

ALRUD

[alrud.com](http://alrud.com)

Q3-Q4 2025

# Legal Regulatory Guide Russia



# Contents

**3** Introduction

**5** Chapter 1  
**TMT**

- 6 / New law limiting foreign research on Russia's commodity market enters into force on March 1, 2026
- 9 / New developments in Russia's telecom regulation: the labeling of telephone calls, a 24-hour cooling-off period for SIM cards and the exclusive use of domestically produced SIM cards
- 13 / New administrative fines on the advertisement and distribution of VPN services and searching for extremist materials

**15** Chapter 2  
**Life Sciences and Pharmaceuticals**

- 16 / Regulatory Changes at the EAEU Level
- 19 / Dietary Supplements: New Regulatory Measures

**22** Chapter 3  
**Consumer Goods**

- 23 / Development of the Honest Sign (Chestny ZNAK) System
- 25 / The list of substances prohibited in cosmetics and perfumes is to be extended
- 28 / Changes in tobacco turnover
- 32 / Utilization fee in Russia: new calculation rules effective from December 1, 2025

**35** Chapter 4  
**General, Agricultural and Subsoil**

- 36 / Formalization and Digitalization of State and Municipal Control
- 39 / New Environmental Fees: 2026–2030
- 41 / New Rules on Land Reclamation and Conservation
- 42 / Expanded Criteria for Mandatory Greenhouse Gas (GHG) Emissions Reporting
- 44 / Russia's Seed Import Policy for 2026

## Dear Readers,

Russia's regulatory environment maintained the rapid pace of its evolution throughout Q3–Q4 2025, with a wave of legislative changes coming into effect across various key industries. This guide provides a practical overview of the most significant developments affecting businesses operating in or with Russia, covering four core sectors: Technology, Media & Telecom (TMT); Life Sciences & Pharmaceuticals; Consumer Goods; and General Regulations.

- The TMT sector saw major shifts in digital oversight and national security regulation. A new law restricting foreign involvement in research on the commodity market enters into force on March 1, 2026, imposing strict ownership limits and data localization requirements on the organizers of such research. On the telecom side, mandatory call labeling for business entities came into effect on September 1, 2025. Additional measures include a 24-hour SIM card cooling-off period for users returning from international roaming and a draft regulation that would require telecom operators to use only domestically produced SIM cards by September 2026. New administrative fines for VPN advertising and distribution, as well as for deliberately accessing extremist content, also came into force in September 2025. [Please refer to the TMT section for more details.](#)
- The pharmaceutical and medical device sectors are currently navigating a major regulatory transition. The EAEU-wide shift to unified medicine registration standards concluded on December 31, 2025, with transitional rules now governing the existing national certificates. Updated GMP, GCP, and GLP standards aligned with the EAEU requirements take effect on March 1, 2026. For medical devices, the transition period regarding the national registration rules has been extended to the end of 2027, with full re-registration permitted until the end of 2028. The requirements for the labeling of dietary supplements have expanded, and Rospotrebnadzor no longer needs a court order to block websites selling prohibited supplements. The export ban on pharmaceuticals and medical devices has been extended to the end of 2027. [Please refer to the Life Science and Pharmaceutical section for more details.](#)
- As for the turnover of consumer goods, the coverage of the mandatory labeling system Chestny ZNAK expanded significantly in H2 2025, to include new product categories such as cosmetics, household chemicals, children's goods, and sports nutrition products. Several pilot programs are soon to conclude, likely transitioning to full mandatory status.

Regarding product safety, the EAEU has extended the list of substances prohibited in cosmetics, effective October 2026, and new obligatory formaldehyde labeling will apply from January 2027. A simplified regime for declarations of conformity for selected consumer goods has been extended to September 2026. Turnover of tobacco products saw major changes and new restrictions in Q3–Q4 2025 as well. [Please refer to the Consumer Goods section for more details.](#)

- Broader regulatory developments include the digitalization of state control mechanisms, updates to environmental fees and obligations on greenhouse gas reporting, new requirements for land reclamation, and revisions to seed and agricultural policies. These changes reflect a wider push toward a stricter compliance infrastructure and increased state oversight across all sectors. [Please refer to the General and Agriculture section for more details.](#)

The regulatory developments above require proactive planning to maintain compliance. Businesses should reassess the foreign ownership structures of their research operations, update their labeling and data localization systems, recalibrate the pricing for those vehicles facing higher fees, prepare for expanded environmental reporting obligations, and monitor pilot programs that are likely to become mandatory requirements. The increasing digitalization of state control creates both opportunities for efficiency and heightened risks of enforcement, making regulatory monitoring and timely adaptation critical to maintain market access in the region. We sincerely hope that this Guide will help our readers to better understand the key trends and navigate through recent regulatory changes.



### **Maxim Alekseyev**

*Senior Partner*

Head of Business Regulation (Regulatory), Private Clients and Tax practices

[MAlekseyev@alrud.com](mailto:MAlekseyev@alrud.com)



### **Boris Pribylov**

*Senior Associate*

Corporate/M&A, Business Regulation (Regulatory)

[BPribylov@alrud.com](mailto:BPribylov@alrud.com)



### **Dina Kravchenko**

*Senior Associate*

Corporate/M&A, Business Regulation (Regulatory), Financial Technology

[DKravchenko@alrud.com](mailto:DKravchenko@alrud.com)

ALRUD

1

TMT



## New law limiting foreign research on Russia's commodity market enters into force

1 March 2026

On March 1, 2026, certain amendments and additions to the Federal Law No. 381-FZ of December 28, 2009 “On the Basics of State Regulation on Trading Activities” come into force, aimed at overseeing research on the commodity market undertaken by foreign companies<sup>1</sup> (the “**Law**”).

The Law introduces a regulatory framework for those organizing research on the structure of commodity markets (“**Organizers**”).

Organizers are defined as “*Russian legal entities engaged in research on commodity markets as their main business activity, unless otherwise specified in an international treaty to which the Russian Federation is party*”. The Law is applicable to Organizers with a minimum annual revenue of RUB 800 million (approx. USD 10,389,824) for the preceding calendar year (individually or within their group of companies).

The business activity of researching commodity markets is distinctly defined as “*a business activity involving providing services for processing and (or) analyzing data on the structure of commodity markets in the Russian Federation*”.

In turn, data on the structure of commodity markets is defined as “*information on the level of supply and demand on commodity markets in the Russian Federation and (or) on the conditions of the circulation of goods on commodity markets, including information on the cost of goods, the volume of production, the import/export and sales of goods, generalized data on the consumers, producers and importers of goods, the conditions of the sale of goods and the principles for determining their prices, and other information on the commodity markets used to promote goods on such markets*”.

<sup>1</sup> Federal Law No. 351-FZ of July 31, 2025 «On Amending the Federal Law ‘On the Basics of State Regulation of Trading Activities in the Russian Federation’».

Under the Law, the following subjects are restricted from conducting regulated business activity involving research on product markets in Russia (unless otherwise stipulated by an international treaty to which the Russian Federation is party) (“**Restricted Subjects**”):

- a foreign state;
- an international organization;
- legal entities under the control of foreign states or international organizations;
- a foreign legal entity;
- a Russian legal entity with more than 20% of its authorized capital under foreign ownership;
- a foreign national;
- a stateless person;
- a Russian national with dual citizenship.

Additionally, any other forms of corporate control over the Organizers, whereby such control results in the ability of a Restricted Subject to directly or indirectly control the Organizer or to determine its decisions, either directly or through third parties are prohibited as well.

Organizers that do not comply with the restrictions on foreign control outlined herein shall dispose of the shares in their authorized capital held by foreign entities, where the value of such shares exceeds the permissible 20% threshold, in accordance with the procedures established by Article 238 of the Civil Code of the Russian Federation.

In addition to corporate control restrictions, Organizers in Russia shall comply with the following regulatory obligations:

- to ensure compliance with Russia’s data protection laws, laws on countersanctions information and other confidential information;
- to localize information received from market research in databases in the Russian Federation;
- to place the technical means used to conduct market research in the Russian Federation;
- to provide information and documents evincing the Organizer’s compliance with the requirements governing the organization and the lawful conduct of commodity market research activities to the authorized regulatory authority;

- to prevent the execution of the decisions of foreign states and (or) associations (unions) of foreign states on the imposition of restrictive measures (sanctions) on the Russian Federation, Russian nationals or Russian legal entities;
- neither to use unreliable data on the structure of the market in the Russian Federation nor to publish such information online.

Any transactions violating the Law shall be deemed null and void.

The monitoring of the Organizers' compliance with the applicable regulations is to be conducted by the authorized regulatory authority for the field of activity of said Organizers. Such an authorized body will be designated by the Government of the Russian Federation along with its procedure for monitoring compliance with the Law.

Currently, there is a draft governmental decree which proposes the Russian Ministry of Industry and Trade as such authorized regulatory authority<sup>2</sup>.

Meanwhile, the Law stipulates certain exemptions; it shall not cover market research activities:

- for internal purposes;
- under the request of state or municipal authorities or agencies;
- using governmental information systems.

<sup>2</sup> *Draft Decree of the Government of the Russian Federation "On Approval of the Procedure for Monitoring Compliance by the Organizers of Market Research with the Requirements for the Organization and Conduct of Market Research Activities, the List of Information and Documents Confirming Compliance by the Organizers of Market Research with the Requirements for the Organization and Conduct of Market Research Activities, and the Procedure for Their Submission to the Authorized Federal Executive Body for Conducting Such Monitoring", ID 160211.*

## **New developments in Russia’s telecom regulation: the labeling of telephone calls, a 24-hour cooling-off period for SIM cards and the exclusive use of domestically produced SIM cards**

We have prepared a summary of the key regulatory developments and initiatives in the Russian telecommunications sector, including the mandatory labeling of telephone calls, the introduction of a 24-hour cooling-off period for SIM card activation, and the requirement to use only domestically produced SIM cards, all aimed at strengthening national digital security and regulatory oversight.

### **1. The requirement to label telephone calls came into force**

*1 September 2025*

From September 1, 2025, the Russian telecom provider, from the network of which a telephone call is initiated, is obliged to transmit to the end-user’s device information about the subscriber – the legal entity or individual entrepreneur who initiated the telephone call – within the timeframes, procedures, scope, and format established by the Government of the Russian Federation<sup>3</sup>. In short, this obligation implies the mandatory labeling of telephone calls initiated by business entities in Russia.

The labeling of telephone calls is to contain the following information on the initiator of the outgoing call:

- the full or abbreviated name of the subscriber – the legal entity, or the indication of individual-entrepreneur status, the subscriber’s surname and initials, or the commercial designation of the subscriber;
- the category of telephone call.

The wording of the labeling cannot exceed 32 symbols, including digits and lowercase and uppercase letters of the Cyrillic or Latin alphabet.

<sup>3</sup> Art. 46 (9.1) *Federal Law No. 126-FZ of July 7, 2003 “On Communications”*; *Decree of the Government of the Russian Federation No. 1300 of August 28, 2025 “On Approval of the Rules for Transmission by a Telecommunications Operator, from the Network of Which a Telephone Call Is Initiated, to an End-User Device (Terminal Equipment) of Information About the Subscriber – the Legal Entity or Individual Entrepreneur Who Initiated the Telephone Call”*.

Such labeling is to be made as per an agreement between the company and the Russian telecom provider including the following mandatory provisions:

- the individual taxpayer identification number (INN) of the initiator of the telephone call;
- the full and abbreviated name of the subscriber – the legal entity, or the surname, first name, and patronymic (if any) of the subscriber – the individual entrepreneur;
- the commercial designation of the subscriber – the legal entity or individual entrepreneur (if applicable);
- the code and name of the main type of activity of the subscriber – the legal entity or individual entrepreneur, according to the All-Russian Classifier of Types of Economic Activities;
- the category of telephone call, determined as per the main type of activity of the initiator of the telephone call;
- the text to be displayed on the end-user’s device (terminal equipment);
- the list of the subscriber’s numbers from which telephone calls will be made.

Although the legal obligation and technical implementation of call labeling is assigned to the initiating telecom provider, private companies with a legal presence in Russia are required to enter into a labeling agreement with said telecom provider to enable the telephone call labeling mechanism.

## **2. Telecom providers in Russia are to provide a 24-hour cooling-off period for SIM cards due to national security considerations**

*10 November 2025*

Based on the information provided by the Russian Ministry of Digital Development and Communications, from November 10, 2025, users of SIM cards issued by Russian telecom providers are obliged to confirm that a SIM card brought into Russia from another country is being used by a natural person<sup>4</sup>. Until confirmation is provided, mobile internet and SMS services on such a SIM card are to be temporarily blocked.

<sup>4</sup> Information from the Russian Ministry of Digital Development and Communication dated November 10, 2025.

Simply put, for subscribers with Russian SIM cards, a 24-hour cooling-off period is applied if the SIM card has not been used for 72 hours after returning from international roaming. This mechanism was implemented by the request of the regulator due to national security considerations.

An alert on this restriction is to be sent via SMS from the telecom provider. The message is to include information on how to lift said restrictions. This can be done at any time by logging in with a CAPTCHA through a link sent by the telecom provider. Then, internet and SMS access will be restored. Alternatively, users can call the customer service center and lift the restrictions upon completing phone-based identity verification.

### 3. Telecom providers in Russia may be obliged to use domestically produced SIM cards

At present, the Russian Ministry of Digital Development and Communications has an initiative on the potential obligation of Russian telecom providers to exclusively use SIM cards produced domestically in Russia following Russian cryptography protocols. The draft regulation is disclosed on the Federal Portal of Draft Regulatory Acts (the “**Draft**”)<sup>5</sup>.

The Draft proposes technical requirements for Universal Subscriber Identity Modules (USIM) in mobile radio telephone networks (MRTS) and applies to the legal relations arising from the procurement of USIMs during the acquisition and operation thereof.

Specifically, the Draft stipulates that:

- USIMs must have a certificate confirming compliance with the Requirements for industrial products, established to classify products as manufactured in the Russian Federation, as approved by the Government of the Russian Federation Decree No. 719 of July 17, 2015, “On the Confirmation of Industrial Products Manufactured in the Russian Federation”;
- USIMs are subject to mandatory assessment of conformity with Russia’s telecom regulations through the submission of a declaration of conformity by the legal entity or individual entrepreneur regarding their telecommunications equipment;

<sup>5</sup> *Draft Order of the Russian Ministry of Digital Development and Communication “On Approval of the Requirements for the Use of Universal Subscriber Identification Modules in Mobile Radio Telephone Networks”, ID 162182.*

- The cryptographic keys stored in the USIM must be produced in the Russian Federation, as per the information security requirements established by the federal executive authority responsible for ensuring security.

According to public statements from the Russian Ministry of Digital Development and Communication, the use of USIMs purchased by telecom operators prior to the entry into force of the proposed regulation is not restricted in any way, until the complete exhaustion of operators' inventory. However, 5G networks are excepted, as the Russian Federal Security Service requires authentication in 5G networks to be performed using Russian cryptography, with keys generated by a Russian organization certified by the Russian Federal Security Service.

*1 September 2026*

Currently, the Draft is expected to come into the force on September 1, 2026, if duly approved.

## New administrative fines on the advertisement and distribution of VPN services and searching for extremist materials

*1 September 2025*

On September 1, 2025, a new law introducing administrative fines for the advertisement of VPN services and deliberate searching for extremist materials came into force<sup>6</sup> (the “**Law**”).

### 1. Administrative fines for deliberately searching for extremist materials

The Law introduces article 13.53 to the Russian Code of Administrative Offences establishing liability for intentionally searching the Internet for “knowingly extremist materials” included those in the relevant list, and for gaining access to such materials, including through the use of VPN services.

The administrative fines are only to be imposed upon natural persons, and are to amount from RUB 3,000 (approx. 38 USD) to RUB 5,000 (approx. USD 64).

Under Russian law, the federal list of extremist materials is established by the Russian Ministry of Justice as per the relevant judicial decisions<sup>7</sup>. At the same time, there is concern over the practical application of the new fines, specifically, the evidence of the user’s intent to search for content in the federal list of extremist materials, and how to distinguish it from an accidental search for such information.

It is worth noting that the current Russian regulations do not generally prohibit the use of VPN services, and the actual restrictions relate to the distribution and advertisement thereof.



*RUB 3 000–5 000  
administrative fine*

<sup>6</sup> Federal Law No. 281-FZ of July 31, 2025 “On Amendments to the Code of the Russian Federation on Administrative Offenses and Federal Law ‘On Amendments to the Code of the Russian Federation on Administrative Offenses’

<sup>7</sup> *Extremist materials.*

## 2. Administrative fines for advertising VPN services and violating the related restrictions

Currently, the advertisement of “software and hardware means of accessing information resources, information and telecommunication networks, access to which is restricted under the legislation of the Russian Federation” is generally prohibited in Russia<sup>8</sup>. Such restrictions target, inter alia, the advertisement of VPN services.

The Law introduces the following administrative fines for the advertisement of VPN services under article 14.3 of the Russian Code of Administrative Offences:

- from RUB 50,000 (approx. USD 648) to RUB 80,000 (approx. USD 1,036) for natural persons;
- from 80,000 RUB (approx. 1,036 USD) to 150,000 RUB (approx. 1,944 USD) for the company’s officials;
- from RUB 200,000 (approx. USD 2,596) to RUB 500,000 (approx. USD 6,480) for legal entities.

Additionally, the Law introduces the following administrative fines under article 13.25 of the Code of Administrative Offences of the Russian Federation for the distribution of VPN services in Russia:

<i>Description of the offence</i>	<i>Administrative fines</i>	<i>A repeat offence of the violations above</i>
Failure for owners of VPN services to comply with the established procedure for coordinating with Roskomnadzor <sup>9</sup>	From RUB 50,000 (approx. USD 648) and up to RUB 80,000 (approx. USD 1,036) for natural persons	From RUB 100,000 (approx. USD 1,295) and up to RUB 200,000 (approx. USD 2,596) for natural persons
Failure of the owners of VPN services to connect to the federal state information system for information resources and information and telecommunication networks, access to which is restricted	From RUB 80,000 (approx. USD 1,036) and up to RUB 150,000 (approx. USD 1,944) for the company’s officials	From RUB 200,000 (approx. USD 2,596) and up to RUB 300,000 (approx. USD 3,877) for the company’s officials
Failure to comply with the restrictions on providing VPN services in Russia	From RUB 200,000 (approx. USD 2,596) and up to RUB 500,000 (approx. USD 6,480) for legal entities	From RUB 800,000 (approx. USD 10,366) and up to RUB 1,000,000 (approx. USD 12,958) for legal entities

<sup>8</sup> Art. 5 (10.8) of Federal Law No. 38-FZ of March 13, 2006 “On Advertising”

ALRUD

# 2

Life Sciences  
and Pharmaceuticals

## Regulatory Changes at the EAEU Level

### 1. Regulations on Medicines

#### (A) End of the Transition Period to a Single Market for Medicines

*31 December 2025*

The transition to unified standards on the registration of medicines across the Eurasian Economic Union (EAEU) concluded on December 31, 2025.

In accordance with:

- (i) EAEU Council Decision No. 77 of September 12, 2025 (amending Decision No. 78 of November 3, 2016), and
- (ii) Letter No. 25-6/894 from the Russian Ministry of Health of January 29, 2026, the following rules apply:

#### *Situation*

Application for dossier adaptation submitted **before December 31, 2025**

Dossier adaptation **completed**

**Application not submitted by the end of 2025**

#### *Outcome*

National registration certificates are extended for up to **3 years** in each of the declared EAEU member states from the date of submission of the application to the reference state and additionally up to **2 years** in the recognizing EAEU member state from the date of submission of the application to the recognizing EAEU member state.

The application to the recognizing EAEU member state must be submitted no later than the expiry of a 3-year period starting on the date of submission of the application to the EAEU member state specified.

The applicant receives an EAEU certificate. Certificates issued under national rules receive EAEU status and **manufacturing and circulation on the market thereunder is permitted for 180 calendar days from completion** or before the respective product expiration date.

The product may be marketed up to the certificate's expiry date – **but no later than January 1, 2027**, if it had been in circulation for **at least 3 full calendar years as of December 1, 2025**.

#### (B) End of the Transition Period to a Single Market for Medicines

*26 November 2025*

The EAEU Council adopted **Decision No. 93 of November 26, 2025** on the amendments to the Rules for Registration and Examination of Medicines for Medical Use.

Key changes include:

- (i) clarified procedures for expert review and dossier evaluation
- (ii) harmonized requirements for registration dossiers

- (iii) introduction of the concept of **confidential data** to protect commercial information
- (iv) simplified processes for submitting amendments to dossiers
- (v) enhanced **transparency and predictability** of the registration process

These updates strengthen legal certainty and support faster market access for compliant products.

### (C) Implementation of Unified GMP, GCP, and GLP Standards

*1 March 2026*

From **March 1, 2026**, the following federal laws will take effect:

- (i) Federal Law No. 405-FZ of October 20, 2022
- (ii) Federal Law No. 304-FZ of July 31, 2025

These laws require that all pharmaceutical production (veterinary and medical) complies with EAEU GMP standards, as defined in EAEU Council Decision No. 77 of November 3, 2016.

GCP (Good Clinical Practice) rules were updated via Decision No. 79 of November 3, 2016, aligning them with international standards via:

- (i) the introduction of a risk-based approach
- (ii) clearer timelines for safety reporting
- (iii) a mandatory shift to electronic document management

*1 August 2025*

GLP (Good Laboratory Practice) procedures were harmonized through Decision No. 60 of August 1, 2025, establishing a uniform inspection process for compliance during registration, re-registration, and dossier updates.

## 2. Regulation of Medical Devices

### (C) Extended transition period to the end of 2028

*29 December 2025*

By the Protocol on Amendments to the Agreement on Uniform Principles and Rules for the Circulation of Medical Devices, signed in Moscow on December 29, 2025 ("**Protocol**" and "**Agreement**" respectively), EAEU member states agreed to amend Article 11 of the Agreement.

As a result:

- (i) Applications for registration under national rules may be submitted up to December 31, 2027 (previously: the end of 2025).
- (ii) Re-registration and document renewal may occur up to December 31, 2028 (previously: the end of 2026).

The Protocol will enter into force upon signature by all EAEU member states.

#### (D) New Medical Devices: Inclusion in the EAEU Nomenclature

Under EAEU Council Decision No. 50, of July 8, 2025, if a type of medical device is not listed in the EAEU Nomenclature, the authorized expert body (in the reference state) may initiate its inclusion provided that:

- (i) No objections are raised in the registration dossier, or
- (ii) Any outstanding comments have been resolved

*28 August 2025*

This procedure comes into effect 180 days after official publication (published: August 28, 2025 effective: February 24, 2026).

This enables faster market access for innovative or previously unclassified devices.

### 3. Data Exchange on Labeled Goods in the EAEU

*28 October 2025*

The EAEU Council adopted Decision No. 100 of October 28, 2025, establishing a unified digital infrastructure for exchanging data on labeled goods.

#### **Purpose:**

- (A) ensure the traceability, authenticity, and origin control of products
- (B) facilitate cross-border trade in medicines and medical devices
- (C) improve supply chain transparency

#### **Key Requirements:**

- (A) development of technical documentation
- (B) upgrading of national IT systems
- (C) full integration with the EAEU-wide data exchange platform within 9 months

This system will significantly reduce the risks of counterfeit and illegally distributed products.

---

## Dietary Supplements: New Regulatory Measures

### 1. Expanded Mandatory Labeling Requirements

*28 November 2025*

By Government Decree No. 1953, of November 28, 2025, the list of dietary supplements subject to mandatory labeling has been expanded.

Labeling becomes mandatory from March 1, 2026 for products registered under:

- (i) **EAEU HS Codes:** 1504 10 990 0, 3507 90 900 0
- (ii) **OKPD 2 Codes:** 10.41.12 (vegetable oils), 20.14.64 (enzymes)

Labeling codes must be transmitted to the monitoring system upon release into circulation and at all subsequent stages.

*Sales of Unlabeled Products: Grace Periods*

<i>Shelf Life</i>	<i>Permitted Sales Period Without Labeling</i>
Up to 3 years	Until August 31, 2026
Over 3 years	Until August 31, 2027

*1 March 2026*

Exceptions: dietary supplements from newly included categories manufactured or imported before 1 March 2026 can be sold without labeling until August 31, 2027; however, if customs clearance occurs after March 1, 2026, labeling is mandatory by March 31, 2026.

### 2. Rosпотrebnadzor's Authority to Block Websites

*2 October 2025*

Pursuant to Rosпотrebnadzor Order No. 768 of 1 November 2025, and Government Decree No. 1520 of October 2, 2025 (amending Decree No. 1101 of October 26, 2012), Rosпотrebnadzor now has the authority to block websites selling prohibited dietary supplements without a court decision, provided that:

- (A) the site offers retail sales (including online)
- (B) the product is legally prohibited from sale

This approach strengthens enforcement against illegal online distribution.

---

## Other Key Developments

### 1. Extension of the Export Ban on Pharmaceuticals and Medical Devices to 2027

*31 December 2027*  
*2 October 2025*

The Government of the Russian Federation extended the ban on the export of certain pharmaceutical products and medical devices until December 31, 2027 as per Decree of the Government of the Russian Federation No. 1516 of October 2, 2025 “On Amendments to Certain Acts of the Government of the Russian Federation”.

The restriction was originally introduced in March 2022 pursuant to Presidential Decree No. 100 of March 8, 2022, which approved a list of goods temporarily prohibited from export. The list includes medical and technological equipment, vehicles, agricultural machinery, as well as pharmaceutical products and medical devices classified under EAEU HS code 3006.

This measure was initially introduced in March 2022 under Presidential Decree No. 100 and has been renewed multiple times.

### 2. Extension of the Simplified Conformity Declaration Regime to September 2026

*1 September 2026*

The Ministry of Industry and Trade of the Russian Federation extended the simplified conformity declaration regime for certain consumer goods until September 1, 2026, via Order No. 4177 of 27 August 2025.

This regime applies to:

- (i) baby products (pacifiers, teats, rubber items)
- (ii) diapers and absorbent products
- (iii) manual and electric toothbrushes

Under this system, manufacturers and importers may confirm compliance based on self-assessment and internal documentation, without mandatory laboratory testing – a key advantage for time- and cost-sensitive operations.



3

Consumer goods

## Development of the Honest Sign (Chestny ZNAK) System

Throughout the second half of 2025, mandatory product labeling under the Chestny ZNAK system expanded significantly. The system of obligatory product tracing has been extended to new categories, strengthening oversight and enforcement against illegal trade practices.

### 1. Newly Mandated Product Categories (effective from 2025):

- instant brewed beverages
- certain types of sweets and confectionery
- building materials
- specific lubricants and special automotive fluids
- certain children’s goods
- light industry products
- cosmetics
- household chemicals and personal care products
- sports nutrition food products

### 2. Ongoing Pilot Experiments

The labeling pilot program continues for the following product categories, with implementation timelines as follows:

<i>Product Category</i>	<i>Experiment Expires</i>
Fiber-optic products	February 28, 2026
Heating devices	February 28, 2026
Certain alcoholic beverages (≤9% alcohol by volume)	August 31, 2026
Pyrotechnic products, fire extinguishers, and fire safety equipment	February 28, 2026
Certain vehicle components, internal combustion engine devices, and self-propelled vehicles	February 28, 2026
Certain household and interior goods	August 31, 2026
Grocery products: cereals, pasta, flour, dough mixtures, porridges, muesli, instant potatoes, honey	February 28, 2026

<i>Product Category</i>	<i>Experiment Expires</i>
Semi-finished and frozen products	August 31, 2026
Radio-electronic products	February 28, 2026
Certain cable and wire products	February 28, 2026
Certain medical devices	February 28, 2026
Certain polymer tube products and related production materials	February 28, 2026
Certain household, sanitary, and hygienic products and toiletries	August 31, 2026
Certain fertilizers	August 31, 2026
Certain meat products	February 28, 2026
Certain baby food products	October 31, 2026

**Note:** Established practice shows that successful pilot programs typically lead to the introduction of mandatory labeling.

Furthermore, the labelling rules were amended for fur products, caviar, clothes, shoes, tobacco, nicotine-containing products and food products.

### 3. Additional Legislative Developments

- **A Law on the Conversion of Confiscated Unlabeled Goods into State Revenue:** This law enables the state to convert seized unlabeled goods into revenue, increasing enforcement incentives.
- **Voluntary Country-of-Origin Disclosure:** Businesses may now voluntarily submit information on the country of origin to the monitoring system for labeled goods.
- **A Simplified Procedure for Major Regulatory Changes:** The new regulation allows for rapid adjustments to the labeling requirements based on pilot results – including expansion or narrowing of product categories – without mandatory transition periods. This introduces significant regulatory flexibility but also uncertainty.

At the same time, the drafts on the following initiatives deserve special attention:

- A. Automated Fines via the Chestny ZNAK System:** Proposal to automatically impose fines for selling expired goods or goods violating the pricing rules<sup>10</sup>;
- B. Granting Control Powers to the Chestny ZNAK Operator:** A suggestion to empower the system's operator with supervisory authority<sup>11</sup>.

These regulatory shifts reflect the government's growing reliance on digital compliance tools to eliminate counterfeit goods and improve consumer safety. However, they also impose new compliance obligations, technical adaptation costs, and organizational burdens on businesses.

## The list of substances prohibited in cosmetics and perfumes is to be extended

12 September 2025

The Council of the Eurasian Economic Commission (EEC) has adopted **Decision No. 74 of September 12, 2025**<sup>12</sup>, introducing amendments to the Technical Regulations of the Customs Union "**On the Safety of Perfume and Cosmetic Products**" (TR CU 009/2011)<sup>13</sup>. The Decision expands the list of substances prohibited in cosmetics and perfumery products, clarifies the rules for certain permitted and conditionally allowed ingredients, and introduces a new mandatory labelling requirement for formaldehyde. Most of these changes will take effect on October 28, 2026, while the formaldehyde labelling obligation will apply from January 1, 2027.

28 October 2026

<sup>10</sup> *Draft Law "On Amendments to the Code of the Russian Federation on Administrative Offenses".*

<sup>11</sup> *Draft Resolution "On amendments to certain acts of the Government of the Russian Federation on the monitoring of the manufacturers of goods subject to mandatory labeling by means of identification".*

<sup>12</sup> *Decision of the Council of the Eurasian Economic Commission No. 74 of September 12, 2025 "On amending the technical regulation of the Customs Union "On the safety of perfumery and cosmetic products" (TR TC 009/2011)".*

<sup>13</sup> *Decision of the Customs Union Commission dated No. 799 of September 23, 2011 "On the Adoption of the Technical Regulations of the Customs Union 'On the Safety of Perfume and Cosmetic Products'" (together with "TR CU 009/2011. Technical Regulations of the Customs Union. On the Safety of Perfume and Cosmetic Products").*

14

*new banned  
chemicals*

## Key Changes:

### 1. Expansion of Prohibited Substances

These amendments reflect the EAEU's ongoing efforts to align the cosmetic safety rules with updated chemical risk assessments and international regulatory trends. The list of banned substances has been extended to include 14 new chemicals, such as:

- Tetrafluoroethylene
- Thiamethoxam
- 3-Methylpyrazole
- Isobutyl methyl ketone (MIBK)
- Dimethomorph (ISO)
- Imazamox (ISO)

After the amendments take effect, any cosmetic or perfumery products containing these substances will no longer be allowed on the EAEU market.

### 2. Substances Permitted with Restrictions

Annex 2 of TR CU 009/2011 has been revised to include dozens of new entries, particularly related to hair dyes and similar compounds. The updated provisions specify:

- allowed uses
- maximum concentration limits
- conditions of application

Examples of the substances now explicitly subject to restricted use include p-phenylenediamine and its salts, and 1,4-Benzenediamine, 2-methyl-2,5-Diamino-toluene sulphate.

From a legal standpoint, the expanded and more detailed annexes make it essential for manufacturers and importers to ensure that the declared composition of their products fully aligns with the technical regulations, especially during conformity assessments, declarations of compliance, and other market-surveillance inspections.

### 3. A New Formaldehyde Labelling Requirement

*1 January 2027*

From January 1, 2027, cosmetic and perfumery products containing substances listed in Annex 2 that release formaldehyde must carry a warning label stating:

*“Contains formaldehyde”*

This requirement applies when the formaldehyde content exceeds 0.05%.

Failure to comply may result in administrative enforcement, including:

- product withdrawal and destruction
- suspension or prohibition of sales
- measures to remove non-compliant products from the EAEU market

Overall, Decision No. 74 represents a tightening of cosmetic safety regulations across the EAEU. By expanding the prohibited substances list, refining the rules for the conditionally allowed ingredients, and introducing stricter formaldehyde labelling requirements, the EEC is reinforcing its precautionary, compliance-focused approach. Companies operating in the cosmetics and perfumery sector will need to take these changes into account in their medium-term regulatory planning, especially considering their staggered entry into force between 2026 and 2027.

## Changes in tobacco turnover

The issues surrounding tobacco smoking and the consumption of other nicotine-containing products have consistently attracted close attention from the Russian state—particularly due to use by minors and the need to protect public health from exposure to secondhand smoke.

According to the *Concept for the Implementation of the State Policy on Combating the Consumption of Tobacco and Other Nicotine-Containing Products in the Russian Federation (up to 2035 and Beyond)*, the overarching goal is to reduce the prevalence of tobacco and nicotine use, with long-term consideration for phasing these products out of civil circulation.

In line with this policy, significant legislative changes have been introduced over the past six months across several key areas:

### 1. Restrictions on Turnover

- The list of locations where the retail sale of tobacco products, nicotine-containing products, hookahs, and nicotine consumption devices is prohibited has been expanded to include all public transportation stops in urban and suburban areas<sup>14</sup>.
- The Government has approved a list of potentially dangerous gas products that may not be sold to minors. It includes gas cylinders (including liquefied gas) used in portable appliances and for refilling cigarette or similar lighters<sup>15</sup>.
- From March 1, 2026, operators of websites or social media pages with daily audiences exceeding 500,000 users located within the Russian Federation must monitor their platforms for content offering the remote sale of:
  - (A) tobacco products,
  - (B) nicotine-containing products,
  - (C) hookahs,
  - (D) devices for consuming nicotine-containing products.

<sup>14</sup> *Federal Law No. 551-FZ of December 29, 2025 “On Amendments to Article 19 of the Federal Law “On protection of health of citizens from exposure to ambient tobacco smoke, the consequences of tobacco consumption or the consumption of nicotine-containing products”.*

<sup>15</sup> *Decree of the Government of the Russian Federation No. 2709-r of September 29, 2025 “On approval of the List of potentially dangerous gas-containing household goods”.*

- Any such content will trigger restrictions on access to the relevant websites <sup>16</sup>.
- The grounds for revoking a license for manufacturing or trading tobacco and nicotine products now include:
  - (A) production or trafficking of raw materials or raw nicotine materials,
  - (B) failure to report such activities to the state information system for monitoring goods subject to mandatory labeling <sup>17</sup>.

## 2. Manufacturing and Equipment Regulations

- A new decree has set reduced quotas for foreign workers across various economic sectors for 2026. In the tobacco sector:
  - (A) A complete ban (0%) on foreign workers applies to the retail sale of tobacco products in specialized stores (OKVED code 47.26) nationwide.
  - (B) Moscow is exempt, with a special quota of 15% allowed for this activity (Clause 38(e) of the Decree).
  - (C) Employers were required to comply with these limits by January 1, 2026 <sup>18</sup>.
- The state register of primary technological equipment for producing tobacco products, raw materials, nicotine-containing products, and nicotine raw materials has been expanded to include the types of products for which the equipment is used (e.g., specific tobacco items and nicotine products) <sup>19</sup>.

<sup>16</sup> *Federal Law No. 569-FZ of December 29, 2025 “On Amending the Federal Law “On Information, Information Technologies and Information Protection” and Certain Legislative Acts of the Russian Federation”.*

<sup>17</sup> *Decree of the Government of the Russian Federation No. 1198 of August 12, 2025 “On Amendments to the Decree of the Government of the Russian Federation No. 421 of April 3, 2024”.*

<sup>18</sup> *Decree of the Government of the Russian Federation No. 1995 of December 5, 2025 “On establishing the permissible share of foreign workers used by business entities carrying out certain types of economic activity on the territory of the Russian Federation for 2026”.*

<sup>19</sup> *Decree of the Government of the Russian Federation No. 2037 of December 15, 2025 “On amending certain acts of the Government of the Russian Federation”.*

- The standardized reporting forms, submission procedures, and requirements for toxicological studies on smokeless tobacco ingredients have been established <sup>20</sup>.

### 3. Excise taxes and the minimum price

- The excise taxes on tobacco products will be gradually increased over the next three years. For instance, the excise tax on cigarettes and papiroses will rise from RUB 3,278 per thousand pieces + 18% of the estimated cost (based on the maximum retail price), but no less than RUB 4,452 in 2026, to RUB 3,545 + 18%, but not less than RUB 4,815 in 2028 per thousand pieces <sup>21</sup>.
- The rules for determining the minimum price for tobacco products (excluding cigarettes and papiroses) upon their introduction into circulation, during circulation, and withdrawal from circulation, have been established with the exception of foreign trade transactions <sup>22</sup>.

### 4. State control and supervision

- The Ministry of Finance has expanded the list of risk indicators in the tobacco market. Two new risk indicators have been added to the list to enhance the effectiveness of federal state control (supervision) <sup>23</sup>.

<sup>20</sup> *Decree of the Government of the Russian Federation No. 1132 of July 30, 2025* “On approval of the form of the report on the composition of smokeless tobacco products, the rules for submitting the report on the composition of smokeless tobacco products, and the rules for submitting information on the results of toxicological studies regarding the ingredients of smokeless tobacco products”.

<sup>21</sup> *Federal Law No. 425-FZ of November 28, 2025* “On amendments to Parts 1 and 2 of the Tax Code of the Russian Federation, certain legislative acts of the Russian Federation and invalidation of legislative acts (certain provisions of legislative acts) of the Russian Federation”.

<sup>22</sup> *Decree of the Government of the Russian Federation No. 1282 of August 27, 2025* “On the procedure for determining the minimum price for tobacco products”.

<sup>23</sup> *Order of the Ministry of Finance of Russia No. 189n* “On amending the list of risk indicators for violations of the mandatory requirements in the exercise of federal state control (supervision) in the field of production and circulation of tobacco products, nicotine-containing products and raw materials for their production, approved by Order of the Ministry of Finance of the Russian Federation No. 87n of June 11, 2024” dated December 22, 2025.

- Amendments have been made to the procedure for federal state control (supervision) of the production and circulation of tobacco products, nicotine-containing products, and the raw materials for their production. In particular, the grounds and procedure for conducting preventive visits have been clarified, the possibility of conducting control (supervision) measures using tools for remote interaction, including via video conferencing, including using the mobile application Inspector, have been established, and the procedure and timeframes for considering complaints from the entities controlled have been adjusted<sup>24</sup>.
- Criminal liability has been established for the turnover of unlabeled nicotine-containing products in large sizes. This criminal act shall be punished by a fine of up to RUB 500,000 or of the wages or other income of the convicted person for up to 2 years, or compulsory labor for a term of up to 3 years, or deprivation of liberty for a term of up to 3 years with a fine of up to RUB 120,000 or of the wages or other income of the convicted person for up to 6 months. In addition, paragraphs 3 and 4 of Article 327.1 of the Criminal Code of the Russian Federation are extended to cases of manufacturing for the purpose of the sale and use of counterfeit means of identification for labeling nicotine-containing, alcohol or tobacco products<sup>25</sup>.

## 5. Proposed Changes

- licensing requirements for the following activities:
  - (i) purchase, storage, and supply of tobacco products, nicotine-containing products, raw materials, and raw nicotine materials,
  - (ii) retail sale of tobacco and nicotine products,
  - (iii) itinerant (mobile) trade of tobacco and nicotine products<sup>26</sup>.

<sup>24</sup> *Decree of the Government of the Russian Federation No. 1402 of September 11, 2025 "On Amending Certain Acts of the Government of the Russian Federation"*.

<sup>25</sup> *Federal Law No. 234-FZ of July 23, 2025 "On Amendments to Articles 171.1 and 327.1 of the Criminal Code of the Russian Federation"*.

<sup>26</sup> *Draft Federal Law "On Amending the Federal Law 'On State Regulation of the Production and Turnover of Tobacco Products, Tobacco Products, Nicotine-Containing Products and the Raw Materials for Their Production' and Article 44 of the Federal Law 'On the General Principles of the Organization of Public Power in the Subjects of the Russian Federation'"*.

- a complete ban on:
  - (iv) wholesale and retail sales of nicotine-containing and nicotine-free (vape) liquids,
  - (v) sales of all devices for consuming nicotine-containing products (including vapes)<sup>27</sup>.
- mandatory digital labeling for electronic cigarettes and similar reusable, individual electrical vaporizing devices used for nicotine consumption<sup>28</sup>.

The Russian Federation is undertaking significant changes to its regulatory framework for tobacco and nicotine. These changes reflect a strong policy shift toward stricter control, enhanced monitoring, and long-term public health protection—signaling a significant evolution in the legal and operational landscape for the sector.

## Utilization fee in Russia: new calculation rules effective

*1 December 2025*

*1 November 2025*

From December 1, 2025, Russia is applying revised rules for calculating the utilization (recycling) fee for passenger vehicles (category M1). This reform was established by Government Decree No. 1713 of November 1, 2025 and introduced power-based differentiation into the coefficient calculation, which significantly alters the financial burden on vehicle manufacturers and importers. It is expected to impact pricing strategies, market positioning, and commercial viability — particularly for high-performance vehicles, electric vehicles (EVs), and hybrids.

<sup>27</sup> Draft Federal Law “On Amending the Federal Law “On Protecting the Health of Citizens from the Effects of Secondhand Tobacco Smoke, the Consequences of Tobacco Consumption or the Consumption of Nicotine-Containing Products” and Article 6 of the Federal Law “On State Regulation of the Production and Turnover of Tobacco Products, Nicotine-Containing Products and the Raw Materials for Their Production”.

<sup>28</sup> Draft Decree of the Government of the Russian Federation “On Amending Decree No. 224 of February 28, 2019 of the Government of the Russian Federation”.

The utilization fee is a mandatory payment imposed on manufacturers and importers of vehicles put on the Russian market. It is designed to fund the future recycling and disposal of end-of-life vehicles. In practice, the fee mainly affects imported vehicles and has long served as a regulatory tool influencing market access, competitiveness, and cost structures for foreign automotive companies operating in Russia.

Under the new rules, the base rate remains at RUB 20,000 per vehicle. However, the method for determining the applicable coefficient has been substantially modified. Previously, the coefficient was based mainly on **engine displacement and vehicle age**. From December 1, 2025, **engine power** (in kilowatts) **becomes an additional and decisive factor**.

The power brackets are defined in increments of approximately 22.07 kW (around 30 horsepower), with the highest bracket applying to vehicles with power exceeding 367.76 kW (approximately 500 horsepower). As a transitional measure, until the official declaration form is updated, the Federal Tax Service of Russia (FTS) has clarified that engine power in kilowatts must be reported in Line 120 (“Gross weight”) of Section 3 of the declaration form approved by the Order of the Federal Tax Service of Russia<sup>29</sup>.

The practical impact of the reform varies significantly by vehicle type:

- **vehicles with low displacement and low power:** the fee remains largely unchanged.
- **vehicles with high displacement and high power** experience a moderate increase.
- **high-power, low-displacement vehicles** (e.g., modern performance models) face the most substantial increase, as power now carries greater weight in the calculation.

A particularly significant change applies to **electric and hybrid vehicles**. Under the previous system, a uniform coefficient of 33.37 applied regardless of power output. The new rules introduce a tiered approach: vehicles with power **from 205.95 kW upward are subject to a coefficient of 152**.

This results in a dramatic increase in the fee:

- previously: RUB 20,000 × 33.37 = RUB 667,400
- from December 2025: RUB 20,000 × 152 = RUB 3,040,000

<sup>29</sup> Order of the Federal Tax Service of Russia No. ED-7-3/1044@ of December 1, 2021 “On Approval of the Form and Format for the Electronic Submission of the Calculation of the Utilization Fee in Respect of Wheeled Vehicles (Chassis) and/or Trailers Thereto”.

This represents a **more than fourfold increase in the utilization fee for high-power EVs and hybrids.**

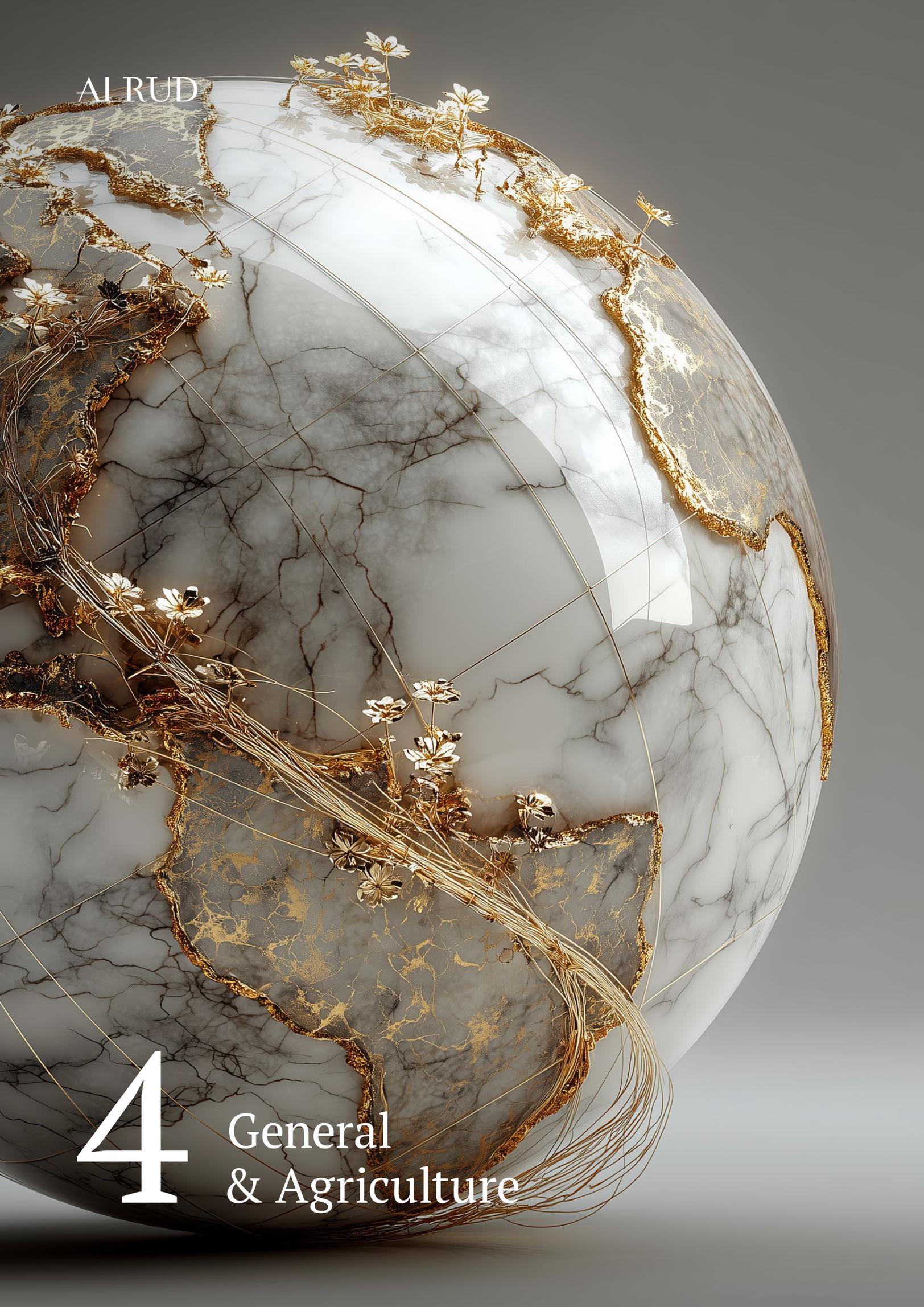
For foreign manufacturers and importers, these changes translate into a tangible increase in the cost of market entry for certain vehicle segments. High-power vehicles, particularly premium electric and hybrid models, may become significantly more expensive to import, directly affecting total landed cost and profitability. This, in turn, may necessitate a reassessment of the recommended retail prices and a review of whether certain models will remain commercially viable under the new fee structure.

From a compliance perspective, companies will also need to adjust their internal processes, tax reporting systems, and customs documentation to reflect the new requirement to report engine power in kilowatts. Beyond technical compliance, the reform may prompt a broader strategic review of product portfolios, including a shift toward lower-power configurations for the Russian market, revisions to model line-ups and trim levels, and, where economically justified, renewed consideration of the localization or assembly options.

Overall, while the nominal base rate of the utilization fee remains unchanged, the introduction of **power-based coefficients fundamentally reshapes its economic impact.** For foreign automotive players, especially those active in the premium, electric, and performance segments, the new rules call for **the immediate recalculation of utilization fee liabilities, revision of pricing strategies, and timely compliance adjustments.**

 **205.95 kW**  
power threshold

ALRUD



4 General  
& Agriculture

## Formalization and Digitalization of State and Municipal Control

In recent years, the Russian government has striven to **formalize state and municipal control procedures (“State Control”)** to enhance the predictability of inspections and reduce the number of disputes. Furthermore, **digital and remote tools** continue to be actively implemented in the State Control system.

The relevant legislative amendments (**“Regulations”**)<sup>30</sup> entered into force in August – December 2025. The key changes are summarized below.

### (A) Revised grounds and methods for conducting State Control measures

The decision to conduct a State Control measure may now be based on evidence of violations of the requirements obtained via **automated recording tools**, including photo and video recording equipment, or unmanned aerial vehicles (UAV). UAVs may now be used during on-site inspections.

Additionally, in certain cases, adopting a decision to conduct State Control, issuing findings following the results thereof and orders to eliminate violations **no longer requires the formal documentation** of special records; it is sufficient to enter a record in the Unified Register of Control (Supervisory) Measures.

**A new type of control measure** has been introduced in environmental regulation: an “experiment” – the creation of an artificial scenario to assess compliance with the requirements.

### (B) Consequences of Contract Termination by the Supervisory Authorities

If a supervisory authority **unilaterally terminates** an agreement with a controlled entity due to the entity’s failure to rectify the violations

<sup>30</sup> Federal Law No. 567-FZ of December 29, 2025, “On Amendments to the Federal Law ‘On State Control (Supervision) and Municipal Control in the Russian Federation’”; Decree of the Government of the Russian Federation No. 1511 of October 1, 2025, “On the Frequency of Mandatory Preventive Visits within the Framework of State Control (Supervision) and Municipal Control”; Decree of the Government of the Russian Federation No. 1290 of August 27, 2025, “On Amendments to Decree of the Government of the Russian Federation No. 1096 of June 30, 2021”.

identified <sup>31</sup>, the entity **will be barred from entering into similar agreements for the next 5 years.**

**(C) New timeframes for conducting State Control measures**

- The Russian regulatory field features several types of State Control. Specifically, in many instances, a Mandatory Preventive Visit (“MPV”) may be conducted instead of a formal control (supervisory) measure. According to the new Regulations, by default, an MPV may be conducted **no more than once per year**. Previously, different supervisory bodies were entitled to establish MPV frequency at their own discretion.
- The controlled person should be notified of the upcoming MPV **no later than 24 hours** prior to its commencement.
- Previously, formal timeframes for conducting MPVs existed only for objects classified as extremely high or high risk (I – II hazard class facilities). The new Regulations introduce the following **timeframes for objects in other risk categories and hazardous facilities:**

<i>Risk Category</i>	extremely high / high and I – II hazard class facilities	significant risk and III hazard class facilities	medium risk and IV hazard class facilities	moderate risk
<i>Permitted Frequency</i>	1–2 times per year	once every 3 years	once every 5 years	once every 6 years

These timeframes are calculated from the date the controlled object was assigned its risk category or hazard class.

- The timeframes for environmental control have been amended, so that scheduled control (supervisory) measures for objects classified as significant, medium, and moderate risk **have been abolished**. Instead, **a new periodicity has been introduced** for scheduled control (supervisory) measures and MPVs, dependent upon the risk category (refer to general timeframes mentioned above).

<sup>31</sup> It may be relevant for companies with strategic status, those the main activities of which are housing and communal services, energy, communications, transport, agriculture and the production of pharmaceuticals, etc. They are entitled to enter into such agreements.

#### (D) Digitalization of State Control

The active integration of digital tools into the State Control system is ongoing. In addition to the aforementioned tools, there are other new features:

- An object of State Control is now considered to be assigned to a specific risk category **only** upon the **entry of the relevant information** into the Unified Register of Control Types.
- There is an option to **submit objections** against warnings on the violation of the mandatory requirements and relevant policies **electronically** via the Gosuslugi portal (Unified State Services Portal) or regional portals.
- Requests for clarifications on State Control may be made through video conferencing, in-person reception, or **through the mobile app Inspector**.

## New Environmental Fees: 2026–2030

The Russian Government approved a phased plan for **increasing fees for negative environmental impact (“NEI”)** for the 2026 – 2030 period (“**NEI Fees Roadmap**”)<sup>32</sup>. The NEI Fees Roadmap establishes a new level of financial obligations for a range of pollutants and waste. While the list of regulated substances remains unchanged from the 2025 NEI fee regulations, the fee levels will rise significantly across most categories<sup>33</sup>.

### 1. Emissions and discharges of pollutants

Starting in 2026, fees for emissions into the atmosphere and discharges into water bodies will increase for the majority of pollutants. Some substances will face multiple increases, as outlined below:

<i>Type of Environmental Impact</i>	<i>Multiplication Factor for the Fee</i>	<i>Pollutants</i>
Emissions	3–10 times	Cobalt and its compounds; Furniture solvent (AMP-3); Methylene chloride; Hydroxymethylbenzene (cresol); Acrolein; Phthalic anhydride
Emissions	10–30 times	Coal ash; Arsenic and its compounds; Carbon tetrachloride; Toluene diisocyanate
Emissions	over 30 times	Saturated hydrocarbons C6–C10; Epichlorohydrin
Discharges	3–10 times	Anionic synthetic surfactants; Cationic synthetic surfactants; Non-ionic synthetic surfactants; Phosphate ion; Fosalona
Discharges	10–30 times	Difluorochloromethane (Freon-22); Tin; Polyacrylamide
Discharges	over 100 times	Glycerin; Iron; Bismuth

<sup>32</sup> Order of the Government of the Russian Federation No. 2409-p of September 1, 2025.

<sup>33</sup> Order of the Government of the Russian Federation No. 1852-p of July 10, 2025.

The fees established for 2026 are subject to phased increases through 2030. Analysis indicates that, for the majority of pollutants, the fee will increase significantly by 2030 compared to the 2026 level, e.g.<sup>34</sup>:

	<i>Iron</i>	<i>Magnesium oxide</i>	<i>Mercury and its compounds</i>	<i>Cadmium and its compounds</i>
2026	13,196.3	196.6	32,765.1	32,765.1
2030	263,926.9	3,931.8	655,302.1	655,302.1

## 2. Waste disposal

For 2026, the NEI fee for Class IV hazardous municipal solid waste has been increased by approx. two times as compared to 2025. The projected fee for 2030 is RUB 823/ton.

For other waste categories, the increase was approx. 8–9% for 2026. Notably, the 2026 figures for other such waste will not change until 2030.

## 3. Additional coefficients to the NEI fees

Furthermore, **extra coefficients** to the NEI fees were introduced in some specific cases<sup>35</sup>:

- for specially protected national territories (e.g., national parks, sanctuaries), the fees under the NEI Fees Roadmap are multiplied by 2;
- for waste disposal fees, a multiplier should be set by the Government for the corresponding calendar year (e.g., 1.045 for 2025).

For businesses, the NEI Fees Roadmap means that, on the one hand, the roadmap itself allows for payment forecasting in advance, but a multiple increase in NEI fee costs may require adjustments to long-term business development plans to account for the increase in the cost item. Under the new conditions, reducing emissions and discharges, as well as the proper application of the fees, becomes critical for minimizing both environmental and financial risks.

<sup>34</sup> RUB per ton.

<sup>35</sup> Resolution of the Government of the Russian Federation No. 2167 of December 27, 2025.

## New Rules on Land Reclamation and Conservation

29 May 2025

1 September 2025

Government Resolution No. 781 of May 29, 2025 (**the “Resolution”**) introduces updated Rules on Land Reclamation and Conservation, replacing the 2018 version. The new rules entered into force on September 1, 2025, and will remain in effect until September 1, 2031.

Land reclamation and conservation<sup>36</sup> activities shall be carried out in strict accordance with the approved land reclamation or conservation projects (**“Project”**).

### A. Persons Responsible for Project Development

The Projects shall be developed by the **party responsible for land deterioration**. If such a party cannot be identified, (i) the owners of land plots or (ii) tenants, land users, and landholders or state and municipal authorities<sup>37</sup>, shall be in charge of Project development.

### B. Project Approval and Adoption

Projects must be **approved before adoption**. Projects concerning private land plots shall be approved by the landowner; ones concerning state or municipal land – by the authorized state (municipal) body, as well as by the current land user (tenant, landholder, or land user).

The approving party must issue its decision **within 20 business days**. The Rules provide for a wide range of grounds for the refusal to approve a Project. Should a Project be rejected by one of the approving parties, the next round of negotiations should take place within **8 months** of receipt of the refusal.

<sup>36</sup> Land conservation is an extreme measure when the negative impact on the land excludes further economic activity thereon, and the rectification of such consequences through reclamation not exceeding 15 years is impossible.

<sup>37</sup> With respect to land held in federal or municipal ownership.

Once a Project is approved by all the interested parties and (if applicable) undergone state environmental review, the person responsible for its development should adopt it and notify the approving parties as well as the Federal Service for Veterinary and Phytosanitary Surveillance (*Rosselkhoznadzor*) or<sup>38</sup> the Federal Service for Supervision of Natural Resources (*Rosprirodnadzor*) (“**Supervisory Bodies**”).

**C. Duration of Works:** land reclamation shall not exceed **15 years**; land conservation – **25 years**. The deadlines for the launch of Projects are also subject to the Resolution.

**D. Monitoring of Results**

A violation of any stage of Project implementation should be **reported to the Supervisory Bodies** by the person in charge of the Project.

Upon completion of the Project (or any stage thereof), the party responsible must notify the bodies involved and issue (with the engagement of the approving parties) **the Completion Certificate**. Then, the Completion Certificate should be delivered to the Supervisory Bodies.

## Expanded Criteria for Mandatory Greenhouse Gas (GHG) Emissions Reporting

In 2025, the Russian government **significantly expanded** the scope of the entities obligated to submit reports on greenhouse gas emissions .

Specifically, organizations are now required to report on greenhouse gases if the mass of their emissions is equivalent to **50,000 tons of carbon dioxide per year** or more **and they satisfy at least one of the following criteria:**

(A) The organization conducts **at least one type of activity** from the newly adopted list thereof. This list now encompasses 72 business activities versus 11 in the past. Regulated organizations now include, inter alia, textile manufacturing, the production of a number of construction

50 000+

tons CO<sub>2</sub> / year  
reporting threshold

<sup>38</sup> Depending on the type of land.

supplies, electric energy, construction, logging etc., OR

- (B) The organization engages in **at least one of the activities specified** in the fields of crop production and animal husbandry where fuel is combusted in situ at I, II or III hazard class facilities: this includes, in particular, (i) the cultivation of grain crops, vegetables, and tea; (ii) the breeding and raising of dairy cattle, pigs, and poultry; (iii) the production of milk, eggs, etc. OR
- (C) The organization **combusts fuel** in the engines of vehicles.

**NB 1** Emission data should be reported no later than July 1st of the year following the reporting period.

**NB 2** The penalty for failing to submit greenhouse gas reports can reach RUB 500,000.



*RUB 500 000  
maximum penalty*

## Russia’s Seed Import Policy for 2026

In 2025, the Russian Ministry of Agriculture (“**MinAgro**”) maintained strict quantitative restrictions on the import of foreign-origin seeds—particularly those from unfriendly countries—covering a wide range of uses, including commercial, industrial, and scientific applications. These measures reflect the Russian government’s continued focus on **food security** and **control over imported genetic material**.

At the same time, additional measures were introduced, including phytosanitary restrictions on imports from certain foreign countries, which limited the entry of planting material to protect the domestic agricultural sector from potential pests and diseases. The quarantine measures are maintained by Rosselkhoznadzor and published exclusively on their website (available in Russian only).

### 1. Scientific Seed Import Quotas for 2026

Building on the experience from 2025, MinAgro approved the maximum permitted volumes of “**unfriendly**” **scientific seed imports** for 2026. The volumes remained unchanged from 2025:

<i>Type of seeds</i>	<i>Maximum permitted volume, kg</i>
Potato	200
Wheat and meslin	10
Rye	10
Barley	10
Corn	10
Soybean	5
Rapeseed for sowing	5
Sunflower for sowing	5
Sugar beet	5

While scientific import quotas remain stable, commercial import quotas have continued to evolve, with reductions observed for certain crops—including barley, waxy corn, and sugar beet. The 2025 competitive selection process for the 2026 quotas, held in December 2025, included both established market players and new entrants, facilitating broader market participation.

The rules for competitive selection have not changed from 2025. To qualify, applicants must demonstrate a history of having imported the specific varieties they are applying for between November 1, 2022 and October 31, 2025. Furthermore, affiliated companies are prohibited from gaining an unfair advantage in the selection process, which remains under close monitoring by MinAgro.

## **2. Impact and Challenges in Practice**

The industry's stakeholders highlighted the impact of restrictions on parental lines and seeds for research, noting that these limitations had contributed to the unauthorized use of foreign genetic material and constrained access to stress-resistant varieties. In practice, the combination of quotas and other import restrictions led to a significant reduction in the actual volumes of imported seeds in 2025, particularly for key crops such as potato, corn, and sunflower, driven by both regulatory and economic barriers.

In conclusion, Russia's regulatory framework for seed imports remained strict but predictable in 2025, with controlled scientific quotas and limited commercial opportunities. The approved quotas for 2026 are a continuation of this approach, reinforcing the long-term oversight of imported genetic material.

## **3. Advancing Regulatory Alignment in the EAEU: Unified Crop Variety Registers and Seed Production Methods**

In 2025, the Eurasian Economic Union ("EAEU") advanced regulatory harmonization in agriculture through unified approaches to national crop variety registers and seed production methods. Developed under the Agreement on the Circulation of the Seeds of Agricultural Plants, these initiatives aim to facilitate cross-border seed circulation and support market transparency.

The Eurasian Economic Commission adopted Recommendation No. 26 (October 7, 2025) standardizing the formation and maintenance of

national crop variety registers. The goal is to unify the information provided by authorized national bodies and reduce regulatory divergence. This framework underpins the planned Unified EAEU Crop Variety Register, which will consolidate national data, provide access to approved varieties, and facilitate the introduction of high-quality crops across member states. Among other things, it is proposed to use the results of tests on various agricultural plants carried out in one EAEU member state when deciding on the inclusion of a variety in the national register of another member state.

Meanwhile, Recommendation No. 21 (August 19, 2025) sets out unified methods for producing seeds and planting material. It defines key concepts, clarifies the role of original seed producers, and establishes approaches to preserve varietal characteristics and biological quality during profligation. While non-binding, the recommendation is expected to guide national legislation and administrative practices, promoting consistency in seed production across the EAEU.

Together, these measures signal a gradual move toward regulatory alignment. Market participants should anticipate more consistent registration and production practices, monitor national implementation, and adjust compliance strategies accordingly during the adoption of these recommendations into the domestic frameworks.

***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.*

[alrud.com](http://alrud.com)

+7 495 234-9692

[info@alrud.com](mailto:info@alrud.com)

125196, Russia, Moscow,  
7 Lesnaya street, 12th floor

