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ПЕРСПЕКТИВИ РЕГУЛЮВАННЯ МЕДІАРЕСУРСІВ В ТЕЛЕГРАМІ: УКРАЇНСЬКИЙ ДОСВІД

PROSPECTS OF REGULATING MEDIA RESOURCES ON TELEGRAM: UKRAINIAN EXPERIENCE

АНОТАЦІЯ. Стаття досліджує структуру українського медіаландшафту на платформі «Телеграм» в умовах повномасштабної війни в контексті перспектив його регулювання. Дослідження базується на моніторингу 288 телеграм-каналів у категорії «Новини та медіа».

Особливу увагу приділено регуляторним аспектам, зокрема в контексті Закону України «Про медіа» та порівнянні його інструментарію з європейським Актом про цифрові послуги (DSA). Дослідження продемонструвало, що хоча онлайн-медіа, представлені в телеграмі, в топ-100 входять лише 4% національних онлайн-медіа. Натомість більшість популярних українських телеграм-каналів мають анонімних власників і не підпадають під дію національного законодавства, що створює потенційні загрози в інформаційному просторі. Розглянуто різні механізми регулювання контенту: пре-модерація, верифікація каналів, видалення незаконного контенту за скаргами користувачів або запитами державних органів, повна заборона платформи, а також превентивні заходи.

Дослідження показує, що в умовах війни корпоративна регуляторна політика соціальних мереж демонструє свою неефективність, а блокування платформи в окремій країні є вимушеним, але непродуктивним рішенням у довгостроковій перспективі. У випадку України ситуація ускладнюється тим, що навколо телеграму вже сформована потужна комунікаційна інфраструктура, руйнування якої означатиме втрату важливого каналу комунікації з громадянами. Автор також наголошує на необхідності регулювання AI-технологій, що впроваджуються на цифрових платформах, зокрема й у телеграмі.

Комплексний аналіз українського сегменту телеграму як медіапростору з унікальними характеристиками, що сформувалися в умовах війни, дозволив розробити практичні рекомендації щодо регулювання цієї платформи з урахуванням законодавства України та європейських норм.

Ключові слова: цифровий медіапростір; онлайн-медіа в телеграмі; регулювання медіа; телеграм; платформи соціальних мереж; Акт про цифрові послуги (DSA).

ABSTRACT. The article examines the structure of the Ukrainian media landscape on the Telegram platform in the context of a full-scale war and the prospects for its regulation. The study is based on the monitoring of 288 Telegram channels in the News and Media category.

Special attention is paid to regulatory aspects, including the Ukrainian Law «On Media» and a comparison of its instruments with the European Digital Services Act (DSA). The study shows that, although online media is represented on Telegram, most popular Ukrainian Telegram channels have anonymous owners and are not

subject to national legislation, creating potential threats in the information space. The study examines various mechanisms for regulating content, including pre-moderation, channel verification, removal of illegal content upon user complaints or requests from government authorities, outright banning from the platform, and preventive measures.

The study shows that in times of war, corporate social media regulation policies are ineffective. Blocking a platform in a particular country is a coercive but unproductive solution in the long run. In the case of Ukraine, the situation is complicated by the fact that a powerful communication infrastructure has already formed around Telegram, and its destruction would mean the loss of an important channel of communication with citizens. The author also stresses the need to regulate AI technologies implemented on digital platforms, including Telegram.

A comprehensive analysis of the Ukrainian segment of Telegram as a media space with unique characteristics that have emerged in the context of the war has enabled us to develop practical recommendations for regulating this platform by Ukrainian and European law.

Keywords: digital media landscape; online media in Telegram; media regulation; Telegram; social media platforms; Digital Services Act (DSA).

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Today, we are witnessing a shift in the focus of media communication to social networks, which naturally increases their informational influence on society. More than 5 billion active social media user identities in the world and, more importantly, a large percentage of people consume news on these platforms (Digital News Report, 2024; Kemp, 2024). At the same time, social media are becoming vulnerable to the spread of illegal content or misinformation, and thus involved in many chaotic world events in recent years (Warzel, 2023). It is important to understand the reasons for the popularity of different social media platforms, even if they are not equally widespread in some parts of the world. This allows us to assess the potential risks associated with their proliferation and explore ways to avoid them, including through regulatory means.

Aim and Objectives. The primary aim of this study is to present a structural analysis of the Ukrainian media landscape on the Telegram platform in the context of full-scale war, and to evaluate potential regulatory frameworks that could address the unique challenges posed by this rapidly evolving media environment.

The specific objectives of the research are:

To assess the applicability of existing national media legislation (particularly the Law «On Media») to Telegram channels and identify regulatory gaps.

To compare Ukrainian regulatory approaches with the proposed Digital Services Act (DSA) framework in the European Union and identify potential areas for harmonization.

To evaluate the effectiveness of various regulatory mechanisms, including pre-moderation, verification systems, content removal procedures, and platform-level policies, in the specific context of Ukraine's information space during war.

Issue Background. The Telegram platform is currently a regulatory gray zone in the EU. Although by Article 13 of the DSA, Telegram has appointed its legal representative in the EUC (Belgium), as required by the European Commission (Answer of the European Commission, 2025). Nevertheless, the main reason is that despite the adoption of the DSA (Eur-Lex, 2022), monitoring committees do not conduct activities on this platform. According to the DSA, it is possible to classify a social network as a VLOP (very large online platform) if the platform has more than 45 million users in the EU, a number that companies have to update every 6 months. However, as of February 2025, the 26th platform to reach this threshold was WhatsApp, but Telegram is still not included in the list of companies subject to this legislation (European Commission, 2025). The fact that the network does not attract enough users in Europe is one of the stated reasons. In Ukraine, the situation is completely opposite. According to

Forbes, Telegram in Ukraine attracts approximately 10 million users (Dudko, 2023), or, according to the latest data, 30-35% of the population (VisitUkraine. Today, 2 Feb. 2025). Therefore, the issue is very relevant for Ukraine.

Reasons for the popularity of Telegram. While the growing popularity of social networks is a global practice (Digital News Report, 2023, 2024), in the context of a full-scale war in Ukraine, the rapid development of communication and information consumption through messengers was conditioned by the need to obtain information in conditions of limited resources quickly. Telegram, like nothing else, better meets these requirements – prompt updates, fast download (given the limited Internet speed on mobile devices, especially while staying in bomb shelters during air raids), and soft regulatory policy. What is unacceptable to publish in the media has become possible on Telegram channels. According to analyst Robert Lorian, this possibility, once made the social network popular in Iran and Hong Kong (Cited by Opora, June 2, 2022), and was crucial to the protest movements (Urman et al., 2021).

In Ukraine, Telegram has become the absolute leader, expanding its influence from 20% to 60% (in 2021 and 2022, respectively) (Internews, Nov 2022), and this number continues to grow rapidly. In 2024, the number of Ukrainians for whom Telegram remains the main social network for news consumption is already 73% (Internews, 2024, cited by Tarasovskiy Y., 2024).

Despite the critical attitude towards this messenger and frequent accusations of non-transparent moderating policy (Badiei, 2022), the level of data protection (Bastius, 2023), and the threat of attracting extremist groups (Gerster et al., 2022; Elliott, 2023), the authorities have also had to switch to this network, where the main Ukrainian audience has also moved to. The President of Ukraine, political figures, and opinion leaders have started their own channels. Telegram channels have become a powerful alternative source of timely information not only for the public (Internews Nov 2023, p.26) but also for the leading Ukrainian media (Kulyas, 2022). Thus, Telegram channels play an important role in the information agenda in Ukraine.

Although this social network is not so popular in the EU, compared to global statistics, we can speak

about significant popularity and a growing number of users worldwide. Although, as Telegram founder Pavel Durov reported in March 2025, Telegram had 1 billion active users (Shubham Singh, 2025). Now, it is one of the top 10 most popular social networks in the world (Graf, 1).

Notably, despite Facebook announcing the closure of the Facebook News platform and claiming only 3% of users turn to the network for news content (Facebook, 5 Sep 2023), Telegram has the highest news usage (Melkadze, 2023). Switching news consumers to Telegram, according to media experts, «is an enormous challenge for news media because [most popular news] Telegram channels are their competitors that are not burdened by journalistic standards and restrictions» (Cited by Protsiuk, 2023). This is why particular attention should be paid to the regulatory principles governing the content distributed on the Platform.

Methodology. Since this segment is developing rapidly, it is necessary to understand its structure in order to find optimal ways of possible regulation. Our research employs a mixed-methods approach combining quantitative analysis of channel metrics with qualitative content assessment to create a comprehensive picture of the Ukrainian Telegram media landscape.

The quantitative analysis covered the top 100 Telegram channels in the Ukrainian segment of the platform (based on TGStat data, January 2025) in the «News and Media» category. A total of 288 channels in this category were analysed. All ratings were formed according to the primary criterion of subscriber count, which serves as a reliable indicator of reach and influence in the digital media environment.

For the qualitative assessment, we conducted a content analysis of the most recent 50 posts from each of the top 30 channels. This included assessing the regularity of output, sources of content and citations, news character of content, and transparency of ownership.

This comprehensive approach allowed us to categorize the Telegram channels (according to TGStat data) as follows:

1. Official media (with their own websites or presented on other platforms)
2. Channels of authorities, government, president's office, accounts of organizations, opinion leaders, etc.

3. Channels with anonymous owners, positioning themselves as media and having related attributes (regularity of output, permanent name, news character of content, etc.).

Results and discussion.

Structure of the Telegram media market and approaches to regulation.

To date, the «News and Media» category of Telegram channels in the Ukrainian segment is the most numerous. It amounts to about 15,000 (TGStat, Apr 2025). However, among the top 20 most popular Telegram channels (Apr 10, 2025), there is only one of all national media – the Telegram channel of TSN News. In the top 100, only 4% is national media. The absolute majority of the leading channels in Ukrainian Telegram are channels with anonymous owners, which does not give us confidence to speak about the reliability of information in these sources.

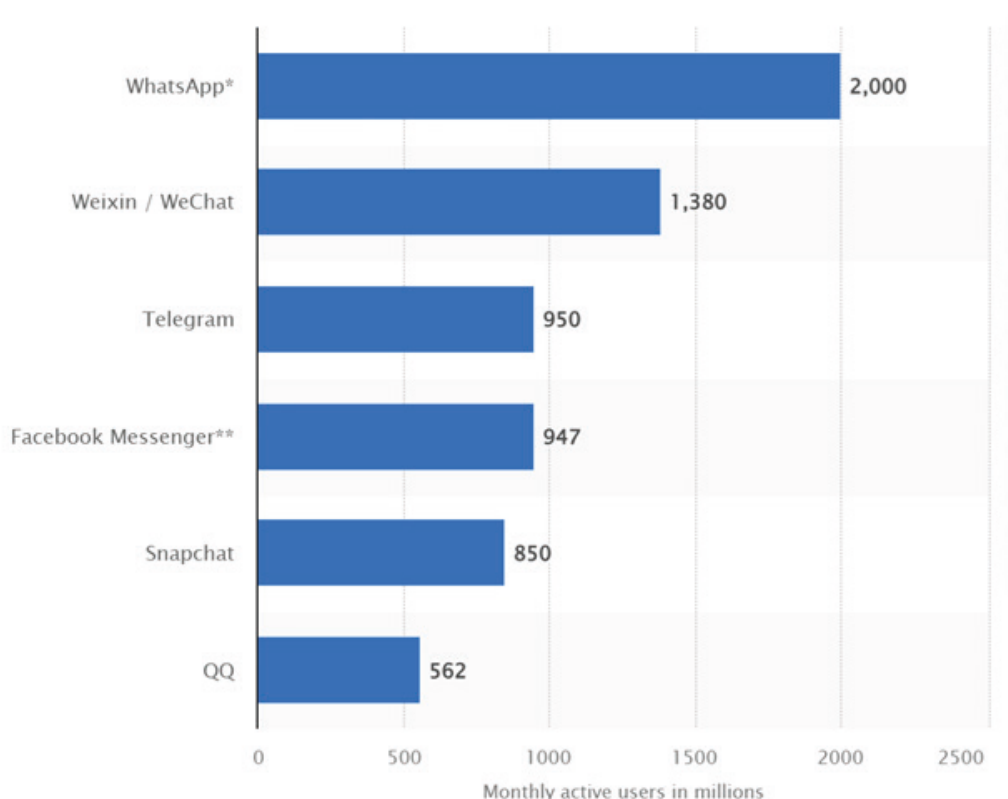
These statistics draw attention to the fact that in the discussion about the regulation of the media in Telegram, first of all, it is necessary to start from the concept of «media» and to avoid attempts to

mistakenly identify it with what we call classical journalism.

Media is a broader term that includes bloggers, opinion leaders, anonymous information channels of different subject areas, as well as corporate channels, newsmaker organizations, and even online stores. It is a term that encompasses all means of communication that have functions such as informing, educating, socializing, entertaining, and agenda setting.

The approach to regulation largely depends on whether a categorization of media is proposed. In Ukraine, at the beginning of 2023, an Act «On Media» was adopted, which was the first major update of media legislation since the Declaration of Independence of Ukraine (over the last 30 years). According to the law, the media is now «a means of disseminating mass information in any form, which is published periodically or regularly under editorial control and a permanent name as an individualizing feature» (Law «On Media», 2022).

For online media hosted on information sharing platforms (which may include Telegram), it is possible



Graf. 1. Most popular global mobile messenger apps as of February 2025, based on number of monthly active users (in millions). 2025¹

¹ Source: Statista. Feb 21, 2025. URL: <https://www.statista.com/statistics/258749/most-popular-global-mobile-messenger-apps/>.

to register and enter their data into the Media Registry officially. Such registration is not a requirement, but further obliges online media to provide information about the owner or persons exercising editorial control. To some extent, this provision of the law is in line with the European Media Freedom Act (EMFA), which requires transparency of ownership through public disclosure of such information.

At the same time, registered online media will be given the opportunity to participate in the creation of co-regulatory bodies, competitions, and tenders for coverage of the activities of state authorities, media accreditation, and so on.

This provision of the law has already made it possible for alternative active participants in the media space to register on an equal footing with traditional media. For example, the possibility of registration is already being used by online shops, which sometimes compete with media newsrooms in terms of the amount of media content they produce. It is also possible to register not as a media outlet, but as a subject of the media sphere (Article 63 of the Law) for opinion leaders who run Telegram channels in their own name. At the same time, the number of Telegram news channels willing to submit their data to the registry is small (according to the National Council of Television and Radio Broadcasting of Ukraine) (Register of media entities, 2025).

However, the convergence of media is a challenge to their regulation. Many broadcasters register their resources on online platforms as separate media or not at all. In this case, on the one hand, as a registered online media, they receive the privileges provided by law, especially access to information. On the other hand, as a telegram channel, they publish part of the content, the distribution of which may be limited by the norms of national media legislation, on their alternative platforms.

Since most online platforms are not under Ukrainian jurisdiction, the adopted law still does not apply to media that are not included in the register of online media, as well as to media that are published without an editorial policy (Article 2 of the law). This leaves the possibility of distributing content at the level of blogs, opinion leader accounts, and individual Telegram channels. In Ukraine, over the past years, some Telegram channels have reached several million users, developed a network of regional subchannels,

and created a pool of advertisers (Dudko, 2023). The financial stability that such channels have achieved allows us to speak of them as full participants in the media market, which at the same time are not subject to legislation, and this poses potential threats, especially in the context of the virtual absence of their regulation.

Prospects for regulation: Discussions are open

The need for regulation is becoming paramount both at the level of countries, regions, and general policy-making, taking into account the cross-border nature of content distribution. Over the past years, Ukraine has significantly revised its media regulatory policy and considers the media as an important resource for the preservation of Ukrainian statehood. This systematic work is focused on several directions: at the level of the state, civil initiatives, media, and the public. Regulation should not focus on individual mechanisms, but rather on a set of measures aimed at combating illegal content and misinformation, respecting human rights and, in the case of registered media, upholding journalistic standards. Ukraine is gradually implementing the initiatives proposed in the DSA as part of its Association with the EU.

Below, we consider possible regulatory mechanisms and assess their effectiveness.

Pre-moderation of content. The main issue for information disseminators, including leading media platforms, is responsibility, since practice shows that it is impossible to verify information before publishing it on social networks, even with today's innovative tools. Pre-moderation goes against the main advantage of social networks – the speed of information distribution. DSA shares this approach by not requiring platforms to verify content before it is published, nor to take responsibility for what users post. Its primary responsibility is to react promptly when content is classified as illegal.

Verification of Telegram channels. This tool is especially relevant in the conditions of numerous cases of launching channels – clones of well-known media. After the verification procedure, the channel is marked with an appropriate blue checkmark. Journalists can refer to it as an official source of information, which affects the level of their legal liability in case of the dissemination of incorrect information from this source.

Removal of illegal content. In Ukraine today, there are two mechanisms for removing content from social networks, including Telegram:

- Users' complaints to the platform. They can appeal to the platform, requiring it to stop distributing content they consider illegal (copyright infringement, spreading misinformation, etc.). In 2024, Telegram has significantly stepped up efforts to combat illegal content as well as moderation. Users are also offered a mechanism to send a report on malicious content.

As an alternative, the Security Service of Ukraine has launched the MRYIA chatbot, where responsible users of the network can complain about specific Telegram channels that, in their opinion, are spreading disinformation or are part of a propaganda campaign.

- *Requests from state authorities based on legal norms.* In Ukraine, for example, the Law «On Media» has clearly defined the impossibility of positive reporting about the Soviet past and the aggressor country, as well as the responsibility for spreading content that threatens territorial integrity, language, and traditions. Violation of these conditions can be a reason for the so-called «geographical» blocking.

Ukrainian legislation also provides that the National Council of Television and Radio Broadcasting of Ukraine may conclude memoranda with various platforms on problematic issues, as well as request the removal of illegal content or the restriction of users from Ukraine (Article 90, paragraph 13 of the Act «On Media»). However, social networks have no legal obligations to the National Council of Television and Radio Broadcasting of Ukraine.

Traditionally, the key to effective legal regulation is the ability to extend jurisdiction over the subject of regulation. According to the Telegram Privacy Policy, Telegram Group Inc. is the parent company of Telegram Messenger Inc. and is located in the British Virgin Islands, while Telegram FZ-LLC is a member of a group located in Dubai. (p.8.2. Telegram Privacy Policy, as of 10 Apr 2025), which complicates the application of national regulatory rules.

It is also important to consider the active use of AI technologies, which may provide an opportunity for regional governments to enhance and improve their online censorship. According to a study conducted by Freedom House (2023), «legal frameworks in at least 21 countries mandate or incentivize digital platforms to deploy machine learning to remove disfavored

political, social, and religious speech» (Freedom House Report, 2023).

- *Regulation by the platform itself.* While Telegram claims to be taking certain steps, for example, to counter the dissemination of terrorist content online under EU Regulation 2021/784, the DSA requires platforms to be transparent about their algorithms for finding and removing illegal content. However, many of the algorithms used by social networks are their own technical developments and are positioned as protected intellectual property or trade secrets that cannot be made public. Recently, a growing number of experts have called for regulatory policy changes aimed at increasing algorithmic transparency to protect the public interest (Foss-Solbrekk, 2023).

Complete legal ban of the platform in a country/region. Blocking Telegram has already been attempted in some countries, such as Russia, Iraq (Azhari, 2023), and Brazil (Dig.Watch, 27 Apr 2023).

Ukraine has experience with blocking Russian Internet services in Ukraine. As part of the sanctions package, President Poroshenko's 2017 decree required ISPs to block access to web resources of popular Russian social networks VKontakte and Odnoklasniki (Decree of the President of Ukraine, April 28, 2017). Although it is still possible to circumvent the block using VPN services, social networks based in Russia, especially VKontakte, have been gradually pushed out of the Ukrainian media market. While 76.1% of Ukrainians were using VKontakte when the decree was issued, by 2020, this figure will be 20.9% of all Ukrainian Internet users (according to a study by Kantar CMeter, 2020). By Feb 2025, the traffic of network users from Ukraine will be just over 0.79%. (SimilarWeb, Feb 2025).

In this context, the opinion of Ukrainian users of the messenger is also revealing. According to a survey conducted by Internews Ukraine 2024, half of Ukrainians are against the government interfering in Telegram's work, while only 4 per cent are in favour of banning it in Ukraine (Tarasovskiy, 2024).

Preventive measures. Risk identification is an important focus in the selection of possible regulatory tools. Article 34 of the DSA identifies systemic risks that must be assessed and addressed by platforms subject to the Act. Part of the response to such risks may be based on policies and standards set by the platforms themselves. However, while Facebook, for

example, defines such requirements in great detail, Telegram's requirements are limited to the Terms of Service section. The paragraphs of these Terms of Use are partially similar to paragraph 1 of Article 34 (b, d) of the DSA, at least as far as personal human rights are concerned.

One of the current risks in the media sphere, in addition to content, is the distribution of advertising. Telegram channels are quite a lucrative business, generating significant advertising revenues. For example, the price of an advertisement on Ukrainian channels can reach 80000 UAH (apr. 2000 €) (Dudko, 2023). Therefore, the regulation of this advertising market also requires the attention of the legislator.

Regarding advertising on the platform, Telegram partially replicates the provisions of Article 34(2) (d) of the DSA by proposing territorial restrictions on displaying advertisements in countries using the same languages (e.g., advertisements in Russian distributed in Ukraine).

Conclusion. To summarize, we can note that despite the still uncertain status of the platform within the framework of the adopted Digital Services Act, as well as Ukrainian legislation, in the context of the country's entry into the European legal field, Ukrainian legislation still has the potential to develop effective tools to regulate this platform.

At the same time, the analysis of the Ukrainian media landscape on the Telegram platform allows us to make several conclusions.

Although the DSA advocates the transparent corporate regulatory policy existing in the social networks themselves, it has already shown its inability to be effectively applied in a wartime environment. For example, Facebook's toolkit does not allow for distinguishing emotions, as a result of which Ukrainian media faced massive blocking of their content related to war issues by the social network's algorithms (Yuskiv, 2023).

Local regulation by blocking in one country (region) becomes a forced solution in certain situations. However, this tool is an unproductive approach in the long run. Although there are examples of such blocking, the situation in Ukraine is complicated by the fact that a strong communication infrastructure has already been developed around the Telegram platform. Destroying it means losing an important channel of communication with citizens.

The use of AI technologies significantly expands the possibilities and scale of media content creation, while reducing its costs. Therefore, the regulation of AI technologies on digital platforms should also become an important area. In particular, Ukraine has joined the Bletchley Declaration (The Bletchley Declaration, 2023), which aims to develop research on advanced AI security. This may include, where appropriate, the classification and categorization of risks based on national circumstances and applicable legal frameworks.

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