ZMINA

4TH CYCLE

Universal Periodic Review on Ukraine

01 On removal of legal or administrative restrictions on civil society activities

Ukraine's civil society policy is guided by the 2021–2026 National Strategy, with a new Strategy for 2027–2032 now under development. However, CSO involvement is limited. Meanwhile, the government has introduced an experimental online procedure to simplify NGO registration, which now needs a proper legal basis. The 2024 Law on Lobbying also requires careful implementation to prevent administrative pressure on CSOs due to the ambiguous definition of "advocacy". In addition, martial law continues to create practical challenges, including restricted access to public registers and difficulties for male CSO representatives travelling abroad for work.

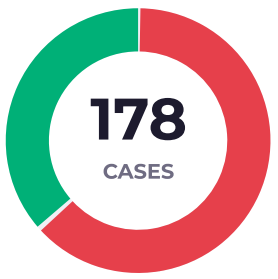
RECOMMENDATIONS

- Ensure civil society's meaningful participation in the development of the new Civil Society Development Strategy.
- Approve law envisaging simplified registration of CSOs.
- Refrain from using martial law as an impediment to the work of CSOs and establish clear procedures for CSO representatives to travel abroad for work-related purposes.

02 On ensuring the safety of civil society and media representatives

ZMINA documented **178 cases** of persecution and pressure on civil society and media in Ukraine in 2025. **63%** were related to Russia's aggression. Domestic pressure also increased: non-state actors, local authorities and law enforcement obstructed the work of investigative journalists, anti-corruption, eco and LGBTQI+ activists through smear and digital campaigns, criminal proceedings and SLAPPs, intimidation and threats. At the same time, the freedom of assembly and association is fully exercised.

Pressure on civil society representatives in 2025



63%
112 cases were related to Russia's aggression

37%
66 cases were driven by domestic factors

RECOMMENDATIONS

- Extend the protection under Article 345-1 of the Criminal Code of Ukraine, which criminalises violence against journalists, to anti-corruption activists and HRDs.
- Criminalise online harassment and cyberstalking in line with EU acquis.
- Adopt the anti-SLAPP legislation (Draft Law No. 16117).
- Strengthen law enforcement agencies' effectiveness in investigating cases involving civil society organisations and media.

03 On freedom of speech and media freedom

The 2022 Law on Media established a modern media regulation framework and strengthened the independence of the National Council on Television and Radio Broadcasting. However, media pluralism and public oversight remain challenging: the United News telethon limits media diversity, while the 2025 Civil Code amendments restricted access to public registers, affecting investigative journalism and anti-corruption oversight. The proposed new Civil Code raises further concerns about restrictions on access to information and legal pressure on journalists. At the same time, journalists have regained access to the Verkhovna Rada and parliamentary broadcasts resumed in 2025.

RECOMMENDATIONS

- Ensure media pluralism by reviewing the broadcasting of the United Telethon and providing adequate funding to the public broadcaster and National Council on Television and Radio Broadcasting.
- Guarantee that the Civil Code, its amendments or new iterations do not impede the work of journalists and public oversight over registers.

04 On strengthening the independence of the Office of the Ombudsperson

The Ombudsman operates under the 1997 Law No. 776/97-BP, but the current selection procedure falls short of the Paris and Venice Principles, lacking pluralistic nominations and an open, merit-based competition. Draft Law No. 13181 aims to strengthen the Ombudsman's independence and clarify eligibility and selection requirements. However, it leaves the appointment procedure unchanged, excluding civil society from nominating and selecting candidates.

RECOMMENDATIONS

- Amend the Draft Law No. 13181 "On the Ukrainian Parliament Commissioner for Human Rights" by allowing the civil society to participate in the nomination and selection procedure.
- Ensure anonymous vote in the Parliament for the candidate.
- Prevent Ombudsman from the possible dismissal on the vote of no confidence which martial law entails.

05 On the implementation of the National Human Rights Strategy

Ukraine's new National Human Rights Strategy until 2035 was approved in October 2026 following online consultations with civil society. However, only around **10%** of CSO recommendations were incorporated, and the Strategy largely repeats previous commitments. With just **52%** of the previous Strategy implemented, longstanding reforms (civil partnerships, anti-discrimination and protection of war-affected people) remain at risk of further delays. The Action Plan is now being developed.

RECOMMENDATIONS

- Translate descriptive results of the National Strategy into measurable indicators of the future Action Plan.
- Include civil society, ensure timely communication and feedback on the provided recommendations.

FURTHER INFORMATION

ZMINA's submissions to the UPR on Ukraine:
zmina.ua · UPR submissions

REACH OUT FOR MORE INFORMATION

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