

Laidlaw Scholars Undergraduate Leadership and Research Programme
Research Report

**Regulating LGBTQ+ Visibility through Child Protection and Media Law:
A comparative doctrinal analysis of Russia, Hungary and Bulgaria under EU
legal frameworks**

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September 1, 2026

Acknowledgement

I would like to express my gratitude towards the Laidlaw Scholars Foundation and the University of Toronto Laidlaw Scholars Programme for making this research project possible by providing the necessary financial, logistical and organizational background. I am especially grateful to my research supervisor Professor Julie Moreau, PhD for her guidance, constructive feedback and continued support throughout the research process.

Introduction

On April 21, 2026, the Court of Justice of the European Union issued a judgement in *Commission v Hungary*, finding that Hungary had violated multiple elements of EU law by restricting access to content portraying or promoting divergence from identity corresponding to sex at birth, gender reassignment or homosexuality (Commission v. Hungary, 2026). The Court identified infringements of internal-market regulation, the Charter of Fundamental Human Rights and Article 2 of the Treaty on the European Union (TEU). The ruling was significant because it was the first case in which the Court found that a Member State had violated Article 2 of the TEU itself (Commission v. Hungary, 2026; Court of Justice of the European Union [CJEU], 2026). More specifically, the judgement acknowledges that although Member States retain a margin of assessment over audiovisual content deemed harmful to minors and may consider parental education rights along with children's interest, their discretion must be exercised in compliance with the Charter, meaning these instruments cannot be used to describe LGBTQ+ representation as inherently harmful. The case brings into question the limits of Member States' regulatory anatomy in the European Union and legal pluralism at large.

Hungary's legislation, Act LXXIX of 2021, was adopted as a package of amendments introducing more severe penalties for persons found guilty of pedophilia while simultaneously amending laws pertaining to child-protection, family, advertising, media and education. These amendments restricted the accessibility and the presentation of content in involving homosexuality, sex change or divergence from the identity associated with a person's sex assigned at birth.

To explain the emergence of the legislation, most scholars have focused Hungary's domestic situation, specifically Hungary's contemporary illiberal and traditionalist politics, which have routinely delegitimized LGBTQ+ identities and representation through the idea of protecting heterosexual families and children (Linnamäki, 2022). However, the origins of the underlying regulatory model for these provisions can be traced back to Russia (Ayoub and Stoeckl, 2024). Russia's Federal Law No 436-FZ, On the Protection of Children from Information Harmful to Their Health and Development was implemented in 2010 as a regulatory framework for limiting children's access to information (Federal Law No. 436-FZ, 2010). The legislation's scope was expanded by subsequent amendments to include "non-traditional sexual relations" in the categories of information prohibited for dissemination among minors. In the case of *Bayev and Others v Russia* the European Court of Human Rights ruled that Russia's ban on the promotion of homosexuality was discriminatory and breach the freedom of expression (Bayev and Others v. Russia, 2017). However, the Russian approach that associates LGBTQ+ representation with harm to minors, family and the protection of traditional values became recognizable outside the country's borders. Ayoub and Stoeckl (2024) explicitly characterized Hungary's Act LXXIX of 2021 as follows the Russian blueprint.

Following its enactment, similar proposal appeared across Europe. Detreköi (2025) highlights Poland's 2021 "Stop LGBTQ" bill aimed at restricting Pride marches and demonstrated labeled as disseminating "homosexual propaganda," and a Slovak proposal restricting the portrayal or promotion of non-heterosexual relationships and gender reassignment to minors. Neither of these proposals were adopted and the other countries where comparable initiatives have also arisen, such as Kazakhstan and Georgia are not EU member states. However, Bulgaria's 2024 amendment to

its Pre-school and School Education Act is a most suitable comparator (Detrekői, 2025; Krasteva, 2026). The modified legislation prohibits the propaganda, promotion or incitement, whether direct or indirect, of ideas relating to “non-traditional sexual orientation” or gender identity other than the biological within the education system (Bulgarian Helsinki Committee [BHC], 2024; de Groot, 2024). While the scope of the Hungarian package spans over several policy areas, the Bulgarian amendment solely concerns education and thus it becomes apparent that even though the regulations share a common legislative origin they differ in scope, legislative technique and institutional placement.

Scholars have recorded several recurring themes across the Russian and Hungarian legislation. Examples include the construction of LGBTQ+ content as a threat to children, linking child protection to heterosexual family norms and the utilization of concept such as propaganda, promotion, harmful information and moral development to not only regulate sexually explicit content but LGBTQ+ representation as well (Detrekői, 2025; Linnamäki, 2022; Wilkinson, 2014). Bulgaria’s 2024 amendment employs similar concepts including “propaganda,” “promotion,” “non-traditional sexual orientation” and biological gender but entirely in the content of pre-school and school education. The overarching themes make the laws suitable for comparison; however, their varying scope and regulated area raise the question of how underlying Russian model was altered as it was adapted by EU Member States.

The Hungary’s and Bulgaria’s membership in the European Union render this process particularly important to investigate. EU law does not fully harmonize education, child protection and family law or even media law as demonstrated by the Audiovisual Media Services Directive (AVMSD). Member States are permitted to impose more stringent or expansive media restrictions under the AVMSD provided they comply with EU legislation, and they remain bound by internal-market obligations and Article 2 of TEU (Detrekői, 2025; Directive 2010/13/EU, consolidated 2018). Hence, the appearance of Russian-style legislation in this partially harmonized legal environment prompts a new line of inquiry into how and to what extent national governments exercise their regulatory discretion within a supranational framework promoting integration, nondiscrimination and freedom of expression.

This question ties LGBTQ-related legislation to broader issues of democratic backsliding and the tension between national sovereignty and EU integration. Hungary has often been analyzed as a central case for democratic backsliding, and it has also been established that opposition to LGBTQ rights operates across borders rather than as isolated national movements (Pech & Scheppele, 2017). Therefore, the diffusion of Russian legal and political models is not only relevant for assessing foreign influence in EU Member states but also for the investigation of illiberal regulatory techniques may be translated into seemingly distinct national legal frameworks. This study contributes the provision-level analysis of the selected laws to the existing scholarship by comparing how analogous legal elements change across the three legal systems and relating those textual adaptation patterns to the uneven reach of EU law.

Considering this, the research poses the following question: How and to what extent were Russian-model restrictions on LGBTQ-related expression reshaped during their adaptation into the Hungarian and Bulgarian legal systems, and what role did the EU legal frameworks play in that process? The report addresses the research question through contextual legal analysis and

structured provision-level comparison. Russia is treated as a source-model, Hungary and Bulgaria as recipient legal systems and relevant provisions of the Audiovisual Media Services Directive as a potential source of regulatory language and structure. The analysis finds that Russian-model restrictions were not simply reproduced but selectively and substantially transformed by national legal structures and the uneven applicability of EU law. The conclusion is supported by the different scope of the laws and their regulated policy areas; the predominance of omissions and reformulation over exact textual retention and the stronger relevance of EU law in policy areas where applicable legal instruments existed, such as media law in the case of Hungary. The report begins by laying out the methodological and contextual underpinnings of the comparison, then examines the relevant provisions and patterns of adaptation before discussing the findings, their implications for EU legislators and their limitations.

Methodology

The study employs a comparative legal research design combining textual legal analysis with provision-level textual comparison. This combination is necessary to determine the extent to which the Russian model legislation was adapted in Hungarian and Bulgarian national law and the role of EU legal frameworks. The contextual analysis describes changes in regulatory scope and identifies applicable supranational legal constraints, while the textual analysis records observable changes in statutory vocabulary. Together, they allow the study to distinguish between broader adaptation of a regulatory model and the reproduction of a particular language and examine their interaction.

Scope and underlying assumptions

The study considers Russia as the source of the regulatory model adapted by Hungary and Bulgaria. It does not seek to independently prove that diffusion occurred, instead it relies on existing literature that identifies Russia as the origin of the relevant child-protection and “propaganda framework” and connects its subsequently implemented Hungarian and Bulgarian counterparts (Ayoub & Stoeckl, 2024; Detrekői, 2025; Wilkinson, 2014).

The study does not undertake a comprehensive assessment of the national provision’s compatibility with EU law. Hungary’s Act LXXIX has already been deemed to violate EU law, Article 2 among other instruments, by the Court of Justice of the European Union and although Bulgarian has not been a subject of comparable judicial decisions, it has drawn significant institutional criticism as well (Commission v. Hungary, 2026; OSCE Office for Democratic Institutions and Human Rights [ODIHR], 2025). These legal assessments are seen as a part of the context in which adaptation occurred. Instead, the investigation delves into whether EU frameworks provide institutional frameworks, regulatory language, or legal restrictions that influenced the national measures’ forms.

Contextual legal analysis

Comparative legal research may combine doctrinal analysis of legal texts with examination of their institutional, political and supranational contexts if the function of each analytical approach is clearly identified (Van Hoecke, 2015). The first part of the analysis, the contextual comparison, applies the same predetermined questions to the three jurisdictions without assuming they retain

equivalent scope or legal function. Primary legislation, judgements, official documents from the European Union and relevant academic literature will be used in this stage of the analysis.

The contextual analysis can be divided into four dimensions of comparison. First, the ‘object and the scope of the regulation’ will be examined to determine whether the national laws govern media, family law, education, advertising or whether they encompass multiple sectors. This step will reveal where each nation adapted the broader regulatory framework. Second, ‘legislative form and regulatory architecture’ focus on whether the restriction was confined in a sector-specific law, dispersed throughout an omnibus amendment, or integrated into a single statute, as well as the methods by which it functions. This captures adaptation through institutional relocation even where wording remains similar. Subsequently, the ‘legislative process and official justification’ dimension will examine how the measure was introduced and adopted, whether opportunities for consultation and scrutinization were provided and whether the proponents provided any official justification. This serves to separate official rationales behind the law from the study’s interpretation and understand the context in which the laws’ implementation took place. Lastly, ‘relationship to EU legal frameworks’ will explore the legal environments applicable to each case, discuss Russia’s position outside of EU jurisdiction and determine what, if any, EU legal instruments are relevant for the Hungarian and Bulgarian regulation or if their regulated policy areas are matters of EU law at all.

Comparing the laws across these dimensions directly support the study's overarching objective, which is determine if EU membership hindered, restricted, deflected, or provided legal frameworks for the adoption of a model of Russian origin. The contextual findings will subsequently be synthesized with, but will not predetermine, the results of the provision-level textual analysis.

Provision-level textual legal analysis

The second component of the study conducts a provision-level textual comparison of Russia’s Federal Law No 436-FZ, Hungary’s Act LXXIX of 2021 and Bulgaria’s 2024 amendment. A qualitative data-analysis software MAXQDA was used to organize the legislative corpus, retrieve potentially relevant provisions and apply a predetermined coding framework to the documents. The software was utilized to identify and visualize textual patterns and adaptation but did not automatically determine legal relevance or pair corresponding provisions across documents. Those decisions were made based on manual legal interpretation, as outlined below. Three studies informed this part of the research design. Chang, Garoupa and Wells (2021) emphasize transparent, predetermined legal coding categories; Linder et al (2020) treat the language of legislation as evidence policy similarity; and Hansen and Janda (2021) distinguish legal textual borrowing from reinvention of policy language during diffusion. The works provided the intellectual foundation for the methodology, but their quantitative and automated similarity and clustering techniques were not replicated.

Lexical retrieval and coding units

The text of the national legislation was standardized as Word documents and imported into MAXQDA. This was necessary because MAXQDA is unable to perform paragraph-based proximity analysis on PDF documents and it also ensured that a MAXQDA paragraph generally

represented the smallest separately numbered legal unit rather than an arbitrary portion of the page (“PDF Documents,” n.d.).

The preliminary concepts—Education, Media and Sexuality—were deduced from the research question and an initial doctrinal review of legislation. ‘Sexuality’ as a word represented the regulated object of the legislation in the broadest sense and ‘Education’ and ‘Media’ represented the principal policy fields of national restrictions and in which comparison across jurisdictions was possible. Each of these words were entered into MAXQDA’s Text Search & Autocode functions and all their synonyms in the English language picked up by the function were also retrieved. The exact list of synonyms and calibrations of the text search are included in Appendix B. The resulting hits were assigned to the corresponding code (Education, Media, Sexuality) and the coding span was set to the complete paragraph containing the hit and zero additional paragraphs before and after it. Word or sentence-level coding risked fragmenting a legal rule in case a regulated institution and the prohibited subject matter appear in distinct sentences. Coding paragraphs reduced this risk and includes any immediately attached qualification while remaining tied to a separately numbered regulatory unit.

Proximity retrieval and sensitivity testing

Given the long lists of synonyms, not every retrieved paragraph was relevant for the research question, candidate provisions for comparison were identified using MAXQDA’s Complex Coding Query and its Near function. Near is defined by MAXQDA as retrieving a segment which is assigned a code in Window A where a segment assigned to the code in Window B occurs before or after it within a distance of a given number of paragraphs (“Complex Coding Query,” n.d.). In this function, “Window A” displays only the segment assigned to the first selected code, whereas “Both” displays both those segments and the proximate segments assigned to the second code. Two queries were conducted separately:

1. Education NEAR Sexuality
2. Media NEAR Sexuality

Education or Media was placed in Window A and Sexuality in Window B. Only Window A segments were returned. The objective was to identify sections regulating the field of media or education when LGBTQ-related subject matter appeared either within the same provision or in a closely adjacent sub-provision.

A sensitivity test was carried out to determine the appropriate maximum distance to be used in the complex coding query. Distances of zero, one and two paragraphs were compared for Education and Sexuality. Respectively, they returned 6, 14 and 19 unique Window A segments and if returning both sides of the relationship they would have produced 12, 27 and 23 segments. For Media and Sexuality, the Complex Coding Query returned 16, 24 and 38 when prompted to only return unique Window A segment and 32, 43 and 61 when asked to retrieve both sides of the relationship for a maximum distance of zero, one and two. The sensitivity test proved that zero is too restrictive as the query for Education and Sexuality did not pick up the Bulgarian amendment, which as an essential case study of the research project. Setting the distance to two significantly increased the number of retrieved segments, particularly in the Media and Sexuality query. However, several added passages were found to be irrelevant to the research question. For instance,

the segment ‘An employer who performs the education, supervision, care or medical treatment of a person who has not the age of eighteen years...’ was picked up since it contains the word education, even though the passage clearly relates to employment law which falls outside the research question’s scope. Distance one has been chosen as it has proven to be the smallest unit that captured relevant adjacent provisions but excluded most irrelevant paragraphs returned under distance two.

Subsequently, the retrieved Window A segments were exported to a Microsoft Excel spreadsheet. 14 Education and 24 Media candidate segments were recorded for the next stage of the analysis. The passages were retrieved by both queries and therefore recoded in the Excel sheet twice as separate entries were merged to be contained in a single row. This consolidated table can be found in Appendix C.

Parent provisions and functional correspondence

Each retrieved segment was linked to its larger parent provision. A parent provision was understood as an article in the Russian law, an amendment in Act LXXIX of 2021 and in the case of Bulgaria, the entire amending provision. Expanding from the lexical hit to the parent provision prevented the comparison from being restricted to the sentence containing the search term. This was particularly important because the three laws use different legislative structures. A substantive category may be defined in one provision and given legal affect in another provision of the model, while a recipient state may distribute these functions across a single amendment.

Working at the parent-provision level also allowed for the observation of omissions of parts of the model legislation by member states during the adaptation coding stage. If only seemingly matching sentences had been selected, surrounding source elements lacking a target counterpart would have been removed before adaptation coding and could never have been identified as omissions.

The candidate parent provisions were assigned a policy area and were manually assessed for functional correspondence. The Excel sheet containing the assigned parent provisions to each segment retrieved through Complex Coding Query and the broader policy areas the parent provisions belong to can be found in Appendix C. Drawing on the functional method outlined by Van Hoecke (2015), to be classified as corresponding, provisions had to regulate the same policy area and address the same or a sufficiently analogous or address a comparable legal issue in the jurisdiction such as education, media classification, access by minors or education. The detailed application of this test is described in the analysis section of the report. Provisions that were identified as corresponding were coded by the name of the policy area they regulate.

Operative-text delamination

Once corresponding provisions across jurisdictions were selected, the text contained within each parent provision was coded into four categories:

- Technical / non-operative / boilerplate text: procedural text that is unrelated to the policies enacted in the legislation, in this case headings, commencement language and other material that does not contribute substantive content to the comparison (Linder et al., 2020).

- Operative core: text directly establishing, defining or implementing the rule relevant for the correspondence.
- Contextually or structurally relevant operative text: substantive text required to understand the structure or operate of the core rule without containing the core text
- Operative but irrelevant for analysis: legally substantive material falling outside the scope of the study

The idea of controlling for boilerplate text was inspired by Linder and colleagues (2020), while the remaining categories have been derived manually through a close reading of the national legislation. Only ‘operative core’ and contextually or structurally relevant segments are coded for adaptation in the next stage of the study in order to preserve relevant segments that operationalize the core substance but to exclude irrelevant substantive rules or technical text.

Selection and screening of EU provisions

The incorporation of EU law followed a sequential procedure, whereby contextual legal analysis explored whether each national regulatory domain fell within an area of EU competence and whether secondary literature supplied a specific enough legal instrument for provision-level comparison. Where a potential EU comparator was identified, its provisions were subjected to the same policy-area, functional correspondence and operative relevance screening applied to the national legislation before adaptation coding. The existence and identity of EU comparators were therefore findings of the research process rather than predetermined elements of the research design.

Adaptation coding

The adaptation categories were conceptually informed by the framework of Rathert and Cabaroğlu (2022) of omission, addition, substitution and modification. Because their paper concerns the adaptation of teaching materials rather than segment-level legislation comparison, its categories were operationalized for this study. A ‘retention’ category was added, and addition was omitted given that adaptations will be coded within the source documents (Russian or relevant EU legislation) where additions made by recipient countries could not be recorded. Furthermore, the research project focuses on examining the adaptation of source elements by Hungary and Bulgaria rather than cataloguing their distinct legal innovations. The final adaptation categories were defined for this study as follows:

- Retention: Reproduction of the source element’s distinct vocabulary, allowing trivial linguistic variation
- Modification: Material alteration of the source element in which distinctive source vocabulary remains identifiable.
- Substitution: Replacement of a source element by materially different target vocabulary that addresses the same specific legal issue within an already established correspondence.
- Omission: Absence of source vocabulary and target elements that replace the source element within an already established correspondence.

All adaptation codes were applied to the segments in source documents, using recipient-specific code families for the Hungarian/Bulgarian laws – Russian legislation and Hungarian/Bulgarian

laws – EU comparators. Coding adaptation in the source documents enabled to observation of all four adaptation types within a single document and allowed for omission to be coded. Once coding was complete, MAXQDA’s character-based Code Coverage function was used to describe the relation distribution of each adaption type within the eligible comparisons.

Contextual Legal Analysis

Object and scope of regulation

The different object and scope of the regulations demonstrate that the shared child-protection rationale produced markedly different noticeably structures. The Russian reference model is embedded in a general system controlling children’s access to information. Federal Law No. 436-FZ defines “information products” broadly, encompassing mass-media products, printed and audiovisual material, computer programs and information distributed through entertainment events or telecommunications networks. It classifies categories of information as harmful to children and subjects their circulation to classification and access-control requirements (Federal Law No. 436-FZ, 2010, arts. 2, 5–6, 11, 16). Federal Law No. 135-FZ inserted information concerning “non-traditional sexual relations” into this pre-existing framework in 2013, making it one component of a system that also addressed violence, drugs, suicide and pornography (Wilkinson, 2014).

Hungary adopted a similarly cross-sectoral child-protection rationale but did not reproduce Russia’s unified information statute. Act LXXIX of 2021 instead amended eight existing Acts, inserting restrictions into child protection, electronic commerce, advertising, audiovisual media, family protection and public education, alongside provisions concerning criminal records and employment eligibility (Act LXXIX, 2021, amendments 1–8). Amendment 1 introduced a general prohibition on making content that “propagates or portrays” divergence from self-identity corresponding to sex at birth, sex change or homosexuality available to persons under eighteen. Amendments 3 and 5 extended comparable restrictions to advertising and audiovisual classification, while Amendment 7 regulated school programmes concerning sexual culture, sexual orientation and sexual development and restricted the external organisations permitted to provide them.

Hungary therefore regulates both access to expressive content and the institutional provision of sexuality-related education. Its architecture is broader than a school-specific prohibition but more dispersed than the Russian regime. In media law, LGBTQ-related subject matter was inserted into an established classification system for content capable of negatively influencing minors’ physical, mental or moral development (Detrekői, 2025).

Bulgaria displays adaptation in merely one policy area. Its 2024 amendment prohibits, within pre-school and school education, the direct or indirect “propaganda, promotion or incitement” of ideas and views relating to “non-traditional sexual orientation” or a gender identity different from the biological. It also defines non-traditional sexual orientation by reference to attraction other than between persons of opposite sexes (BHC, 2024). Unlike Russia and Hungary, it does not create media classifications, advertising restrictions or a general information-access system. Its object is expression and activity within education. This narrower scope does not necessarily mean less restriction within that field: the prohibition applies “in any way, directly or indirectly” without the

detailed age categories or harm assessments found in the media provisions. Scope and restrictiveness must therefore be distinguished. However, it can be observed that adaptation changed how the restrictions operated. While Russia and Hungary spread them over several fields, Bulgaria concentrated them in education, without necessarily reducing their restrictiveness.

Legal form and architecture

The Russian restriction developed incrementally. Federal Law No. 436-FZ was enacted in 2010 as a general child-information law, and the 2013 amendment then inserted “non-traditional sexual relations” into Article 5 and introduced related administrative liability. Regional “homosexual propaganda” laws preceded the federal measure, situating it within an established domestic legislative trajectory rather than creating an entirely new regulatory form (Wilkinson, 2014).

Hungary instead used an omnibus act to insert LGBTQ-related restrictions into several existing statutes. Their operation was different in each field. For instance, they were used to restrict minors’ access to content and advertisements, place certain audiovisual programs into the 18+ category, and regulate sexuality-related education and its providers.

The title and composition of the Hungarian Act LXXIX are also significant. The act is titled “On Taking More Severe Action Against Paedophile Offenders and Amending Certain Acts for the Protection of Children.” Although several amendments regulate representations of homosexuality, gender identity, and sex change rather than sexual offences. The Venice Commission concluded that this juxtaposition associated sexual orientation and gender identity with threats to children and contributed to stigmatization (Venice Commission, 2021). The Court of Justice later found that the law formed a coordinated series of discriminatory measures and that its association of non-heterosexual and non-cisgender persons with persons convicted of pedophilia intensified their stigmatization (Commission v. Hungary, 2026). It is therefore more legitimate to claim that the structure of the act results in association, rather than that every provision literally equates homosexuality with pedophilia.

Placement within existing legislation also shapes enforcement. The Hungarian Media Council applies the amended classification system to particular programs. Detrekői’s analysis indicates that positive or normalized portrayals of same-sex relationships may attract the highest age classification even without explicit sexual content (Detrekői, 2025). The adaptation consequently extends beyond the inserted words to the administrative practices enabled by their institutional location.

Bulgaria’s legal form is more compact. It places one new prohibited category alongside existing restrictions on ideological, religious, and political activity in education and adds a definition of “non-traditional sexual orientation” (BHC, 2024). This placement frames LGBTQ-related expression as a form of influence from which education should be insulated. The formal progression is therefore not simple copying: Hungary disaggregated the Russian model across specialized statutes, whereas Bulgaria removed most of its regulatory machinery and retained a concentrated educational prohibition.

Legislative process and justification

The Russian federal measure followed earlier regional laws and formed part of a political project presenting “traditional values” as an alternative to allegedly foreign liberal understandings of rights (Wilkinson, 2014).

Hungary’s 2021 process was distinguished by the late introduction and rapid adoption of the LGBTQ-related provisions. The bill submitted on 25 May initially concerned harsher treatment and registration of pedophile offenders. The relevant media, education, gender identity, and homosexuality provisions were introduced through legislative committee amendments on 10 June and adopted on 15 June. The Act entered into force on 8 July (Venice Commission, 2021). The Venice Commission found that fast-tracking limited meaningful participation by civil society, opposition parties, and other stakeholders and that no justification for the urgency was provided (Venice Commission, 2021).

Hungarian authorities presented the restrictions as protecting children’s physical, mental, and moral development (Act LXXIX of 2021, 2021). However, the official justification lacks empirical evidence. Linnamäki (2022) situates that justification within “illiberal familism,” in which the Christian heterosexual family is treated as the normative foundation of political community and LGBTQ identities as its opposing category. Attaching the restrictions to a bill originally addressing offences against children reinforced this political framing.

Bulgaria’s process was similarly compressed. The bill was introduced in July 2024, adopted in its first and final readings on 7 August, signed on 15 August, and promulgated on 16 August. Its proponents relied on a biologically binary conception of sex, demographic concerns, and the protection of traditional Christian family values (ODIHR, 2025). ODIHR (2025) found that Parliament completed both readings and deliberations in a single day, severely limiting meaningful input from educators, opposition parties, and civil society.

This occurred against a broader procedural weakness identified by the Commission. Bills introduced by Bulgarian parliamentarians do not undergo the same mandatory impact assessment and public consultation as government proposals (European Commission, 2024). The European Parliamentary Research Service connected the amendment to this pre-existing concern (de Groot, 2024). Hungary and Bulgaria therefore share accelerated processes that restricted scrutiny, although their legislative vehicles differed. EU membership provided no automatic barrier to either enactment.

Relationship to EU legal frameworks

Russia supplies the baseline case in which EU law imposed no constraint on legislative design. Russia was nevertheless subject to the European Convention on Human Rights when its federal prohibition was adopted, even though that is no longer the case. Bayev is consequently important contextual evidence, but it cannot be used to demonstrate the influence of EU law.

Hungary occupied a different position because Act LXXIX amended fields governed by EU law. Section 230 of the Hungarian Media Act expressly identifies the AVMSD among the EU measures with which the Act complies (Act CLXXXV, 2010). This, however, merely establishes that the

Media Act forms part of Hungary's formal AVMSD framework. It does not prove that the drafters of the 2021 amendments consciously consulted particular AVMSD provisions.

The AVMSD permits stricter national rules but requires compliance with EU law. Article 6a requires proportionate measures concerning audiovisual content capable of impairing minors' physical, mental, or moral development, while Article 9(1)(c)(ii) prohibits audiovisual commercial communications from promoting discrimination based on sexual orientation (Directive 2010/13/EU, consolidated 2018, arts. 4(1), 6a, 9(1)(c)(ii)). It therefore provides both the vocabulary of harm to minors and limits on national discretion. Detrekői (2025) argues that Hungary exploited the indeterminacy of "moral development" to incorporate LGBTQ-related portrayals into its classification system. This supports an interpretation that the AVMSD's ambiguity created legal space for Hungary's approach but it cannot prove that lawmakers deliberately exploited it to evade EU scrutiny.

The importance of this EU-law gateway was confirmed in *Commission v. Hungary*. The Court found infringements of the AVMSD, Services, and e-Commerce Directives; Charter rights; the GDPR; and Article 2 TEU (*Commission v. Hungary*, 2026). Although Member States retain discretion to define content potentially harmful to minors, that discretion must comply with the Charter, including its prohibition of discrimination. Treating any portrayal of homosexuality, gender reassignment, or divergence from sex assigned at birth as inherently harmful did not satisfy that requirement (*Commission v. Hungary*, 2026). EU law did not prevent enactment but provided strong instruments for subsequent review once Hungary legislated within harmonized internal-market fields.

Bulgaria's amendment occupies a different competence structure. Article 165 TFEU authorizes the Union to support cooperation and quality education while respecting national responsibility for teaching content and expressly excludes harmonization of national education laws (Treaty on the Functioning of the European Union [TFEU], 2016, art. 165). The EU may encourage cooperation and supplement national action, but it cannot harmonize Member States' laws governing school curricula (European Parliament, 2026). This does not mean that EU law never applies to education. National legislation may enter other fields of EU law, and Article 2 TEU remains binding. However, the Charter applies to Member States only when implementing EU law and does not enlarge Union competence (Charter of Fundamental Rights of the European Union [Charter], 2016).

The decisive difference is thus the absence of a sector-specific harmonizing instrument for school curriculum comparable to the AVMSD. EU institutions could scrutinize Bulgaria's legislative process and raise political and fundamental-rights concerns, but the study identified no directly corresponding EU education provision for textual comparison. This does not prove that Bulgaria selected education to evade EU law. It supports the narrower structural inference that concentrating the restriction in education reduced the availability of an obvious EU comparator and enforcement pathway.

Across the four dimensions, adaptation occurred through relocation across legal fields rather than uniform transplantation. Russia used a comprehensive child-information regime; Hungary dispersed comparable restrictions through an omnibus act extending into EU-regulated sectors;

and Bulgaria concentrated them in education, where national competence remains stronger. EU membership therefore neither prevented nor uniformly constrained adaptation. Its practical effect depended upon the regulatory field into which the restriction was translated.

Provision-Level Textual Legal Analysis

Retrieval and construction of comparison units

The segments obtained through proximity retrieval, as discussed in methodology, demonstrated that although it the process could identify candidate provisions based on shared vocabulary, the provisions did not necessarily regulate the same legal issue. Some results contained both search concepts only, incidentally, including Hungarian criminal-record provisions and Russian provisions concerning violence, expert review, or general definitions. Conversely, examining only the exact retrieved sentence would have concealed how the provision operated within its parent article or amendment and made omission impossible to identify. Duplicate retrievals were therefore consolidated, and each result was linked to its parent article or amendment before substantive comparison, as demonstrated in Appendix C.

Given that each country organized comparable restrictions differently, provisions were matched according to the regulated policy area rather than their numbering or shared terminology. This produced three national correspondence categories. General child-access restrictions connected the substantive prohibitions and circulation rules in Russian Articles 5 and 11 with Hungarian Amendments 1 and 6. Education connected Russian Articles 5 and 16 with Hungarian Amendment 7 and the entire Bulgarian amendment. Article 5 was required because Article 16 regulates the distribution of information already classified as prohibited under Article 5; Article 16 would therefore be unintelligible if isolated from the substantive prohibition. Media classification and protection of minors connected the relevant Russian classification provisions with Hungarian Amendment 5. The Hungarian family-protection provisions, visible in Appendix C, did not form a separate adaptation category because they repeated the general prohibition on making specified content accessible to persons under eighteen and were consequently incorporated into general child-access. Definitions, criminal records, criminal law, employment eligibility, and expert-review provisions were excluded because they did not establish functional correspondence within the selected policy areas. Table 1 below summarizes the provisions eligible for comparison in each correspondence category.

Table 1: Summary of the provisions eligible for comparison in each correspondence category

	Russia	Hungary	Bulgaria
Education	Articles 5 & 16	Amendment 7	Entire provision
General Child-Access	Articles 5 & 11	Amendments 1 & 6	-
Media Classification	Article 5	Amendment 5	-

Relevance screening and EU correspondence

The identification of a parent unit was followed by internal relevance coding. Technical and non-operative material was separated from operative text, which was divided into core relevant,

contextually or structurally relevant, and irrelevant material. This step prevented entire articles from being treated as comparable merely because one sentence contained a relevant term. At the same time, contextually relevant provisions were retained where they explained the operation of a core restriction. For example, Russian circulation and age-verification rules were retained where they implemented Article 5, while purely administrative detail without a corresponding legal issue was excluded from the eligible adaptation comparison.

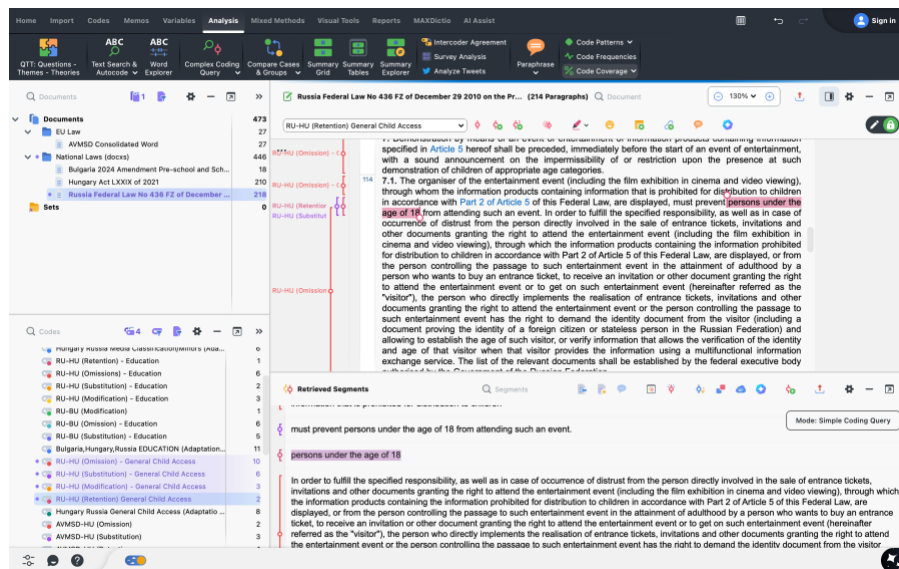
The same process was applied to the AVMSD provisions identified by Detrekői: Articles 2, 3(1), 3(2), 4(1), 6a, 9(1)(c)(ii) and 28b (Detrekői, 2025). Coding their complete paragraphs before screening avoided selecting only language that appeared likely to correspond with Hungary. Articles 6a and 9(1)(c)(ii) emerged as the provisions regulating the relevant policy areas of harm to minors and discriminatory audiovisual advertising. However, only Article 6a formed an eligible textual pair with the Hungarian material that survived the national-law screening, namely Amendment 5. Although Article 9(1)(c)(ii) was substantively relevant, Hungarian Amendment 3 had not passed the preliminary screening and could not be reintroduced solely to manufacture an EU correspondence. Bulgaria had no equivalent sector-specific EU education comparator. The EU analysis was therefore necessarily narrower than the national comparisons.

Adaptation within national correspondences

The general child-access comparison was dominated by omission. Eighty-four per cent of the coded Russian source characters were classified as omitted in Hungary, compared with 9% substitution, 7% modification and 1% retention. The minimal retention primarily concerned the age boundary expressed through references to persons under eighteen. Hungary preserved the general idea of restricting minors' access to designated content but did not reproduce most of Russia's detailed distribution and access-control regulations. Russian provisions concerning information-product logos, packaging, sound announcements before entertainment events, technical protection measures and identity verification generally lacked affirmative Hungarian equivalents and were therefore coded as omissions (Federal Law No. 436-FZ, 2010, arts. 5, 11).

The modifications and substitutions show why this category cannot be described as wholesale rejection. Hungary retained identifiable components of the source formulation concerning harmful content, age, and access but incorporated different subject matter and expressed the prohibition through the vocabulary of making content "accessible" to persons under eighteen (Act LXXIX, 2021, amendments 1 and 6). It therefore preserved the central access-restriction model while omitting most of the Russian system used to administer it. The percentages total 101% after rounding because one portion of Russian Article 11 was assigned overlapping adaptation codes, as Image 1 below demonstrates. The phrase concerning persons under eighteen was retained, while the broader source formulation containing it was replaced through a Hungarian substitute. The categories consequently measure coded character coverage rather than mutually exclusive shares of an abstract whole.

Image 1: The segment 'persons under the age of 18' being assigned two adaptation codes under the Hungary-Russia comparison of 'general child-access' provision



Education produced similarly omission-heavy results in both recipient states. In the Russia–Hungary comparison, omission covered 87% of coded source characters, modification 10%, substitution 3% and retention less than 1% after rounding. Hungary did not reproduce Russia’s distinctive terminology exactly. Its main correspondences arose through the alteration or replacement of source formulations. Russian restrictions on distributing prohibited information in educational institutions became a rule governing the permitted aims and providers of activities concerning sexual culture, sex, sexual orientation, and sexual development (Act LXXIX, 2021, amendment 7). The registration requirement and sanctions for unauthorized providers were important features of the Hungarian provision, but they were not treated as source-derived additions where no corresponding Russian element existed.

The Russia–Bulgaria education comparison contained 86% omission, 12% substitution, and 2% modification, with no retention. Bulgaria’s prohibition addresses the same established educational issue but replaces the Russian formulation with “propaganda, promotion or incitement” conducted directly or indirectly and adds its own definition of “non-traditional sexual orientation” (BHC 2024). The absence of retention is significant under the study’s deliberately lexical definition: functional resemblance or use of the general concept of non-traditional sexuality was insufficient unless the distinctive source vocabulary was reproduced subject only to trivial linguistic variation. The result therefore indicates strong functional correspondence accompanied by very limited textual continuity.

Media classification produced a different pattern. In the Russia–Hungary comparison, modification accounted for 49% of coded source characters, substitution for 27%, omission for 22%, and retention for 1%. This was the only national category in which omission was not dominant. Hungary retained identifiable Russian elements concerning harm, minors, and restricted subject matter but materially altered their formulation by embedding them in the Media Act’s Category V classification. Russian information classified as prohibited for distribution to children was reformulated as programming capable of negatively influencing minors’ physical, mental, or moral development and designated unsuitable for audiences under eighteen (Federal Law No. 436-FZ, 2010, arts. 5–6; Act LXXIX, 2021, amendment 5). Media classification, therefore, provides the clearest textual evidence of reshaping rather than simple contraction, as source vocabulary remained identifiable across much of the comparison, but it was adjusted to operate through Hungary’s existing audiovisual regulatory structure.

The AVMSD-Hungary Comparison

The comparison between AVMSD Article 6a and Hungarian Amendment 5 produced the most evenly distributed result. Substitution represented 40% of coded AVMSD source characters, modification 28%, omission 25% and retention 7%. The retained language included the shared description of content capable of impairing or negatively influencing the “physical, mental or moral development of minors.” This phrase connects the Hungarian classification rule directly to the vocabulary of Article 6a (Directive 2010/13/EU, consolidated 2018, art. 6a).

Nevertheless, the Hungarian media provisions only retained only a small portion of the AVMSD’s exact vocabulary. Hungary substituted its mandatory Category V classification and under-eighteen rating for some of the AVMSD’s more open formulation of “appropriate measures.” It modified the EU harm framework by expressly inserting portrayals or promotion of divergence from sex at birth, sex change, and homosexuality among the matters treated as negatively influencing minors. Other elements of Article 6a such as its examples of age-verification tools or technical measures, proportionality to the potential harm of a program, and special treatment of the most harmful content, were omitted from the eligible Hungarian correspondence. The result shows that Hungary neither simply copied nor wholly displaced the AVMSD framework: it preserved selected vocabulary while narrowing and redirecting that framework toward specifically identified LGBTQ-related content.

Comparative results of provision-level textual analysis

Table 2. Overview of character coverage of adaptation codes within eligible source units

Source-target correspondence	Retention	Modification	Substitution	Omission
Russia–Hungary: General child-access	1%	7%	9%	84% *
Russia–Hungary: Education	0%	10%	3%	87%
Russia–Hungary: Media classification / minors	1%	49%	27%	22%
Russia–Bulgaria: Education	0%	2%	12%	86%
AVMSD–Hungary: Media / harm to minors	7%	28%	40%	25%

** Note: Percentages represent the distribution of coded source characters, not percentages of the complete statutes. Values are rounded. The Russia–Hungary general child-access row exceeds 100% because of overlapping codes.*

Across all five comparisons, exact lexical retention was consistently marginal. Adaptation occurred primarily through omission, modification, and substitution. The education and general-access comparisons were characterized by extensive omission because Hungary and Bulgaria did not reproduce Russia’s elaborate circulation and enforcement mechanisms. Media classification displayed greater textual continuity, but mainly through modification rather than exact retention. The AVMSD comparison similarly showed that Hungary preserved the EU vocabulary of harm to minors while altering its content and regulatory consequences.

Conclusion

This study inquired how and to what extent Russian-model restrictions on LGBTQ-related expression was reshaped in Hungary and Bulgaria, and what role EU legal frameworks played in that process. The synthesized findings suggest neither straightforward legal transplantation nor independent national development. Instead, the Russian model was adopted selectively. The central association between LGBTQ-related expression, harm and the protection of children remained influential, while its vocabulary, regulatory reach and enforcement mechanisms were substantially reconstructed within each legal system.

The contextual analysis demonstrated that this construction differed markedly between two countries. Russia's restrictions operate through a comprehensive federal information-regulation framework, while Hungary distributed comparable restrictions across the multiple sectors amended by Act LXXIX of 2021, including child protection, family protection, education, advertising and media regulation. Bulgaria adopted a considerably narrower restriction within education law. The form and scope of the legislation passed by each recipient country impacted what could be transferred since Hungary carried out adaptation using multiple pre-existing legal frameworks, whereas Bulgaria concentrated it within a single regulatory setting. Nevertheless, both their legislative processes utilized child-protection framing to introduce restrictions reaching beyond the prevention of what they defined to constitute harm to children.

The results of the provision-level textual comparison reinforce this observation. Exact lexical retention was rare or absent across almost every policy area based on which corresponding provisions were selected. In the Russia-Hungary general child-access comparison, omission covered approximately 84% of coded characters, while in the case of the Hungary-Russia and Bulgaria-Russia education comparison, omission showed approximately 87% and 86% coverage, respectively. These results do not indicate rejection of the underlying restrictive model, however. Much of the omitted text was made of up Russia's extensive implementation mechanisms, including labeling, event-access, age-verification and distribution procedures. The recipient therefore preserved selected restrictive elements without reproducing the Russian state in its entirety.

A different pattern becomes apparent in media classification. Modification accounted for approximately 49% and substitution comprised 27% of the Russia-Hungary comparison, with omission falling to 22%. Hungary consequently displayed its closest textual adaptation where the Russian law could be incorporated into an existing system for classifying audiovisual content that is deemed harmful to minors. The underlying restriction was most heavily reformulated where pre-existing domestic legal structure was already in place to serve a comparable objective, which supports the idea of selective sectoral adaptation.

Although EU law formed a part of said structure, its role was asymmetric. The AVSMD-Hungary comparison was dominated by substitution and modification rather than retention. Hungary used elements of the Article 6a's harm-to-minors classification while introducing LGBTQ-specific content that the article does not identify. It is important to note that the AVMSD does discuss LGBTQ-related matters, superficially in the form of Article 9(1)(c)(ii) which explicitly prohibits discrimination based on sexual orientation in audiovisual commercial communications. However,

that provision was not included in the adaptation analysis given that the Hungarian advertising amendment that could have been analyzed as its corresponding provision failed the study's preliminary screening. As a result, EU law does not appear as a source of legislative content or a barrier to the adoption of national laws. Within the corpus that remained eligible for comparison, it can be described as a part of legal vocabulary and institutional framework through which legal substance was reformulated. No equivalent provision-level EU comparator can be identified for Bulgaria since education remains within national competence and no sufficiently relevant harmonized EU legal instrument governed the amendment's subject matter.

Overall, the results describe adaptation as primarily transformative, selective, and structurally driven. The Russian model supplied the restrictive orientation, while national legal form, regulated sector and, in the case of Hungary, EU regulatory architecture shaped the language and mechanisms through which that orientation entered Hungarian and Bulgarian law.

Implications for EU policymakers

The findings indicate that EU responses to the emergence of Russian-model restrictions must consider the method of adaptation that took place and whether EU legal instruments apply to the fields regulated by the Member States. The judgement in *Commission v Hungary* demonstrates that providing a child protection framework for discriminatory restrictions does not insulate them from EU law. The Court determined violations of the AVMSD, the Services and e-Commerce Directives, the Charter and Article 2 EU itself given the grave discriminatory nature of the provisions (Commission v. Hungary, 2026). For this reason, and due to the violation of Article 2 TEU being the first found by the Court, the immediate priority should be effective implementation of the judgement (CJEU, 2026). If Hungary does not comply, the Commission may initiate further proceedings seeking financial penalties under Article 260 TFEU (TFEU, 2016; CJEU, 2026). Financial consequences have, however, already been imposed because of the breach. The Commission held that Hungary's "child-protection law" precluded the Charter's horizontal enabling requirement governing access to some cohesion funds from being met (European Commission, 2026a). In April 2026, it identified almost €5 billion across three programs as blocked with relation to this issue. This is distinct from the €6.3 billion suspended under the Rule of Law Conditionality Regulation for procurement, prosecutorial and anti-corruption deficiencies (Council of the European Union, 2022). Although Compliance appears more plausible under Hungary's new government elected in April 2026, described the Commission as undertaking intensive reforms to restore the rule of law, the implementation of the judgement cannot be assured in the absence of a verified repeal or amendment (European Commission, 2026b).

The study's textual findings also suggest that EU monitoring should examine regulatory effects rather than search for exact terminology. Hungary rarely retained Russian-sourced vocabulary exactly, but dispersed and reformulated selected restrictions through child-protection, education, advertising and media legislation. Without analyzing the overall legislative effect of the amendments, diffusion cannot be identified definitively. In media regulation, Hungary incorporated LGBTQ-related restrictions into the AVMSD-derived of content classification and harm to minors (Directive 2010/13/EU, consolidated 2018; *Commission v. Hungary*). The Court nevertheless held that the discretion Member States have when determining what harmful content is for minors must be exercised in accordance with Charter rights, particularly the prohibition of

discrimination (Commission v. Hungary, 2026). Commission scrutiny should therefore examine whether national rules use formally neutral EU regulatory categories to impose discriminatory measures against “non-traditional” sexual orientations or gender identities. If the amendments had been examining in isolation, the coordinated operation that made Act LXXIX legally and constitutionally significant might have been overlooked.

Bulgaria presents a more difficult case. Article 165(4) TFEU explicitly excludes the harmonization of Member States’ education laws, while Article 51(1) of the Charter binds Member states only when acting within the scope of EU law (Charter, 2016; TFEU, 2016). A directive aimed at harmonizing nations’ school curriculum or sex education would therefore not be legally viable on the competence of education alone (TFEU, 2016). Nor can infringement proceedings be initiated simply because a national legislation conflicts with an EU quality approach (TFEU, 2016). However, it could potentially prove useful for the Commission to reassess Bulgaria’s 2024 amendment in light of *Commission v Hungary* to determine whether it hinders cross-border educational services or whether article 2 TEU could possibly be invoked, although it is important to highlight that the judgement does not automatically establish jurisdiction over Bulgaria. The landmark decision makes these legal routes conceivable, but it cannot be applied automatically to Bulgaria. The Bulgarian amendment must first be assessed independently, particularly because its scope and regulated policy area differs significantly from those of its Hungarian counterpart.

However, binding enforcement may remain unavailable in certain cases, which renders early-on political and procedural scrutiny more important. The Commission requested information from Bulgaria shortly after the amendment was passed, while the European Parliament’s research service connected its passage to the wider problem of parliamentary bills avoiding impact assessment and public consultation requirements that other bills would normally be required to go through (de Groot, 2024; European Commission, 2024). The Rule of Law Report and direct dialogue between the Commission and national governments should therefore be used as early-warning mechanisms to identify accelerated or fragmented legislative adaptations. These tools cannot substitute enforceable law, but they can expose emerging patterns before comparable restrictions become embedded across multiple national policy areas.

Limitations and opportunities for further research

Although the study contributes to scholarship in the field by systematically tracing adaptations on a provision-level and analyzing their interaction with the varying reach of EU law, several limitations apply to its conclusions.. Given that the research had to construct comparable units, it required the exclusion of legislative material that may nevertheless illuminate the broader diffusion process. The comparison was restricted to provisions operating within established correspondence domains and then to text classified as substantively relevant. This was necessary to avoid comparing differently structured instruments at incompatible levels, for example, treating the entirety of Hungary’s omnibus Act LXXIX of 2021 as equivalent to one provision of the Russian legislation.

However, this standardization process resulted in only a fragment of the entire legislative corpus being analyzed. Definitions, criminal-law provisions, employment restrictions, criminal-record rules and expert-review mechanisms were excluded where no corresponding policy domain existed

across the relevant jurisdictions. Similarly, AVMSD Article 9(1)(c)(ii), concerning audiovisual commercial communications, could not be included in the final adaptation comparison because the potentially corresponding Hungarian provision in Amendment 3 did not pass the preliminary relevance screening.

Although many of these exclusions concerned policy areas that are deemed irrelevant for this research project, it is a distinct possibility that several elements like AVMSD Article 9(1)(c)(ii) have also been excluded throughout the process, even though their analysis presumably would have proved insightful.

Coding adaptation in the source documents, specifically in the Russian legislation and the AVMSD, also created a limitation. Coding retention, modification, substitution, and omission within the source documents made omissions measurable and prevented adaptation codes from being dispersed across documents. However, because no independent "addition" category was used, recipient provisions introducing elements without a source counterpart were not systematically inventoried. The study can therefore explain what happened to eligible Russian or EU source elements, but it cannot provide a complete account of every innovation introduced by Hungary or Bulgaria. A broader study could examine entire legislative packages, explanatory memoranda, draft bills, and rejected amendments before subsequently narrowing the material into comparable units. This would require substantially more time but could capture how borrowed restrictions were packaged with locally generated provisions.

Second, the findings are dependent on translation. English is not an official language of Russia, Hungary, or Bulgaria, while the adaptation categories, particularly the deliberately strict definition of retention, are sensitive to individual words and formulations. Translation may standardize legally distinct expressions, obscure common vocabulary, or create apparent similarities absent from the original texts. Van Hoecke (2015) cautions that legal systems can only be fully understood through their own language and conceptual framework and regards knowledge of the relevant local languages as essential for thorough comparative research. The study attempted to reduce this risk by using the English-language text of the Russian law obtained through GARANT, a prominent legal information and software company in Russia. The translation purchased from the company has been placed in Appendix A. The Hungarian text was obtained from an official government source, and for the Bulgarian case, the study used the local Helsinki Committee's translation, a global NGO that Detrekői (2025) also relied on. The AVMSD was examined in its English version on EUR-Lex, which, unlike the national translations, is an official EU-language version. These choices strengthen source reliability but do not eliminate translation effects. Consequently, findings of retention or modification should be understood as findings concerning the English-language texts used in the study, not as definitive measurements of similarity between the original Russian, Hungarian, and Bulgarian formulations. Replication by researchers with proficiency in all three languages would provide the strongest safeguard against this caveat.

Third, the lexical retrieval and coding procedures inevitably involved researcher judgment. The synonym groups and selected NEAR distance were sensitivity-tested yet indirectly framed or structurally separated provisions may not have been retrieved. The distinction between modification, substitution and omission likewise required interpretation, notwithstanding the use of explicit definitions and collected textual evidence. As a single-researcher project, the study

could not assess intercoder reliability. Future replication should therefore use a published codebook, multiple coders and agreement testing.

The code-coverage percentages also require caution. They are character-weighted descriptive measures, not jurisdictional "similarity scores." Long procedural passages exert greater influence than short prohibitions; overlapping coding can produce totals exceeding 100 per cent; and low lexical retention does not establish weak functional or political influence. The percentages support comparison within the defined corpus but cannot measure the overall extent of Russian influence independently of the coded passages.

Finally, the research compares enacted law on the books at a particular point in time. It does not examine enforcement, administrative interpretation, litigation or the experiences of teachers, media providers and LGBTQ+ persons. Nor does textual correspondence itself prove causal transmission or legislative intent. The study expressly relies on existing literature for the Russia-Hungary-Bulgaria diffusion sequence rather than independently demonstrating it. Van Hocke (2015) similarly warns that law on the books may diverge from law in action. Longitudinal research incorporating judicial decisions, enforcement data, parliamentary records and interviews with legislators, civil servants and civil-society organizations could therefore test whether the identified textual adaptations also produce different practical effects.

The most immediate opportunity for further research is a reassessment of Bulgaria following *Commission v Hungary*. The Court's judgment of 21 April 2026 addressed restrictions concerning media, services and sexuality education and found multiple infringements of EU law, including a breach of Article 2 TEU (Commission v. Hungary, 2026). It should not, however, be assumed that every part of that reasoning automatically applies to Bulgaria. Bulgaria's prohibition is concentrated in education, an area in which EU harmonizing competence is limited, whereas the Hungarian legislation operated across several fields governed by secondary EU law. Future research should map each element of the judgment onto the Bulgarian measure and determine whether a sufficiently concrete connection to EU law exists to engage the Charter or support infringement proceedings. The different regulatory scope makes Bulgaria a particularly useful test of the judgment's reach.

A second extension should examine the comparable Polish and Slovak proposals that were not enacted. Including failed proposals would introduce "negative cases" capable of showing why Russian-model restrictions sometimes do not complete the diffusion process. Legislative histories, coalition politics, civil-society mobilization and communications from EU institutions could be examined to determine whether EU law contributed to the proposals not being adopted.

References

- Act CLXXXV of 2010 on Media Services and Mass Communication (Hungary).
https://hunmedialaw.org/dokumentum/153/Mttv_110803_EN_final.pdf
- Act LXXIX of 2021 on Taking More Severe Action against Paedophile Offenders and Amending Certain Acts for the Protection of Children (Hungary).
- Ayoub, P. M., & Stoeckl, K. (2024). The double-helix entanglements of transnational advocacy: Moral conservative resistance to LGBTI rights. *Review of International Studies*, 50(2), 289–311. <https://doi.org/10.1017/S0260210523000530>
- Bayev and Others v. Russia, Applications Nos. 67667/09, 44092/12, and 56717/12, ECLI:CE:ECHR:2017:0620JUD006766709 (ECtHR, June 20, 2017).
- Bulgarian Helsinki Committee. (2024). *Law on amending the Pre-school and School Education Act (No. 50-454-01-15 of 3 July 2024)—Adopted* [English translation]. <https://www.ilga-europe.org/files/uploads/2024/08/Law-on-amending-the-Pre-School-and-School-Education-Act.pdf>
- Case C-769/22 Commission v Hungary (Values of the European Union) ECLI:EU:C:2026:326.
- Chang, Y., Garoupa, N., & Wells, M. T. (2021). Drawing the Legal Family Tree: An Empirical Comparative Study of 170 Dimensions of Property Law in 129 Jurisdictions. *Journal of Legal Analysis*, 13(1), 231–282. <https://doi.org/10.1093/jla/laaa004>
- Charter of Fundamental Rights of the European Union, 2016 O.J. C 202/389. https://eur-lex.europa.eu/eli/treaty/char_2016/oj/eng
- Consolidated Version of Directive 2010/13/EU of the European Parliament and of the Council on audiovisual media services, 2010 O.J. (L 95) 1 (consolidated Dec. 18, 2018), CELEX

02010L0013-20181218.

[https://eur-lex.europa.eu/legal-](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02010L0013-20181218&qid=1687345036967)

[content/EN/TXT/PDF/?uri=CELEX:02010L0013-20181218&qid=1687345036967](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02010L0013-20181218&qid=1687345036967)

Consolidated version of the Treaty on the Functioning of the European Union, 2016 O.J. C 202/47.

[https://eur-lex.europa.eu/resource.html?uri=cellar:9e8d52e1-2c70-11e6-b497-](https://eur-lex.europa.eu/resource.html?uri=cellar:9e8d52e1-2c70-11e6-b497-01aa75ed71a1.0006.01/DOC_2&format=PDF)

[01aa75ed71a1.0006.01/DOC_2&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:9e8d52e1-2c70-11e6-b497-01aa75ed71a1.0006.01/DOC_2&format=PDF)

Council of the European Union. (2022, December 12). *Rule of law conditionality mechanism:*

Council decides to suspend €6.3 billion given only partial remedial action by Hungary.

<https://www.consilium.europa.eu/en/press/press-releases/2022/12/12/rule-of-law->

[conditionality-mechanism/](https://www.consilium.europa.eu/en/press/press-releases/2022/12/12/rule-of-law-)

Court of Justice of the European Union. (2026, April 21). *Values of the European Union: By*

adopting a law which stigmatises and marginalises LGBTI+ persons, Hungary has acted in

breach of EU law [Press release No. 59/26].

<https://curia.europa.eu/site/upload/docs/application/pdf/2026-04/cp260059en.pdf>

de Groot, D. (2024, November). *Recent legislation targeting LGBTI persons* (PE 766.250).

European Parliamentary Research Service.

[https://www.europarl.europa.eu/RegData/etudes/ATAG/2024/766250/EPRS_ATA\(2024\)76](https://www.europarl.europa.eu/RegData/etudes/ATAG/2024/766250/EPRS_ATA(2024)76)

[6250_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/ATAG/2024/766250/EPRS_ATA(2024)76)

Detrekői, Z. (2025). Media Regulation and LGBTQ Representation: Analyzing the Impact of

Hungary's "Pedophile Law" in the EU Context. *Global Media Journal - German Edition,*

15(2). <https://doi.org/10.60678/GMJ-DE.V15I2.294>

European Commission for Democracy through Law (Venice Commission). (2021). *Opinion on the*

Compatibility with International Human Rights Standards of Act LXXIX Amending Certain

Acts for the Protection of Children (CDL-AD(2021)050).
[https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD\(2021\)050-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2021)050-e)

European Commission. (2024). 2024 Rule of Law Report: Country chapter on the rule of law situation in Bulgaria (SWD(2024) 802 final).https://commission.europa.eu/document/download/fd6bb85d-4aaa-4c79-88a2-8709edfb2002_en?filename=10_1_58051_coun_chap_bulgaria_en.pdf

European Commission. (2026a, April 21). *Equality—ECJ ruling in Case C-769/22 Commission v Hungary: Q&A* [Video]. Audiovisual Service

European Commission. (2026b). 2026 Rule of Law Report: Country chapter on the rule of law situation in Hungary (SWD(2026) 917 final) <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52026SC0917>

European Parliament. (2026, March 31). *Education | Fact Sheets on the European Union* .
<https://www.europarl.europa.eu/factsheets/en/sheet/140/higher-education>

Federal Law No. 135-FZ of 29 June 2013, On amendments to Article 5 of the Federal Law “On the Protection of Children from Information Harmful to Their Health and Development” and certain legislative acts of the Russian Federation for the purpose of protecting children from information promoting the rejection of traditional family values (Russia).

Federal Law No. 436-FZ of December 29, 2010, On the Protection of Children from Information Harmful to Their Health and Development (Russian Federation).

Hansen, E. R., & Jansa, J. M. (2021). Complexity, resources and text borrowing in state legislatures. *Journal of Public Policy*, 41(4), 752–775.
<https://doi.org/10.1017/S0143814X20000252>

- Linder, F., Desmarais, B., Burgess, M., & Giraudy, E. (2020). ext as Policy: Measuring Policy Similarity through Bill Text Reuse. *Policy Studies Journal*, 48(2), 546–574.
<https://doi.org/10.1111/psj.12257>
- Linnamäki, K. (2022). Not in Front of the Child: Illiberal Familism and the Hungarian Anti-LGBTQ+ “Child Protective Law.” *Politics and Governance*, 10(4), 16–25.
<https://doi.org/10.17645/pag.v10i4.5521>
- OSCE Office for Democratic Institutions and Human Rights. (2025, May 30). Opinion on the Act amending and supplementing the Preschool and School Education Act of Bulgaria (Opinion No. NDISCR-BGR/531/2025). Organization for Security and Co-operation in Europe.
<https://odhr.osce.org/sites/default/files/f/documents/a/e/593477.pdf>
- Rathert, S., & Cabaroğlu, N. (2022). Teorising Textbook Adaptation in English Language Teaching. *Center for Educational Policy Studies Journal*, 12(2), 169–188.
<https://doi.org/10.26529/cepsj.1287>
- Van Hoecke, M. (2015). Methodology of Comparative Legal Research. *Recht En Methode in Onderzoek En Onderwijs*. <https://doi.org/10.5553/REM/.000010>
- Wilkinson, C. (2014). Putting “Traditional Values” Into Practice: The Rise and Contestation of Anti-Homopropaganda Laws in Russia. *Journal of Human Rights*, 13(3), 363–379.
<https://doi.org/10.1080/14754835.2014.919218>

Appendix A

English translation of Russia's Federal Law No 436-FZ, On the Protection of Children from Information Harmful to Their Health and Development as provided by GARANT

Federal Law No. 436-FZ of December 29, 2010 on the Protection of Children from Information That May Be Harmful to Their Health and Development (with Amendments and Additions)

Passed by the State Duma on December 21, 2010
Passed by the Federation Council on December 24, 2010

Chapter 1. General Provisions

Article 1. Scope of This Federal Law

1. This Federal Law shall regulate relations associated with the protection of children against information that may cause harm to their health and/or development, including against such information that may be a part of information products.
2. This Federal Law shall not apply to relations in the sphere of:
 - 1) circulation of information products containing scientific, science-engineering or statistical information;
 - 2) dissemination of information the impermissibility of restricting the access to which is established by **Federal Law** No. 149-FZ of July 27, 2006 on Information, Information Technologies and Protection of Information and by other federal laws;
 - 3) circulation of information products being of substantial historic, artistic or other cultural value to society;
 - 3.1) circulation of works of literature, the study of which is provided for by federal state educational standards and federal basic general educational programs;
 - 3.2) distribution of the Bible, Koran, Tanakh or Kanjur;
 - 4) advertising.

Article 2. Basic Notions Used in This Federal Law

The following basic notions are used in this Federal Law:

- 1) **access of children to information** - a possibility for children to receive and use freely disseminated information;
- 2) **information products logo** - a graphic and/or textual designation of information products in accordance with the information products classification specified in **Part 3 of Article 6** hereof;
- 3) **event of entertainment** - demonstration of information products in a place accessible to children and also in a place attended by a large number of persons not belonging to immediate family members, including by conducting theatrical shows, cultural-enlightening activities and events of public entertainment;
- 4) **children's information security** - a state of children being secure which is free of risk associated with the infliction of harm by information to their health and/or physical, psychic, spiritual or moral development;

- 5) **information products** - products of mass media information, printed matter, audio-visual products on whatever types of media, software for electronic computing machines (ECM programs) and data bases intended for circulation in the territory of the Russian Federation and also information disseminated by means of activities of entertainment, disseminated through information-telecommunication networks, including the Internet, and mobile radio-telephone communications networks;
- 6) **information products for children** - information products corresponding by its topics, content and artistic design to the physical, psychic, spiritual and moral development of children;
- 7) **information inflicting harm to the health and/or development of children** - information (including that as part of information products for children) whose dissemination among children is either banned or restricted in accordance with this Federal Law;
- 8) **information of pornographic character** - information presented as naturalistic pictures or description of human genitals and/or sexual intercourse or action of sexual character comparable with sexual intercourse, including such action committed towards animals;
- 9) **information products classification** - distribution of information products by their topics, genre, content and artistic design according to the age of children in the procedure prescribed hereunder;
- 10) **places accessible to children** - public places the access of a child to which and/or the stay of a child at which is not forbidden, including public places at which a child enjoys the access to products of mass media and/or to information products posted within information-telecommunications networks;
- 11) **naturalistic pictures or description** - a picture or description in whatever form and by using any means of humans, animals, individual parts of human body and/or animal, an action (inaction), event, phenomenon, consequences of same by focusing attention upon details, anatomic particulars and/or physiological processes;
- 12) **circulation of information products** - provision and/or dissemination of information products, including selling of same (including dissemination by subscription), leasing, hire, distribution, delivery from the funds of publicly accessible libraries, public showing, public performance (including through events of entertainment), dissemination through air or cable broadcasting, information-telecommunication networks, in particular the Internet, and mobile radio-telephone networks;
- 13) **expert** - a person meeting the requirements of this Federal Law and whose services are engaged to conduct experts' examination of information products and to offer an experts' report or to carry out the classification of information products and conduct the examination of same.

Article 3. Legislation of the Russian Federation on the Protection of Children Against Information Harmful to Their Health and/or Development

The legislation of the Russian Federation on the protection of children against information inflicting harm to their health and/or development shall comprise the **Constitution** of the Russian Federation, this Federal Law, other federal laws and regulatory legal acts to be adopted in conformity therewith.

Article 4. Powers of the Federal Executive Body, State Power Bodies of the Subjects of the Russian Federation in the Sphere of Protection of Children Against Information Inflicting Harm to Their Health and/or Development

1. The powers of the federal executive body authorized by the Government of the Russian Federation, in the sphere of protection of children against information inflicting harm to their health and/or development shall include:

- 1) elaboration and realization of the common state policy in the sphere of information inflicting harm to their health and/or development;
- 2) preparation and implementation of the list of federal measures aimed at ensuring the information security of children, production of information products for children and the circulation of information products;
- 3) establishing the **procedure** for conducting an examination of the information products stipulated by this Federal Law;
- 4) federal state control (supervision) over compliance with the legislation of the Russian Federation on the protection of children against information inflicting harm to their health and/or development.

2. The powers of state power bodies of the subjects of the Russian Federation in the sphere of protection of children against information inflicting harm to their health and/or development shall include elaboration and realisation of the list of regional activities aimed at ensuring the information security of children, production of information products for children and the circulation of information products, as well as other authorities established by this Federal Law.

Article 5. Types of Information Inflicting Harm to the Health and/or Development of Children

1. The information inflicting harm to the health and/or development of children shall comprise:

- 1) information specified in **Part 2** of this Article and banned for dissemination among children;
- 2) information specified in **Part 3** of this Article with due regard for provisions of **Articles 7-10** hereof the dissemination of which is restricted among children of specified age categories.

2. The information banned for dissemination among children shall include:

- 1) information encouraging children to commit actions posing a threat to their life and/or health, including to cause harm to their health, to commit suicide; cide, or for the life and/or health of other persons, or aimed at predisposing or otherwise involving children in performing such actions;
- 2) information which may provoke a desire in children to use narcotic drugs, psychotropic and/or stupefying substances, tobacco articles, nicotine-containing products, liquefied hydrocarbon gases contained in potentially hazardous gas-containing household goods and (or) their vapors, alcoholic and alcohol-containing products, to take part in gambling, get engaged in prostitution, vagrancy or begging;
- 3) information providing grounds and justification for the permissibility of violence and/or cruelty or encouraging to commit violent actions towards humans or animals, except for cases envisaged by this Federal Law;
- 3.1) information containing a picture or description of sexual abuse;
- 3.2) insulting human dignity and public morality, expressing obvious disrespect for society, containing images of actions with signs of illegality, including violent ones, and distributed from uncouth, selfish or other base motives;
- 4) information denouncing family values and encouraging disrespect for one's parents and/or other family members;
- 4.1) information promoting or demonstrating non-traditional sexual relations and (or) preferences;
- 4.2) information promoting pedophilia;
- 4.3) information that can make children want to change sex;

- 4.4) information promoting the refusal to procreate children;
 - 5) information justifying illegal behavior;
 - 6) information containing taboo language;
 - 7) information containing information of a pornographic character.
 - 8) information on a minor who have suffered as a result of unlawful actions (omission to act), including the family name, first name and patronymic, photo and video images of such minor, of his/her parents (legal representatives), date of birth of such minor, audio record of his/her voice, place of residence or place of temporary stay, place or work or place of studies, as well as other information enabling to identify directly or indirectly such minor.
 - 9) contained in information products produced by a foreign agent.
3. The information whose dissemination is restricted among children of specified age categories shall include:
- 1) information presented as pictures or description of cruelty, physical and/or psychic violence (except for sexual abuse), crime or other antisocial action;
 - 2) information provoking fear, horror or panic in children, including that presented as pictures or description of non-violent death, disease, suicide, accident, crash or disaster and/or effects thereof in the form degrading to the human dignity;
 - 3) information presented as pictures or description of sexual relations between man and woman;
 - 4) information containing foul language and words not categorized as taboo language;

Chapter 2. Classification of Information Products

Article 6. Making Classification of Information Products

1. The classification of information products shall be effected by the makers and/or distributors of same on their own (including with the participation of expert, experts and/or experts' organisations complying with the requirements of [Article 17](#) thereof) prior to them being circulated in the territory of the Russian Federation.
2. In conducting investigations for the purposes of classification of information products one shall assess:
 - 1) topics, genre, content and artistic design of the products;
 - 2) peculiarities of perception of information contained therein by children of specified age categories;
 - 3) the probability of information contained therein causing harm to the health and/or development of children.
3. The classification of information products shall be effected in compliance with the requirements of this Federal Law according to the following categories of information products:
 - 1) information products for children under six years of age;
 - 2) information products for children who reached the age of six;
 - 3) information products for children who reached the age of twelve;
 - 4) information products for children who reached the age of sixteen;
 - 5) information products banned for children (information products containing information stipulated by [Part 2 of Article 5](#) hereof).
4. The classification of information products intended and/or used for education and upbringing of children at the organisations exercising educational activity in compliance with basic programmes of general education, educational programmes of secondary vocational education and additional

general education programmes shall be effected in compliance with this Federal Law and the **legislation** on education.

5. The classification of movies shall be made in accordance with the requirements of this Federal Law and **legislation** of the Russian Federation on the state support to cinematography.

6. The data received as a result of classification of information products shall be specified by the maker or distributor of same in covering documents for information products and shall be the basis for placing thereupon an information products logo and for circulation thereof in the territory of the Russian Federation.

Article 7. Information Products for Children under Six

The information products for children who did not reach the age of six may include information products containing information not inflicting harm to the health and/or development of children (including information products containing incidental non-naturalistic pictures and/or description of physical and/or psychic violence (except for sexual violence) justified by the genre and/or subject-matter of same, on the condition of triumph of good over evil and manifestation of compassion for the victim of violence and/or denunciation of violence).

Article 8. Information Products for Children Who Reached the Age of Six

Information products for children who reached the age of six admitted for circulation may include the information products specified in **Article 7** hereof and also information products containing the following justified by their genre and/or subject-matter:

- 1) short-term and non-naturalistic pictures or description of human diseases (except for grave ones) and/or the effects of same in the form not degrading to human dignity;
- 2) non-naturalistic pictures or description of an accident, crash, disaster or non-violent death without the demonstration of effects thereof which may provoke fear, horror or panic in children;
- 3) incidental pictures or descriptions of anti-social actions and/or crime not encouraging them to commit those actions, on the condition that no substantiation or justification is provided for the permissibility of such actions and expression is made of a negative, denouncing attitude towards the persons who commit them.

Article 9. Information Products for Children Who Reached the Age of Twelve

Information products for children who reached the age of twelve admitted for circulation may include the information products specified in **Article 8** hereof and also information products containing the following justified by their genre and/or subject-matter:

- 1) incidental pictures or description of cruelty and/or violence (except for sexual) without naturalistic demonstration of the process of taking somebody's life or inflicting injuries on the condition of expressing compassion for the victim of violence and/or negative, denouncing attitude towards cruelty and violence (except for violence applied in the event of protection of civil rights and statutory interests of society or state);
- 2) pictures or descriptions not encouraging children to commit anti-social actions, including to consume alcohol and alcohol-containing products, to take part in gambling, engage in vagrancy or begging), incidental mentioning (without demonstration) of narcotic drugs, psychotropic and/or stupefying substances, tobacco products, nicotine-containing products or devices for the consumption of nicotine-containing products on the condition that no substantiation or justification is given for the permissibility of anti-social actions, expression is made of the negative, denouncing

attitude towards such actions and mention is made of the danger of taking said products, agents, substances and items;

3) incidental non-naturalistic pictures or description of sexual relations between man and woman unless they exploit the interest to sex or are exciting or abusive, except for pictures or description of actions of sexual character.

Article 10. Information Products for Children Who Reached the Age of Sixteen

Information products for children who reached the age of sixteen admitted for circulation may include the information products specified in [Article 9](#) hereof and also information products containing the following justified by their genre and/or subject-matter:

- 1) pictures or descriptions of an accident, crash, disaster, disease, death without naturalistic demonstration of effects thereof which may provoke fear, horror or panic in children;
- 2) pictures or descriptions of cruelty and/or violence (except sexual) without naturalistic demonstration of taking somebody's life or inflicting injuries on the condition that compassion is shown towards the victim and/or negative, denouncing attitude is expressed towards cruelty and violence (except for violence applied in the event of protecting civil rights and statutory interests of society or the state);
- 3) information on narcotic drugs or psychotropic and/or stupefying substances (without their demonstration), on hazardous effects of taking the same, demonstrating such cases on the condition that a negative, denouncing attitude is shown to taking those substances or agents and mention is made of the danger of taking them;
- 4) individual foul words and/or terms not categorized as taboo language;
- 5) pictures or descriptions of sexual relations between man and woman unless they exploit the interest to sex and are abusive in character, except for pictures and descriptions of actions of sexual character.

Chapter 3. Requirements for Circulation of Information Products

Article 11. General Requirements to Circulation of Information Products

1. The circulation of information products containing information specified in [Part 2 of Article 5](#) hereof shall not be allowed, except for cases envisaged hereunder.
2. The circulation of information products containing information banned for dissemination among children under [Part 2 of Article 5](#) hereof in places accessible to children shall not be allowed without the application of administrative and organisational measures, technical and software-hardware means of protection of children against said information.
3. The requirements to the administrative and organisational measures, technical and software-hardware means of protection of children against the information inflicting harm to their health and/or development shall be fixed by the federal executive body duly authorized by the Government of the Russian Federation.
4. The circulation of information products containing information specified in [Article 5](#) hereof, without the information products' logo, shall not be allowed, except for:
 - 1) text-books and teaching aids recommended or admitted to use in the educational process in accordance with the [laws](#) on education;
 - 2) television programs and broadcasts released on air without preliminary recording;
 - 3) information products disseminated by means of radio-broadcasting;
 - 4) information products demonstrated by means of events of entertainment;

- 5) printed periodicals specialized in dissemination of information of a public-political or production-practical character.
- 6) information disseminated through information-telecommunication networks, including the Internet, except for network editions and audiovisual services;
- 7) comments and/or messages inserted by readers of a network edition at their own discretion on such edition's site in the procedure established by the editorial board of this mass medium.
- 5.** In the presence of parents or other legitimate representatives of children who reached the age of six, circulation shall be allowed of information products specified in **Article 9** hereof.
- 6.** Prior to demonstration by means of an event of entertainment of information products, they shall be given an information products' logo. In the case of demonstration of several types of information products for children of different age categories the said logo shall correspond to the information products for children of an older age category. The said logo shall be placed on billboards and other announcements of conducting an event of entertainment and also upon entry tickets, invitation cards and other documents giving the right to attend it.
- 7.** Demonstration by means of an event of entertainment of information products containing information specified in **Article 5** hereof shall be preceded, immediately before the start of an event of entertainment, with a sound announcement on the impermissibility of or restriction upon the presence at such demonstration of children of appropriate age categories.
- 7.1.** The organiser of the entertainment event (including the film exhibition in cinema and video viewing), through whom the information products containing information that is prohibited for distribution to children in accordance with **Part 2 of Article 5** of this Federal Law, are displayed, must prevent persons under the age of 18 from attending such an event. In order to fulfill the specified responsibility, as well as in case of occurrence of distrust from the person directly involved in the sale of entrance tickets, invitations and other documents granting the right to attend the entertainment event (including the film exhibition in cinema and video viewing), through which the information products containing the information prohibited for distribution to children in accordance with Part 2 of Article 5 of this Federal Law, are displayed, or from the person controlling the passage to such entertainment event in the attainment of adulthood by a person who wants to buy an entrance ticket, to receive an invitation or other document granting the right to attend the entertainment event or to get on such entertainment event (hereinafter referred as the "visitor"), the person who directly implements the realisation of entrance tickets, invitations and other documents granting the right to attend the entertainment event or the person controlling the passage to such entertainment event has the right to demand the identity document from the visitor (including a document proving the identity of a foreign citizen or stateless person in the Russian Federation) and allowing to establish the age of such visitor, or verify information that allows the verification of the identity and age of that visitor when that visitor provides the information using a multifunctional information exchange service. The list of the relevant documents shall be established by the federal executive body authorised by the Government of the Russian Federation.
- 7.2.** The procedure and terms of attendance (permission) of children when carrying out entertainment events (including a film exhibition in cinema and video viewing) shall be determined by the local act of the organiser of the entertainment event, taking into account the provisions of **Parts 3, 5 and 7.1** of this Article.
- 8.** An audio-visual work distribution certificate as a medium of mass information shall specify a category of the given information products.

Article 12. Information Products Logo

1. The category of information products shall be denoted with an information products logo and/or with a textual warning that the distribution of information products to children is restricted subject to the requirements of this Federal Law by their manufacturer and/or distributor in the following manner:

- 1) as applied to the category of information products for children under six years old - in the form of the figure "0" and the plus sign;
- 2) as applied to the category of information products for children who have attained the age of six years old - in the form of the figure "6" and the plus sign and/or a textual warning in the form of the word combination "for children over six years old";
- 3) as applied to the category of information products for children who have attained the age of twelve years old - in the form of the figure "12" and the plus sign and/or the textual warning in the form of the word combination "for children over 12 years old";
- 4) as applied to the category of information products for children who have attained the age of sixteen years old - in the form of the figure "16" and the plus sign and/or the textual warning in the form of the word combination "for children over 16 years old";
- 5) as applied to the category of information products prohibited for children - in the form of the figure "18" and the plus sign and/or the textual warning in the form of the word combination "prohibited for children".

2. The maker or distributor of information products shall place an information products logo and/or a textual warning on the limitation of dissemination of same prior to the start of airing a television program, television broadcast, the demonstration of a movie in case of cine- and video-catering in the procedure established by the federal executive body duly authorized by the Government of the Russian Federation. The information products logo shall be demonstrated in the corner of a frame, except when a movie is shown in a movie-theater. The size of an information products logo shall take no less than five percent of the screen area.

3. The size of an information products logo shall amount to no less than five percent of the billboard space or other announcement of conducting an appropriate event of entertainment, announcement of cine- or video-showing and also of an entry ticket, invitation card or of other document giving the right to attend such event.

4. The information products logo shall be placed on published programs of television- and radio-broadcasts, lists and catalogues of information products and also upon such information products which may be posted within information - telecommunications networks.

4.1. Goods producer, distributor of the products of the mass media have the right to conclude the civil law treaty, with a person who had provided a program of TV and (or) radio broadcasts, the list and (or) the catalogue of information products for publication to him, upon which the obligation to designate a sign of information products in accordance with this Article, such programs for TV and (or) radio broadcasts, lists and (or) catalogues of information products are assigned to the said person.

5. A textual warning as to the restriction of information products' dissemination to children shall be drawn up in Russian or, where it is established by [Federal Law](#) No. 53-FZ of June 1, 2005 on the State Language of the Russian Federation, in the state languages of the republics forming part of the Russian Federation, in other languages of the peoples of the Russian Federation or in foreign languages.

Article 13. Additional Requirements for the Dissemination of Information Products by Means of Television- and Radio-Broadcasting

1. The information products containing information specified in **Items 1-5 of Part 2 of Article 5** hereof shall not be subject to dissemination by means of television- and radio-broadcasting from four a.m. till eleven p.m. local time, except for television- and radio-programs, television- and radio-broadcasts access to the watching or hearing of which is effected exclusively on a paid basis by using decoding technical devices providing access to the specified information products only to persons who have reached the age of eighteen, by introducing codes or performing other actions confirming the age of these persons, as well as subject to compliance the requirements of **Parts 3 and 4** of this Article.
2. The information products containing information specified in **Items 4 and 5 of Article 10** hereof shall not be disseminated by means of television- and radio-broadcasting from seven a.m. until nine p.m. local time, except for television- and radio-programs, television- and radio-broadcasts the access to the watching and hearing of which is effected exclusively on a paid basis by using decoding technical devices providing access to the specified information products only to persons who have reached the age of sixteen, by entering codes or performing other actions confirming the age of these persons, as well as subject to compliance requirements of **Parts 3 and 4** of this Article.
3. The dissemination by way of TV broadcasting of information products containing the information provided for by **Article 5** of this Federal Law shall be accompanied by showing the information products logo to be placed in the picture's corner in the procedure established by the **federal executive power body** authorised by the Government of the Russian Federation at the start of broadcasting a TV programme, as well as every time when their broadcasting is resumed (after breaking them by advertising and/or other information).
4. The dissemination by way of radio broadcasting of information products containing the information provided for by **Article 5** of this Federal Law, except for radiobroadcasts aired without preliminary recording, shall be accompanied by an announcement about restricted dissemination of such information products to children at the start of radiobroadcasts in the procedure established by the **federal executive power body** authorised by the Government of the Russian Federation.
5. Announcements or information about the dissemination of information products through television or radio broadcasting must be accompanied by a sign of information products and (or) a text warning about limiting the distribution of information products among children, assigned to this information product. When placing announcements or information about the distribution through television or radio broadcasting of information products provided for by **part 2 of Article 5** and **Article 10** of this Federal Law, it is not allowed to use fragments of this information product containing information that is harmful to the health and (or) development of children.

Article 14. Specifics of Disseminating Information through Information and Telecommunication Networks

1. Access to the information disseminated through information and telecommunication networks, in particular through the Internet, at the places accessible to children shall be provided by the person arranging access to the Internet at such places (except for the communication operators engaged in rendering the communication services on the basis of contracts of rendering communication services made in writing) to other persons provided that the administrative and organisational measures, as well as technical and software means, of children's protection against information harmful to their health and development are used.
2. A website which is not registered as a mass medium may contain an information products logo (in particular in a machine-readable form) and/or a textual warning as to its restricted dissemination to children, corresponding to one of the categories of information products established by **Part 3**

of **Article 6** of this Federal Law. Sites shall be independently classified by their owners in compliance with the requirements of this Federal Law.

3. An audiovisual service shall contain a sign of information products (in particular in a machine readable form) and/or a textual warning about restricted dissemination of information products to children that correspond to one of the categories of information products established by **Part 3 of Article 6** of this Federal Law. Audiovisual services shall be classified by owners thereof independently in compliance with the requirements of this Federal Law.

4. It is prohibited to distribute information products provided for by **Part 2 of Article 5** of this Federal Law on the audiovisual service if the owner of the audiovisual service does not ensure that minors' access to this information product is restricted.

Article 15. Further Requirements for the Circulation of Individual Types of Information Products for Children

1. It is not allowed to insert in the information products for children, including information products disseminated through information-telecommunications networks, in particular through the Internet and mobile radio-telephone communications networks, announcements on engaging children in making information products inflicting harm upon their health and/or development.

2. The content and artistic design of information products intended for teaching children at pre-school educational organisations shall correspond to the content and artistic design of information products for children who did not reach the age of six.

3. The content and artistic design of printed matter, polygraphic products (including note-books, diaries, book covers, bookmarks), audio-visual products, other information products used in the educational process shall be consistent with the requirements of **Articles 7-10** hereof.

Article 16. Further Requirements for the Circulation of Information Products Banned for Children

1. The first and last pages of newspapers, covers for printed matter or for other polygraphic products containing information that is prohibited for distribution to children in accordance with **Part 2 of Article 5** of this Federal Law, packaging information products containing the information prohibited for distribution to children in accordance with Part 2 of Article 5 of this Federal Law (if any), shall not, in the case of them being disseminated for an unspecified group of persons at places accessible to children, contain information that may be harmful to the health and/or development of children.

2. The information products containing information that is prohibited for distribution to children in accordance with **Part 2 of Article 5** of this Federal Law, in the form of printed matter may be disseminated at places accessible to children only in sealed packing.

3. The information products containing information that is prohibited for distribution to children in accordance with **Part 2 of Article 5** of this Federal Law, shall not be disseminated at educational institutions intended for children, children's medical, sanatoria-resort, physical culture and sporting establishments, facilities of culture, establishments for recreation and health-improvement of children.

4. The information products, containing information that is prohibited for distribution to children in accordance with **Part 2 of Article 5** of this Federal Law, shall not be allowed to disseminate at a distance of less than one hundred metres in the direct line without taking into account natural and artificial barriers from the closest point bordering with the organisation's territory from the number of organisations, specified in **Part 3** of this Article, if the regulatory legal act of the highest

executive body of state power of the subject of the Russian Federation does not establish that the information products, containing information that is prohibited for distribution to children in accordance with Part 2 of Article 5 of this Federal Law, is allowed to be distributed on the territories of specific settlements of the subject of the Russian Federation at a distance of less than one hundred metres in the direct line without taking into account natural and artificial barriers from the closest point bordering with the organisation's territory from the number of organisations, specified in Part 3 of this Article, but not less than fifty metres from the boundaries of the territories of the specified organisations. Such a decision shall be taken by the state authority of the subject of the Russian Federation, taking into account the specifics and density of development in each particular locality of the subject of the Russian Federation.

5. In order to inform the distributors of information products, the information on the organisations located within the boundaries of the municipal formation, specified in **Part 3** of this Article (with the indication of their address, full name, company name (for commercial organisations)), shall be posted by the local government on its official website on the Internet, and in the absence of the technical ability to place this information on the official website of the local government on the Internet, this information shall be posted on the official website of the subject of the Russian Federation on the Internet, in which boundaries the relevant municipal formation is located. The procedure of placing the information on the organisations located within the boundaries of the municipal formation, specified in Part 3 of this Article, shall be established by the regulatory legal act of the supreme government organ of the subject of the Russian Federation in which boundaries the relevant municipal formation is located.

6. The sale, release, lease, as well as issuance of information products from the collections of public libraries, containing information that is prohibited for distribution among children in accordance with **Part 2 of Article 5** of this Federal Law, shall not be allowed to persons under the age of 18. If the seller or lessor, who directly implements the sale, release or lease of information products, containing information that is prohibited for distribution among children in accordance with Part 2 of Article 5 of this Federal Law, is not sure about the attainment of adulthood by a person, who wants to purchase, hire or take on lease the specified products, the seller or lessor has a right to demand an identity document (including a document certifying the identity of a foreign citizen or stateless person in the Russian Federation) from this person and allows to establish the age of this person, or verify information that allows the verification of the identity and age of that visitor when that visitor provides the information using a multifunctional information exchange service. The list of the relevant documents shall be established by the federal executive body authorised by the Government of the Russian Federation.

7. The sale of information products containing the information that is prohibited for distribution to children in accordance with **Part 2 of Article 5** of this Federal Law with the use of machines shall not be allowed.

8. The provision and placement of information products containing the information that is prohibited for distribution to children in accordance with **Part 2 of Article 5** of this Federal Law and located in the collections of public libraries is carried out by public libraries in accordance with the rules approved by the federal executive body in the sphere of culture.

9. Before the start of the film demonstration in cinema and video viewing, which is classified under the category of informational products specified in **Items 1 - 4 of Part 3 of Article 6** of this Federal Law, when placing movie trailers containing the information that is prohibited for distribution among children in accordance with **Part 2 of Article 5** of this Federal Law, the use of fragments

of the specified films containing the information that is prohibited for distribution among children in accordance with Part 2 of Article 5 of this Federal Law, shall not be allowed.

Chapter 4. Examination of Information Products

Article 17. The General Requirements for an Expert Examination of Information Products

1. An expert examination of information products shall be conducted by an expert, experts and/or expert organisations accredited with the federal executive body authorised by the Government of the Russian Federation on the initiative of state power bodies, local authorities, legal entities, individual businessmen, public associations and citizens on a contractual basis. In the event of non-agreement with the results of an expert examination of information products that has been conducted, the person concerned is entitled to dispute the expert opinion judicially.
2. The federal executive body authorised by the Government of the Russian Federation shall establish the requirements for the experts and expert organisations and carry out their accreditation in the procedure determined by them for the right to hold an expert examination of information products, including suspension, renewal or termination of accreditation of experts and expert organisations, keeping a register of accredited experts and expert organisations and the exercise of control over the activities of the experts and expert organisations accredited by them.
3. The data contained in a register of accredited experts and expert organisations shall be public and accessible to any natural persons and legal entities for getting familiar with them, except when access to such data is restricted in compliance with federal laws.
4. The federal executive body authorised by the Government of the Russian Federation shall place on its official site on the Internet the following data from a register of accredited experts and expert organisations:
 - 1) full and shortened (if any) denomination and organisational legal form of legal entity, its local address and addresses where expert activities are exercised (in respect of accredited expert organisations);
 - 2) surname, first name and patronymic (if any) of individual businessman, addresses of the places where expert activities are exercised (in respect of accredited experts who are individual businessmen);
 - 3) surname, first name and patronymic (if any) of natural person, denomination and organisational legal form of expert organisation, addresses of the places where expert activities are exercised (in respect of accredited experts who are employees of expert organisations);
 - 4) registration number;
 - 5) number and date of an order (direction of an official) of the federal executive power body authorized by the Government of the Russian Federation to accredit an expert or an expert organisation;
 - 6) kind of the information products in respect of which an accredited expert or accredited expert organisation are entitled to conduct an expert examination;
 - 7) information on suspension, renewal or termination of accreditation.
5. As an expert or experts for conducting an expert examination of information products may act a person with higher professional education or with special knowledge, in particular in the area of pedagogics, development psychology, development physiology, child psychiatry, cultural studies, art criticism or art history, except for the following persons:

- 1) who have or had a previous conviction for making grave and especially grave crimes against the person, against sexual integrity or sexual freedom of the person, against the family and minors, willful crimes against the population's health and public morals;
- 2) who are producers and distributors of the information products transferred for the expert examination or representatives thereof.
6. A procedure for holding an expert examination of information products shall be established by the federal executive body authorised by the Government of the Russian Federation subject to the requirements of this Federal Law.
7. An expert examination of information products may be held by two and more experts having the same specialty (a commission expert examination) or various specialties (a complex expert examination).
8. The time period for holding an expert examination of information products may not exceed 30 days from the time when an agreement on its holding is made.
9. The services of experts and expert organisations shall be paid for, as well as the expenses borne in connection with holding an expert examination shall be reimbursed, on account of the expert examination's orderer.

Article 18. Experts' Report

1. Upon the termination of examination of information products an experts' report shall be given.
2. The experts' report shall specify:
 - 1) date, time and place of conducting examination of information products;
 - 2) data on the experts' organisation and expert (surname, first name, patronymic, educational background, speciality, work record in the given speciality, the presence of an academic degree, academic title, position held, place of work);
 - 3) problems set before an expert, experts;
 - 4) objects of investigation and materials presented for purposes of examination of information products;
 - 5) the content and results of investigations specifying methodologies employed;
 - 6) well-reasoned solutions of the problems that an expert, experts has/have been confronted with;
 - 7) conclusions as to the presence or absence in the information products of information that may cause harm to the health and/or development of children, whether the information products correspond or fail to correspond to a specified category of information products and an information products logo.
3. The experts' report of the commission-type examination shall be signed by all experts involved in the examination provided they agree in their report regarding the problems set. In the case of differences, each expert shall give an individual experts' report on issues that provoked differences. Each expert involved in a comprehensive examination shall sign a part of the experts' report containing the description of investigations made by him and shall be held responsible for it.
4. An expert report shall be drawn up in three copies for their transfer to the orderer of an expert examination of information products for the purpose of its forwarding within two working days as from the date when the expert report is signed to the federal executive power body authorized by the Government of the Russian Federation and for keeping to the expert or to the expert organisation within five years.
5. Information on an expert examination of information products that has been held and about the results thereof shall be inserted by the federal executive power body authorised by the Government

of the Russian Federation on its official site on the Internet within two working days as from the date when an expert report is received.

6. A repeated expert examination of specific information products shall be allowed in the procedure established by the procedural legislation, when considering judicially disputes connected with the results of an expert examination of information products.

Article 19. Legal Consequences of Examination of Information Products

The federal executive body duly authorised by the Government of the Russian Federation shall, not later than within fifteen days from the receipt of an experts' report, take a decision:

- 1) to declare the information products inconsistent with the requirements of this Federal Law and to give an order to make good an irregularity that has been detected when the experts' report draws a conclusion on the presence in the given information products of information that may cause harm to the health and/or development of children or to declare an information products logo inconsistent with a specified category of information products;
- 2) to declare the information products consistent with the requirements of this Federal Law and to refuse to give an order specified in [Item 1](#) of this part.

Chapter 5. Federal State Control (Supervision) and Public Control over the Observance of the Legislation of the Russian Federation on Protection of Children Against Information That May Be Harmful to Their Health and/or Development

Article 20. Federal State Control (Supervision) over Compliance with the Legislation of the Russian Federation on the Protection of Children from Information Harmful to Their Health and (or) Development

1. Federal state control (supervision) over the observance of the legislation of the Russian Federation on the protection of children from information harmful to their health and (or) development shall be carried out by the federal executive body exercising control and supervision functions in the area of mass media, mass communications, information technologies and communications, the federal executive body exercising federal state control (supervision) in the area of consumer protection, and the federal executive body performing the functions of control and supervision in the area of education and science (hereinafter referred to as federal state supervision bodies), within the competence these bodies.

2. The scope of federal state control (supervision) over compliance with the legislation of the Russian Federation on the protection of children from information harmful to their health and (or) development is compliance by manufacturers, distributors of information products and (or) persons providing children's access to information with mandatory requirements the protection of children from information harmful to their health and (or) development.

3. The organisation and implementation of federal state control (supervision) over the observance of the legislation of the Russian Federation on the protection of children from information harmful to their health and (or) development in relation to manufacturers and (or) distributors of information products shall be regulated by [Federal Law](#) No. 248-FZ of July 31, 2020 on State Control (Supervision) and Municipal Control in the Russian Federation (with the exception of state control over compliance with the legislation of the Russian Federation on the protection of children from information harmful to their health and (or) development, when exercising such control without interaction with the controlled person).

4. Regulations on federal state control (supervision) over compliance with the legislation of the Russian Federation on the protection of children from information harmful to their health and (or) development shall be approved by the Government of the Russian Federation.
5. When exercising federal state control (supervision) over compliance with the legislation of the Russian Federation on the protection of children from information harmful to their health and (or) development, federal state supervision bodies have the right to involve experts, expert organisations specified in [Article 33](#) of Federal Law No. 248-FZ of July 31, 2020 on State Control (Supervision) and Municipal Control in the Russian Federation.
6. Payment for the services of experts and expert organisations specified in [part 5](#) of this article shall be made in the procedure and amounts established by the Government of the Russian Federation. The expert has the right to reimbursement of expenses incurred in connection with control (supervisory) activities. The expert shall be reimbursed for travel expenses to the place of implementation of the activities of a legal entity or an individual entrepreneur, in respect of which control (supervisory) measures are carried out, and back to the expert's place of residence, as well as expenses for renting living quarters. Reimbursement of these costs shall be carried out in the amount established by the Government of the Russian Federation, upon presentation of supporting documents by the expert.

Article 21. Public Control in the Sphere of Protection of Children Against Information That May Be Harmful to Their Health and/or Development

1. Public associations and other non-profit organisations registered in the procedure prescribed by a federal statute in accordance with their charters and also citizens shall have the right to exercise in line with the legislation of the Russian Federation public control over compliance with the requirements of this Federal Law.
2. When exercising public control, public associations and other non-profit organisations, as well as citizens, are entitled to monitor the circulation of information products and children's access to information, in particular by way of creating "hot lines".

Chapter 6. Liability for Offences in the Sphere of Protection of Children Against Information That May Be Harmful to Their Health and/or Development

Article 22. Liability for Offences in the Sphere of Protection of Children Against Information That May Be Harmful to Their Health and/or Development

The violation of the legislation of the Russian Federation on the protection of children against information that may be harmful to their health and/or development shall entail liability as envisaged under the legislation of the Russian Federation.

Chapter 7. Final provisions

Article 23. Procedure for This Federal Law Taking Effect

1. This Federal Law shall take effect on September 1, 2012.
2. The provisions of [Part 1 of Article 12](#) of this Federal Law shall not apply to the printed matter released for circulation prior to the effective day of this Federal Law.

3. The provisions of **Part 1 of Article 12** of this Federal Law do not extend to the information products submitted to the collections of public libraries before the day of entry into force of this Federal Law.

President of the Russian Federation

D. Medvedev

The Kremlin, Moscow

December 29, 2010

No. 436-FZ

Appendix B

List of synonyms and calibrations used during lexical retrieval

Preliminary Concept	Synonyms and calibration as displayed in MAXQDA
Media	Text Search & Autocode - ALL: media (offerings, networks, channels, mp3, streams, platforms, news, editions, telecoms, avenues, newsroom, sites, content, mediums, digital, publisher, publishing, vlogs, recordings, data, tapes, reports, outlets, socials, pressroom, milieu, press, videos, environment, downloads, versions, journalists, anime, newspapers, materials, ebooks, rhetoric, presentations, drives, visuals, documents, surroundings, file, newspaper, discs, reagents, files, format, telecommunications, reporters, communications, formats, vids, cultures, reporting, attachments, journalism, elements, podcasts, broadcasting) Within: Document Find whole words Find all word forms (lemma list): English Only in activated documents
Education	Text Search & Autocode - ALL: education (tuition, studies, preparation, training, professors, enlightenment, enrichment, cultivation, nurturing, scholarship, coursework, pedagogy, classroom, knowledge, tutelage, schoolwork, refinements, tutoring, humanities, learning, development, formation, lessons, formations, arts, erudition, university, growth, college, academy, coaching, instructions, academics, grounding, school, teachings, experience, edu, instruction, scholars, background, indoctrination, research, teaching, didactics, schooling, academia, literacy, cultures, ed, study, upbringing, guidance, sciences) Within: Document Find whole words Find all word forms (lemma list): English
Sexuality	Text Search & Autocode - ALL: sexuality (intercourse, erotica, lust, desire, copulation, arousal, eroticism, passion, expression, lechery, carnality, characteristics, sex, attributes, libido, identity, orientation, attraction, gender, sensuality, intimacy, preference, pornography) Within: Document Find all word forms (lemma list): English

Appendix C

Consolidated table containing segments retrieved by Complex Coding Query with assigned parent provisions and policy areas

Document name	Code	Segment	Unit within the Legislation	Regulated policy area by the Unit
Bulgaria 2024 Amendment Pre-school and School Education Act	Education + Sexuality	(3) (New, SG No. 34 of 2022) In the system of pre-school and school education, ideologies, doctrines and systems of views and ideas shall be studied in order to achieve the objectives referred to in Article 5, to form national self-esteem, patriotic spirit and patriotism in children and pupils, and in compliance with the State educational standards and curricula.	Amendment on the Pre-School and School Education Act	Education
Hungary Act LXXIX of 2021	Media + Sexuality	"Section 6/A For ensuring the fulfilment of the objectives set out in this Act and the implementation of the rights of the child, it is forbidden to make accessible to persons who have not attained the age of eighteen years content that is pornographic or that depicts sexuality in a gratuitous manner or that propagates or portrays divergence from self-identity corresponding to sex at birth, sex change or homosexuality."	1. Amendment to Act XXXI of 1997 on the protection of children and guardianship	Child protection/family law

Hungary Act LXXIX of 2021	Media + Sexuality	c) verify data at the request of entitled persons,	4. Amendment of Act XLVII of 2009 on the criminal records system, the registry of judgments against Hungarian citizens passed by courts of Member States of the European Union, and the recording of criminal and police biometric data	Criminal Records (of persons committing sexual offenses against children)
Hungary Act LXXIX of 2021	Media + Sexuality	d) make the registered data of persons who have committed criminal offences against the freedom of sexual life and sexual morality against children available to entitled persons, or	4. Amendment of Act XLVII of 2009 on the criminal records system, the registry of judgments against Hungarian citizens passed by courts of Member States of the European Union, and the recording of criminal and police biometric data	Criminal Records (of persons committing sexual offenses against children)
Hungary Act LXXIX of 2021	Media + Sexuality	e) transfers data by automatic data transfer	4. Amendment of Act XLVII of 2009 on the criminal records system, the registry of judgments against Hungarian citizens passed by courts of Member States of the European Union, and the recording of criminal and police biometric data	Criminal Records (of persons committing sexual offenses against children)
Hungary Act LXXIX of 2021	Media + Sexuality	Section 5 In Chapter V of the Bnyt., after the subtitle “Certificate of criminal record”, the following subtitle “Making available data of persons who have committed criminal offences against the freedom of sexual life and sexual morality against children” shall be added:	4. Amendment of Act XLVII of 2009 on the criminal records system, the registry of judgments against Hungarian citizens passed by courts of Member States of the European Union, and the recording of criminal and police biometric data	Criminal Records (of persons committing sexual offenses against children)

Hungary Act LXXIX of 2021	Media + Sexuality	“Making available data of persons who have committed criminal offences against the freedom of sexual life and sexual morality against children	4. Amendment of Act XLVII of 2009 on the criminal records system, the registry of judgments against Hungarian citizens passed by courts of Member States of the European Union, and the recording of criminal and police biometric data	Criminal Records (of persons committing sexual offenses against children)
Hungary Act LXXIX of 2021	Media + Sexuality	Section 75/B (1) For monitoring persons in direct contact with children to ensure the protection of children and prevent the commission of criminal offences against the freedom of sexual life and sexual morality against or by exploiting children, the organ maintaining criminal records shall make, subject to the conditions set out in paragraphs (2) to (3) and section 75/C, the following data relating to the data subject available on the electronic platform (hereinafter “platform”) set up in accordance with the Act on the general rules on	4. Amendment of Act XLVII of 2009 on the criminal records system, the registry of judgments against Hungarian citizens passed by courts of Member States of the European Union, and the recording of criminal and police biometric data	Criminal Records (of persons committing sexual offenses against children)
Hungary Act LXXIX of 2021	Media + Sexuality	b) the data is related to	4. Amendment of Act XLVII of 2009 on the criminal records system, the registry of judgments against Hungarian citizens passed by courts of Member States of the European Union, and the recording of criminal and police biometric data	Criminal Records (of persons committing sexual offenses against children)

Hungary Act LXXIX of 2021	Media + Sexuality	ba) the commission of forced intercourse [section 197 (2) a) and (3) of Act IV of 1978], sexual assault [section 198 (2) a) and (3) of Act IV of 1978], corrupting a child [sections 201 to 202/A of Act IV of 1978], abuse of illegal pornographic material (section 204 of Act IV of 1978), promoting prostitution [section 205 (3) a) of Act IV of 1978], sexual coercion [section 196 (2) a) and (3) of the Btk.], sexual violence (section 198 of the Btk.), procuring [section 200 (2), (3a) b) and (4) a) of the Btk.], facilitating prostitution [section 201 (1) c), (2) and (4) b) of the Btk., as in force on 30 June 2020], exploitation of child prostitution (section 203 of the Btk.), child pornography (sections 204 to 204/A of the Btk.), indecent exposure [section 205 (2) of the Btk.], as in force on 30 June 2020, or	4. Amendment of Act XLVII of 2009 on the criminal records system, the registry of judgments against Hungarian citizens passed by courts of Member States of the European Union, and the recording of criminal and police biometric data	Criminal Records (of persons committing sexual offenses against children)
Hungary Act LXXIX of 2021	Media + Sexuality	bb) the permanent disqualification from a profession under section 52 (3) of the Btk. imposed on the data subject, and	4. Amendment of Act XLVII of 2009 on the criminal records system, the registry of judgments against Hungarian citizens passed by courts of Member States of the European Union, and the recording of criminal and police biometric data	Criminal Records (of persons committing sexual offenses against children)

Hungary Act LXXIX of 2021	Education + Sexuality / Media + Sexuality	“(6) Programmes shall be classified into category V if they are capable of exerting negative influence on the physical, mental or moral development of minors, in particular as a result of having as their central element violence, propagation or portrayal of divergence from self-identity corresponding to sex at birth, sex change or homosexuality or direct, naturalistic or gratuitous depiction of sexuality. These programmes shall be rated as follows: not appropriate for audiences under the age of eighteen.”	5. Amendment to Act CLXXXV of 2010 on media services and mass communication (Hungary Act LXXIX of 2021, Pos. 90)	Audiovisual Media / classification / supervision
Hungary Act LXXIX of 2021	Education + Sexuality / Media + Sexuality	“(4a) Programmes shall not qualify as public service announcements and community facility advertisements if they are capable of exerting negative influence on the appropriate physical, mental or moral development of minors, in particular as a result of having as their central element gratuitous depiction of sexuality, pornography, propagation or portrayal of divergence from self-identity corresponding to sex at birth, sex change or homosexuality.”	5. Amendment to Act CLXXXV of 2010 on media services and mass communication (Hungary Act LXXIX of 2021, Pos. 90)	Audiovisual Media / classification / supervision

Hungary Act LXXIX of 2021	Media + Sexuality	“Section 5/A For the protection of the objectives set out in this Act and of children, it shall be forbidden to make accessible to persons who have not attained the age of eighteen years content that is pornographic or that depicts sexuality in a gratuitous manner or that propagates or portrays divergence from self-identity corresponding to sex at birth, sex change or homosexuality.”	6. Amendment to Act CCXI of 2011 on the protection of families (Hungary Act LXXIX of 2021, Pos. 102)	Child protection/family law (children's access to media content)
Hungary Act LXXIX of 2021	Education + Sexuality	7. Amendment to Act CXC of 2011 on national public upbringing	7. Amendment to Act CXC of 2011 on national public upbringing	Education
Hungary Act LXXIX of 2021	Education + Sexuality	Section 11 (1) In section 9 of Act CXC of 2011 on national public upbringing (hereinafter the “Nktv.”), the following paragraph (12) shall be added:	7. Amendment to Act CXC of 2011 on national public upbringing	Education
Hungary Act LXXIX of 2021	Education + Sexuality / Media + Sexuality	“(12) In the conduct of activities concerning sexual culture, sex, sexual orientation and sexual development, special attention shall be paid to the provisions of Article XVI (1) of the Fundamental Law. Such activities cannot be aimed at the propagation of divergence from self-identity corresponding to sex at birth, sex change or homosexuality.”	7. Amendment to Act CXC of 2011 on national public upbringing	Education

Hungary Act LXXIX of 2021	Education + Sexuality / Media + Sexuality	“Section 9/A (1) A person or organisation other than an employee employed as a teacher by an educational and upbringing institution, a professional providing school health services in such an institution and a state organ party to a cooperation agreement concluded with such an institution may conduct an activity in class or organised otherwise for students relating to sexual culture, sex, sexual orientation, sexual development, the adverse effects of drug consumption, the dangers of the Internet, and any form of physical or mental health development (for the purposes of this section, hereinafter the “programme”) only if he is registered by the organ designated by law.	7. Amendment to Act CXC of 2011 on national public upbringing	Education
Hungary Act LXXIX of 2021	Education + Sexuality / Media + Sexuality	(2) Data in the register under paragraph (1) shall qualify as data accessible on public interest grounds that shall be published on the website of the organ designated by law to keep the register under paragraph (1).	7. Amendment to Act CXC of 2011 on national public upbringing	Education

Hungary Act LXXIX of 2021	Media + Sexuality	aa) homicide [section 166 (2) i) of Act IV of 1978 on the Criminal Code (hereinafter "Act IV of 1978")], participating in suicide (section 168 (2) of Act IV of 1978), violation of personal freedom (section 175 (3) e) of Act IV of 1978), trafficking in human beings (section 175B (2) a) and (5) of Act IV of 1978), altering family status (section 193 (2) b) of Act IV of 1978), endangering a minor (section 195 (1) to (3) of Act IV of 1978), forced intercourse (section 197 (2) a) and (3) of Act IV of 1978), sexual assault (section 198 (2) a) and (3) of Act IV of 1978), corrupting a child (sections 201 to 202/A of Act IV of 1978), abuse of illegal pornographic material (section 204 of Act IV of 1978), promoting prostitution (section 205 (3) a) of Act IV of 1978), abuse of drugs (section 282/B (1), (2) a) and c) and section 282/B (5) and (7) a) of Act IV of 1978), as in force on 30 June 2013,	8. Amendment to Act I of 2012 on the Labour Code	Employment (child-facing occupations)
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Hungary Act LXXIX of 2021	Education + Sexuality	“(3) The perpetrator of a criminal offence against the freedom of sexual life and sexual morality who committed the criminal offence against a person who has not attained the age of eighteen years, and the perpetrator of the criminal offence of child pornography shall be disqualified permanently from exercising any profession or performing any other activity that involves the education, supervision, care, or medical treatment of a person who has not attained the age of eighteen years, or in the context of which he is in a position of power or influence towards a person who has not attained the age of eighteen years.”	10. Amendment to Act C of 2012 on the Criminal Code (Hungary Act LXXIX of 2021, Pos. 162)	Criminal Law (sexual offences against minors/child pornography)
Hungary Act LXXIX of 2021	Media + Sexuality	(7) A person who invites one or more persons who have attained the age of fourteen years but have not attained the age of eighteen years to participate in a pornographic recording is guilty of a felony and shall be punished by imprisonment for up to three years, provided that none of the circumstances listed under paragraph (2) b) to e) exists.	10. Amendment to Act C of 2012 on the Criminal Code (Hungary Act LXXIX of 2021, Pos. 162)	Criminal Law (sexual offences against minors/child pornography)

Hungary Act LXXIX of 2021	Media + Sexuality	(8) For the purposes of this section, pornographic recording means the depiction of one or more persons in a grossly indecent manner for the purpose of arousing sexual desire, including the life-like depiction of a non-existent person or persons.	10. Amendment to Act C of 2012 on the Criminal Code (Hungary Act LXXIX of 2021, Pos. 162)	Criminal Law (sexual offences against minors/child pornography)
Hungary Act LXXIX of 2021	Media + Sexuality	a) is subject to a criminal proceeding for homicide (section 166 (2) i) of Act IV of 1978), participating in suicide (section 168 (2) of Act IV of 1978), violation of personal freedom (section 175 (3) e) of Act IV of 1978), trafficking in human beings (section 175B (2) a) and (5) of Act IV of 1978), altering family status (section 193 (2) b) of Act IV of 1978), endangering a minor (section 195 (1) to (3) of Act IV of 1978), forced intercourse (section 197 (2) a) and (3) of Act IV of 1978), sexual assault (section 198 (2) a) and (3) of Act IV of 1978), corrupting a child (sections 201 to 202/A of Act IV of 1978), abuse of illegal pornographic material (section 204 of Act IV of 1978), promoting prostitution (section 205 (3) a) of Act IV of 1978), abuse of drugs (section 282/B (1), (2) a) and c) and section 282/B (5) and (7) a) of Act IV of 1978), as in force on 30 June 2013,	11. Amendment to Act CXXV of 2018 on government administration (Hungary Act LXXIX of 2021, Pos. 235)	Employment (government)

Russia Federal Law No 436 FZ of December 29 2010 on the Protection of Children	Education + Sexuality	7) information inflicting harm to the health and/or development of children - information (including that as part of information products for children) whose dissemination among children is either banned or restricted in accordance with this Federal Law;	Article 2. Basic Notions Used in This Federal Law	Definitions
Russia Federal Law No 436 FZ of December 29 2010 on the Protection of Children	Media + Sexuality	9) information products classification - distribution of information products by their topics, genre, content and artistic design according to the age of children in the procedure prescribed hereunder;	Article 2. Basic Notions Used in This Federal Law	Definitions
Russia Federal Law No 436 FZ of December 29 2010 on the Protection of Children	Education + Sexuality	3) information providing grounds and justification for the permissibility of violence and/or cruelty or encouraging to commit violent actions towards humans or animals, except for cases envisaged by this Federal Law;	Article 5. Types of Information Inflicting Harm to the Health and/or Development of Children	Content regulation / Child Protection (defines what content is banned or age-restricted for children)

Russia Federal Law No 436 FZ of December 29 2010 on the Protection of Children	Education + Sexuality	The information products for children who did not reach the age of six may include information products containing information not inflicting harm to the health and/or development of children (including information products containing incidental non-naturalistic pictures and/or description of physical and/or psychic violence (except for sexual violence) justified by the genre and/or subject-matter of same, on the condition of triumph of good over evil and manifestation of compassion for the victim of violence and/or denunciation of violence).	Article 7. Information Products for Children under Six (Russia Federal Law No 436 FZ of December 29 2010 on the Protection of Children, Pos. 79)	Age-specific content standards (under 6)
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Russia Federal Law No 436 FZ of December 29 2010 on the Protection of Children	Media + Sexuality	7.1. The organiser of the entertainment event (including the film exhibition in cinema and video viewing), through whom the information products containing information that is prohibited for distribution to children in accordance with Part 2 of Article 5 of this Federal Law, are displayed, must prevent persons under the age of 18 from attending such an event. In order to fulfill the specified responsibility, as well as in case of occurrence of distrust from the person directly involved in the sale of entrance tickets, invitations and other documents granting the right to attend the entertainment event (including the film exhibition in cinema and video viewing), through which the information products containing the information prohibited for distribution to children in accordance with Part 2 of Article 5 of this Federal Law, are displayed, or from the person controlling the passage to such entertainment event in the attainment of adulthood by a person who wants to buy an entrance ticket, to receive an invitation or other document granting the right to attend the entertainment event or to get on such entertainment event (hereinafter referred as the "visitor"), the person who directly implements the realisation of entrance tickets, invitations and other documents granting the right to attend the entertainment event or the person controlling the passage to such entertainment event has the right to demand the identity	Article 11. General Requirements to Circulation of Information Products (Russia Federal Law No 436 FZ of December 29 2010 on the Protection of Children, Pos. 99)	Distribution/access controls
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document from the visitor (including a document proving the identity of a foreign citizen or stateless person in the Russian Federation) and allowing to establish the age of such visitor, or verify information that allows the verification of the identity and age of that visitor when that visitor provides the information using a multifunctional information exchange service. The list of the relevant documents shall be established by the federal executive body authorised by the Government of the Russian Federation.

Russia Federal Law No 436 FZ of December 29 2010 on the Protection of Children	Media + Sexuality	7.2. The procedure and terms of attendance (permission) of children when carrying out entertainment events (including a film exhibition in cinema and video viewing) shall be determined by the local act of the organiser of the entertainment event, taking into account the provisions of Parts 3, 5 and 7.1 of this Article.	Article 11. General Requirements to Circulation of Information Products (Russia Federal Law No 436 FZ of December 29 2010 on the Protection of Children, Pos. 99)	Distribution/access controls
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Russia Federal Law No 436 FZ of December 29 2010 on the Protection of Children	Education + Sexuality	5. In order to inform the distributors of information products, the information on the organisations located within the boundaries of the municipal formation, specified in Part 3 of this Article (with the indication of their address, full name, company name (for commercial organisations)), shall be posted by the local government on its official website on the Internet, and in the absence of the technical ability to place this information on the official website of the local government on the Internet, this information shall be posted on the official website of the subject of the Russian Federation on the Internet, in which boundaries the relevant municipal formation is located. The procedure of placing the information on the organisations located within the boundaries of the municipal formation, specified in Part 3 of this Article, shall be established by the regulatory legal act of the supreme government organ of the subject of the Russian Federation in which boundaries the relevant municipal formation is located.	Article 16. Further Requirements for the Circulation of Information Products Banned for Children	Distribution/access controls (physical copies, libraries, schools)
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Russia Federal Law No 436 FZ of December 29 2010 on the Protection of Children	Media + Sexuality	6. The sale, release, lease, as well as issuance of information products from the collections of public libraries, containing information that is prohibited for distribution among children in accordance with Part 2 of Article 5 of this Federal Law, shall not be allowed to persons under the age of 18. If the seller or lessor, who directly implements the sale, release or lease of information products, containing information that is prohibited for distribution among children in accordance with Part 2 of Article 5 of this Federal Law, is not sure about the attainment of adulthood by a person, who wants to purchase, hire or take on lease the specified products, the seller or lessor has a right to demand an identity document (including a document certifying the identity of a foreign citizen or stateless person in the Russian Federation) from this person and allows to establish the age of this person, or verify information that allows the verification of the identity and age of that visitor when that visitor provides the information using a multifunctional information exchange service. The list of the relevant documents shall be established by the federal executive body authorised by the Government of the Russian Federation.	Article 16. Further Requirements for the Circulation of Information Products Banned for Children	Distribution/access controls (physical copies, libraries, schools)
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Russia Federal Law No 436 FZ of December 29 2010 on the Protection of Children	Education + Sexuality	5. As an expert or experts for conducting an expert examination of information products may act a person with higher professional education or with special knowledge, in particular in the area of pedagogics, development psychology, development physiology, child psychiatry, cultural studies, art criticism or art history, except for the following persons:	Article 17. The General Requirements for an Expert Examination of Information Products	Expert review / legal assessment
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