

THE LAW OF UKRAINE “ON MEDIA”: ETHNOCULTURAL ASPECTS IN PUBLIC BROADCASTERS’ OFFICIAL WEB RESOURCES

LA LEY DE UCRANIA “SOBRE LOS MEDIOS DE COMUNICACIÓN”: ASPECTOS ETNOCULTURALES EN LOS SITIOS WEB OFICIALES DE LOS MEDIOS PÚBLICOS

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Abstract

Legislative norms regulating the media sphere are an important tool for ensuring freedom of speech, transparency, and access to information in modern democratic societies. Each country develops its media legislation in accordance with specific historical, socio-political, economic, and ethno-cultural factors. This article focuses solely on the ethno-cultural aspect of modern media legislation in Ukraine, Germany, and the United Kingdom, which has not yet been the subject of a specialized study. The proposed research does not claim to be exhaustive. It merely outlines general issues and proposes a methodology for studying the ethno-cultural specificity of media legislation in a comparative aspect, using public broadcasters as an example. Each country develops its own models of public broadcasting, the comparative study of which also requires separate research. The article outlines only the general features of the legislative regulation of public broadcasting in the Ukrainian, German, and British media landscapes. The application of the parametric content analysis methodology is demonstrated through examples of specific broadcasters, focusing on the adoption of the Law of Ukraine “On Media” (2022), which marked a significant milestone in the development of Ukraine’s media legal framework. A comparative parametric analysis was conducted on the presentation of information about this law in different formats on three web resources: “Suspilne. Suspilne Lviv” (Ukraine), “DeutschlandFunk” (Germany), and “BBC World Service” (United Kingdom). This analysis also highlighted ethno-cultural aspects in the presentation of information for Ukrainian and foreign audiences, which is crucial in the context of compliance with journalistic standards.

Keywords

Analysis Parameters; Content Analysis; Law; Media Legislation; Public Broadcasters; Web Resource

Resumen

Las normas legislativas que regulan la esfera mediática son una herramienta importante para garantizar la libertad de expresión, la transparencia y el acceso a la información en las sociedades democráticas modernas. Cada país desarrolla su propia legislación mediática de acuerdo con factores históricos, sociopolíticos, económicos y etnoculturales específicos. Este artículo está dedicado exclusivamente al aspecto etnocultural de la legislación mediática moderna en Ucrania, Alemania y el Reino Unido, el cual aún no ha sido objeto de un estudio especializado. La investigación propuesta no pretende ser exhaustiva. Solo plantea cuestiones generales y propone una metodología para estudiar la especificidad etnocultural de la legislación mediática en un aspecto comparativo, tomando como ejemplo los medios de comunicación públicos. Cada país desarrolla sus propios modelos de radiodifusión pública, cuyo estudio comparativo también requiere una investigación aparte. El artículo describe únicamente las características generales de la regulación legislativa de la radiodifusión pública en los paisajes mediáticos de Ucrania, Alemania y el Reino Unido. La aplicación de la metodología del análisis paramétrico de contenido se demuestra a través de ejemplos de medios públicos concretos, centrando la atención en la aprobación de la Ley de Ucrania “Sobre los Medios de Comunicación” (2022), que representó un hito importante en el desarrollo del marco jurídico mediático del país. Se realizó un análisis paramétrico comparativo sobre la presentación de la información relativa a dicha

ley en diferentes formatos en tres recursos web: “Suspilne. Suspilne Lviv” (Ucrania), “Deutschland-Funk” (Alemania) y “BBC World Service” (Reino Unido). Este análisis también reveló aspectos etnoculturales en la presentación de la información para audiencias ucranianas y extranjeras, lo cual resulta clave en el contexto del cumplimiento de los estándares periodísticos.

Plabras clave

parámetros de análisis; análisis de contenido; ley; legislación sobre medios; medios públicos; recurso web.

Introduction

In the modern world, information and communication technologies are developing rapidly, the traditional media landscape is undergoing reconfiguration, and new genres, forms, and formats are emerging, with digital media trends swiftly replacing one another, necessitating updated media legislation. Ukraine’s progress toward EU membership also entails specific obligations regarding the revision of its existing media legislation. Consequently, by the end of 2022, Ukraine concluded the discussions on the Law “On Media” (the first draft of which was adopted by the Verkhovna Rada of Ukraine on December 13, 2022) and the draft Law “On Audiovisual Services”¹ which were designed to replace the Law of Ukraine “On Television and Radio Broadcasting” (Верховна Рада України, 1993) and the Law of Ukraine “On the National Council of Ukraine on Television and Radio Broadcasting” (Верховна Рада України, 1997). Following intense debates, the Law of Ukraine “On Media” officially came into force on March 31, 2023 (Прес-служба Апарату Верховної Ради України, 2023). It was developed within the framework of the EU-Ukraine Association Agreement (official title: “Association Agreement between the European Union and the European Atomic Energy Community and their member states, of the one part, and Ukraine, of the other part”), signed on June 27, 2014 (Верховна Рада України, 2014), in the aftermath of the Revolution of Dignity. Under this agreement, Ukraine committed to adopting the law by the end of 2017, reflecting its efforts to harmonize national legislation with EU standards.

COVID-19 (December 2019 - August 2023) and the subsequent full-scale Russian invasion of Ukraine (February 24, 2022) delayed but did not cancel the adoption of this law. Governmental institutions, in collaboration with civil society organizations and with the support of experts from the Council of Europe, overcame prolonged debates and fulfilled their commitments by drafting and passing the historic Law of Ukraine “On Media”. This law not only streamlined the media landscape and clearly defined the procedures for licensing online media by the National Council on Television and Radio

¹ Amendments to Ukrainian legislation intended to comply with Directive 2007/65/EC (as amended by Directive 2010/13/EU) were to be adopted by September 1, 2019. However, as noted by Ukrainian media lawyer V. Volodarska, none of the previous drafts of the proposed Law “On Audiovisual Services” were considered by the Parliament. One of the attempts in this direction was the Draft Law on Amendments to the Law of Ukraine “On Television and Radio Broadcasting” No. 7397. Meanwhile, in 2018, Directive 2010/13/EU underwent significant updates (Володарська, 2020). V. Volodarska also observes that, in order to ensure the comprehensive harmonization of Ukrainian legislation with the current regulation of audiovisual media in EU member states, certain provisions of Directive 2010/13/EU, as amended by Directive 2018/1808, were incorporated into the new Law of Ukraine “On Media” No. 2693-d. These include provisions related to the definition of audiovisual media service providers, the regulation of video-sharing platforms, requirements for the proportion of European audiovisual works, and the promotion of co-regulation, among others (Володарська, 2020). At the same time, the media lawyer highlights that the draft Law “On Media” does not provide for the implementation of updated requirements concerning the dissemination of commercial communications (advertising, sponsorship, etc.), which necessitated separate, comprehensive amendments to the legislation on advertising (Володарська, 2020).

Broadcasting but also dismantled mechanisms previously used by oligarchic media conglomerates to disseminate Russian propaganda and disinformation within Ukrainian media. The discourse surrounding these processes actively circulated within the Ukrainian media sphere in various audiovisual formats. As a result, the new Ukrainian media legislation emerged through two crucial steps:

First, the Law of Ukraine “On Media”, which also incorporated key provisions for regulating the audiovisual media sector in accordance with Directive 2010/13/EU, as amended by Directive 2018/1808. A significant portion of this law is dedicated to the restructuring of the audiovisual landscape, including the definition of “audiovisual media”, the distinction between linear and non-linear audiovisual media services, the identification of public audiovisual media services, subjects within the audiovisual media sphere, and audiovisual service providers. Additionally, it clarifies the understanding of audiovisual works as European products, thus providing a comprehensive framework to organize and structure the complex Ukrainian audiovisual space and adjust its substantial influence on mass audiences.

Second, the Law “On Advertising” with its latest version adopted in 2024 (Верховна Рада України, 1996)².

The European Commission has concluded that Ukraine has fully met its obligations regarding the development of new media legislation and its alignment with EU standards, which, in fact, became one of the prerequisites for initiating negotiations on EU membership (Мельник, 2023).

Within the Ukrainian audiovisual space, information about the provisions of the Law of Ukraine “On Media” and its significant role has been actively disseminated by both public and private media since 2016. Discussions of this law in various formats were held between 2019 and 2022 during conferences and media forums such as the “Donbas Media Forum” and the fifth and sixth “National Media Talk” conferences. This information was also shared through online broadcasts, interviews with media professionals and opinion leaders, video blogs (vlogs), discussions on television channels, and other formats.

However, the issue of representing the provisions of the Law of Ukraine “On Media” across Ukrainian and foreign media resources has not been adequately addressed in academic literature, which is precisely what captured our attention. To date, no research has been conducted specifically on the issue of revealing the ethnocultural specificity of this representation. We consider this to be a matter of great importance, as media legislation in different countries, despite the common European values and directives, retains national particularities that influence the perception of legal norms and their implementation within national media systems.

² This law does not constitute the primary subject of our research. For details regarding the implementation of specific provisions of the EU acquis in the field of audiovisual advertising, see the Resolution of the Verkhovna Rada of Ukraine No. 3060-IX (Верховна Рада України, 2023).

There are few works devoted to the exploration of legal issues through cultural analyses. Certain aspects of this problem are presented, for example, in the work “Cultural Analysis, Cultural Studies, and the Law: Moving Beyond Legal Realism” (Sarat, Simon, 2003), which deals with interdisciplinary law as being formed at the intersection of law, cultural analysis and cultural studies.

In this regard, one may find interesting the opinion of B. Williams, who believes that today we can talk about the formation of legal ethnography as an understanding of law in a cultural context, which is based on cultural legal analysis. This method allows scholars to uncover the nuances of law that operate in everyday life, as well as to better understand the diverse interpretations and applications of law in different communities and societies. Cultural legal analysis offers a fresh perspective on understanding law within its societal context (Williams).

The novelty of our research lie in its pioneering exploration of the ethnocultural aspects of the representation of the Law of Ukraine “On Media” on the official media platforms of public broadcasters. The representation of the law on media platforms of various types and purposes requires a separate and dedicated study. Given the limitations of a single article, it is also challenging to comprehensively analyse the specifics of how the law is represented on the official media platforms of public broadcasters across all European countries, a task that would require a different research format. Therefore, in this study, we offer a comparative analysis of the official web platforms of public broadcasters from three countries - Ukraine, Germany, and the United Kingdom - using one key platform from each country as a case study. Considering the outlined research problem, the primary objectives of this study include the following: (1) an examination of the key legislative frameworks governing media activities in Ukraine, Germany, and the United Kingdom; (2) a comparison of the ethnocultural characteristics of media legislation in these countries, highlighting the elements that make them unique; (3) an examination of the general principles of public broadcasting regulation in the legislation of Ukraine, Germany, and the United Kingdom; (4) the development of analytical parameters and the subsequent analysis of the public broadcasters’ web platforms in the selected countries, focusing on content related to the Law of Ukraine “On Media”; and (5) identifying ethno-cultural aspects in the presentation of such information and a generalization of the study findings.

Literature Review

The issues and objectives of our research largely pertain to the comparative study of media legislation, which is closely correlated with media law, media policy, and information law. The term *media legislation* in the study is used to refer to the regulatory framework encompassing various legal documents (specific laws, constitutional provisions, by-laws, and constitutional treaties) that govern the media sphere. These regulations cover journalistic activities, media and mass media operations, online media and social platforms, media content and copyright, press freedom and media responsibility (including libel, misinformation, and censorship), broadcaster licensing, and state influence on the media (e.g., state-owned media, funding, and censorship), etc. We use the term *media law* in a broader sense, referring to the legal field that systematizes the principles and regulations governing

media activities. It also includes the study of legal theories, doctrines, and case law that determine how these norms are applied in the media sector. This broader definition incorporates the concept of "media legislation". Additionally, we consider media legislation as a subset of information law, which focuses on protecting personal data and information systems, cybersecurity, combating misinformation and fake news, regulating document circulation and archive activities, artificial intelligence and data processing algorithms, and ensuring access to public information. **Given the correlation between these concepts, our study examines:**

(1) Comprehensive international and foundational studies and reports, which analyze:

In a comparative aspect -

(a) the challenges national constitutions and courts face in addressing media convergence and media ownership concentration, which often result in legal uncertainty and a lack of unified definitions for "media" and "media freedom" (Oster, 2015);

(b) National regulatory approaches to global communication platforms, particularly social media, which lack a universally agreed legal definition across jurisdictions. These regulatory approaches vary significantly by country (especially regarding content regulation (Germany, the United Kingdom, Singapore, Finland, Canada, India, Latin American countries, South Africa, etc.) in terms of the correlation of national and transnational regulation, international rules and reflect differences in legal frameworks (Broemel et al, 2021);

(c) alternative methods for providing accessible audiovisual services and formats for persons with disabilities in media and cinema (subtitling, sign language interpretation, audio description/sound recording). These measures are evolving from voluntary initiatives to mandatory legal standards in many national laws³ (for example, Armenia, Slovak Republic, Romania, Hungary, Austria, Azerbaijan, Belgium, Switzerland, France, Germany, Bulgaria, Cyprus, Czech Republic, Croatia, Republic of Poland, Finland, Netherlands, Malta, Sweden, Norway, Lithuania, Slovenia, Portugal, Latvia, Italy, Estonia, Denmark, Ireland, Spain, United Kingdom) (Мойца et al, 2023, с. 3)⁴.

In terms of institutions of co-regulation and media governance - the main legal instruments and stages of media governance used by transnational institutions such as the EU and the Council of Europe; the interaction between EU and Council of Europe standards along with the development of complex multi-level media co-regulation institutions, presents challenges to legitimacy and subsidiarity due to the limited legal competencies of these organizations (Tambini, 2024).

3 The European Commission points out the need for access to audiovisual services in Article 7 of Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 (Європейський Союз, 2019).

4 The analytical review was conducted based on the criteria proposed in the report of the Group of European Audiovisual Regulators (Report, 2021).

In the aspect of national media regulation, particularly in the United Kingdom, where codes of practices are developed by largely independent bodies (various codes are based on "community standards" and the concept of "public interest", yet they remain vague, leading to varied interpretations and applications) (E. Ruth).

(2) Educational and reference literature - textbooks and handbooks on American, non-American and international media law (Calvert et al, 2023; Moore et al, 2022; Youm, 2008), on the basics of European and international media law (Oster, 2017). It also encompasses pocket books on national media law (Crook, 2013) and the bases of national media legislation (База медіазаконодавства України. MBR).

The focus of the article on the comparative aspects of the media legislation in Germany, the United Kingdom, and Ukraine, prompting a brief review of: on the one hand, research by German, British and Ukrainian scholars specializing in media law, information law, media regulation, media policy, etc.; on the other hand, studies focusing on the the national media legislation of each of these countries. Our analysis of the scientific discourse on the peculiarities of national and European media legislation in relation to broader trends in the fields, primarily focuses on:

(1) Problem analysis of legal and regulatory documents of media legislation, e.g.:

(a) Interstate Media Treaty (Interstate Media Treaty, 2020), which introduced regulations for content providers on social networks and required the legislature to be more careful about the digital offerings of public broadcasters in response to digitalization risks (Holznagel et al, 2021);

(b) Network Enforcement Act developed by German legislators, which mandates the rapid removal of illegal content from social media, and also provides the opportunity to strengthen regulatory control over such platforms and expands user rights (Hemmert-Halswick, 2021);

(c) German Copyright Act as an important tool for regulating open source projects or e-learning offerings in educational institutions in the context of the complex relationship between law and media, which today requires not only legislative reform but also reformatting certain social and political obligations (Hoeren, 2023);

(d) Germany's new State Treaty on the modernisation of media legislation (Medienstaatsvertrag or MStV) (07.11.2020), which transposes EU Directive 2018/1808 on audiovisual media services (AVMS Directive) into national law and aims to preventive defence law, with the goal of protecting democracy (Dümenil, 2021) (referring to the need to adapt national legislative frameworks to the new realities of digitalisation) (Dümenil, 2021).

(2) Analysis of national strategies for legislative regulation of the media space, such as the UK's digital platform regulation strategy, represented by three key areas: protection from online threats

(involves the development of relevant legislation aimed at protecting children and vulnerable groups from the impact of harmful content); competition policy (also involves the creation of legislation aimed at regulating the activities of large technology companies); consumer protection in the digital environment (involves transparency of algorithms and processing of personal data) (Woods, 2021).

(3) Analysis of media law issues, e.g.:

(a) in Germany - in view of legal practice and educational discourse (Prinz et al, 2019; Prinz 2000);

(b) in the United Kingdom - in the correlation "media law - media legislation", which represents an in-depth commentary on EU media law including analysis of key directives and court rulings (practical examples) by leading European lawyers who have extensive knowledge and practical experience in the field of media law, in particular: "and the Television without Frontiers Directive; the Audiovisual Media Services Directive; and directives on advertising, on copyright, on e-commerce, and on electronic communications; and relevant primary law such as Article 49 and 55 EC on the freedom to provide services, the competition and state aid rules of Articles 81, 82, 86, 87, including the merger regulation, and Article 151 on culture; and Article 10 of the European Convention on the protection of Human Rights and Fundamental Freedoms" ("the commentary is vital for the interpretation not only of European media law but of national media regulation as well") (Castendyk et al, 2008);

(c) in Ukraine - considering the educational discourse (Петрова et al, 2007; Еннан, 2020), the features of its functioning in the information society (Цимбалюк, 2011) and in the context of studying information law (Цимбалюк, 2010).

(4) Analysis of current media policy issues, e.g.:

(a) German media policy characterized by: a significant influence of the European Union (EU) on national legislation; first, prolonged negotiations on the adoption of certain laws, then the adoption and implementation of regulations, and then processes of configuration and reconfiguration (new governments come to power, constant adaptation to new technological developments, forcing political actors to review the system and encourage private media operators to launch political campaigns or lawsuits to challenge the current legislation) (Müller et al, 2012);

(b) media policy of the European Community from the perspective of the United Kingdom, in particular: in the aspect of providing "a comprehensive account of the history and development of the regulation, law and policy of the European Community relating to the media and audiovisual fields" (Goldberg et al, 1998); in the context of a detailed consideration of European broadcasting legislation and relevant policy in this area, which is somewhat tense regarding the appropriate level, purpose and mechanism of broadcasting regulation (against the background of the "legislation - policy" dichotomy) (Harrison et al, 2007); in the correlation "communication - media policy" (Tambini, 2009);

(5) Analysis of problems and solutions for public service broadcasting in different countries, e.g. from the perspective of the UK: challenges related to the digital transformation of public media (Tambini, 2015a); solutions for the renewal of civil society debate on media organizations and their public responsibility, which requires the need for simplified public discussions to open them to non-experts, as well as to clearly clarify outline the social contract that defines the responsibilities and reciprocity between media organizations (Tambini, 2015b); issues of distinguishing public service broadcasters from state-owned broadcasters, which function mainly to serve the interests of the government, as well as from purely commercial broadcasters, which respond primarily to individual consumer choices rather than to the public interest (Tambini, 2008).

Methodology

This section describes the participants of the study, the main research methods, the means of obtaining empirical material, the criteria for its selection, as well as the step-by-step procedures and stages.

Participants

The empirical base of the study and its analysis were developed solely by the authors of this article. The data collection was conducted via the internet, with searches performed in English, German, and Ukrainian for the following:

(1) key media-related legislation on the official web resources of Ukraine, Germany, and the United Kingdom. For Ukraine, the selected source was the web portal “Verkhovna Rada of Ukraine. Legislation of Ukraine”. For Germany, the web portals included “Landesrecht Brandenburg” (Brandenburg), “Bayern.Recht” (Bavaria), “Ministerium des Innern des Landes Nordrhein-Westfalen RECHT.NRW.DE bestens informiert” (North Rhine-Westphalia), “Bundesministerium der Justiz”, and “BUNDESGESETZBLATT”. For the United Kingdom, the web portal “Legislation.gov.uk” was utilized. The search was restricted to the period between 2000 and 2004;

(2) web resources of public service broadcasters within the Ukrainian, German, and British media spaces. Only three resources were selected for analysis: within the Ukrainian media space - “Suspilne. Suspilne Lviv”; within the German media space - “DeutschlandFunk”; and within the British media space - “BBC World Service”;

(3) information on the Law of Ukraine “On Media” available on the selected web resources. Chronological boundaries were also taken into account: only information published from January 2022 onward was considered.

Measurement and research design

The electronic devices that facilitated the authors in gathering the research material along three vectors were the MacBook Pro (13-inch, 2019, Two Thunderbolt 3 ports), MacBook Pro (13-inch, 2016, Two Thunderbolt 3 ports), and ASUS Vivobook X712E (17.3-inch, 2019, Seven ports).

Along the first vector, over 150 legislative acts were inventoried from official web resources in three languages. However, the article provides only fragments of the lists of key media legislation from Ukraine, Germany, and the United Kingdom in their original languages.

For the second and third vectors, information retrieval queries concerning the localization of content related to the Law of Ukraine “On Media” on the web resources of public service broadcasters selected for analysis were conducted using the key phrase “Law of Ukraine “On Media” in three languages. Through an initial (overview) search, the authors identified 15 examples (this was not an exhaustive search). The selection procedure, based on the criterion of “different formats of information representation”, resulted in the selection of only one example from each country for inclusion in the article. For the analysis, 11 key parameters were developed, the list of which is presented in Table 4 below.

Table 4: Parameters for the Analysis of Content Related to the Law of Ukraine “On Media” on Web Resources

	Parameter	Parameter Definition
1.	Full Name of the Web Resource:	In the original language with the corresponding URL
2.	Localization of Content Related to the Law of Ukraine “On Media”:	Placement within the structure of the web resource
3.	General Structure and Characteristics of Content Related to the Law of Ukraine “On Media”:	
3.1.	Textual Elements:	Full-text, partial, or fragmentary presentation of the text of the Law of Ukraine “On Media” on the web resource; Other textual materials/messages (presence/absence of socio-cultural and political contexts).
3.2.	Audio Elements:	Audio means of conveying the content and ideas of the Law of Ukraine “On Media” (podcasts, audio comments, audio lectures, etc.).
3.3.	Video Elements:	Video means of conveying the content and ideas of the Law of Ukraine “On Media” (video recordings of Verkhovna Rada of Ukraine sessions; video comments from officials, deputies, and experts; video recordings of conferences, press conferences, and briefings; video analytics and expert interviews; short videos explaining key aspects of the law; video broadcasts of lectures, webinars, online seminars, and discussions, etc.).
3.4.	Visual Elements / Semiotics of Media Text:	Visual means of conveying the content and ideas of the Law of Ukraine “On Media” (slide presentations, charts, infographics, diagrams, tables, photos, images, symbols, icons/pictograms, animations, etc.).

3.5.	Other Elements:	Legislative/legal information (explanations of provisions, expert comments, practical recommendations); Analytical, educational/informational elements; Research materials (including market research on the target audience and the impact of content on it), among others.
3.6.	Language and Style:	Language accuracy, terminology, and key terms; Primary style of information presentation: official-business (legislative, jurisdictional, diplomatic, administrative); scientific (purely scientific, academic, popular science); conversational; publicistic/media (analytical, informational, literary-publicistic, entertainment); artistic; substyles; Presence/absence of clear definitions of terms; Logical structure of the textual content; Rhetorical means and techniques for influencing the audience, comparisons and analogies with other countries, emotional expressions, calls to action, etc.
3.7.	User Interface, Navigation, Interactive Elements, and Integration	Forms of feedback, audience response, comments and reviews, surveys, hyperlinks, forums, discussions, social media engagement.
3.8.	Ethics:	Primary vs. secondary information sources, ethical standards (presence of references to information sources, compliance with copyright laws - licenses, permissions).

A content card, compiling the relevant data according to the developed parameters, was created for each localization of such content on a given web resource.

Procedure

Each of the three vectors of search and analysis of empirical material involved key stages and procedures, as well as specific criteria for systematizing the material.

The first vector was focused on the inventory and identification of the ethnocultural specificity of media legislation in Ukraine, Germany, and the United Kingdom. Procedurally, this vector of empirical material search and analysis was carried out in three stages:

(1) step-by-step inventory and systematization of regulatory legal documents within the media legislation of the selected countries (documents containing the following terms in their titles were chosen: in Ukrainian - закон (law), in German - *Gesetz*, *Staatsvertrag*, in English - *Bill*, *Act*, *Royal Charter*);

(2) identification of markers of ethnocultural specificity within the texts of these documents, such as: “national”, “nationwide”, “national regulator”, “national identity”, “national minorities”, “eth-

nic”, “nation”, “indigenous peoples”, “ethnic group”; “state language”, “Ukrainian/German/English language”, “language of the people/national minorities”, “regional language”, “language policy”, “multilingual”; “culture”, “regional culture”, “cultural diversity”, among others;

(3) uncovering the content of the ethnocultural specificity of media legislation in each of the three selected countries through comparative analysis.

The second and third vectors were aimed at developing key parameters for analyzing content related to the Law of Ukraine “On Media” on the web resources of public service broadcasters. The parameters were developed based on the systematization of individual components from research methods such as content analysis, semiotic analysis, textual analysis, rhetorical analysis, and audio-visual analysis. This procedure also involved three stages:

(1) identification of the features and components of each of the aforementioned methods and the development of corresponding parameters for analyzing content related to the Law of Ukraine “On Media”;

(2) conducting the actual analysis of the localized content on the web resources using the developed parameters and comparing the results;

(3) identification of the ethnocultural specificity and symbolic representation of information about the law on the web resources of public service broadcasters within the context of the legal, legislative, and socio-political frameworks of its adoption.

Results

1. Ethnocultural specificity of media legislation in Ukraine, Germany and UK

An inventory of the main media-related laws available on official web resources - “Verkhovna Rada of Ukraine. Legislation of Ukraine”, “Landesrecht Brandenburg”, “Bayern.Recht”, “Ministerium des Innern des Landes Nordrhein-Westfalen RECHT.NRW.DE bestens informiert”, “Bundesministerium der Justiz”, “BUNDESGESETZBLATT” (Germany), “Legislation.gov.uk” (Great Britain) (for fragments of the media legislation of Ukraine, Germany and Great Britain, see Tables 1, 2 and 3 below) - revealed commonalities and differences in media regulation across these countries. These distinctions reflect the political, cultural, and historical realities of each nation.

Table 1: Fragment of Media Legislation in Ukraine

Verkhovna Rada of Ukraine. Legislation of Ukraine
Law of Ukraine “On Media” No. 2849-IX of December 13, 2022 [valid, version as of 11.02.2024]
Law of Ukraine “On Amendments to Certain Laws of Ukraine Regarding Additional Guarantees of Protection for Media Workers Operating in Areas of Military (Combat) Actions and/or Temporarily Occupied Territories of Ukraine” No. 2382-IX of July 8, 2022 [valid, version as of 01.01.2024]
Law of Ukraine “On Amendments to Article 114-2 of the Criminal Code of Ukraine Regarding the Improvement of Liability for Unauthorized Dissemination of Information on Means of Countering the Armed Aggression of the Russian Federation” No. 2178-IX of April 1, 2022 [valid]
Law of Ukraine “On Amendments to Certain Laws of Ukraine Regarding the Prohibition of Production and Dissemination of Information Products Aimed at Promoting the Actions of the Aggressor State” No. 2109-IX of March 3, 2022 [valid, version as of 31.03.2023]
Law of Ukraine “On Electronic Communications” No. 1089-IX of December 16, 2020 [valid, version as of 01.07.2024]
Law of Ukraine “On Ensuring the Functioning of the Ukrainian Language as the State Language” No. 2704-VIII of April 25, 2019 [valid, version as of 27.06.2024]
Law of Ukraine “On State Support of Cinematography in Ukraine” No. 1977-VIII of March 23, 2017 [valid, version as of 31.03.2023]
Law of Ukraine “On Amendments to Certain Laws of Ukraine Regarding the Language of Audiovisual (Electronic) Mass Media” No. 2054-VIII of May 23, 2017 [valid, version as of 31.03.2023]
Law of Ukraine “On Amendments to the Law of Ukraine ‘On Public Television and Radio Broadcasting of Ukraine’ Regarding the Procedure for the Accession of the State Enterprise ‘Ukrainian Television Film Studio ‘Ukrtelefilm’” No. 1363-VIII of May 17, 2016 [valid]
Law of Ukraine “On the System of Foreign Broadcasting of Ukraine” No. 856-VIII of December 8, 2015 [valid, version as of 31.03.2023]
Law of Ukraine “On Amendments to Certain Laws of Ukraine Regarding Ensuring Transparency of Media Ownership and Implementation of State Policy Principles in the Field of Television and Radio Broadcasting” No. 674-VIII of September 3, 2015 [valid, version as of 31.03.2023]
Law of Ukraine “On Public Media of Ukraine” No. 1227-VII of April 17, 2014 [valid, version as of 02.10.2023]
Law of Ukraine “On Amendments to Certain Laws of Ukraine Regarding Public Television and Radio Broadcasting of Ukraine” No. 271-VIII of March 19, 2013 [valid, version as of 31.03.2023]
Law of Ukraine “On Access to Public Information” No. 2939-VI of January 13, 2011 [valid, version as of 08.10.2023]
Law of Ukraine “On Amendments to the Law of Ukraine ‘On Information’” No. 2938-VI of January 13, 2011 [valid, version as of 30.10.2023]
Law of Ukraine “On Amendments to the Law of Ukraine ‘On State Support of Mass Media and Social Protection of Journalists’” No. 214-IV of October 24, 2002 [valid]
Law of Ukraine “On Amendments to Certain Laws of Ukraine Following Parliamentary Hearings on ‘Problems of Information Activities, Freedom of Speech, Compliance with the Law, and the State of Information Security in Ukraine’” No. 2680-III of September 13, 2001 [valid, version as of 31.03.2023]

Table 2: Fragment of Media Legislation in Germany

Brandenburg State Law (Landesrecht Brandenburg)
Law on the Fifth Interstate Treaty Amending Media Law Treaties (Fifth Media Amendment Interstate Treaty) (GVBl. I - 2024, No. 26)
Law on the Seventh Interstate Treaty Amending the Interstate Treaty on Cooperation between Berlin and Brandenburg in the Field of Media (GVBl. I - 2023, No. 24)
Law on the Second Interstate Treaty Amending Media Law Treaties (Second Media Amendment Interstate Treaty) (GVBl. I - 2022, No. 10)
Law on the Interstate Treaty on the Modernization of Media Regulation in Germany (GVBl. I - 2020, No. 19)
Interstate Treaty on Broadcasting and Telemedia (Rundfunkstaatsvertrag - RStV) of August 31, 1991, last amended by the Twenty-Second Interstate Treaty Amending the Broadcasting Treaty (Law of April 1, 2019)
Bavarian Law (Bayern.Recht)
Bavarian Digital Act (BayDiG) of July 22, 2022 (GVBl. p. 374, BayRS 206-1-D), last amended by § 1 of the Act of October 8, 2024 (GVBl. p. 474)
State Media Treaty (Medienstaatsvertrag - MStV) of April 23, 2020 (GVBl. pp. 450, 451, 2021 p. 14, BayRS 02-33-S), last amended by Article 1 of the Treaty of February 27, 2024 (GVBl. p. 326)
Bavarian Broadcasting Act (BayRG) as promulgated on October 22, 2003 (GVBl. p. 792, BayRS 2251-1-S), last amended by the Act of July 24, 2023 (GVBl. p. 448)
Bavarian Media Act (BayMG) as promulgated on October 22, 2003 (GVBl. p. 799, BayRS 2251-4-S), last amended by § 1 of the Act of March 24, 2022 (GVBl. p. 70)
Ministry of the Interior of the State of North Rhine-Westphalia (Ministerium des Innern des Landes Nordrhein-Westfalen) RECHT.NRW.DE
Act to Amend the Police Act of the State of North Rhine-Westphalia and Other Laws to Align with the Telecommunications-Telemedia Data Protection Act of April 13, 2022
Consent to the Twenty-Third Interstate Treaty Amending the Broadcasting Treaty of April 3, 2020
Act Implementing the Seventeenth Interstate Treaty Amending the Broadcasting Treaty (Seventeenth Broadcasting Amendment Interstate Treaty Implementation Act) of December 17, 2015
Interstate Treaty on Broadcasting Fees of December 13, 2011
Act on the Publication of Descriptions of Telemedia Services - Description Publication Act (GVBT) - of December 8, 2009
Act Regulating the Responsibility for the Supervision of Telemedia under the Telemedia Act, the Telecommunications-Telemedia Data Protection Act, and under § 24 Paragraph 3, § 104 Paragraph 1, § 106 Paragraph 3, and § 113 of the State Media Treaty (Telemedia Responsibility Act - TMZ Act) of March 29, 2007
Ministry of the Interior of the State of North Rhine-Westphalia (Ministerium des Innern des Landes Nordrhein-Westfalen)
Federal Ministry of Justice (Bundesministerium der Justiz) Federal Law Gazette of Germany (BUNDESGESETZBLATT)
Digital Services Act of May 6, 2024 (BGBl. 2024 I No. 149)
Second Act Amending the Film Funding Act of December 13, 2023

Table 3: Fragment of Media Legislation in the United Kingdom

Legislation.gov.uk
Online Safety Bill
Media Act 2024 (is up to date with all changes known to be in force on or before 24 October 2024)
The Media Act 2024 (Commencement No. 2 and Transitional and Saving Provisions) Regulations 2024
The Media Act 2024 (Commencement No. 1) Regulations 2024

Digital Markets, Competition and Consumers Act 2024
Product Security and Telecommunications Infrastructure Act 2022
The Secretaries of State for Energy Security and Net Zero, for Science, Innovation and Technology, for Business and Trade, and for Culture, Media and Sport and the Transfer of Functions (National Security and Investment Act 2021 etc) Order 2023
The Defamation and Malicious Publication (Scotland) Act 2021 (Commencement and Transitional Provision) Regulations 2022
The Telecommunications (Security) Act 2021 (Commencement) Regulations 2022
Telecommunications (Security) Act 2021
The Communications Act (e-Commerce) (EU Exit) Regulations 2020
Data Protection Act 2018
BBC Royal Charter 2017
Freedom of Information (Amendment) (Scotland) Act 2013
Defamation Act 2013
The Defamation Act 2013 (Commencement) (England and Wales) Order 2013
The Defamation Act 2013 (Commencement) (Scotland) Order 2013
Communications Act 2003
The Communications Act 2003 (Restrictions on the Advertising of Less Healthy Food) (Effective Date) (Amendment) (No. 2) Regulations 2022
The Communications Act 2003 (Restrictions on the Advertising of Less Healthy Food) (Effective Date) (Amendment) Regulations 2022
The Communications Act 2003 (Disclosure of Information) Order 2014
Freedom of Information (Scotland) Act 2002
The Enterprise Act 2002 and Media Mergers (Consequential Amendments) Order 2003
Freedom of Information Act 2000

The identification of ethnocultural markers (“national”, “nationwide”, “national regulator”, “national identity”, “national minorities”, “ethnic”, “nation”, “indigenous peoples”, “ethnic group”; “state language”, “Ukrainian/German/English language”, “language of the people/national minorities”, “regional language”, “language policy”, “multilingual”; “culture”, “regional culture”, “cultural diversity”, among others) in the texts of laws relating to the media helped to trace the ethnocultural specificity of the media legislation of each of these countries.

The ethno-cultural nature of Ukrainian media legislation implies the harmonisation of regulatory mechanisms in the media sector:

- on the one hand, the protection of national identity (cultural, linguistic) as an important aspect of state-building through promoting the development of the state language; stimulating the production of the national goods; restricting the content of information that humiliates or disparages the state language, denies or doubts the existence of the Ukrainian people (nation) and/or Ukrainian statehood and/or the Ukrainian language;
- on the other hand, the desire to integrate into EU standards through state support for media that intentionally promote the development of languages and cultures of national

minorities and indigenous peoples of Ukraine; granting the right to indigenous peoples of Ukraine (Crimean Tatars, Karaites) to establish their own media; providing the opportunity to broadcast in the languages of indigenous peoples and national minorities (communities) of Ukraine, except for the languages of national minorities (communities) that are the official language of a state recognised by the Verkhovna Rada of Ukraine as an aggressor or occupying state.

The ethno-cultural nature of German media legislation is characterised by a decentralised approach, with a combination of national and federal legislation, as well as multiple regulatory bodies at different levels. On the one hand, there is the dominance of national media in the German language through federal television; the establishment of a national identity, a unified language policy to strengthen and promote the German language at the national level; integration of regional cultures into the national context (they are less represented in the national media than in the UK). On the other hand, there is a significant support for multilingualism and cultural diversity, including Frisian, Lusatian and other regional languages and cultures, as well as languages and cultures of immigrant communities (notably Turkish) and foreign communities.

It is our opinion that the ethno-cultural nature of the regulatory documents of UK is revealed in regulating media through a single national body while considering multiculturalism as the integration of ethnic minorities into the broader British cultural context. It is notable that: equal representation of ethnic groups on the broadcasting airwaves is ensured; support for media content that highlights the interests of ethnic groups (Caribbean, Indian and Pakistani) and minorities, reflects their culture and regional languages (Welsh, Scottish, Gaelic, Irish) is provided.

2. Public broadcasters of Ukraine, Germany and the United Kingdom

In an era of diverse media corporations and simplified information and communication technologies, the role of public broadcasters remains highly relevant. This issue is particularly significant for countries advancing towards European integration and democracy. According to the European Broadcasting Union, public broadcasters play a leading role in Europe. Roberto Suarez Candel, head of strategy and media analytics at the union, stated that “independent public media are a reflection of a healthy and democratic society”:

“People need not only entertainment, but also information. People need to discuss problems in society. If public service broadcasters do not understand the problems of their target audience, then, of course, society will not want to give their money to finance them. People want to invest money in a product or service that gives them something. These are challenges that public service broadcasters face all over Europe, and it does not matter what financial situation the media is in. The BBC also has these problems. Although, of course, in Eastern Europe this situation between public service broadcasters and the state is more complicated” (Незалежні суспільні медіа, 2019).

Ukraine. The complex process of establishing a full-fledged public (public) broadcasting in Ukraine has mirrored major socio-political events, including the Orange Revolution (2005), the Revolution of Dignity (2013-2014), and Russia’s full-scale invasion of Ukraine (2022). These pivotal moments have driven legislative efforts to establish a public broadcasting framework. In 2005, the Coalition of Public Organizations “Public Broadcasting” was created, which developed a package of legislative and organizational proposals. However, the Ukrainian parliament rejected the proposed bill on December 22, 2005, since at that time democratic processes in the media industry were being hampered in favor of oligarchic media corporations (primarily this concerned TV channels as a tool for forming the appropriate electorate during election campaigns), which was common practice (Остранин, 2021). The draft Law of Ukraine “On Public Television and Radio Broadcasting of Ukraine” was submitted to the parliament for consideration in December 2012, but it was adopted only in 2014, and in 2023 it was renamed the Law of Ukraine “On Public Media of Ukraine” (Верховна Рада України, 2014):

“This law creates the legal basis for the activities of the Public Media of Ukraine, determines the principles of the activities of the National Public Television and Radio Company of Ukraine. (...) Public media services of Ukraine are provided by the Joint Stock Company “National Public Television and Radio Company of Ukraine” (hereinafter referred to as the UASC), 100 percent of the shares of which belong to the state. The alienation of shares owned by the state in the authorized capital of the UASC, the privatization of shares is prohibited” (Верховна Рада України, 2014; Верховна Рада України, 2015).

The law states that the activities of the UASC are carried out on the principles of:

“1) comprehensive, objective and balanced reporting on socially significant events in Ukraine and abroad; 2) adherence to the norms of public morality, traditions and culture of the Ukrainian people, dissemination of family values and strengthening the role of the traditional family in the development of Ukrainian society; 3) priority of public interests over commercial and political ones; 4) clear separation of facts from comments and assessments; 5) free expression of views, opinions and beliefs; 6) independence of management and current activities from state authorities, local self-government bodies, their officials and employees, political parties, enterprises, institutions, organizations, individuals; 7) public participation in management, shaping program policy; 8) absence of discrimination on any grounds; 9) transparency and openness of activities” (Верховна Рада України, 2014).

The law prohibits the establishment of censorship, prior control and illegal influence on the content of information disseminated by the Public Media of Ukraine, as well as interference by state bodies and local self-government bodies, officials and service personnel, and non-governmental organizations in the activities of the Public Broadcasting Service of Ukraine.

Among the main tasks of the UASP are the following:

"1) objective, complete, timely and impartial information about socially significant events in Ukraine and abroad (...); 2) promoting the consolidation of Ukrainian society; 3) development and strengthening of the status of the Ukrainian language and culture, promoting the development of the languages and cultures of national minorities; 4) promoting the most complete satisfaction of the information, cultural and educational needs of the population of Ukraine (...); 5) prompt information of the population about emergencies that pose a threat to the life or health of people; 6) providing citizens of Ukraine with sought-after information products that are not available on the commercial market; 7) promoting the strengthening of Ukraine's international authority" (Верховна Рада України, 2014).

A separate section, which is called "On Public Media of Ukraine", was also included in the Law of Ukraine "On Media" (Верховна Рада України, 2022).

Germany. After World War II and during the democratization process, the Western Allies introduced public broadcasting in Germany based on the British model (BBC). On June 9, 1950, ARD was founded from six regional broadcasting companies, and on April 2, 1963, ZDF aired its first broadcast. In the mid-1980s, private broadcasting was introduced alongside public broadcasting as part of a reorganization known as the "dual system". Unlike other public broadcasters in Europe, the public broadcaster in Germany is not allowed to make a profit directly in the same way as private-sector entities. However, broadcasters are permitted to establish or participate in private companies. The German public broadcaster is the world's largest non-profit broadcaster (Öffentlich-rechtlicher Rundfunk, 2024).

Until recently, Germany operated under the State Treaty on Broadcasting and Telemedia (Broadcasting Treaty or RStV for short). This administrative agreement, signed by all 16 federal states, established unified national regulations for broadcasting law. The most recent amendments to the Broadcasting Treaty came into effect on May 1, 2019. On November 7, 2020, it was replaced by the Media State Treaty (deu Medienstaatsvertrag (MStV)). (Rundfunkstaatsvertrag, 2024). It states:

"Public and private broadcasting aim to facilitate the free formation of individual and public opinion while ensuring diversity of viewpoints. Both pillars of the dual broadcasting system must meet the requirements of national and international competition. In addition, they are responsible for adhering to the principles of sustainable development" (Medienstaatsvertrag, 2020).

In August 2022, the debate over public broadcasting reform resumed. By November 2022, discussions had emerged regarding the reduction of public broadcasting services and a potential merger between ARD and ZDF (Öffentlich-rechtlicher Rundfunk, 2024).

On July 1, 2023, the 3rd Amendment to the Media Treaty (deu Medienänderungsstaatsvertrag) came into force. The amendments aimed to enhance adaptation and flexibility of the public service broadcasting mandate and the provision of services to regional broadcasters that are members of

ARD, ZDF and Deutschlandradio. The primary goal was to adjust to changes in media consumption and reinforce the role of regulatory authorities (Medienstaatsvertrag, 2025).

"On October 21, 2022, and November 2, 2022, the heads of government of the federal states signed the Third State Treaty Amending Media Law (deu Dritter Medienänderungsstaatsvertrag). The changes introduced by this treaty applied exclusively to the Media Agreement" (Begründung zum Dritten Staatsvertrag zur Änderung medienrechtlicher Staatsverträge, c. 1).

Given the fundamental shifts in the media landscape, as stated in the document, the amendments focused on: reinforcing the democratic principles of public service broadcasting, which play a crucial role in society; combating the generation gap in the use of public service broadcasting services (all age groups, but especially children, adolescents and young people, should be recipients of appropriate content from public service broadcasting); a high level of attention to families with special needs; accessibility of services (Begründung zum Dritten Staatsvertrag zur Änderung medienrechtlicher Staatsverträge, c. 3).

The State Media Treaty defines the role of the public broadcaster as follows:

"Public broadcasting has the task of acting as a counterweight to private broadcasters by offering a range of services that are based on a different rationale for decision-making than market incentives, and thus open up its own programming opportunities. It must promote diversity of content (...)" (Begründung zum Dritten Staatsvertrag zur Änderung medienrechtlicher Staatsverträge).

Additionally, the treaty emphasizes:

"considering the influence of public media as a means of mass information and a factor in the process of free formation of individual and public opinion (...) in the online sphere. (...) The diversity of content representation is particularly important in this context. (...) The recommendation system of public broadcasters should focus on the possibility of opening up new topics and perspectives for users with algorithmic support in order to broaden the basis of the process of social opinion formation and discourse, which is important for the functioning of democracy" (Begründung zum Dritten Staatsvertrag zur Änderung medienrechtlicher Staatsverträge, c. 10).

United Kingdom. Public service broadcasting first emerged in the United Kingdom with the formation of the British Broadcasting Company Ltd (BBC) in 1922 and is delivered through the British Broadcasting Corporation (BBC). The corporation's governing body is the BBC Trust, but its founding documents state that the company is independent of outside influence and accountable only to viewers and listeners (Суспільне мовлення, 2025).

The Royal Charter is the constitutional basis for the BBC. The current Charter began on 1 January 2017 and ends on 31 December 2027 (The Royal Charter is the constitutional basis for the BBC. About the BBC). It sets out the public purposes of the Corporation, and guarantees its independence.

"The BBC started life as a Company, changing to a Corporation following a report by the Crawford Committee. The Government accepted the Committee's findings and established by Royal Charter, the British Broadcasting Corporation. The first Charter ran for 10 years from 1 January 1927 and recognized the BBC as an instrument of education and entertainment. Subsequent Charters expanded this remit to include the dissemination of information. The eighth Charter (1 January 2007) charged the BBC with delivering the latest technology to the public and taking a leading role in the switchover to digital television, and the latest (from 1 January 2017), sets out major changes to the way the BBC is to be run for an 11 year period" (The Royal Charter is the constitutional basis for the BBC. History of the BBC).

One of the key provisions of the BBC Royal Charter 2017 is: OFCOM to be the external independent regulator of the BBC. The government to provide "guidance" to OFCOM on "content requirements" for the BBC (The Royal Charter is the constitutional basis for the BBC. History of the BBC).

The Charter states that

"The BBC must be independent in all matters concerning the fulfilment of its Mission and the promotion of the Public Purposes, particularly as regards editorial and creative decisions, the times and manner in which its output and services are supplied, and in the management of its affairs. (...) The BBC's Object is the fulfilment of its Mission and the promotion of the Public Purposes. (...) The Mission of the BBC is to act in the public interest, serving all audiences through the provision of impartial, high-quality and distinctive output and services which inform, educate and entertain" (The Secretary of State for Culture, Media and Sport, 2016).

"The Public Purposes of the BBC are as follows. (1) To provide impartial news and information to help people understand and engage with the world around them (...). (2) To support learning for people of all ages (...). (3) To show the most creative, highest quality and distinctive output and services (...). (4) To reflect, represent and serve the diverse communities of all of the United Kingdom's nations and regions (...). (5) To reflect the United Kingdom, its culture and values to the world" (The Secretary of State for Culture, Media and Sport, 2016).

The activities of the BBC include:

"the only activities that may be carried out by the BBC are – (a) provision of the UK Public Services; (b) provision of the World Service; (c) non-service activities; (d) through commercial subsidiaries, commercial activities; (e) trading activities" (The Secretary of State for

Culture, Media and Sport, 2016).

The general duties, inter alia, are as follows:

“The BBC must observe high standards of openness and seek to maximise transparency and accountability. (...) The BBC must ensure it reflects the diverse communities of the whole of the United Kingdom in the content of its output, the means by which its output and services are delivered (...) The BBC must support the regional and minority languages of the United Kingdom through its output and services and through partnerships with other organisations” (The Secretary of State for Culture, Media and Sport, 2016).

During the public discussion of the Law of Ukraine “On Media” (2018-2021), BBC Media Action media workers conducted training sessions for Ukrainian journalists from the regional studios of Suspilny on standards, mobile format, etc.

3. The Law of Ukraine “On Media” on the web resources of public broadcasters of Ukraine, Germany and the United Kingdom

The ethnocultural markers listed above define the ethno-cultural context of the adoption of the Law of Ukraine “On Media” as follows: decommunizing and de-russifying Ukrainian society as getting rid of the imperial legacy of the Soviet Union; strengthening of national identity and culture, civil society, the legal framework for gender equality and non-discrimination in Ukraine; increasing the quota of the Ukrainian language in the media and preventing hate speech.

In terms of semiotics, mechanisms have been established for the active use of Ukrainian symbols and those of international and European democratic institutions. The gradual process of displacing Russian symbols, names, texts, and markers of Russian culture, along with the relevant symbols of Soviet imperial heritage, from media content and society has commenced.



This section, based on the developed parameters, analyzes the features of the presentation of the Law of Ukraine “On Media” on three web resources of public broadcasters: Ukraine - “Suspilne. Suspilne Lviv”, Germany - “DeutschlandFunk” and United Kingdom - “BBC World Service”. It focuses on identifying the ethnocultural specificity of the analyzed content in a semiotic context.

Ukraine. Today, public broadcasting in Ukraine is a large corporation that includes two nationwide channels (UA: PERSHYJ and UA: KULTURA), three Public Radio channels (Ukrainian Radio, Radio Promin, and Radio Kultura), 23 regional branches, and a powerful digital platform.

For example, let’s consider the features of presenting information about the Law of Ukraine “On Media” according to the developed parameters on the official page of the branch of the Public Broadcaster on YouTube and on the website “Public: Public Lviv” / “Suspilne. Suspilne Lviv” (ukr

“Суспільне. Суспільне Львів”) (see Table 4).

Table 4: Card of parametric analysis of content related to the Law of Ukraine “On Media” on the web resource “Suspilne. Suspilne Lviv” (Ukraine)

Parameters	Comments
Full Name of the Web Resource:	official YouTube page of the Suspilne Broadcaster’s branch and the website “Suspilne: Suspilne Lviv” (https://www.youtube.com/watch?v=8TGjuQf8c34) 
Localization of Content Related to the Law of Ukraine “On Media”:	Content title: “The new Law on Media. Everything you need to know about it - an expert comment” (15.12.2022) - the expert’s 16-minute in-studio interview was posted on the stream of the National Telemarathon “United News”: “Suspilne” block (regional broadcasts)
General Structure and Characteristics of Content Related to the Law of Ukraine “On Media”:	
Textual Elements:	<ul style="list-style-type: none"> - fragmentary presentation of the text of the Law of Ukraine “On Media” on the web resource; - combination of texts on the website and YouTube; - web content: headlines, annotations to the publication and YouTube, media identity (font, name), captions embedded in the frame and studio background with inscriptions
Audiovisual Elements:	
Visual Elements / Semiotics of Media Text:	<ul style="list-style-type: none"> - the frame contains an element of the National Flag of Ukraine and the inscription “Struggle Suspilne” (ukr “спротив суспільне” / “sprotyv suspilne”); - the identity of the regional media outlet “Suspilne Lviv” (blue semicircle in the logo) and the national media outlet “Suspilne Broadcasting” (yellow semicircle in the logo)
Language and Style:	<ul style="list-style-type: none"> - keywords: <i>change</i> (ukr <i>змінити</i>), <i>struggle</i> (ukr <i>спротив</i>), <i>monopolization</i> (ukr <i>монізувати</i>), <i>Struggle Suspilne</i> (ukr <i>спротив суспільного</i>), <i>market</i> (ukr <i>ринок</i>), <i>media</i> (ukr <i>медіа</i>); - language oppositions “prohibitions - freedom of speech”, “linear - non-linear media”; - vector “from ukr ЗМІ (media) to ukr медіа (media)”
Ethics:	<ul style="list-style-type: none"> - primary information sources; - references to information sources

This was a regional inclusion of an expert in the studio, which lasted 16 minutes, and was posted on the stream of the National Telemarathon, entitled “United News”. The segment was part of the “Suspilne” block, entitled “New Law on Media”. “All You Need to Know About It - Expert Commentary” (15 December 2022).


The ethno-cultural context: The law is examined as a means of protecting and promoting the Ukrainian national identity, with the objective of establishing the Ukrainian language in the media through the implementation of quotas. The introduction of new restrictions in the law serves to reinforce the position of the Ukrainian language and cultural content in the media space, thereby protecting Ukrainian society from the influence of Russian propaganda. The law places an emphasis on the prohibition of the use of musical content by performers who support Russian aggression.

The elements that constitute the semiotics of the text are as follows: (1) visual elements -The national flag of Ukraine is embedded in the frame, accompanied by the inscription “Struggle Suspilne” (sprotyv suspilne), which symbolises the resistance of Ukrainians to oppression and their struggle for freedom of speech, their rights and independence. The regional media outlet “Suspilne Lviv” (depicted by a blue semicircle in its logo) and the national media outlet Suspilne Broadcasting (depicted by a yellow semicircle in its logo) symbolise the unity of the centre and regions, united by the yellow and blue colours of the Ukrainian national flag; (2) language elements - oppositions “prohibitions - freedom of speech”, “linear - non-linear media”; vector “from ukr 3MI (media) to ukr media (media)”.

Germany. This is how information about the Law of Ukraine “On Media” is presented on the German web resource “Deutschlandfunk”, which forms part of the public broadcaster ARD (see Table 5). The article and its audio version, entitled “Controversial aspects of the new media law (2022)”.

Table 5: Card of parametric analysis of content related to the Law of Ukraine “On Media” on the web resource “DeutschlandFunk” (Germany)

Parameters	Comments
Full Name of the Web Resource:	<p>“DeutschlandFunk” (https://www.deutschlandfunk.de/neues-mediengesetz-in-der-ukraine-100.html)</p> 


Localization of Content Related to the Law of Ukraine “On Media”:	The article and its audio version “Das sind die Streitpunkte des neuen Mediengesetzes” (Controversial aspects of the new media law) (15.12.2022) are available in the archive of the block ‘Startseite/@mediasres/’
General Structure and Characteristics of Content Related to the Law of Ukraine “On Media”:	
Textual Elements:	<ul style="list-style-type: none"> - fragmentary presentation of information about the text of the Law of Ukraine “On Media” on the web resource; - the text is organized: in the paradigmatic aspect - by the oppositions: “opinion of Zelenskyy’s party” / “the law meets EU requirements” - “critics” / “too much influence of the Ukrainian government”; “the path to the EU through media reform” - “the dominance of oligarchs in the media”; in syntagmatic terms, “reducing the influence of private media actors as required by the EU” demands a “strong independent supervisory body” / “control”
Audio Elements:	<ul style="list-style-type: none"> - the article can be listened to in audio format and downloaded as an audio file
Visual Elements / Semiotics of Media Text:	<ul style="list-style-type: none"> - photo with President of Ukraine V. Zelenskyy with the background of a video broadcast from the European Parliament session hall; - caption: The European Parliament awards the Sakharov Prize to the Ukrainian people - President Volodymyr Zelenskyy is live via video link while Ukraine is adopting a controversial media law (IMAGO / ZUMA Wire / IMAGO / Ukraine Presidency / Ukrainian Pre)  <p>Das Europäische Parlament zeichnet das ukrainische Volk mit dem Sakharow-Preis aus – Präsident Volodymyr Zelenskyy ist live dabei via Videoschalttafel, während in der Ukraine ein umstrittenes Mediengesetz beschlossen wird (IMAGO / ZUMA Wire / IMAGO / Ukraine Presidency / Ukrainian Pre)</p>
Language and Style:	<ul style="list-style-type: none"> - the stylistics of the journalistic style is maintained in accordance with journalistic standards; - the contrast of the keywords <i>deu Sicherheitsmaßnahmen</i> (security measures) and <i>deu Meinungsfreiheit</i> (freedom of speech); - without elements of subjective assessment
Ethics:	<ul style="list-style-type: none"> - primary information sources


The ethno-cultural context shows that the law protects the Ukrainian national identity, which is an important value for the Ukrainian people, especially in the context of the information war with Russia. Ukrainian culture is part of the fight against Russian influence, which requires state control. Germany

is a supporter of democracy and freedoms, so it is concerned about the risks of excessive control. The semiotics of the media text indicates an attempt to disassociate itself from Russian influence, to establish new markers of transparency and national security, despite concerns about the potential for restrictions on freedom of speech. The photo of President Zelenskyy against the backdrop of a video broadcast from the European Parliament symbolises Ukraine’s unity with European values, which is also confirmed by the award of the Sakharov Prize for Freedom of Thought to the Ukrainian people. At the same time, the photo serves to illustrate the tensions between Ukraine’s aspirations for European integration and the internal challenges to democratic values and freedom of speech, as evidenced by the adoption of a controversial media law.

United Kingdom. The Global Jigsaw podcast website of the BBC World Service hosts the podcast “Ukraine’s media at war” (2023), which contains several symbolic oppositions in its description, including “truth versus censorship”, “war versus peace”, “pluralism versus centralisation” (see Table 6).

Table 6: Card of parametric analysis of content related to the Law of Ukraine “On Media” on the web resource “BBC World Service” (United Kingdom)

Parameters	Comments
Full Name of the Web Resource:	Global Jigsaw podcast website of the BBC World Service (https://www.bbc.co.uk/programmes/w3ct5hl7) 
Localization of Content Related to the Law of Ukraine “On Media”:	The podcast ‘Ukraine’s media at war’ is posted on the website ‘The Global Jigsaw podcast’ of the BBC World Service (12.01.2023)
General Structure and Characteristics of Content Related to the Law of Ukraine “On Media”:	
Textual Elements:	<ul style="list-style-type: none"> - fragmentary presentation of information about the text of the Law of Ukraine “On Media” on the web resource; - a description of the podcast containing symbolic oppositions: “truth versus censorship”, “war versus peace”, “pluralism versus centralisation”
Audio Elements:	podcast
Video Elements:	<ul style="list-style-type: none"> - podcast splash screen

Visual Elements / Semiotics of Media Text:	<ul style="list-style-type: none"> - the red, yellow and blue colours of the podcast and the style are consistent with the BBC’s colours in general; - photos of the interviewer and invited guests 
Other Elements:	<ul style="list-style-type: none"> - the presence of different formats: the description of the podcast, the BBC’s comments, interviews with invited guests - Ukrainian journalists
Language and Style:	<ul style="list-style-type: none"> - the language is informal, in the manner of a friendly conversation on a serious topic, combining journalistic neutrality with empathy; - explains Ukrainian terms for the Russian military (e.g., the word <i>ukrcs</i>) as cultural markers that deepen the audience’s understanding of the ethno-cultural specifics of the war; - the terms are used as iconic symbols of two different cultures: “the defender of one’s land” (Ukrainian) and “the invader who comes to kill on foreign land” (Russian)
Ethics:	primary information sources

In the ethno-cultural and semiotic contexts that are closely linked in the podcast, the law is considered a means of reinforcing national identity and unity in Ukraine. The Ukrainian identity is constituted through the symbolic representation of heroism, as embodied by the *Ghost of Kyiv* and the defenders of *Zmiinyi Island*. The use of disparaging terms for Russian troops, such as *rashists*, *orcs*, and *occupiers* serves to reinforce national unity by creating a distinction between Ukrainians as defenders of their homeland (positive connotations) and Russians as aggressors who have invaded another country (negative connotations). The terms *invaders* and *resilient Ukraine* also serve to represent Ukraine’s cultural identity. The BBC presents the Ukrainian media landscape as an example of heroism and unity of the nation, while also raising the issue of the potential risk of authoritarian influence. In this context, the UK serves to reflect Western democratic values, thereby encouraging the audience to engage in critical reflection on the restrictions on media freedom that have been observed during the war.

Discussion and Conclusions

The Law of Ukraine “On Media” is an important step for Ukraine towards EU membership. After lengthy discussions the law was adopted in the context of martial law, hybrid warfare and information aggression by Russia, which was reflected in some of its provisions, criticised by the European media. The law contains preventive measures against excessive political influence. The document is focused on de-oligarchisation and the introduction of a mechanism to counter Russian propaganda and disinformation. It establishes a system of joint regulation.

This law is one of those determining modern media legislation of Ukraine, when compared with the media legislation of Germany and the UK illustrates differing approaches to the integration of national identity with the promotion of cultural and linguistic diversity. Ukrainian media legislation is aimed at protecting national identity, languages of national minorities and indigenous peoples. This is revealed in the establishment the Ukrainian language as the state language, restriction of hostile content, countering Russian information aggression and the desire for decolonisation. German media legislation demonstrates a decentralised approach to media regulation. Considerable attention is paid to both the support of the German language and cultural diversity, especially in the context of minority languages and immigrant communities. In contrast, British media legislation is characterised by a centralised approach to regulation, yet simultaneously emphasises multiculturalism and the equal representation of ethnic groups in the media.

Each country has its own model of public broadcasting, adapted to the existing socio-cultural and political realities. All these countries integrate ethnocultural specificity into public broadcasting in their own way, adapting content to the diversity of their communities. Ukraine is only building an effective model of public broadcasting. The reform of the media space is taking place in an extremely difficult conditions, associated with the challenges of a full-scale Russian invasion and difficulties in ensuring independence from political influence.

The web resources of public broadcasters of Ukraine, Germany and UK serve as crucial instruments for implementing state cultural policy and preserving national identity in the context of globalisation.

Bringing a particular piece of information to Ukrainian and foreign audiences has its own specifics. While the Ukrainian web resource presents the introduction of new restrictions in the law as helping to strengthen the position of Ukrainian linguistic and cultural content in the media space protecting society from Russian propaganda influences, the German and British web resources of public broadcasters express concerns about the risks of excessive control. It is important for media professionals to consider not only legal, but also socio-political and ethno-cultural aspects of presenting a particular piece of information, so that it is truly balanced and objective. After all, the media are responsible for shaping public opinion, understanding how legislation affects media

policy in different countries, which is a key aspect of developing media culture and increasing the level of media literacy.

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