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Legal Regulatory Guide Russia

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Dear Readers,

In an era of rapid regulatory change, staying informed of the latest legislative changes is paramount for a business to succeed in Russia. We are pleased to present our Regulatory Guide for the first half of 2025, a comprehensive overview designed to help companies navigate the complex and shifting legal landscapes of the Russian Federation and the Eurasian Economic Union (EAEU).

This edition provides an insightful analysis of the most significant regulatory updates, which collectively evince a strategic push by the government to forge a more self-sufficient and consumer-centric market landscape with better oversight. The guide is structured to offer clarity on the developments in the fields of Technology, Media, and Telecommunications (TMT); Life Sciences and Pharmaceuticals; Consumer Goods; as well as General, Agricultural and Subsoil regulations. More specifically:

- The TMT sector is undergoing foundational changes with the establishment of a new regulatory framework for data centers, the allocation of 5G frequency bands, and a proposal for stringent new rules on the interception and categorization of critical infrastructure. These developments signal a concerted effort to assert sovereign control over digital assets and data flows (for more details, refer to the [TMT section¹](#)).
- Concurrently, the Life Sciences and Pharmaceuticals sector is experiencing a wave of reforms aimed at ensuring the availability of drugs and alignment with EAEU standards. Key updates include simplified registration procedures for deficit medicines, new rules for introducing drugs into civil circulation, and generous extensions for bringing documentation into EAEU compliance (for more details, refer to the [Life Sciences and Pharmaceuticals section²](#)).

¹ [TMT section](#)

² [Life Sciences and Pharmaceuticals section](#)

- For consumer-facing businesses, the Consumer Goods landscape is being reshaped by the expansion of the Chestny ZNAK digital labeling system to new product categories and a decisive strengthening of the linguistic requirements for commerce. Furthermore, escalated regulatory pressure on tobacco, energy drinks, and organic product labeling introduces new compliance burdens and necessitates strategic review (for more details, refer to the [Consumer Goods section³](#)).
- Meanwhile, developments in the General, Agricultural and Subsoil regulations highlight a dual trend of introducing more pro-business procedures for resolving regulatory violations while simultaneously imposing significantly harsher penalties, particularly regarding industrial safety and subsoil use. Updates in agricultural monitoring and audit procedures further augment the operational environment for these critical sectors (for more details, refer to the [General, Agricultural and Subsoil section⁴](#)).

Navigating this new regulatory terrain requires foresight and agility. We intend that this guide will empower you with foreknowledge of forthcoming obligations and the ability to refine your risk management strategies and successfully navigate your business through the demands of Russia's commercial environment as they evolve. We hope this analysis provides not only a summary of the new rules but a lens through which to clearly discern the strategic priorities that characterize the Russian market.



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³ [Consumer Goods section](#)

⁴ [General, Agricultural and Subsoil section](#)

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1 TMT



Regulatory framework for data centers in Russia

23 June 2025

On 23 June 2025, Federal Law No. 244-FZ dated 23 July 2025 “On Amendments to Articles 2 and 6 of the **Federal Law ‘On Telecommunications’ and Certain Legislative Acts of the Russian Federation**”⁵ was enacted, also known to the general public as the “Law on Data Centers”, as it establishes a general regulatory framework for data centers in Russia.

A “data center” is legally defined as “a set of buildings, sections of buildings, or premises, including a complex of engineering and technical support systems, united by a single purpose, i.e., designed and used to accommodate equipment for data processing and/or storage”.

The Law on Data Centers stipulates that the Russian telecommunications regulator (the Ministry of Digital Communications and Mass Media of the Russian Federation) will operate a register of data centers located in Russia (**The Register of Data Centers**). It is expected that detailed regulations for data centers in Russia will be developed by the Government of the Russian Federation, covering the following:

- (A) The procedure for the development and operation of The Register of Data Centers;
- (B) Specific requirements for data centers and their owners/operators;
- (C) Mandatory information security measures to be undertaken by the owners/operators of data centers.

Additionally, the Law on Data Centers specifically bans the placement of cryptocurrency mining equipment or engagement in cryptocurrency mining or a mining pool in data centers located in Russia included in the Register of Data Centers.



⁵ <http://publication.pravo.gov.ru/Document/View/0001202507230046>.

23 July 2025

The provisions of the Law on Data Centers Law above came into force on 23 July 2025.

On a separate note, some other amendments related to the regulation of data centers were made to the following federal laws of the Russian Federation on **telecommunications**⁶ and **public-private partnerships**⁷:

- (A) The composition and structure of the data centers should be determined during the urban planning stage for the development and construction of zones and settlements;
- (B) Data centers may be the objects of concessionary agreements;
- (C) Data centers may be the objects of public-private and municipal-private partnership agreements.

1 March 2026

These amendments will come into effect on 1 March 2026.

⁶ Federal Law No. 126-FZ, of 7 July 2003, "On Telecommunications";

⁷ Federal Law No. 115-FZ, of 21 July 2005, "On Concession Agreements" and Federal Law No. 224-FZ, of 13 July 2015, "On Public-Private Partnership, Municipal-Private Partnership in the Russian Federation and Amendments to Certain Legislative Acts of the Russian Federation".

New initiatives in the regulations on interception: obligations for aggregator owners and telecommunication services providers

There are currently two pending initiatives related to the lawful interception of certain regulated subjects in Russia – aggregator owners⁸ and telecommunication services providers⁹ – proposed by the Ministry of Digital Development, Communications and Mass Media of the Russian Federation (the **Russian Ministry of Digital Development**).

1. Proposed interception rules for aggregator owners

16 May 2025

On 16 May 2025, the Russian Ministry of Digital Development published the draft Decree of the Government of the Russian Federation “*On Establishing Rules for the Provision of Information to an Aggregator Owner Using a Unified System of Interdepartmental Electronic Interaction at the Request of an Authorized State Body Engaged in Operational Investigative Activities or Ensuring the Security of the Russian Federation*”¹⁰ on the Federal Portal of Draft Regulatory Legal Acts (the **Federal Portal**).

⁸ Under Russia’s Consumer Protection laws, the owner of the aggregator of information about goods/services (aggregator owner) is an organization, regardless of its organizational and legal form, or an individual entrepreneur, who is the owner of a computer program or the owners of a website or a website page on the Internet who provide consumers with the opportunity to simultaneously familiarize themselves with the seller’s (contractor’s) offer for a particular product (service), to conclude a purchase and sale agreement with the seller (contractor; a contract for the provision of paid services), as well as to make an advance payment for the specified product (service) by cash or money transfer to the aggregator owner.

⁹ Under Russian telecommunications laws, a telecommunication services provider is a legal entity or individual entrepreneur that provides communication services in accordance with an applicable license.



¹⁰ <https://regulation.gov.ru/Regulation/Npa/PublicView?npaID=156913>

The draft proposes a list of information that Russian enforcement authorities may request from aggregator owners. Such information, *inter alia*, includes the personal information of the user (phone number, email, passport details), information about changes in phone numbers, data on access to the platform (date, time, IP address, device and location data), information about goods/services, orders, tickets, payment methods, as well as photographic, video and audio materials obtained during registration and interaction with support.

This information is to be provided to law enforcement authorities through the unified interagency electronic interaction system as an electronic message. The deadline for the provision of information requested is no later than 24 hours, although the specific deadline may be specified in an official request.

2. Proposed interception rules for telecommunication service providers regarding subscriber data

30 April 2025

On 30 April 2025, the Russian Ministry of Digital Development published the draft Decree of the Government of the Russian Federation “*On Approval of the Rules for the Provision of Information by a Telecom Operator Using a Unified System of Interdepartmental Electronic Interaction at the Request of an Authorized State Body Engaged in Operational Investigative Activities or Ensuring the Security of the Russian Federation*” on the Federal Portal¹¹.

The draft proposes regulation for the provision of information on subscribers by telecommunication service providers upon request of Russian law enforcement authorities via the unified interagency electronic interaction system. The maximum deadline for the provision of such information is the same as that for aggregator owners – no later than 24 hours from the moment a request is received.



¹¹ <https://regulation.gov.ru/Regulation/Npa/PublicView?npaID=156656>

Under the proposed draft, law enforcement authorities may request various forms of (end-)subscriber data from telecommunication service providers, including personal information (name, date of birth, address, passport details) and details about the service provided (type, contract details, active status) that vary depending on whether the subscriber is an individual, legal entity, or identified by IMSI, ICCID, or network address.

Both drafts are currently at the regulatory-impact assessment stage.

Development of 5G in Russia: specific frequency bands have been allocated

30 June 2025

On 30 June 2025, during a routine meeting of the State Commission on Radio Frequencies (the SCRF), the latter decided to allocate the 4800–4990 MHz radio frequency band to the establishment of fifth-generation mobile communication networks (5G network) in Russia¹².

Based on this decision, the Ministry of Digital Development¹³, Communications and Mass Media of the Russian Federation (the Russian Ministry of Digital Development) was to pass a regulation on holding auctions of bandwidths in this range. The regulation shall specify the conditions and the starting price of the lots. This is expected to facilitate the introduction of innovative, high-speed communication services based on 5G technology.



¹² SCRF Protocol No. 25–81, of 30 June 2025 (available [here](#) in Russian only).



¹³ Order of The Ministry of Digital Development No. 646, of 29 July 2025, "On the Approval of the Decision to Hold Open Auctions for the Right to Obtain a License to Provide Telecommunications Services Using the Radio Frequency Spectrum (available [here](#) in Russian only).

29 July 2025

The corresponding regulation was adopted by the Russian Ministry of Digital Development on 29 July 2025. Two lots within the 4800–4990 MHz radio frequency band, with initial valuations of RUB 26.2 billion and 21.2 billion, have been put up for auction.

Each auction lot includes the right to obtain licenses for providing the following telecommunication services:

- (A) mobile radio telephone communication services;
- (B) data transmission services;
- (C) telematic services.

31 December 2025

The protocol on the results of the auction must be signed no later than 31 December 2025.

Auction winners shall be obligated to comply with the obligations specified in SCRF Protocol No. 25–81 dated 30 June 2025, including the obligation to provide 5G coverage to cities in Russia with a population exceeding one million residents and to use domestic base stations for building 5G networks.

Additionally, the winners undertake the commitment to fulfill a number of other conditions, including:

- (A) compliance with the schedule for providing communication coverage to cities with a population of over 1 million people, starting with 4 cities in 2026, to 16 cities in 2030;
- (B) compliance with the number of domestically produced base stations to be installed, from 2,000 units in 2026 to 25,000 units in 2030.

However, the position of the business community is that the 4800–4990 MHz band allocated is not optimal for the deployment of 5G networks. International best practice demonstrates the superior efficacy of frequencies ranging from 3.4 to 3.8 GHz – commonly referred to as the “golden band” – for 5G applications.

Proposal of specific rules for the categorization of critical information infrastructure facilities in the telecommunications sector

16 May 2025

On 16 May 2025, the Ministry of Digital Development, Communications and Mass Media of the Russian Federation (the **Russian Ministry of Digital Development**) published a draft regulation on approval of industry-specific features of categorization of critical information infrastructure (“**CII**”) facilities in the telecommunications sector¹⁴ on the Portal of Draft Regulatory Legal Acts (the “**Federal Portal**”). Public discussion of the draft was closed on 17 June 2025, and the document is currently at the regulatory-impact assessment stage.

17 June 2025

The general procedure for categorizing CII objects currently in use by Russian telecom providers is established by Decree of the Government of the Russian Federation No. 127, dated 8 February 2018, “On Approval of the Rules for Categorizing Critical Information Infrastructure Facilities of the Russian Federation, as well as the List of Indicators of Significance as Criteria for Critical Information Infrastructure Facilities of the Russian Federation and their Values”.

Under Federal Law No. 187-FZ, dated 26 July 2017, “On the Security of Critical Information Infrastructure of the Russian Federation” (the “**CII Law**”), CII facilities are defined as information systems, information and telecommunications networks, and the automated control systems of CII subjects. Moreover, CII subjects are government bodies, state institutions, Russian legal entities and/or individual entrepreneurs who, on the grounds of ownership, lease, or other legal basis, own information systems, information and telecommunications networks, and automated control systems operating in the fields of healthcare, science, transport, **telecommunications**,



¹⁴ <https://regulation.gov.ru/projects/156891>.

energy, state registration of property rights and transactions with it, the banking sector and other financial markets, the fuel and energy complex, and the atomic energy, defense, rocketry, space, mining, metallurgical, and chemical industries, as well as Russian legal entities and/or individual entrepreneurs who ensure interaction between these systems or networks. Therefore, telecom providers in Russia are regarded as CII subjects, and they are to comply with the obligations specified under the CII Law.

One such obligation is the categorization of the CII objects owned. This internal procedure includes establishing a categorization commission within the company, identifying critical processes related to the CII objects owned, compiling an inventory of CII objects, assigning a significance category to the CII objects, and submitting the results of this categorization to the **FSTEC**¹⁵.

Through this process, CII objects are to be classified as significant or non-significant. If a facility is deemed significant, it may be assigned to Category 1, 2, or 3. The composition of the mandatory organizational and technical security measures for CII facilities varies depending on the significance category assigned (Category 1 – maximum, Category 3 – minimum). If a CII facility is not considered significant, the additional security measures outlined in the CII Law do not apply.

The categorization procedure proposed specifically for the telecommunications sector includes industry-specific criteria for the significance of CII facilities and a procedure for calculating the values for the indicators of such criteria, taking the particularities of how each CII facility operates into account.

According to the draft, the following significance indicators apply to CII subjects in the telecommunications sector:

- (A) cessation or disruption of the operation of a telecommunications network – applies to all CII subjects;
- (B) cessation or disruption of the operation of a government agency in terms of non-fulfillment of its function (authority) – applies to CII subjects that have concluded a state contract with a government agency;
- (C) violation of the terms of an international treaty to which the Russian

¹⁵ *Federal Service for Technical and Export Control.*

Federation is party, disruption of negotiations or the planned signing of an international treaty to which the Russian Federation is or is to be party, assessed as per the given international treaty to which the Russian Federation is party – applicable to CII subjects that have concluded a contract for the provision of telecommunication services which stipulates international obligations on the part of the Russian Federation;

- (D) damage to the CII subject, assessed by a decrease in revenue – for CII subjects that are:
 - (i) state corporations, unitary enterprises, companies;
 - (ii) organizations with state participation;
 - (iii) strategic joint-stock companies or enterprises;
 - (iv) organizations that are part of the defense industrial complex.
- (E) damage to the budget of the Russian Federation, assessed by a decrease in payments (contributions) to the budget.

For each of the above significance indicators, the regulation stipulates a procedure for calculating the indicator values. It also includes the significance characteristics of CII facilities. To determine the significance category for each CII facility in the telecommunications sector:

- (A) the actual number of subscribers of the telecom provider is assessed, based on the number of subscribers served;
- (B) the scale of the consequences of IS attacks and IS incidents in the form of the disruption or cessation of the operation of the telecommunications network is assessed;
- (C) the actual subscriber capacity of the telecom provider is compared with the values provided for the indicator “cessation or disruption of the operation of the telecommunications network” in the list of indicators above.

If the draft regulation is approved and adopted, it will apply as the CII-facility categorization procedure specific to telecom providers in Russia.

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2

Life Sciences
and Pharmaceuticals

1

Streamlined state registration of medicines

1.1 A simplified procedure for the state registration of deficit medicines will remain in effect until the end of 2027

17 March 2025

Order of the Ministry of Health of Russia No. 128n, dated 17 March 2025, approved provisions regarding the interdepartmental commission for determining inventory shortage or the risk of inventory shortage of medicines due to sanctions against Russia.

The commission determines whether an inventory shortage exists, issues permits for the temporary use of unregistered medicines, permits their sale and use in packaging intended for other countries, and cancels previously issued permits if an inventory shortage is resolved.

The criteria for determining whether an inventory shortage of medicines exists, the composition of the commission, and the procedure for discussing proposals for determining whether an inventory shortage exists have been stipulated. The main stipulations of the document are valid until 31 December 2027, and certain other points, until the end of 2025.

31 December 2027

1.2 The government has allowed the import of unregistered medicines for development and scientific research

18 June 2025

According to Decree of the Government of the Russian Federation No. 913 of 18 June 2025, “On Amendments to Decree of the Government of the Russian Federation No. 853 of 1 June 2021”, the import of a specific batch of unregistered medicines is allowed for clinical trials, the registration and examination of medicines intended for circulation in Russia or on the common market of the Eurasian Economic Union (EAEU).

2

The procedure for introducing medicines into civil circulation has been updated

31 May 2025

In accordance with Decree of the Government of the Russian Federation No. 815, of 31 May 2025, “On the procedure for introducing medicines for medical use into civil circulation”, new rules have been approved for introducing medicines into civil circulation, including with respect to the submission of documents and information, issuance of test reports, conducting tests, issuing permits for introduction into circulation and reaching the decision to terminate civil circulation.

It also regulates the procedure for conducting remote studies of medicines.

3

The EEC Council extended the terms for bringing medicines registration certificates into compliance with the EAEU rules

22 May 2025

In accordance with Decision of the Council of the Eurasian Economic Commission (EEC) No. 34, of 22 May 2025, “On Amendments to the Decision of the Council of the Eurasian Economic Commission No. 78, of 3 November 2016”, medicines registration certificates issued before 31 December 2025, remain valid until their expiration after 31 December 2025 under the following conditions.

31 December 2025

For medicines registered under national rules, but with applications submitted to bring them into compliance with EAEU rules before 31 December 2025, the validity period of certificates is extended:

- by no more than 3 years for the reference state (from the date of application);
- by no more than 2 years for the states of recognition (from the date of application therein).

If the procedure of bringing into compliance is completed in the reference state before 31 December 2025, the certificates in the recognition states are extended for 2 years from December 31, 2025.

Applications for bringing the registration dossier into compliance with the EAEU rules must be submitted to the reference state by 31 December 2025.

In addition, instead of the EAEU GMP certificate, applicants can provide a package of supporting documents as per the obligation to pass inspection within 3 years of receiving the registration certificate.

4

From 1 September 2025, monitoring of the use of dietary supplements has been strengthened

7 June 2025

The specific regulations on the use of dietary supplements are stipulated in Federal Law No. 150-FZ of 7 June 2025 “On Amendments to Certain Legislative Acts of the Russian Federation”.

In accordance with the procedure established by the Russian Ministry of Health in agreement with Rospotrebnadzor, HPCs have the right to prescribe registered dietary supplements included in the list if there are indications for their use.

The list includes dietary supplements, including those produced in Russia, that meet the criteria of quality and effectiveness established by the Government of the Russian Federation as per the degree of impact on human health, as well as those of the technical regulations of the EAEU.

Moreover, it is prohibited to distribute any offer for the in-person or remote retail sale of dietary supplements, the retail sale of which is prohibited. Access restrictions are introduced to websites containing such information.

23 May 2025

In addition, Federal Law No. 120-FZ, of 23 May 2025, “On Amending Article 9 of the Federal Law ‘On the Fundamentals of State Regulation of Trade Activities in the Russian Federation’” prohibits the inclusion in contracts of conditions for the supply of dietary supplements that stipulate the supplier’s liability for:

- failure to deliver goods in excess of the quantity agreed upon by the parties;
 - partial fulfillment of the contract in an amount exceeding the agreed-upon indicators.
-

5

The EAEU introduces a single database on veterinary medicines

11 March 2025

In accordance with Order of the Board of the Eurasian Economic Commission No. 21, of 11 March 2025, the creation of a single database of veterinary medicines identified within the framework of state control within EAEU member states has been approved. The system will include data on high-quality, low-quality, falsified, and counterfeit veterinary medicines within EAEU member states.

6

The EEC Council banned the use of medicine names in cosmetics

29 November 2024

In accordance with the Decision of the EEC Council No. 114, of 29 November 2024, “On Amendments to the Technical Regulations of the Customs Union ‘On the Safety of Perfumery and Cosmetic Products’ (TR CU 009/2011)”, it is prohibited to use for cosmetics the name of, or a name confusingly similar to, the trade name of registered medicines or medical devices.

Moreover, the list of products to which the technical regulation does not apply has been expanded and the requirements for the packaging of oral hygiene products and family cosmetics have been tightened.

24 December 2025

This decision will enter into force on 24 December 2025; documents confirming that perfumery and cosmetic products conform to the technical regulation adopted before this date are valid until their expiration date.

A surreal architectural scene featuring a large, textured, light-colored wall with a prominent, glowing orange archway in the center. The wall is composed of many small, rectangular blocks, creating a stepped, terraced effect. Numerous shelves of varying heights are built into the wall, each holding a variety of small, colorful objects that resemble consumer goods, such as jars, boxes, and containers. The lighting is warm and golden, casting long shadows and highlighting the textures of the wall and the objects. A small figure of a person stands in the foreground, looking up at the archway, providing a sense of scale.

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3

Consumer Goods

Chestny ZNAK 2.0: Russia's Digital Labeling Regime Enters a New Phase

The first half of 2025 has marked a new phase in the evolution of Russia's national product traceability system, Chestny ZNAK. The scope of mandatory labeling has expanded significantly – encompassing new product categories, strengthening verification mechanisms, and requiring more detailed reporting from participants¹⁶. These regulatory shifts reflect the government's growing reliance on digital compliance tools to fight counterfeit goods, ensure tax transparency, and improve consumer safety. For businesses, however, these developments mean new compliance burdens, technical adaptations, and organizational costs.

The labeling rollout in 2025 targets both new product categories and technical upgrades for the existing ones. Some of the key additions are as follows:

1 March 2025

- Starting 1 March 2025, obligatory registration commences *inter alia* for groceries, cosmetics and household chemicals, auto chemicals, and antiseptics. This means that all participants in such turnover must apply for registration in the labeling system. Turnover participants need to fully set up the processes for ordering codes, applying them to goods, submitting reports on the applications, paying for codes, and putting them into circulation;
- From 1 March 2025, obligatory labelling comes into effect for, *inter alia*, light industrial products (12 new subcategories), pet food (wet), and medical gloves.



¹⁶ *Decree of the Government of the Russian Federation No. 249-r, of 7 February 2025, "On Amending the List of Certain Goods Subject to Mandatory Labeling with Identification Means, approved by Decree of the Government of the Russian Federation No. 792-r, of 28 April 2018".*

For many products, compliance is now linked to digital workflows:

- EDM (electronic document management) between supply-chain participants;
- VAA (volume and assortment accounting);
- Itemized tracking and retail write-offs through fiscal cash registers.

In 2025, businesses face not only a longer list of goods to be labeled but also a higher standard for technical precision and real-time integration. Chestny ZNAK is no longer a system for select industries — it is becoming a universal resource for B2B and B2C monitoring. Therefore, due consideration of the requirements above and ensuring compliance with them is now essential for foreign and Russian businesses operating in the Russian market.

Language Matters: Strengthening Consumer Protection through Linguistic Requirements in Russian Commerce

Over the past year, Russia has significantly expanded the scope of the linguistic obligations imposed on consumer-related businesses. What was once a matter of best practice is now evolving into a formal legal requirement, with language playing a central role in the protection of consumer rights. These developments form part of a broader regulatory trend aimed at strengthening transparency, accessibility, and accountability in B2C interactions — particularly in the e-commerce, retail, and service industries.

The obligation to provide essential information in Russian is rooted in Federal Law No. 2300–1, of 7 February 1992, “On the Protection of Consumer Rights” (**Consumer Protection Law**)¹⁷, which enshrines the right of consumers to receive accurate and comprehensible information in the Russian language. However, until recently, enforcement of this provision was relatively lenient, particularly in cases where foreign-language content was used for advertising or branding purposes.

The most significant legislative development in this area is the adoption of amendments to the Consumer Protection Law, set to enter into force on **1 March 2026**¹⁸. These amendments will make **the use of the Russian language mandatory** for all *non-promotional* public-facing content in consumer environments. This includes, but is not limited to:

1 March 2026

- Signage and display boards;
- Product labels and packaging;



¹⁷ *Law of the Russian Federation No. 2300–1, of 7 February 1992, “On Protection of Consumer Rights”.*



¹⁸ *Federal Law No. 168-FZ, of 24 June 2025, “On Amendments to Certain Legislative Acts of the Russian Federation”.*

- Price tags and menus;
- Service-related instructions and announcements.

Importantly, the new rules apply across all retail, hospitality, transportation, and service sectors. While companies may provide information in foreign languages or regional/state languages recognized under local legislation, such content must **not conflict with, or replace, the Russian-language original**, and must be equivalent in content and visibility. The amendments do not extend to **trademarks, company names, or service marks**. However, the regulatory guidance emphasizes that businesses must avoid the use of generic foreign marketing terms — such as *sale*, *fresh*, or *coffee* — without a Russian-language explanation. The objective is to eliminate ambiguous, foreignized advertising that may confuse or mislead Russian-speaking consumers.

To facilitate compliance, regulators plan to roll out an official **National Lexical Fund**, an authoritative government-run digital reference for correct Russian usage in commercial contexts. This is expected to become operational in **2027** and will serve as a linguistic compliance benchmark for both public and private sector entities.

An additional regulatory measure, introduced in parallel, prohibits the use of **Latin-script naming** in the marketing of **real estate projects** under development. Effective from the date of the law's entry into force, developers will be required to use the **Cyrillic script** for all project names used in promotional materials, including those targeting the co-investors and buyers of apartments in residential complexes. This rule will not apply retroactively to buildings commissioned prior to the effective date.

Taken together, these changes represent a decisive regulatory shift: use of the Russian language in commercial communications has become a **strict requirement**. Failure to comply with these linguistic standards may now trigger **regulatory investigations, administrative fines, or reputational exposure**.

Businesses operating in Russia — especially those engaged in multi-lingual branding, e-commerce, or cross-border retail — must undertake a thorough review of their **localization policies, contractual materials, and consumer interfaces** to ensure compliance.

Draft law on the transitional period for organic labelling

July 2025

In July 2025, the State Duma adopted, in the third reading¹⁹, **Draft Law No. 782666–8** “*On amendments to certain legislative acts of the Russian Federation*” (**Draft Law**) aimed at **clarifying the rules for labeling organic products**.

1 September 2025

At present, Russian legislation states that producers are free to use terms and designations such as “biodynamic,” “biological,” “ecological,” “environmentally friendly”, and “green” as well as prefixes and abbreviations such as “eco” and “bio”, on organic products before their expiration date in contravention of the requirements adopted if the products were put into circulation before 1 September 2025. This rule will come into force on 1 September 2025.

Thus, all the products labelled as organic or similar and put into circulation after 1 September 2025 must meet the **legal requirements for organic products**.

1 September 2030

The Draft Law suggests the adoption of a transitional grace period until 1 September 2030, within which all the products labelled as organic or similar may be released into circulation without complying with the numerous requirements for organic products stipulated by Articles 4 and 5 of Federal Law No. 280-FZ, of 3 August 2018, “On Organic Products”.

The Draft Law will allow producers of organic products to update their labelling within an extended period, easing the burden on the business.

¹⁹ Information is relevant as of 24 July 2025.

Escalating Regulatory Pressure on Tobacco Sales in Russia

In recent months, Russia has taken significant steps toward tightening regulatory oversight over the sale of tobacco and nicotine-containing products. These measures reflect a broader state policy aimed at reducing risks to public health, reinforcing market discipline, and curbing youth access to harmful goods. From increasing fines to introducing licensing requirements, the legal landscape for tobacco retailers is becoming progressively more restrictive. Below is an outline of key legislative developments that signal the state's resolve to impose more rigorous controls on the tobacco market.

1 September 2026

One of the clearest signs of this trend is the forthcoming **licensing regime for retail tobacco sales**. According to a draft law²⁰ prepared by the Ministry of Finance, starting from **1 September 2026**, businesses intending to sell tobacco or nicotine products will need to obtain a license from the regional authorities. Licenses will be issued for a period of up to 5 years, with applications accepted from **1 March 2026**.

1 March 2026

Accompanying the licensing requirement are **new state fees** (government duties) for obtaining these licenses. The Ministry of Finance has also proposed amendments to the Tax Code to introduce such duties for both wholesale and retail tobacco distribution²¹. These financial barriers will likely disincentivize unregulated market entry and ensure greater control over market participants.



²⁰ Draft Federal Law "On Amendments to the Federal Law 'On State Regulation of the Production and Circulation of Tobacco Products, Tobacco-Containing Products, Nicotine-Containing Products, and Raw Materials for the Production Thereof'"



²¹ Draft Federal Law "On Amendments to the Federal Law 'On State Regulation of the Production and Circulation of Tobacco Products, Tobacco-Containing Products, Nicotine-Containing Products, and Raw Materials for the Production Thereof'" (prepared by the Ministry of Finance of the Russian Federation, Project ID 02/04/05-25/00156762).

In a parallel effort, the Russian President has signed a **new federal law** introducing fines for violations of the statutory restrictions under the Federal Law “*On State Regulation of the Production and Circulation of Tobacco Products, Nicotine-Containing Products, and Raw Materials*”²². The amendments to the **Code of Administrative Offenses**²³ impose the following penalties:

- For **individual entrepreneurs**: fines between **RUB 20,000 and 30,000 (approx. USD 250–375)**, with **the confiscation of products, equipment, and raw materials**.
- For **legal entities**: fines from **RUB 100,000 to 150,000 (approx. USD 1,250–1,875)**, also with **mandatory confiscation**.

These sanctions apply to the following violations:

- **Turnover of unlabelled tobacco products;**
- **Sale without consumer packaging;**
- **Retail sale of nicotine raw materials;**
- **Production or sale of products without the submission of data to the state monitoring system.**

Previously, such violations were not punishable under administrative law, leaving a legal gap that this law aims to fill.



²² Federal Law No. 203-FZ, of 13 June 2023 (as amended on 28 December 2024), “*On State Regulation of the Production and Circulation of Tobacco Products, Tobacco-Containing Products, Nicotine-Containing Products, and Raw Materials for the Production Thereof*”.



²³ Federal Law No. 148-FZ, of 7 June 2025, “*On Amendments to Articles 14.67 and 23.1 of the Code of Administrative Offenses of the Russian Federation*”.

14 February 2025

A major development in **administrative enforcement** is the introduction of **higher fines** for violations related to tobacco sales²⁴. From **14 February 2025**, the fines for selling tobacco or nicotine products to minors have substantially increased. **Officials** face penalties between **RUB 500,000 and 700,000 (approx. USD 6,250–8,750)**, while **legal entities** may be fined from **RUB 1.5 million to 2 million (approx. USD 18,750–25,000)**. These penalties represent a substantial escalation from the previous thresholds and emphasize the seriousness with which the authorities regard the protection of minors.

1 September 2025

The same level of strictness applies to **hazardous gas-filled consumer products** such as lighters. From **1 September 2025**, selling such goods to minors will carry the same penalties as illegal tobacco sales²⁵. In parallel, from **23 May 2025**, sellers of these products are required to request official identification if they suspect a buyer is underage. The Ministry of Health has issued a **list of acceptable identity documents**, including domestic and foreign passports, driver's licenses, military IDs, and temporary ID cards²⁶.

23 May 2025

Further amendments to the Code of Administrative Offences propose **harsher fines for unlicensed retail sales** of tobacco and related products. For **first-time violations**, companies will face fines ranging from **RUB 90,000 to 120,000 (approx. USD 1,125–1,500)**, and for **repeat**



²⁴ *Federal Law No. 1-FZ, of 3 February 2025, "On Amendments to the Code of Administrative Offenses of the Russian Federation".*



²⁵ *Federal Law No. 2-FZ, of 3 February 2025, "On Amendments to Article 14.53 of the Code of Administrative Offenses of the Russian Federation".*



²⁶ *Order of the Ministry of Health of the Russian Federation No. 255n, of 25 April 2025, "On Approval of the List of Identity Documents Allowing for the Determination of the Age of a Person Purchasing Potentially Hazardous Household Gas-Containing Products".*

violations, up to **RUB 150,000 (approx. USD 1,875)**. Moreover, **repeat offenders** will not only face financial penalties but also risk the **confiscation of goods**, especially if the products are unmarked or sold without compliance with other legal restrictions.

Finally, the state is combating the **illegal circulation of tobacco and alcohol products that lack the proper labeling**. The proposed amendments increase the fines several times over, with **organizations liable for up to RUB 1.5 million (approx. USD 18,750)** and **officials up to RUB 500,000 (approx. USD 6,250)**²⁷. These measures seek to eliminate gray-market trade and ensure that all products in circulation meet the requirements for traceability and safety.

In sum, the first half of 2025 has witnessed a decisive regulatory pivot in Russia's approach to tobacco control. Through a combination of licensing, increased fines, enhanced ID-checking procedures, and broader administrative enforcement, the government is creating a legal environment in which noncompliance carries strict consequences. These initiatives reflect a clear policy shift — **Russia is systematically tightening its grip on the tobacco market**, aligning regulatory mechanisms with public health priorities and signaling that tobacco sales will no longer be treated with regulatory leniency.



²⁷ *Federal Law No. 1-FZ, of 3 February 2025, "On Amendments to the Code of Administrative Offenses of the Russian Federation".*

Protecting Minors: Russia Moves to Restrict Energy Drink Sales and Advertising

In 2025, Russian lawmakers and regulators made significant progress in their efforts to restrict access by minors to non-alcoholic energy and tonic beverages. These measures form part of a broader policy initiative to address public health concerns associated with excessive caffeine and stimulant intake among adolescents. The new restrictions, which apply to both online and offline sales, advertising, and identity verification procedures, collectively shift energy drinks into a regulatory category more closely aligned with tobacco and alcohol.

Amendments to the Code of Administrative Offenses have established direct liability for the sale of non-alcoholic energy drinks to minors²⁸. Legal entities found in violation of this restriction may now be fined up to RUB 500,000 (approx. USD 6,250). These provisions consolidate the pre-existing regional restrictions into a uniform federal regime, thereby establishing a nationwide compliance baseline for businesses engaged in the production and retail of such beverages.

1 September 2025

A draft regulation issued by the Ministry of Digital Development introduces mandatory biometric age verification for remote sales of energy drinks. From 1 September 2025, online vendors – including e-commerce platforms and automated parcel locker operators – will be required to verify the purchaser's age using Russia's Unified Biometric System (UBS), both at the time of purchase and at the moment of product delivery. If implemented, this would represent one of the first formal integrations of centralized biometric technologies into the everyday retail process for fast-moving consumer goods.

To facilitate the enforcement of age restrictions in traditional retail settings, the Ministry of Industry and Trade (Minpromtorg) has prepared an approved list of acceptable identity documents for presentation at the



²⁸ *Federal Law No. 149-FZ, of 7 June 2025, "On Amendments to the Code of Administrative Offenses of the Russian Federation".*

1 March 2025

point of sale. Effective 1 March 2025, sellers are permitted to verify age using Russian internal and foreign passports, military IDs, driver's licenses, temporary identification certificates, and, in the case of foreign nationals, international passports or analogous documents. This development aims to standardize compliance protocols and ensure operational clarity at physical points of sale.

A legislative initiative currently under consideration by the State Duma proposes mandatory health warnings in advertisements for non-alcoholic tonic drinks, including energy beverages. Should the draft be enacted, all relevant marketing materials will be required to include clearly visible health risk disclosures, echoing the established norms applied to alcohol and tobacco products. This measure is designed to address concerns regarding the promotion of energy drinks to youthful audiences and to prevent the minimization of the associated health risks in advertising content.

Collectively, these regulatory developments underscore a clear policy trajectory: non-alcoholic energy drinks are now subject to a layered compliance framework, which includes age verification obligations, content control standards, and advertising restrictions. Businesses operating in this segment — particularly online retailers and advertising service providers — must take proactive steps to align with the emerging legal requirements.

In light of the heightened focus on enforcement, companies should review their sales workflows, payment systems, user verification processes, and promotional strategies to ensure timely and comprehensive compliance. The evolving regulatory landscape confirms that energy drinks remain lawful consumer products; however, their accessibility is increasingly conditioned on strict procedural safeguards. Early compliance planning in 2025 is not only recommended — it is essential to mitigate legal and reputational risks.

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4

General, Agricultural
and Subsoil

Enactment of the procedural rules for entering into agreements with state authorities on the rectification of violations

31 May 2025

Prior legislation has introduced the possibility for an entity subject to state control, and in respect of which violations of the requirements have been identified, to enter into an agreement with a supervisory authority regarding the rectification of any violations of the requirements identified (**“Agreement”**). **Government Decree No. 829, of 31 May 2025**, “On the Approval of the Rules for Concluding, Amending, Prolonging, and Terminating Agreements on the Rectification of violations of the requirements identified” (the **Resolution**) **specifies the procedure for concluding and implementing** such Agreements.

Such an Agreement can be concluded specifically in the spheres of land control, environmental control, supervision of industrial safety, licensing control over the production of medicines, or energy supervision. Such an Agreement cannot be concluded on violations that threaten human life or health.

According to the Resolution, the following entities are eligible to enter into such an Agreement:

- state authorities,
- legal entities operating in sectors such as utilities, energy, telecommunications, transport, agriculture, and pharmaceuticals,
- city-forming enterprises,
- strategic enterprises,
- organizations included in the consolidated register of organizations of the military-industrial complex,
- legal entities if so instructed by the highest state authorities or regional authorities of the Russian Federation.

Procedure for Concluding such an Agreement

Organizations shall submit a petition to the Supervisory Authority to enter into such an Agreement. The deadline for submitting such a petition is 10 business days from the date of receiving the order. A decision to approve or reject the petition must be made within 15 business days. If the petition is approved, the regulated entity shall prepare a draft Agreement, which must be coordinated with the Supervisory Authority within 10 business days.

The Agreement must include:

- a list of the violations identified;
- a program for the rectification of the violations identified;
- the term for which the Agreement shall be in effect;
- the procedure and deadlines for submitting a petition for the amendment (prolongation) of the Agreement.

The term of the Agreement **may not exceed 3 years**. The signed Agreement enters into force upon approval by the Prosecutor's Office.

Thus, the state monitoring regime is gradually adopting a preventive attitude towards regulatory violations and establishing a pro-business atmosphere in the actions of the monitoring bodies.

New rules for auditing foreign laboratories: changes effective from 2025

Starting from 2025, new rules for the **audit of foreign laboratories conducting tests on plant-based products** imported into the Russian Federation, as well as **quarantine-regulated products (Audits)**, are coming into force. These audits are conducted by the Federal Service for Veterinary and Phytosanitary Surveillance (the **Supervisory Authority**) on the basis of the following regulations of the Ministry of Agriculture of the Russian Federation ("**Ministry**"):

15 May 2025

1. Ministry Order No. 335, of 15 May 2025, "On the Approval of the Procedure for Auditing Foreign Testing Laboratories (Centers) Conducting Laboratory Studies to Determine the Residual Levels of Active Substances of Pesticides and Agrochemicals in Plant-based products Intended for Import into the Russian Federation" (**Order No. 335**);
2. Ministry Order No. 337, of 15 May 2025, "On the Approval of the Procedure for Auditing Foreign Testing Laboratories (Centers) Conducting Laboratory Studies in the Field of Plant Quarantine Concerning Quarantine-regulated Products Intended for Import into the Russian Federation" (**Order No. 337**).

These changes are aimed at simplifying the auditing process and improving the effectiveness of seed quality control, which, in turn, should contribute to the strength of Russia's agricultural sector.

Key Changes:

A. New Grounds for Initiating an Audit

An audit may be initiated by the authorized body of a foreign state by submitting an application in free form together with the necessary documents (**Application**) to the Supervisory Authority. One of the key changes is the abolition of mandatory coordination with the competent authorities of the foreign country.

B. Deadlines and Decision-Making

Within 15 business days of receiving the Application and documents, the Supervisory Authority shall decide whether to conduct the audit and approve the audit program, select the form of the audit (on-site or remote), and set the dates for the audit. In the event of refusal, the reasons shall be substantiated and communicated to the applicant.

The audit period shall not exceed 15 business days from the start date.

C. Audit Results

Upon completion of the audit, an audit report shall be prepared within 7 business days. The report must be signed by all members of the audit team and sent to the laboratory and the authorized body of the foreign state.

D. Additions to the Federal State Information System “Grain” (FGIS “Grain”)

Alongside changes in the auditing and control procedures, the range of data required to be entered into the FGIS “Grain” has been expanded. The register of legal entities and entrepreneurs engaged in grain storage now requires information on the services provided, including grain processing. This will allow more precise tracking of all stages of grain handling and improve the transparency of recordkeeping.

Removal of Quarantine Zone Data from Public Access

24 June 2025

In June 2025, Federal Law No. 166-FZ, of 24 June 2025, “On Amendments to the Federal Law ‘On Plant Quarantine’” (the **Law**) was adopted, clarifying the procedure for granting access to information on the establishment of quarantine phytosanitary zones (**Quarantine Zones**) within the Russian Federation.

The Law stipulates that it is **no longer required to publish information on the establishment of Quarantine Zones in the public domain**. Previously, such disclosure was mandatory for the authorized federal executive authority.

According to the amendments stipulated in the Law, information on the establishment of Quarantine Zones is provided to individuals and legal entities whose activities involve quarantine-regulated products, and are therefore carried out within the Quarantine Zone, through the federal state information system for plant quarantine or sent as copies of the relevant decisions to the individuals and legal entities via the post or electronic communication. Such individuals and legal entities are entitled to receive information regarding the establishment of a Quarantine Zone, the introduction of a quarantine phytosanitary regime, and the removal of such a zone and the lifting of the corresponding regime.

Thus, the adopted law limits both access to information about Quarantine Zones and the dissemination of such information.

Recent positions of the Supreme Court of Russia on subsoil use

The Supreme Court of Russia issued a review of judicial practice for 2025, which contains the following positions in the field of subsoil use:

(A) Claims for liquidation and conservation can be brought against a subsoil user for up to 20 years.

The Subsoil Law does not regulate the period within which a claim for liquidation and conservation can be filed. The Supreme Court determined that this does not mean that claims may be filed within an unlimited period.

The Supreme Court referred to the Law “On Environmental Protection”, which sets a 20-year limitation period for claims for compensation for damage caused to the environment. The Supreme Court determined that subsoil is part of the natural environment. Therefore, the 20-year period from the Law “On Environmental Protection” is to be applied to claims for conservation and liquidation.

(B) A lease agreement with a subsoil user may be terminated due to violations of the agreement, even though the user has a valid subsoil license.

According to Russian law, subsoil usage rights are to be obtained by the subsoil user separately from the subsoil license. In the meantime, the subsoil user has a preferential right to receive a land plot for lease without holding an auction. The subsurface usage right for the land arises from the moment of conclusion of the land lease agreement. Early termination of a land lease agreement concluded for a period of more than 5 years is possible only through a court in the event of a material breach of the lease agreement.

In a case considered by the Supreme Court, the lease agreement with a subsoil user was terminated due to non-payment of rent more than two subsequent times. The subsoil user challenged the termination of the lease agreement, but the Supreme Court ruled against. The Supreme Court noted that a lease agreement may be terminated in the event of a material breach, even though the lessee has a valid subsoil use license.

We consider that these new developments in Russian judicial practice should be taken into account by subsoil users active in the Russian market or considering entrance thereto.

Increased fines for the violation of industrial safety rules in coal mines from 1 September 2025

The fines for the violation of industrial safety requirements have long remained under RUB 1 million (approx. USD 12,500). However, the fines will soon increase significantly.

The law on the increasing fines (Federal Law No. 638-FZ) was adopted in 2023 due to an explosion at the Listvyazhnaya Coal Mine (in Kemerovo Region). The law will come into force on 1 September 2025.

1 September 2025

Key Changes:

(A) The law defines **a list of the most dangerous violations** of the industrial safety requirements in coal mines for which the fines will increase.

These violations pose a threat to human life and health: violation of the requirements for the prevention of sudden emissions of coal, the degassing and ventilation of mine works, implementation of aerogas control, sinking and fastening of mine works, and emergency protection in mine works during the mining of coal.

(B) The law introduces “**turnover fines**”, which have not previously been applied for violations of the industrial safety regulations. Rather than being fixed, turnover fines are calculated based on the company’s revenue. The minimum amount of a turnover fine is RUB15 million (approx. USD 187,500).

(C) The law introduces the term “**controlling organization**”. This is an organization that controls more than 50% of the votes or has the right to appoint the director or more than 50% of the members of the board of directors of the organization operating a mine. The most severe fines are imposed on the controlling organization.

More detailed information on new fines can be found in the table below:

*Violations**Fines (from 1 September 2025)*

-
- | | |
|---|---|
| <p>1. A violation listed among the most significant violations of the safety requirements.</p> | <p>For the organization operating the mine – a fine from RUB 1 to 5 million or the administrative suspension of activities for up to 90 days.</p> <p>For directors and other persons performing organizational and administrative functions in the organization operating the mine – a fine from RUB 80 to 100 thousand or disqualification for a period from 2 to 3 years.</p> |
| <p>2. A violation listed among the most significant violations of the safety requirements that resulted in the death of a person or resulted in serious harm to the health of two or more people.</p> | <p>For the controlling organization – a fine from RUB 5 to 10 million.</p> |
| <p>3. A violation from the list of the most significant violations of the safety requirements that resulted in the death of two or more people.</p> | <p>For the controlling organization – a turnover fine from 1/100 to 1/10 of the organization's revenue from the sale of coal mined at the mine where the accident occurred during the calendar year preceding the year in which the violation was discovered (in no case less than RUB 15 million).</p> |
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Taking the above into account, due compliance with the industrial safety rules becomes even more crucial for all owners of coal mines.

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***Note:** please be aware that all information provided in this letter is based on an analysis of publicly available information as well as our understanding and interpretation of legislation and law enforcement practices. Neither ALRUD Law Firm nor the authors of this letter bear any liability for the consequences of any decisions made in reliance upon this information.*

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