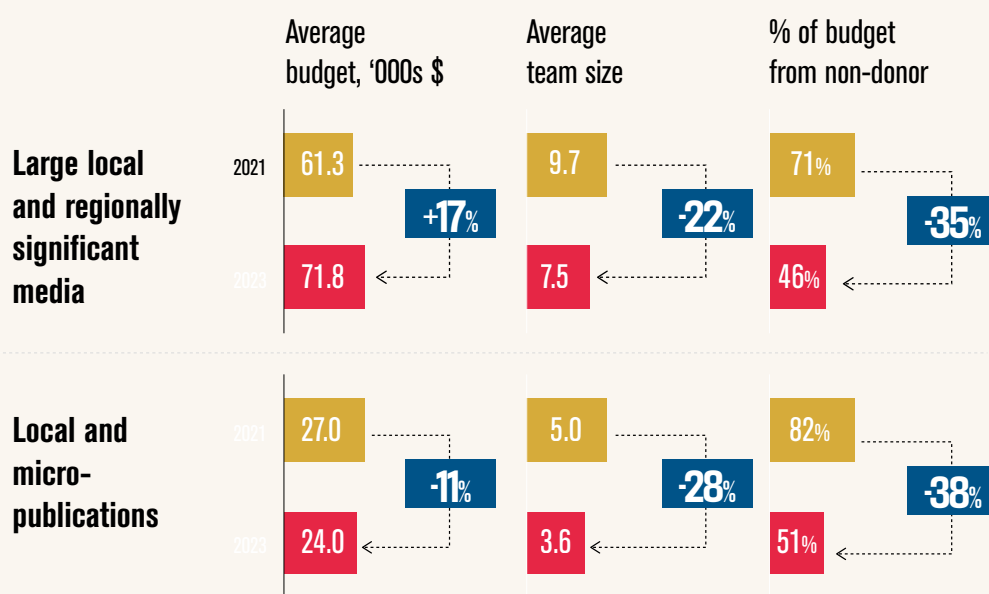
It's worth noting that local journalism in Ukraine was already struggling before the full-scale invasion. Many outlets were transformed during the “destatisation” process in 2016-2018, when at least 760 registered state and communal media outlets were handed over to their media teams and no longer supported by public funds. By May 2019, at least 133 media had closed, largely due to this destatisation. Others reduced their activity, or closed at a later date.

The dire situation of local media has resulted in the expansion of information deserts in certain regions of Ukraine. A study of 11 oblasts (administrative regions) in the north, south and east of the country revealed that 21 of the 68 raions (districts) had no local news outlets. These information deserts are partly due to the demographic decline of rural areas, which has been exacerbated by the war.

ECONOMIC AND STAFFING TRENDS OF REGIONAL AND LOCAL MEDIA BETWEEN 2021 AND 2023

Over the past two years, local media have faced a decrease in their team sizes, a reduction in funding and, for hyper-local media, a drop in overall budgets.

Local media in Ukraine, 2021 vs. 2023 (n=28)



Source: Media surveys

2 Defined as generating income from commercial sources rather than being dependent on development grants.

5/CASE STUDIES: THE EXCEPTIONAL LOCAL MEDIA THRIVING POST-INVASION

A handful of local media have not only survived the 2022 invasion, but increased their audience. Below are two such examples.

| **CUKR – RESILIENCE AND INNOVATION WHILE UNDER SIEGE**

Cukr is a local online outlet from Sumy, a city in northern Ukraine located less than 30 kilometres from the Russian border. Named after the city's sugar factories – *cukr* means “sugar” in Ukrainian – the outlet was launched in 2019 by several founders, including Dmytro Tischenko, a local activist and participant in the Revolution of Dignity. Some of *Cukr*'s staff remained in the city when Russian forces entered Sumy in the early days of the invasion. *Cukr*'s team continued reporting during the Battle of Sumy, which ended with a Ukrainian victory on April 4, 2022.

Cukr is one of the rare local media to have both grown their editorial team and improved their financial situation over the past two-and-a-half years. This is mainly due to donor support and their innovative [members club](#) – which counted 663 paying members as of August 8, 2024, with many supporting monthly – as well as the 2022 launch of an e-store selling *Cukr* merchandise, coffee, snacks, utensils, hemp, and other [products](#). The e-store also serves as an excellent way to promote local producers. As a result of the launch, the team has grown from 5 people in 2021 to the equivalent of 16 full-time employees³, and the share of the budget covered by non-donor revenue grew from 5% in 2021 to 30% in 2023.

| **VGORU – SURVIVING OCCUPATION WITH DONOR SUPPORT**

The online local media *Vgoru* is based in the southern city of Kherson, which saw a long period of Russian occupation that lasted from March to November of 2022.

During the occupation, the *Vgoru* team continued their operations with a portion remaining in the city while the rest relocated to other regions of free Ukraine or abroad. They continued to provide coverage of events in Kherson, and their footage from this time was eventually compiled into the documentary “[Unconquered Kherson](#).”

Thanks to post-invasion donor support, *Vgoru* has managed to expand both its budget and staff, which has grown from 15 to 20 full-time equivalent employees. This has allowed the outlet to invest in video content, mostly broadcast via TikTok and YouTube, although the share of commercial revenue has stayed relatively flat, increasing from 5% in 2021 to 7% in 2023.

It is also worth noting that multiple outlets have been modelled after *Suspilne*'s local affiliates, which illustrates the ripple effect national outlets could have on the larger media ecosystem by setting up local bureaus. Their presence brings valuable editorial and managerial knowledge to cities and regions in need, spurring the creation of viable local media.

³ Includes both full time staff and a share of part-time, freelance and permanent workers.

3 | MARKET SIZING AND FUTURE SCENARIOS: THE URGENT NEED FOR A FUND TO SUSTAIN THE MEDIA

With severely hampered revenue streams and heavy donor dependence, what will become of Ukrainian media? The following assessment of media budgets and market trends points to three potential future outcomes – none of which end in a robust independent sector. At this stage, a new strategic financial intervention is the only way forward.

1/ MEDIA BUDGETS

An estimate of Ukraine's media sector – based on the reported budgets of 42 media that fall into various categories – suggests that the overall aggregate budgets amount to approximately **\$46 million**⁴. This is a hefty amount considering the spike in donor dependence that followed the full-scale invasion.

Estimating the overall Ukrainian independent media market

Total costs by media category \$ millions (n=41; mid-point value)*	Estimated # in category	Estimated budget range**
Large multimedia outlets	6-8	\$1.5-2.7M
National media and "specialised" media	10-15	\$0.3-0.9M
Large regional, municipal publishing groups	10-15	\$0.2-1.0M
Large local newsrooms	40-60	\$40-110K
Small local and micro-publications	400-600	\$10-40K
Total	466-698	NA

Source: Media survey

* Valuation is based on the mid-point calculations, both in terms of number of media in category and average budget size.

**Media overwhelmingly fall within the ranges mentioned (over 80%), albeit with some outliers

The market is fairly top-heavy. Large, multimedia publishers – who typically produce and distribute graphic, audio and video content and can have teams of more than 100 people – account for a third of the market in dollar terms. If specialised media are included, which also tend to have large teams or produce expensive content, this share rises to almost 50%.

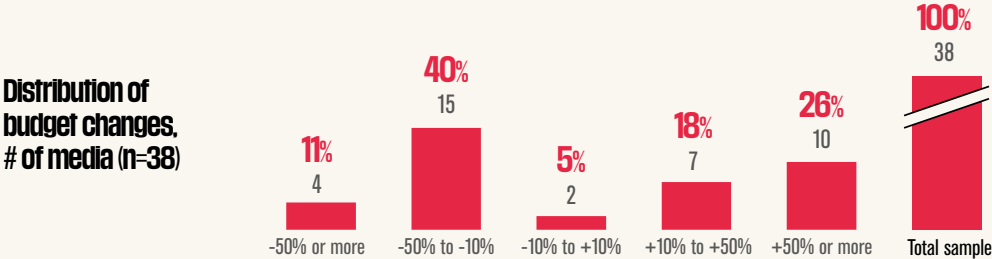
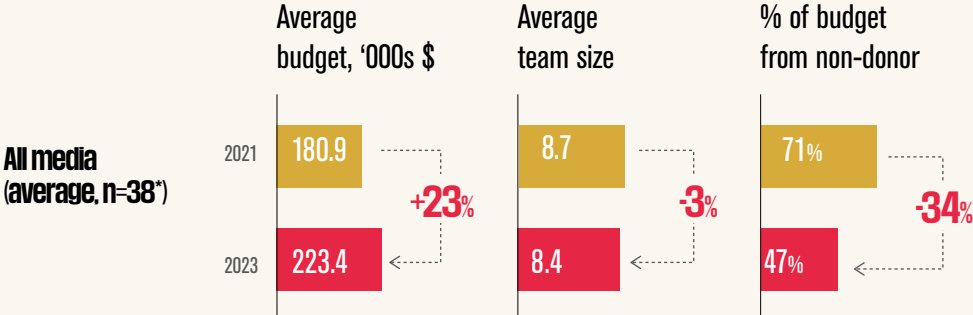
4 See Appendix I for the calculation of media included in the estimate. This figure may exclude a number of media currently registered by the National Council for Television and Radio Broadcasting, but with little relevance to ensuring the presence of local content. It also does not include the budget of Suspilne, or any television stations.

With both groups based in Kyiv, this puts a value of at least \$22 million on the capital's media sector. The actual value may be higher, as many regional outlets, especially from the country's east and south, have relocated there. This Kyiv-centricity has likely contributed to the media's escalated spending, as the capital saw a significant rise in [living costs](#) (as has [Western Ukraine](#), where many other media workers relocated).

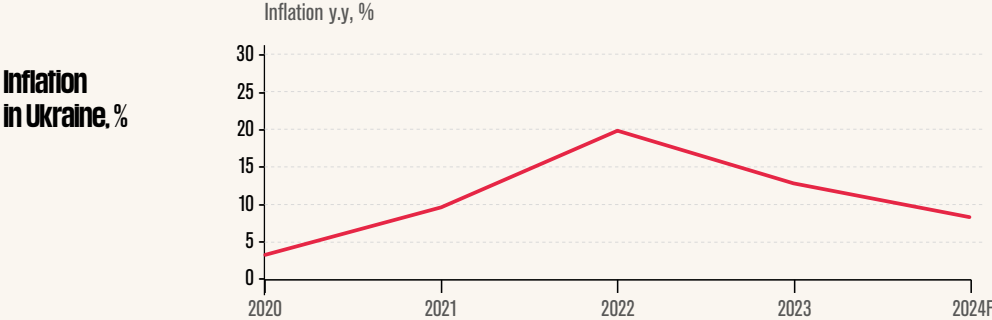
War-time inflation has also significantly increased operation costs, as inflation spiked at 20% in 2022. However, this fails, to take into account the actual rise in expenses faced by media managers, who have had to pay for satellite internet, power banks and generators, war insurance and other new expenses. As a result, the average media budget increased 24% while staffing fell slightly, by 3%, on average.

It is worth noting that the financial experience of Ukrainian media has varied widely, which can be seen in the different budget changes of 2021 vs. 2023. Many media budgets have collapsed: fifteen of the 38 media outlets with available data during the study saw their budget fall between 10% and 50%, four outlets' budgets dropped by more than 50%, yet a quarter saw their budget increase by 50% or more in dollar terms. These differences are mostly driven by an individual outlets' ability to fundraise and will likely increase consolidation across the sector.

The evolving cost structure of Ukrainian media



Source: Media survey
 * Data cleansed of media with gaps (e.g., launched since 2022) and/ or extreme outliers



Source: World Bank, IMF

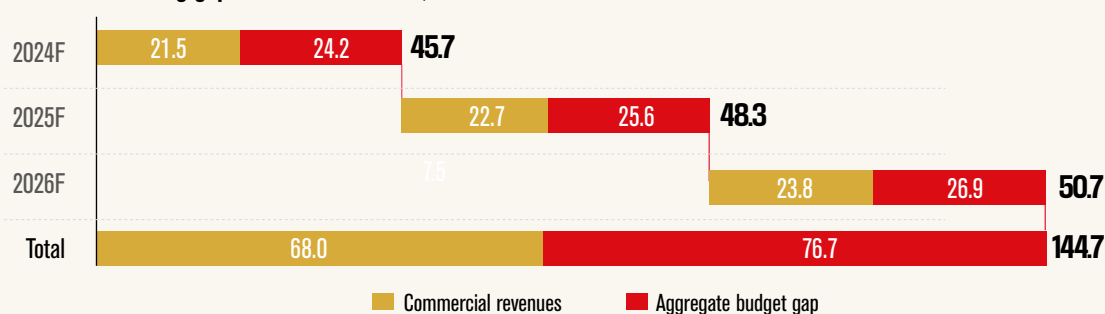
2/ ESTIMATING THE FUNDING GAP

Assessing the funding gap facing independent Ukrainian media in the coming years is a daunting task, given the general level of economic and political instability. Moreover, the sample of media outlets surveyed for this report is likely to be biased: the most responsive outlets have probably been more successful in raising funds from donors, resulting in greater reports of donor dependency. Nevertheless, a simplified extrapolation of current trends serves as a useful indicator, assuming budget growth is in line with expected inflation, and that donor contributions remain proportionally stable.

Our extrapolation implies raising at least **\$77 million** over a three-year period. Yet this number does not account for the fact that donor funding tends to be administered by a relatively overhead-heavy system. Assuming an optimistic average administrative cost of 20%, this would mean raising **\$96 million to fully sustain Ukrainian media operating in their current form.**

Estimating the overall Ukrainian independent media market

Estimated funding gap for Ukrainian media, \$ millions



In addition to the \$77 needed to fill the budget gap, an additional 20% of administrative costs should also be factored in

FUNDRAISING TARGET



Source: estimates based on our research team's calculations.

3/ FUTURE SCENARIOS: LOCAL MEDIA WILL DISAPPEAR WITHOUT SUSTAINABLE FUNDING

Ukrainian media have benefitted from extraordinary global support since February 2022. Individuals, foreign companies, international publishers and non-media charities stepped in to help support Ukrainian outlets, and significant portions of media-donor budgets were reallocated towards Ukraine.

This support is unlikely to remain sustained at 2022 levels as general donor funding for Ukraine is already decreasing, meaning the media should prepare for a variety of scenarios. The following analysis is based on the assumption that commercial revenues will not return at scale until a ceasefire is secured and a recovery programme launched – an uncertain prospect that is hard to predict in a timeline.

The scenarios below are therefore based on the assumption that the war and subsequent depressed economic growth will continue, coupled with sustained high operational costs.

Expected scenarios for the Ukrainian independent news media

<p>1</p> <p>Sustaining aggregate funding at current levels</p>	<ul style="list-style-type: none"> > Smaller media outlets continue to die off due to conscription and the relocation of audiences and teams, but this trend gradually slows. > Larger outlets consolidate and are able to serve audiences in major cities. The core of Ukrainian journalism is kept intact and is able to contribute to the country's reconstruction efforts, but will require significant work to rebuild commercial capabilities.
<p>2</p> <p>Reversion to the 2010-2019 mean (~\$11 million/ year)</p>	<ul style="list-style-type: none"> > Major loss of smaller municipal and regional media (potentially 50%), as well as some specialised publications and groups. Many outlets downsize. Large publishers and media groups consolidate, especially by merging media cost centers (e.g. backoffice functions like accounting). > Consolidated publishers have a relatively easier path towards rebuilding commercial capabilities. Mid-sized outlets, especially regional media, are more susceptible to needing external support and, therefore, receiving external pressure. Support for reconstruction efforts is damaged, but viable.
<p>3</p> <p>Funding cut down to half of 2010-2019 mean (~\$5.5 million/ year)</p>	<ul style="list-style-type: none"> > Major loss of smaller and regional media (potentially 75%), half of specialised publications and regional publishing groups are shut down. Large publishers and a few groups are sustained but exposed to external pressure and susceptible to downsizing. > Ukrainian journalism is fundamentally damaged and will have to be rebuilt from pre-2013 levels. Its capacity to play a role in rebuilding the country is severely limited.

**Note: the scenarios presented above are based on the funds allocated to media, rather than for media development (e.g., trainings, research, exchange programs...).*

4 |

RSF'S KEY RECOMMENDATIONS

None of Ukraine's short and long term challenges – be they humanitarian, economic, or political – can be solved without access to reliable and quality information.

Yet quality information cannot be produced without journalists to cover the war, secure sources of revenue for media outlets, and safeguards protecting the right to information.

This report highlights a number of key challenges and metrics intended to help inform the public debate on Ukraine's recovery plans. To provide further guidance to decision-makers, Reporters Without Borders (RSF) has created a detailed package of measures to restart the news media sector in Ukraine, support quality journalism, and ensure a plurality of trusted sources. The starting point of this reconstruction is to set up a fund to support the economic recovery of the media sector: the International Fund for the Reconstruction of the Ukrainian Media (IFRUM). RSF has also set out policy recommendations to complement the fund – such as aligning existing media laws with the European Media Freedom Act (EMFA) – that will improve the general state of press freedom in Ukraine.

1/ FUND THE RECONSTRUCTION OF UKRAINE'S MEDIA ECOSYSTEM

RSF advocates for the development of an independent and transparent funding framework involving international donors (public development agencies, international foundations and banks, private donations, etc.). The IFRUM would be run by an independent ad hoc committee whose members are diverse enough to represent a broad spectrum of international stakeholders actively involved in journalism.

The aim of this fund would be to address the critical and long-term needs of Ukrainian media organisations through financial support and capacity-building. In order to cover the identified needs, the fund would collect a sum of **\$96 million** over three years.

The IFRUM would finance a diverse range of vital activities:

- > **Core funding:** would help media outlets recover their essential equipment and infrastructure, and cover their main operational costs, such as salaries.
- > **Seed funding:** would support the launch and development of new Ukrainian media outlets, especially in information deserts and liberated zones, and cover their initial costs (e.g. equipment, office space and staffing).
- > **Advertising funds:** would bolster advertising revenue for media outlets that meet transparency criteria, either by matching earnings or directly buying advertising space to be used by public interest organisations. This will help media retain their commercial teams and avoid having to rebuild them when the market recovers, by which time many commercial employees may leave the industry and take valuable expertise with them.
- > **Training funds:** would finance training programmes in order to develop a new pool of media workers, and fund upskilling programmes in safety, cybersecurity, legal support, financial management and other much-needed skills.

2/ ADMINISTER FUNDS WITH CONDITIONALITY BASED ON JOURNALISTIC ETHICS AND STANDARDS

Reliable, trustworthy journalism must be enhanced and protected. That's why the allocation of IFRUM funds should be decided on the basis of transparent and stringent criteria. Investments should be conditional on an outlet's ethical commitments – which could include securing journalists' jobs and producing quality information – and its internal mechanisms to protect its editorial independence from the outlet's owners.

To facilitate this process, the IFRUM committee should take into account a media's adherence to existing ethical frameworks, such as the Journalism Trust Initiative (JTI), during its assessment. Ukrainian outlets engaged in the JTI certification process should be granted priority access to IFRUM funds⁵.

3/ IMPLEMENT ADDITIONAL ECONOMIC MEASURES TO BOOST THE UKRAINIAN MEDIA SECTOR

In addition to the creation of the IFRUM – and to reinforce its impact – the Ukrainian government should adopt a series of targeted economic measures enabling the media to resume their long-term investments. These measures could include:

- > Exemptions from social security contributions to help boost job creation in the first three years, allowing media outlets to rebuild their workforce;
- > Interest-free loans to bolster frontline news gathering roles and/or buy new journalistic equipment;
- > Tax breaks, rate relief and other forms of financial assistance targeting local and regional media outlets in particular;
- > A law allowing taxpayers to donate 1.5% of their taxes to the charity of their choice, including media-related charities, which would take effect after the war;
- > Free vouchers for online subscriptions and membership to media clubs for all Ukrainians between 18 and 25 years old.

4/ BOLSTER PUBLIC SERVICE MEDIA IN UKRAINE

The Ukrainian government should value the role of the public service broadcaster while ensuring it maintains full editorial and financial independence, in accordance with the criteria set out in Article 5 of the European Media Freedom Act (EMFA). *Suspilne's* funding model should be solid enough to guarantee quality journalism, and its budget should be determined on a pluriannual basis. Furthermore, any budgetary cut that arises in the course of a multiannual programme should be subject to prior consultation with *Suspilne's* board of directors and planned early enough to allow for the reallocation of resources.

Furthermore, *Ukrinform* must be protected from political influence. To this end, the process to nominate its director should be reviewed.

⁵ The Journalism Trust Initiative (JTI) is an international standard for evaluating news media quality. Launched by RSF, the JTI was designed and developed by 130 international experts in accordance with the International Organisation for Standardisation (ISO). Implementation of the JTI standard aims to significantly increase news media transparency, independence and quality. The JTI fast-track programme, which accelerates the process of aligning a media's editorial standards with the JTI's criteria, was implemented in Ukraine in May 2023 in partnership with NewsGuard. It was renewed in October 2023 and other local partners, such as the International Institute for Regional Media and Information (IRMI) and the Lviv Media Forum (LMF), have expressed interest in partnering with RSF to implement such programmes.

5/ END ARBITRARY RESTRICTIONS AND UNDUE GOVERNMENT PRESSURE ON UKRAINIAN MEDIA

The United TV News Marathon, once a useful source of information in the face of the Russian disinformation that flooded Ukraine in February 2022, is now plagued with state interference in its editorial policy. What's more, despite the significant amount of state budget allocated to the United TV News Marathon, audiences remain very low and the public's confidence in the programme has fallen. It is, therefore, no longer appropriate to maintain this costly and unduly restrictive measure.

Furthermore, the Ukrainian government must stop exercising undue pressure on journalists and hindering their right to report on the war through restrictions to their freedom of access. A first step could be the creation of a standing contact committee, where journalists and government representatives discuss alleged violations of journalists' rights and risks to their safety.

6/ SET UP A REGULATORY FRAMEWORK TO TACKLE THE ONLINE INFORMATION CRISIS

Social media platforms, especially Telegram, are now the leading source of news in Ukraine. Through these platforms, Ukrainian citizens are exposed to constant flows of unverified or unsourced information. There is an urgent need to hold these platforms accountable for their role in the spread of misinformation.

In the short term, the Ukrainian government should establish an Independent Platform Regulatory Authority (IPRA)⁶. The primary purpose of the IPRA would be to conduct annual reviews on the "state of disinformation" that analyse specific content on platforms like Telegram, and present these reports to Parliament to inform policy decisions. If the reviews show evidence that a platform fails to prevent the mass dissemination of disinformation, Parliament should consider adopting more stringent regulations that require the platform to ensure the due prominence of reliable sources of information, which would be identified as such on the basis of widely recognised self-regulatory systems such as the JTI.

The IPRA should be granted with the powers necessary to carry out its mission, including the ability to request that all major online platforms available in Ukraine share relevant data regarding the implementation (or lack of) of their moderation policy.

6 The existing National Council of Television and Radio Broadcasting may fulfil this role provided it has a renewed mandate and is guaranteed the ability to operate independently from the government both in terms of staff and funding.



"A Ukrainian Police investigator examines debris at the Kharkiv Television Tower." @ SERGEY BOBOK / AFP

APPENDIX I:

APPROACH AND METHODOLOGY

This report employs a mixed-methods research approach, integrating perspectives from various sources and frameworks in order to offer a comprehensive overview of the current state of Ukrainian media.

The primary data source is the media themselves. A total of 42 media outlets provided budgetary data and responded to survey questions and/or interviews. Additionally, seven media outlets provided partial insights about their financial and operational state without going so far as to answer the full set of research questions. Once obtained, the data was reviewed and validated by researchers.

The selected media represent a diverse pool, originating from all 24 oblasts of Ukraine (20 oblasts are represented directly, four are covered by a network with outlets in multiple regions), the Autonomous Republic of Crimea and Kyiv. The sample includes four outlets classified as multimedia, five specialised publications, three large regional media, nine large local/ smaller regional outlets, and 21 local publications.

In addition to data from these outlets, the researchers used open-source historical data, particularly for the analysis of content distribution, changes to consumer behaviour and for an outside-in analysis of reader revenue collection.

Finally, a review of prior literature and research further enriched the analysis and provided context to data gathered.

APPROACH TO DATA GATHERING

- > Selected media outlets provided data on their budget and staff structure, including a breakdown of revenue dynamics for the 2021-2023 period. They also completed a survey on how they perceived specific market dynamics and what their expectations were for the coming year.
- > Different types of outlets were selected in order to ensure that each media category was represented. During the data validation process, the researchers double-checked answers with outlets when concerns appeared and/or eliminated outliers.
- > The media selection process aimed to make the sample as representative of the different media types as possible, securing a minimum of three budgets from each category of independent media outlet.

Open-source gathering and literature review

Open-source data gathering and a review of existing literature were major sources of data for this report, informing a broad range of topics: media distribution, typology, legal status, and various operational metrics. These sources include media websites, social media channels and accounts, SocialBlade, TGStat, Graphtron as well as industry research and publications.

Calculating the number of media outlets in Ukraine

Determining how many outlets operate in Ukraine is a complex task. Separating affiliated projects can be difficult: many registered outlets are essentially defunct, and some large publications are not registered. Statistics from The National Council on Television and Radio Broadcasting of Ukraine are unclear – its [online register](#) lists 7,692 “media subjects” across 2225 Ukrainian organisations, which excludes foreign operators with Ukrainian licences, but an [infographic on their website](#) suggests there are 2,714 media entities and licences as of April 2024. Lastly, the definition of “media” is up for debate as the Ukrainian regulator does not have one.

One way to approach the problem is to ask how many news outlets *should* Ukraine have; philanthropic capital typically aims to support a certain level of development of the [media ecosystem](#) rather than securing funding

for all outlets, especially those that do not meet criteria related to quality, transparency or independence⁷. Thus, the approach taken by this report contrasts an overview of the estimated number of media outlets currently operating in each category with the amount of outlets necessary to avoid the appearance of broad news deserts – which is particularly relevant for local media.

As larger outlets are easier to identify, our researchers used existing numbers for the first three categories identified on page 15. For the last two categories, which are comprised of smaller outlets, our researchers used Ukraine's hromadas, or administrative districts, as a framework to calculate the number of outlets needed to avoid news deserts.

In 2020, Ukraine finished restructuring its administrative divisions, leading to the creation of 1,469 hromadas, classified into urban, settlement and rural areas. After the restructuring, there were [41 urban hromadas](#) with populations of over 100,000 in 2020, the last year for which estimates are available⁸. This would likely be the base for an estimated 40-60 large local media and some larger, regional publications. Smaller cities would have one main publication, while larger ones would have several⁹.

The remaining 1,428 hromadas had an average population of 18,576¹⁰ in 2020. For the 625 rural hromadas, the figure is just over 8,000, which may be too small to sustain a publication. Furthermore, just under 20% of Ukraine is occupied – Crimea accounts for 5% – as of August 2024, and the evacuation of frontline areas has impacted the viability of many hromadas. A reasonable adjusted estimate of the current number of hromadas is around 1,250.

Given the small populations of many hromadas, the [calculation for needed support](#) assumes that, at most, an independent news outlet for every 2 to 3 hromadas can and should be supported – roughly 400 to 600 outlets.

7 A notable recent study by the Media Development Foundation, which surveyed 11 oblasts of Ukraine in the east, south and north of the country, found that each oblast had approximately 60-70 media, 10 of which could be described as independent.

8 Ukraine has experienced large population loss and relocation, meaning current figures are likely significantly lower for most areas, and higher for large cities and Western oblasts where people disproportionately relocated.


9 A total of 7 hromadas had populations above 500,000 in 2020.

10 This excludes 31 hromadas from territories occupied since 2014; the Autonomous Republic of Crimea is exempt from the decentralisation reform.

APPENDIX II:

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