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Legal Regulatory Guide Russia

Contents

Russia's regulatory environment continued to evolve at a rapid pace in the first half of 2026, with significant developments affecting the technology sector, pharmaceuticals, consumer protection, the digital labeling system, agriculture, and the turnover of tobacco and products containing nicotine. This guide provides a practical overview of the key regulatory developments affecting businesses operating in or with Russia.

- **In the TMT sector**, the key development was the adoption of a law on artificial intelligence (AI) regulation, which enters into force on 01 September 2026, and introduces the concepts of sovereign and national AI models, requirements for labeling AI-generated content, and new rules on the use of publicly available data for model training. New fines have also been introduced for violations of the rules for authorization on Russian websites and the use of recommendation technologies. The technology fee on electronic components has been postponed until 01 December 2026, and an extension of the trial Track & Trace system for radio-electronic products has been proposed.
- **In the healthcare and pharmaceuticals sector**, the transition to unified EAEU rules continues. The transition period toward a single market for veterinary medicines has been extended to 2030, a «Second-One-Out» rule has been introduced for certain categories of medicines (suspended until 01 December 2026), the special regime for foreign-packaged medicines has been extended until the end of 2027, and the pilot project for the digital labeling of medical devices has been extended until 28 February 2027.
- **Consumer protection** has undergone significant changes. Amendments to Consumer Protection Law limit abuse of consumer claims while simultaneously expanding judicial protection for consumers. Meanwhile, harmonization with Belarus establishes a broader range of remedies for consumers.
- **Digitalization of state control continues**. A fully digital model for administrative proceedings is being introduced, the risk-based approach to scheduling inspections is being expanded, and the right to copy case file in administrative offence proceedings has been explicitly established.

– **The Chestny ZNAK labeling system continues to cover new product categories**, manufacturer verification has been introduced to prevent fictitious registration, and automated enforcement of labeled product turnover is being strengthened, including new grounds for prohibiting retail sales.
– **Regulation of tobacco and nicotine-containing products is being tightened**: regional licensing of retail sales of electronic nicotine delivery systems is being introduced for the period of 2027–2032, fines linked to price monitoring are being increased, sales at public transport stops are being banned, and an extrajudicial website-blocking mechanism has been introduced.
– **In the agricultural sector**, harmonization of seed regulation at the EAEU level continues alongside increased scrutiny of supply chains. Meanwhile digitalization of sector-specific regulation through state information systems (FGIS) is becoming the primary means of compliance.

The regulatory developments outlined above require businesses to take a proactive approach to compliance: reviewing internal labeling and digital traceability procedures, assessing the impact of new fees and fines, preparing for expanded labeling and verification requirements, and monitoring pilot programs that may become mandatory. We hope this guide will help readers better understand the key trends and adapt to the evolving regulatory environment in a timely manner.

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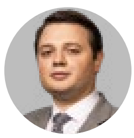

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1 TMT

The New Law On The Regulation Of Artificial Intelligence (AI) Has Been Introduced In Russia

Federal Law No. 243-FZ

On 28 June 2026, Federal Law No. 243-FZ dated 26 June 2026, on Supporting the Development of Artificial Intelligence Technologies in the Russian Federation (the "**AI Law**") was signed by the President. The law establishes a basic legal framework governing the development, deployment, and use of large-scale foundational models of artificial intelligence (AI) in Russia.

A large foundational model of artificial intelligence is defined as a program for electronic computers (or their constituent parts) intended to perform intellectual tasks at a level comparable to, or exceeding, the results of human intellectual activity. Such a program employs algorithms and is trained (or has been previously trained) on data sets for the purpose of deriving (or recognizing) patterns, providing information, making decisions, or forecasting outcomes based on objectives defined by humans. It simultaneously constitutes a basis for the creation and modification of various types of software, contains no less than 1 billion parameters, and is applied to perform a broad and diverse range of tasks.

Below are the key provisions of the newly introduced AI Law.

Sovereign and National AI Models

The following two categories of AI modes were introduced in the AI Law:

Sovereign model	National model
A Russian legal company that develops a large foundational model is responsible for creating the model, including defining and modifying its characteristics at all stages of its life cycle.	The essential characteristics of the large foundational model are defined and modified by the Russian legal entity that develops such model. These characteristics will be listed by the Russian Government.
Such a Russian legal entity is capable of fully replicating the entire development cycle.	In the development process, components distributed under an open license may be used. The origin of the components (including those from other large foundational models) does not matter.

Both sovereign and national models are to comply with the following requirements:

(A) They are developed by a Russian legal entity.

(B) Data centers for processing user inquiries and storing information are located within the Russian Federation and are owned by domestic entities.

(C) The large foundational model has undergone confirmation of compliance with Russian laws and with traditional Russian spiritual and moral values (the procedure shall be established by the Russian Government).

Government Authority to Mandate Russian Models

The Russian Government has the authorityto determine specific cases where only sovereign and/or national models may be used. For banks and financial market participants, such decisions require coordination with the Bank of Russia. According to public statements on discussions over the new law, such restrictions may mainly affect public administration and federal agencies and critical information infrastructure.

01 September 2032

Until 01 September 2032, the requirement for exclusive use of sovereign and/or national models shall not apply, provided that data is processed and stored within Russia.

Labeling of AI-Generated Content

The AI Law establishes a legal framework for labeling AI-generated content:

(A) Persons using large foundation models to create informational material in audio and/or visual form shall be provided with the technical capability to place an informational warning indicating the use of AI technologies. No automatic or compulsory labeling is mandated.

(B) The format, content, and procedure for providing such informational warnings are established by agreement between the user applying the large foundation model and the operator providing access to such model.

(C) Mandatory for large platforms: a major obligation is imposed on owners of websites, web pages, information systems, and computer programs that:

- are intended or used by their users to provide and/or distribute information via user-created personal pages;

- are in the Russian language, state languages of republics within the Russian Federation, or other languages of Russia's peoples (in which advertising targeting consumers located in Russia may be distributed); and

Daily audience threshold

500,000 users

- have a daily audience exceeding 500,000 users within the Russian Federation.

Such platform owners must ensure that users distributing content created with large foundational models on their personal pages have the ability to present an informational warning about the use of large foundation models.

Use of Publicly Available Data for Training

The AI Law stipulates that the following does not constitute a violation of copyright and/or related rights:

(A) accessing information contained in copyrighted works for the purpose of practical application of the provisions constituting the content of such works, including — within computer processing — the extraction, comparison, classification, and analysis of patterns, trends, and correlations contained in these copyrighted works;

(B) reproduction by means of short-term recording into computer memory exclusively for the purpose of training a sovereign and/or national large foundation model, provided that the developer uses a lawfully obtained copy of such work, or such copyrighted work has been made publicly available and is accessible for analysis without technical restriction.

The AI Law enters into force on 01 September 2026, with certain provisions taking effect from 01 March 2027.

New Fines In The Internet Sector: Authorization On Russian Websites And Use Of Recommendation

26 June 2026

On 26 June 2026, a new law introducing new articles 13.55 and 13.56 into the Code of Administrative Offences of the Russian Federation (CAO RF) was signed by the President[1]. These amendments establish administrative liability for *(i)* violations of user authorization rules and *(ii)* the use of recommendation technologies in breach of statutory requirements.

The new fines pose compliance risks for website and application owners operating in Russia. Below you may see a brief overview of violations now subject to administrative liability.

Rules for authorization on Russian websites

From 01 December 2023, owners of websites, mobile applications or other information systems who are Russian legal entities or citizens of the Russian Federation face limited options for the authorization of users located in Russia. Options include:

– via phone number;

– via Gosuslugi (the Russian state services platform);

– via the Unified Biometric System;

[1] Federal Law No. 199-FZ dated June 26, 2026 on "Amendments to the Code of the Russian Federation on Administrative Offenses".

- via another information system that meets information protection requirements. The owner of such a system may only be a citizen of the Russian Federation who does not have citizenship of another state, or a Russian legal entity. Thus, the use of foreign authorization systems on Russian websites or applications, such as Apple ID, Google is restricted.

Use of recommendation technologies

From 01 October 2023, legal requirements were introduced on the use by owners of websites, mobile applications or other information systems (“**owners**”) of information technologies to provide information from the collection, systematisation and analysis (i.e., profiling) of the preferences of users located in Russia (i.e., **recommendation technologies**).

Owners deploying recommendation technologies or algorithms are obliged to:

- prevent the use of recommendation technologies that violate the rights and legitimate interests of citizens and organizations and the provision of information that violates the Russian laws;

- inform users about the use of recommendation technologies;

- provide an e-mail address to which users can send their requests;

- publish their policy on the use of recommendation technologies in Russian language specifying the types of information on user preferences, the sources for obtaining such information, a description of the processes and methods of collecting, systematizing, and analyzing the information on user preferences, and the methods of implementing such processes and methods.

Summary of the new fines

Non-compliance with the legal requirements for authorization on websites and the use of recommendation technologies may now lead to the administrative fines presented in the table below.

Violation	First offence	Repeat offence
Failure to comply with the rules for authorization on Russian websites	– up to RUB 20,000 (approx. USD 248) for natural persons – up to RUB 50,000 (approx. USD 621) for officials – up to RUB 700,000 (approx. USD 8,706) for legal entities	N/A
Failure to comply with any of the legal requirements for the use of recommendation technologies as listed above	– up to RUB 20,000 (approx. USD 248) for natural persons – up to RUB 50,000 (approx. USD 621) for officials – up to RUB 700,000 (approx. USD 8,706) for legal entities	– up to RUB 40,000 (approx. USD 495) for natural persons – up to RUB 100,000 (approx. USD 1,243) for officials – up to RUB 1,4 million (approx. USD 17,400) for legal entities
Failure to cease unlawful use of recommendation technologies upon request of the Russian regulator, Roskomnadzor[2]	– up to RUB 40,000 (approx. USD 495) for natural persons – up to RUB 100,000 (approx. USD 1,243) for officials – up to RUB 1,4 million (approx. USD 17,400) for legal entities	– up to RUB 80,000 (approx. USD 988) for natural persons; – up to RUB 200,000 (approx. USD 2,473) for officials; – up to RUB 2,8 million (approx. USD 34,600) for legal entities

[2] The Federal Service for Supervision of Communications, Information Technology and Mass Media.

Therefore, we recommend website owners in Russia to carefully review the legal requirements for user authorization and use of recommendation technologies and ensure that the necessary compliance measures are implemented, including the replacement of authorization methods and publication of policies and disclaimers for users regarding use of recommendation technologies, etc.

Technology Fee For Electronics Has Been Postponed Until 01 December 2026

On 26 June 2026, Federal Law No. 195-FZ[3] was signed by the President, amending the previously adopted Law No. 425-FZ, which introduced a new non-tax levy, a “technology fee” into the Russian legal framework. The fee was originally scheduled to come into force on 01 September 2026, but it has been postponed to 01 December 2026.

The new fee will apply to imported or domestically manufactured electronic component bases (electronic modules) and industrial products containing such components.

The technology fee was first introduced in Federal Law No. 425-FZ dated 28 November 2025[4], which amended the Law on Industrial Policy of the Russian Federation[5]. The fee was conceived as a mechanism to stimulate domestic production of electronics by imposing a financial charge on imported and locally manufactured electronic components and finished electronic products.

[3] Federal Law No. 195-FZ dated 26 June 2026 on “Amendments to the Budget Code of the Russian Federation and Certain Legislative Acts of the Russian Federation”.

[4] Federal Law No. 425-FZ dated 28 November 2025 on “Amendments to Parts One and Two of the Tax Code of the Russian Federation, Certain Legislative Acts of the Russian Federation, and on Repealing Certain Legislative Acts (Provisions of Legislative Acts) of the Russian Federation”.

[5] Federal Law No. 488-FZ dated 31 December 2014 on “Industrial Policy in the Russian Federation”.

Organizations and individual entrepreneurs must pay the technology fee for electronic products if the following conditions are all met:

(A) They import such products into Russia or produce them in Russia, in an exclusive economic zone of the Russian Federation, or on its continental shelf.

(B) The products are included in a special list approved by the Ministry of Industry and Trade of Russia.

The technology fee is paid for each unit or each unit from a group of electronic component bases (electronic modules) and/or industrial products containing electronic component bases.

The Ministry of Industry and Trade of approves the methodology for determining the fee amounts and establishes specific rates in the form of fixed price values per unit, depending on:

(A) TN VED EAEU or OKPD codes;

(B) The presence or absence of a trademark, model, and/or technical characteristics in the special list.

Maximum technology fee
RUB 5,000
per unit

The maximum fee amount is RUB 5,000 (approx. USD 61) per unit.

In the event of non-payment of the technology fee, the introduction into circulation of electronic component bases and industrial products subject to the mandatory Trace & Track labeling with identification means (e.g., through the Chestny ZNAK system) is not permitted, unless otherwise stipulated by law or a Russian Government decree.

The technology fee, effective from 01 December 2026, will directly impact all importers and manufacturers of electronic component bases and finished electronic products in Russia, requiring payment for each unit of the products covered. The linkage between fee payment and the Chestny ZNAK marking system means that non-payment will effectively block the legal sale of the products covered in Russia, creating a supply chain risk for businesses that fail to comply.

The Trial For The Track & Trace System For Radio-Electronic Products Has Been Proposed To Be Extended

Due to the general trend regarding the expansion of the Track & Trace digital labelling system, Chestny ZNAK, as part of the mandatory labelling requirements for more groups of products on the Russian market, a voluntary labeling experiment is ongoing for certain groups of radio-electronic products.

This experiment started on 01 December 2023, and it is currently expected to end on 31 August 2026[6].

Currently, the experiment includes the following stages:

	Timeline	Type of radio-electronic products
Stage 1	01 December 2023 – 30 November 2024	Varied lighting equipment (e.g., luminaires, portable electric lanterns, various lamps, light-emitting diode (LED) light sources, rectifiers, static converters, etc.)
Stage 2	10 June 2024 – 30 April 2025	Laptops, smartphones and various types of telephone sets
Stage 3	01 July 2024 – 31 August 2025	Various types of printed circuit boards (PCBs)
Stage 4	14 July 2025 – 31 August 2026	Electronic cigarettes and reusable individual electric vaporizing devices

6 The Decree of the Government of the Russian Federation No. 1993 dated 25 November 2023 on "Conducting an Experiment on the Territory of the Russian Federation on Labeling Certain Types of Radio-Electronic Products with Identification Means".

Regarding products listed on Stages 1–3, the voluntary experiment switched to mandatory Track & Trace labeling from 01 March 2026[7]. The mandatory labeling for electronic cigarettes and reusable individual electric vaporizing devices will apply to that category of products once the experiment is finalized, i.e., starting on 01 September 2026. The full list of radio-electronic products subject to mandatory labeling is stipulated in Governmental Decree No. 1993.

On 26 June 2026, the Ministry of Industry and Trade of Russia published the draft of a regulation proposing a further extension of the experiment[8]. It also proposes new stages for the new groups of radio-electronic products.

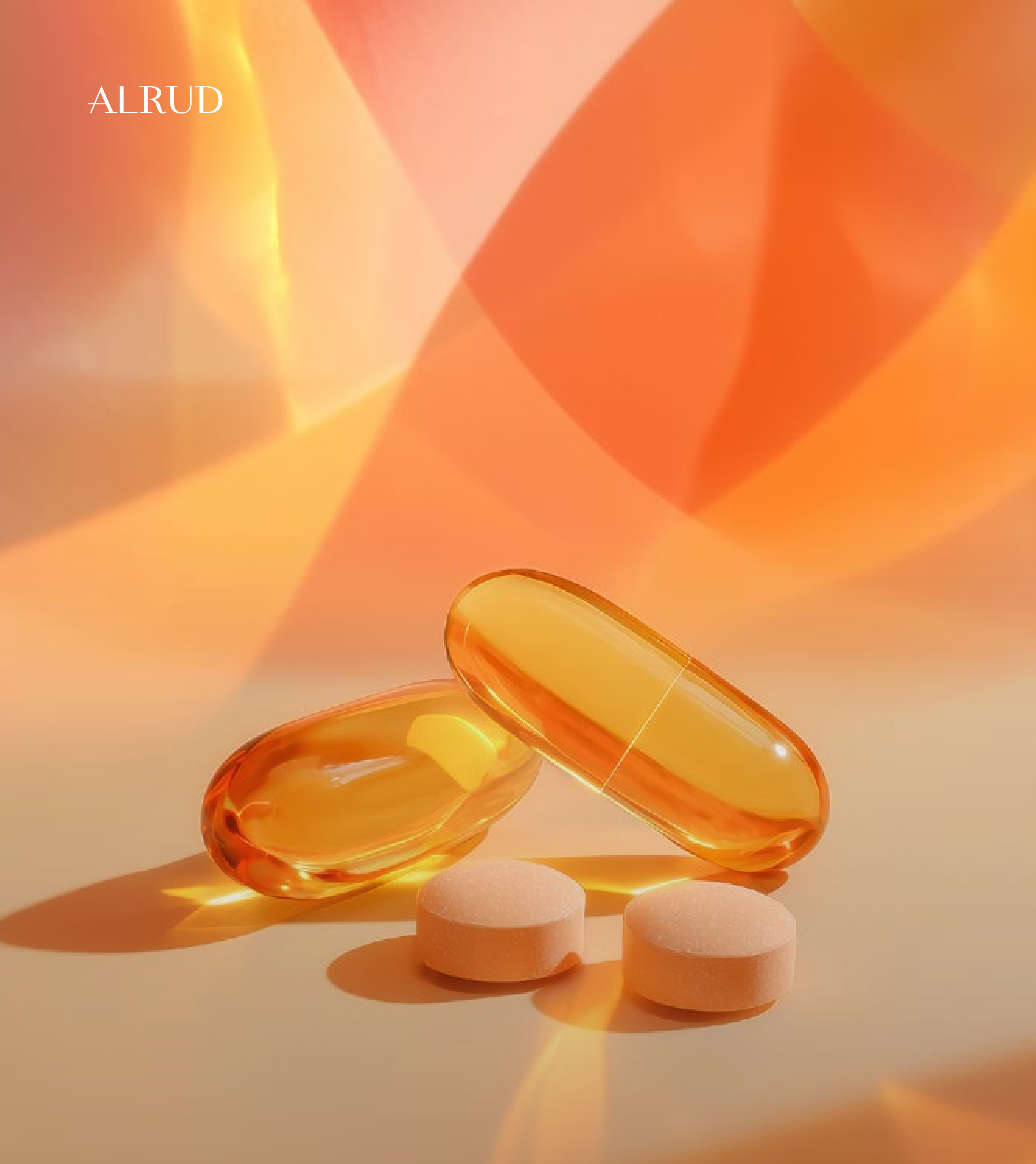
	Timeline	Type of radio-electronic products
Stage 5	01 September 2026 – 31 May 2027	Cash register equipment, coin sorting, counting and wrapping machines, and automated teller machines (ATMs)
Stage 6	01 September 2026 – 31 August 2027	Calculators, computers and central processing units, input/output apparatus, data storage devices and solid-state drives, gaming consoles, mail sorting and processing equipment, and various information carriers

The draft regulation is currently at the stage of finalizing public consultations.

Therefore, we recommend manufacturers and importers of radio-electronic products to monitor the current developments in the Track & Trace system for such types of products and to prepare and adapt to the mandatory and voluntary labeling requirements as they constantly expand.

[7] The Decree of the Government of the Russian Federation No. 1954 dated 28 November 2025 on "Approval of the Rules for Labeling Certain Types of Radio-Electronic Products with Identification Means and on the Features of Implementing the State Information System for Monitoring the Turnover of Goods Subject to Mandatory Labeling with Identification Means in Respect of Certain Types of Radio-Electronic Products (the '**Governmental Decree No. 1993'**)".

[8] The draft Decree of the Government of the Russian Federation No. 1993 dated 25 November 2023 on "Amendments to the Decree of the Government of the Russian Federation (ID 168843)".



2 Life Sciences And Pharmaceuticals

Veterinary Medicines Regulation

Transition to the single EAEU market for veterinary medicines will be completed in 2030

The single EAEU market for veterinary medicines has been in effect since 13 March 2024. Under Decision No. 33 of the Council of the Eurasian Economic Commission (EEC), dated 24 February 2026, on "Amending Decision of the Council of the Eurasian Economic Commission No. 1 dated 21 January 2022", the transition period for the single EAEU market **has been extended from 2027 to 2030**.

01 January 2031

Veterinary medicines **may continue to be registered under national procedures until the end of 2030**. However, the registration dossiers for such products **must be brought into line with EAEU requirements within that period**. Failing this, marketing authorizations granted under national procedures will become invalid as of 01 January 2031.

Decision No. 33 also introduced the following changes to the regulation of veterinary medicines:

(A) Remote GMP inspections of veterinary medicine manufacturers are now permitted in exceptional circumstances, including public health emergencies, natural disasters, force majeure events, or situations posing risks to inspectors, which may be particularly relevant for inspections of foreign manufacturing sites.

(B) A GMP certificate may now be reissued without a new inspection if the manufacturer's name or address has changed, or to correct a technical error. The reissued certificate remains valid until the original expiry date.

Regulation Of Medicines

The Second-One-Out Rule in public procurement

By Government Decree No. 1326 dated 29 August 2025, on "Amending Government Decree No. 1875 of 23 December 2024", the Russian Government introduced restrictions on the purchase of goods originating from foreign countries and on works or services performed or provided by foreign persons (commonly referred to as the "**Second-One-Out Rule**" rule [Russian: *второй лишний*]) under Federal Law No. 44-FZ dated 05 April 2013, on "The Contract System in the Sphere of Procurement of Goods, Works and Services for State and Municipal Needs".

Under this rule, any tender application proposing the supply of goods of foreign origin is subject to rejection if a compliant application has been submitted proposing the supply of equivalent goods originating in the EAEU, **provided that full-cycle production of those goods is localized within the EAEU**.

Second-One-Out Rule suspended until

01 December 2026

The application of the Second-One-Out rule to strategically important medicines was subsequently postponed. Government Decree No. 835 dated 03 July 2026, amending Decree No. 1875, postponed the launch of the rule for such medicines from 01 July to 01 December 2026. This was further specified by Government Decree No. 969 dated 03 August 2026, on "Amending Certain Acts of the Government of the Russian Federation" (published 06 August 2026), which confirmed the suspension of the rule until 01 December 2026 and introduced a registry-based mechanism for confirming full-cycle production in Russia.

In addition, the Rules for forming the list of strategically important medicines were approved by Government Decree No. 277 dated 17 March 2026 (published 24 March 2026). Production of the medicines on this list will benefit from state support and priority treatment in state procurement; the list itself was subsequently approved by Government Order No. 942-r dated 23 April 2026.

Compliance with EAEU pharmacovigilance rules

A draft Government Decree amending Government Decree No. 353 dated 12 March 2022 (currently under development by the Ministry of Health; not yet adopted as of the publishing of this bulletin), includes a proposal that Roszdravnadzor-affiliated institutions will inspect holders of marketing authorization for compliance with the EAEU's pharmacovigilance rules (GVP) and inspect clinical trials for compliance with the EAEU's good clinical practice rules (GCP), with full rollout targeted by the end of 2029.

Under the draft, the first scheduled inspection would generally take place within three years of a medicinal product's first appearance on the Russian market. Follow-up inspections may be scheduled where deficiencies are identified, while critical non-compliance could trigger an inspection within three months.

The draft also envisages risk-based, unscheduled GVP inspections, along with a dedicated framework for GCP inspections of clinical trials.

Extension of Temporary Regulatory Regimes

The Russian Government has extended several temporary regulatory regimes introduced in recent years to ensure the continuity of healthcare supply chains. These extensions affect the circulation of medicines and the labeling of medical devices.

(A) Foreign-packaged medicines.

Federal Law No. 483-FZ

The special regime prolonged by *Federal Law No. 483-FZ dated 15 December 2025 on Amending Article 47 of the Federal Law "On the Circulation of Medicines"*, allowing the import and circulation of registered medicines in foreign-language packaging in cases of actual or potential shortages has been extended **until 31 December 2027**. Products may continue to be supplied with foreign packaging, provided they bear a Russian-language label, subject to approval by the interagency commission.

(B) Pilot project for Medical device labeling.

Government Decree of RF No. 204

According to *Government Decree of the Russian Federation No. 204 dated 28 February 2026 on "Amending Government Decree of the Russian Federation No. 620 dated 17 May 2024"* the pilot project for the digital *labeling* of selected medical devices has been extended **until 28 February 2027**. The program continues to expand in phases and now covers a broad range of products, including syringes, infusion systems, glucose meters, blood glucose test strips, blood pressure monitors, rapid diagnostic tests, and in vitro diagnostic reagents.

For the first time, Russia's Ministry of Health has registered a foreign medicine without clinical trials being conducted in the EAEU

Russia's Ministry of Health has registered the medicine **Dayvigo (lemborexant)** from the Japanese company Eisai, without clinical trials of the medicine being conducted in any EAEU member state. Registration was possible due to **an unscheduled inspection of compliance with Good Clinical Practice (GCP) at one of the for-eign clinical centers,** which confirmed the study's compliance with the EAEU's GCP requirements.

According to clause 36 of the Rules for registration and expert examination of medicinal products, approved by the Decision of Eurasian Economic Commission No. 78 dated 03 November 2016 (the "**Rules**"), when registering a medicinal product, at least one clinical trial must be conducted, in whole or in part, in the EAEU.

Meanwhile, the Rules provide for an exception. The authorized body has the right to appoint an unscheduled inspection of one of the clinical sites in which the study was conducted outside the EAEU during the review of the registration dossier. When confirming that the study complies with the EAEU's GCP requirements, the data obtained can be used in assessing the registration dossier.

The practical application of this mechanism **opens up an additional pathway for the registration of medicines in Russia for companies that conducted clinical trials outside the EAEU**, subject to the completion of a corresponding GCP inspection.

3 Consumer Goods

Russia Continues To Develop Consumer Protection Rules While Limiting Abusive Consumer Claims

Recent legislative developments demonstrate a dual regulatory trend in Russia. While lawmakers, regulators and courts continue to strengthen consumer protection (particularly in e-commerce and digital commerce) they are also introducing safeguards aimed at preventing the abuse of consumer rights and reducing disproportionate liability for businesses.

Russia revises consumer protection rules and limits certain consumer claims

Amendments to the Russian Consumer Protection Law adopted as Federal Law No. 500 FZ[9], effective from 01 January 2026, introduce several changes aimed at balancing consumer rights with the interests of manufacturers, sellers, and service providers.

Statutory 50% penalty

Three new exceptions

The new rules clarify the circumstances in which the statutory 50% penalty (imposed where a business fails to voluntarily satisfy a consumer's lawful claim) will not apply. In particular, the penalty will not be imposed where:

(A) The consumer's own actions or omissions prevented the voluntary settlement of the claim.

(B) The business failed to perform its obligations due to a supplier's breach, provided that the business acted reasonably and in good faith when selecting that supplier; or

(C) The parties entered into a mediation agreement before court proceedings, unless the business subsequently failed to comply with that agreement.

[9] Federal Law No. 500-FZ dated 28 December 2025 on "Introducing Amendments to Certain Legislative Acts of the Russian Federation".

The amendments also prohibit consumers from assigning claims for statutory penalties and certain liquidated damages to third parties before a final court judgment has been issued, thereby restricting the commercialization of such claims. In addition, the statutory penalty for delayed performance under the Consumer Protection Law is now generally capped at the purchase price of the goods.

The legislation further authorizes the Russian Government to intro duce, during 2026, special rules governing the repair of defects in certain categories of goods and the calculation of penalties and other remedies where supply chain disruptions affect performance.

Separately, the amendments revise the compensation rules applicable to technically complex products returned due to defects. When calculating the difference between the purchase price and the replacement value of the product, courts must now take the product's degree of wear and tear and year of manufacture into account, unless the consumer was intentionally misled regarding those characteristics at the time of purchase.

The draft law would allow mandatory disclosures in advertising to be made online

A draft law submitted to the State Duma[10] proposes to simplify mandatory disclosure requirements under the Russian Advertising Law by allowing certain information currently required to appear in advertisements to be provided through a website instead. Under the proposal, advertisements would contain a link or QR code directing consumers to a webpage with the full mandatory information.

The amendments would apply, *inter alia*, to advertisements for distance selling, promotional campaigns and gambling. Advertisers would remain responsible for ensuring that the linked information is complete, accurate and easily accessible. Providing an incorrect, inaccessible or non-functioning website or QR code would constitute misleading advertising and could result in liability under the Advertising Law.

[10] Draft Federal Law No. 1261475-8 on "Amending the Federal Law 'On Advertising".

New Russian retail rules to come into force on 01 September 2026

Another significant development is the adoption of Decree of the Government of the Russian Federation No. 657 dated 30 May 2026[11], which approves new Rules for the sale of goods under retail sale and purchase agreements. The Decree enters into force on 01 September 2026 and will remain effective until 01 September 2032. In addition to adopting the lists of non-exchangeable goods and technically complex products for which consumers cannot require a temporary replacement during repairs, the new Rules introduce a broader digital replacement for interactions between retailers and consumers.

The updated Rules clarify the procedure for submitting consumer claims, including claims for refunds in distance sales. The Rules further stipulate that consumers participating in discount or loyalty programmes must be able to submit the required information through the domestic messenger MAX from 01 September 2026, and sellers may use the Unified Biometric System for identification or age verification where required by law.

Meanwhile, as for distance selling, the Decree also introduces a consumer-friendly clarification regarding technically complex household goods. Such goods may be returned even if they are of proper quality, provided that the technical or operating documentation, consumer packaging and completeness of the product are preserved.

Together, these changes, *inter alia*, reflect a broader policy of digitalizing retail interactions while simultaneously clarifying consumer rights and the sellers' procedural obligations.

[11] Government Decree of the Russian Federation No. 657 dated 30 May 2026 on "Approval of the Rules for the sale of goods under a retail purchase and sale agreement, the List of durable goods not subject to the consumer's right to free provision of a good with the same essential consumer properties for the period of repair or replacement of such good, and the List of non-food products of proper quality not subject to return or exchange".

Expansion of judicial protection for consumers

In a landmark Judgment of the Constitutional Court of the Russian Federation dated 09 June 2026 No. 38-P[12], the Constitutional Court clarified that the statutory two-year period for discovering hidden defects does not limit the period during which consumers may bring legal claims.

Provided that hidden defects were discovered and the seller was notified within the applicable two-year period (or another contractual or statutory period), consumers may continue to pursue their claims within the general limitation period. The ruling, therefore, significantly strengthens consumers' ability to seek judicial remedies in cases involving latent defects that require lengthy investigation or unsuccessful repair attempts.

Harmonization with Belarus and broader consumer rights

Consumer protection is also being strengthened at the supranational level. The Supreme State Council of the Union State of Russia and Belarus adopted Decree No. 6 "On Uniform Rules in the Field of Consumer Protection"[13], aimed at harmonizing consumer legislation across both jurisdictions.

The Decree introduces several significant innovations, including the possibility of imposing personal liability on company directors and founders for consumer rights violations, shorter deadlines for warranty repairs and replacement of defective products, removal of the statutory cap on penalties for delayed services, and the extension of consumer protection rules to digital products.

The harmonized rules also reaffirm consumers' broad range of remedies, including replacement of defective goods, price reductions, reimbursement of repair costs and termination of purchase agreements.

[12] Judgment of the Constitutional Court of the Russian Federation No. 38-P dated 09 June 2026 on the case concerning the verification of constitutionality of clause 2 of Article 1, Article 12, and clause 2 of Article 477 of the Civil Code of the Russian Federation in connection with the complaint of citizen Nadiya Vladimirovna Batrakova.

[13] Decree of the Supreme State Council of the Union State No. 6 "On Uniform Rules in the field of consumer rights protection (adopted on 06 December 2025)".

Rosaccreditation launches API-based verification of conformity assessment documents for marketplaces

Rosaccreditation has launched a pilot project introducing an API-based verification system that enables online marketplaces to automatically verify certificates and declarations of conformity against official state registers[14]. The pilot started on 01 July 2026 and covers EAEU and Russian conformity assessment documents, including verification of their validity, status and registration. From 01 September 2026, marketplaces will be required to provide direct links to conformity documents for products subject to mandatory conformity assessment.

01 October 2026

Beginning 01 October 2026, the system will conduct automated weekly checks of product listings. Products may be blocked or removed where conformity documents are missing, invalid, revoked, contain inconsistencies, or cannot be verified through the official registers. The initiative forms part of Russia's broader digitalization of market surveillance and is intended to improve product traceability, reduce the circulation of counterfeit goods and strengthen compliance with EAEU technical regulations.

Russia introduces administrative liability for violations of the platform economy rules

The Russian Parliament has adopted a law introducing administrative liability for violations of the new platform economy legislation which will come into force after the President's signing[15]. Effective from 01 October 2026, marketplace operators and other digital platforms may face fines of up to RUB 500,000 for failing to establish complaint-handling and dispute resolution procedures for sellers and other platform partners.

[14] Government Decree of the Russian Federation No. 821 dated 02 July 2026 on "The Procedure for intermediary digital platform operators to verify information in product, work, or service listings placed on such platforms, as required under Article 7(1)(1) and Article 7(2) of the Federal Law on 'Certain Issues of Regulating the Platform Economy in the Russian Federation".

[15] Draft Federal Law No. 959258-8 on amendments to the Code of the Russian Federation "On Administrative offenses".

The law also introduces penalties for failing to verify information contained in product listings, unlawfully restricting sellers' access to their personal accounts, improperly removing or blocking product listings, failing to provide the technical means for sellers to publish the required information, and reducing product prices at the seller's expense without the seller's consent. The new rules strengthen regulatory oversight of digital platforms and are intended to enhance the protection of sellers operating on online marketplaces.

Russia introduces new requirements for the online sale of regulated goods

Russia is introducing new restrictions on the placement of certain goods for sale online, including through intermediary digital platforms and marketplaces. The amendments, introduced by the Federal Law "On Amendments to Article 2 of Federal Law No. 290-FZ dated 31 July 2025"[16], establish new requirements for businesses engaged in trading activities and aim to strengthen control over the circulation of regulated products in the digital environment.

Under the new rules, sellers will be prohibited from publicly offering goods that have been withdrawn from circulation, unregistered pesticides and agrochemicals, biologically active supplements requiring state registration, unregistered medicinal products and medical devices, unlabeled goods subject to mandatory labelling requirements, as well as products lacking mandatory conformity certificates, declarations of conformity or state registration certificates. The requirements apply both to traditional sellers and partners operating through intermediary digital platforms, which will need to implement additional compliance procedures to prevent the publication of non-compliant products.

[16] Draft Federal Law "On Amendments to Article 2 of Federal Law No. 290-FZ dated 31 July 2025 'On Amendments to certain legislative acts of the Russian Federation". Project ID: 166747.

The amendments also introduce additional consumer information obligations for online sellers. Businesses will be required to disclose information regarding consumers' rights to return goods purchased remotely, including available return methods, as well as clarify that consumers bear the costs of returning goods of proper quality and the risks of accidental loss or damage during transportation. The new rules reflect Russia's broader trend toward increased regulation of digital commerce, combining product compliance control with enhanced consumer protection requirements.

Conclusion

The developments outlined above demonstrate that Russia's consumer protection framework is entering a new phase, characterized by stronger consumer safeguards, increased digitalization of regulatory oversight and greater accountability for online platforms. Legislative reforms increasingly focus on e-commerce, digital communication channels and automated compliance mechanisms, while judicial practice continues to broaden the scope of consumer remedies and clarify businesses' obligations.

At the same time, the legislature is seeking to strike a more balanced approach by limiting abusive consumer claims and providing greater legal certainty for businesses acting in good faith. Companies operating in consumer goods, retail and digital platform sectors should therefore expect continued regulatory activity and review their consumer-facing policies, complaint-handling procedures and compliance systems to ensure they remain aligned with the evolving legal framework.

Development Of The Regulations On Tobacco And Nicotine-Containing Products

In 2026, the tobacco and nicotine-containing sphere is undergoing significant reforms, which will determine the future regulatory environment. Among the most essential are the following:

Regional ENDS licensing

2027–2032

(A) **Regional licensing of the retail sale of ENDS (2027–2032).** The regions of the Russian Federation are granted the authority to impose, from 01 March 2027 through 01 March 2032, a ban on the retail sale of electronic nicotine delivery systems (ENDS) and the e-liquids used through them, pursuant to Federal Law No. 186-FZ dated 26 June 2026. In particular:

- Stipulations, including those governing the licensing of wholesale and retail trade in tobacco products and nicotine-containing products, have been incorporated into Federal Law No. 203-FZ dated 13 June 2023 on State Regulation of the Production and Circulation of Tobacco Products, Tobacco Goods, Nicotine-Containing Products, and the Raw Materials for Their Production.
- The executive authorities of the regions will issue a license for a maximum of 5 years, provided separately for each commercial facility (store, pavilion, etc.), allowing the license holder to purchase, store and sell such products to consumers.
- Stipulations have been introduced establishing regional state control (supervision) over the retail sale of tobacco products and nicotine-containing products.

(B) **License fee.** For each year of the license, the applicant will need to pay a state duty of RUB 20,000, pursuant to Federal Law No. 187-FZ dated 26 June 2026.

(C) **Enhanced administrative fines linked to price monitoring.** Federal Law No. 120-FZ dated 02 May 2026 introduced new Parts 6, 7, and 8 to Article 14.3.1 of the Code of Administrative Offences of the Russian Federation, establishing tightened administrative fines for the sale of tobacco or nicotine-containing products below the maximum retail price or minimum calculated price, where the violation is detected after the seller has received notification via the State Information System for Monitoring Goods Subject to Mandatory Identification (the Monitoring System). New Parts 4, 5, and 6 were added to Article 14.6 of the Code of Administrative Offences, establishing fines for the sale of labelled tobacco products above the maximum retail price (MRP). The level of liability is determined based on the volume of goods sold (up to 100 units, 101–1,000 units, or over 1,000 units) within a single retail outlet per day.

(D) **Ban on sale at public transport stops.** Starting from 01 September 2026, tobacco and nicotine-containing products cannot be sold at public transport stops, pursuant to Federal Law No. 551-FZ dated 29 December 2025. The ban also applies to hookahs and devices for the consumption of nicotine-containing products. An exception applies where a retail facility is the only place of sale of such products in a locality.

(E) **Extrajudicial website blocking.** Since 01 March 2026, an extrajudicial blocking mechanism for websites offering the remote sale of tobacco has been established, pursuant to Federal Law No. 569-FZ dated 29 December 2025. The rule concerns information containing proposals for the remote retail sale of tobacco, nicotine-containing products, hookahs, and devices for the consumption of nicotine-containing products, bypassing the legal prohibition.

To sum up, the state continues to implement a trend of tightening the regulatory regime for tobacco and nicotine-containing products.

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4 General And Agricultural

Russia Advances The Digitalization Of State Control And Supervisory Procedures

Digital transformation remains one of the key trends in the development of Russia's regulatory framework. Recent legislative initiatives demonstrate a shift from traditional forms of state supervision towards data-driven, automated and remote-control mechanisms.

The new approach is aimed at increasing the transparency of regulatory procedures, reducing administrative burdens for compliant businesses, and improving the efficiency of the supervisory authorities through the use of digital platforms and automated monitoring tools.

Russia introduces a new remote monitoring regime for industrial safety supervision

The Government of the Russian Federation has adopted Decree No. 213 dated 02 March 2026[17], introducing a new special supervisory regime in the field of industrial safety – monitoring, a form of remote state supervision based on the automated exchange of information. The new regime, which entered into force on 10 March 2026, builds on the results of a pilot project on remote industrial safety supervision conducted by the Federal Service for Environmental, Technological and Nuclear Supervision (Rostekhnadzor) under Government Decree No. 2415 as of 31 December 2020.

Participation in the monitoring regime is voluntary and is available to operators of hazardous production facilities equipped with remote monitoring systems. To participate, an operator must conclude a monitoring agreement with Rostekhnadzor and satisfy the technical and organizational requirements established by the Decree. The existence of such an agreement is recognized as a separate indicator of the operator's regulatory compliance and good faith, allowing for longer intervals between scheduled on-site inspections.

[17] Decree of the Government of the Russian Federation No. 213 dated 02 March 2026 on "Amending certain acts of the Government of the Russian Federation".

The Decree also amends the regulations governing federal state supervision in the fields of industrial safety, hydraulic structure safety and energy supervision by expanding the use of the mobile application "Inspector" during inspections and preventive visits.

Full digitalization of administrative proceedings and state control

The Russian Government is introducing a framework for the complete digitalization of administrative offence proceedings within the state control system according to Government Resolution of the Russian Federation No. 980 dated 30 June 2025[18].

Starting from 01 January 2026, the federal supervisory authorities will gradually transition to conducting administrative offence proceedings through a dedicated digital subsystem integrated into the State Information System for Automated Control and Supervisory Activities (GIS TOR KND).

The digital platform will cover the entire lifecycle of administrative proceedings, including recording violations, preparing procedural documents, issuing decisions, and storing case materials.

The new system will introduce:

(A) Mandatory electronic document management in administrative offence cases.

(B) A unified digital register of administrative proceedings.

(C) Standardized requirements for the format and exchange of regulatory documents.

(D) Integration of enforcement data into government analytical systems.

[18] Decree of the Government of the Russian Federation No. 980 dated 30 June 2025 on "Approval of the Regulation on the procedure for submission (forwarding) of documents in administrative offence cases in electronic form and requirements for their format, the model regulation on the procedure for submission (forwarding) of such documents via regional portals of state and municipal services, and recommendations on the format of such documents".

The digitalization of administrative procedures is expected to improve the transparency of enforcement activities and enable authorities to analyze regulatory risks based on the accumulated data. The framework also formalizes the legal status of the mobile application “Inspector”, which is already used by the supervisory authorities for photo and video recording during inspections.

29 December 2025

Federal Law No. 567-FZ dated 29 December 2025 introduced extensive amendments to the Federal Law “On state control (supervision) and municipal control in the Russian Federation” (Federal Law No. 248-FZ), most of which entered into force in January 2026[19]. The amendments significantly advance the digitalization of the supervisory procedures by replacing paper-based documentation with electronic records maintained in the Unified Register of Control (Supervisory) Activities (ERKNM) in terms of decisions on inspections, preventive visits, warnings, acts and regulations. The supervisory authorities now prepare and sign procedural documents electronically, while the entities supervised receive notifications and access to case materials through their personal accounts on the public services portal Gosuslugi.

The amendments also strengthen the use of digital technologies in enforcement. Decisions to initiate inspections may now be based on indications of regulatory violations detected through automated monitoring tools, including photo and video recording systems and unmanned aerial vehicles (drones), where such technologies are authorized under the relevant supervisory regime.

In addition, the law revises the rules for assigning risk categories to the entities supervised by linking risk classification to entries in the Unified Register of Types of Control and expands the authorities’ powers to verify compliance with previously issued orders without obtaining prior approval from the prosecutor’s office.

The legislation further shortens the notification period for mandatory preventive visits to 24 hours before their commencement and expressly recognizes electronic notifications delivered via email or through the Gosuslugi portal as legally sufficient where the recipient has completed the required registration procedures.

[19] Federal Law No. 567-FZ dated 29 December 2025 “On Introducing Amendments to the Federal Law ‘On State Control (Supervision) and Municipal Control in the Russian Federation”.

Further digitalization of state control procedures proposed

On 19 May 2026, Draft Law No. 1238113-8 was submitted to the State Duma[20]. The draft continues the digitalization of Russia's control and supervisory framework by expanding the use of electronic interaction between the supervisory authorities and regulated entities. It stipulates the electronic notification of the entities supervised regarding the inspection-related decisions and reports, the issuance of electronic extracts from the Unified Register of Control (Supervisory) Measures, and the use of QR codes to verify the authenticity of official documents. The proposed amendments would also introduce a paperless procedure for issuing decisions on preventive visits, warnings and inspections involving interaction with the entities supervised.

Beyond the digitalization measures, the draft clarifies the powers of municipal authorities in the field of municipal control, establishes a legal framework for assigning public compliance ratings to businesses, and expressly permits the entities supervised to involve the Federal Business Ombudsman, regional business ombudsmen or their representatives in mandatory preventive visits.

Conclusion

Russia continues to move towards a fully digital model of state control and supervision, combining the expansion of automated monitoring tools with the digitalization of administrative procedures and regulatory interactions. The reforms are designed to increase the efficiency and transparency of enforcement while reducing administrative burdens for businesses that demonstrate a high level of compliance.

At the same time, these developments place greater emphasis on companies' ability to maintain robust compliance systems, ensure the availability of digital evidence confirming compliance with mandatory requirements, and promptly respond to regulatory requests and notifications.

[20] Draft Federal Law No. 1238113-8 on "Amending the Federal Law on state control (supervision) and municipal control in the Russian Federation".

Russia Continues To Expand The Mandatory Product Labeling System Chestny ZNAK

Russia continues to expand the scope and functionality of the national digital product labeling system Chestny ZNAK. Legislative developments in 2026 demonstrate that mandatory labeling is evolving from a product traceability mechanism into a broader tool for digital market supervision covering manufacturing, importation, circulation and enforcement.

Continuous expansion of products subject to mandatory labeling

During 2026, Russia continues to expand the range of products subject to mandatory digital labeling under the Chestny ZNAK system. (Note: the detailed product-category tables below are highly granular and are primarily relevant to businesses manufacturing, importing or selling the specifically listed goods in Russia; see the flagged-items note accompanying this bulletin).

New product categories subject to mandatory labeling in 2026

Date	Product Category
01 March 2026	– Sweets and sugary confectionery products (including cookies, marmalade, marshmallows, pastila, waffles, chocolate spreads, etc.) – Clothing and light industry products (4th wave special-purpose clothing, uniforms and certain categories of light industry products)

Date	Product Category
01 April 2026	Tea and tea-based beverages
01 May 2026	– Long shelf-life flour-based confectionery products (rolls, cakes, pastries and similar products) – Radio-electronic products
01 June 2026	Coffee and chicory products
01 July 2026	Chocolate products, caramel, dragees and chewing gum
01 August 2026	Ready-to-eat meat products and meat delicacies
01 September 2026	Grocery products (expanded scope) (pasta, honey, muesli, grain products and baking mixes)
01 October 2026	Sausage products
01 December 2026	Flour, cereals, cereal mixtures and dry soup mixes

Subsequent regulatory stages for existing labeled product categories in 2026

Date	Product Category	Regulatory Stage
01 March 2026	– Meat products	– Registration of market participants in the Chestny ZNAK labeling system
	– Grocery products	– Registration of market participants for certain product categories
	– Non-alcoholic beverages	– Transition to item-level tracking (electronic document flow (EDO) with the transfer of labeling codes)

Date	Product Category	Regulatory Stage
01 March 2026	– Non-alcoholic beer	– Introduction of item-level tracking and reporting of product movement data
	– Natural fur products (fur coats and fur goods)	– Transition from RFID identification marks (KiZ) to Data Matrix codes; mandatory registration of market participants in the labeling system
	– Veterinary medicinal products	– Transition to electronic document flow with item-level tracking
	– Medical devices (certain categories)	– Transition to item-level tracking for medical gloves and sanitary and hygiene products
	– Antiseptics and disinfectants	– Transition to reporting information for each individual product unit
	– Dietary supplements (BADS)	– Expansion of the list of labeled products; transition of certain categories to item-level tracking
01 April 2026	Automotive fluids	Transition to item-level tracking; withdrawal from circulation upon retail sale through cash registers
01 September 2026	– Medical devices 2.0	– Registration of market participants; launch of mandatory labeling for the expanded list of products
	– Dietary supplements (BADS)	– Registration of market participants for the expanded list of products
	– Antiseptics	– Registration of market participants

Date	Product Category	Regulatory Stage
01 September 2026	– Wheelchairs and technical rehabilitation equipment	– Registration of market participants for new product categories
	– Children's products	– Mandatory registration in retail accounting systems; transition to item-level tracking
01 November 2026	Vegetable oils	Transition to electronic document flow with item-level tracking
30 November 2026	Radio-electronic products	Completion of the period for labeling existing stock
01 December 2026	– Construction materials	– Introduction of mandatory electronic document flow and reporting of product circulation data
	– Animal feed	– Transition to item-level tracking

The gradual extension of labeling requirements reflects the authorities' broader objective of creating a unified environment for digital market control. The Chestny ZNAK system is increasingly integrated with other state information systems and is becoming not only a tool for product identification but also an instrument for automated compliance monitoring, enforcement and prevention of the circulation of non-compliant goods.

Russia Introduces Manufacturer Verification for the Chestny ZNAK Labelling System

Resolution of the Government of the Russian Federation No. 526 dated 07 May 2026 introduces a manufacturer verification mechanism for companies applying for Data Matrix codes under the mandatory product labelling system Chestny ZNAK. This mechanism took practical effect on 06 July 2026.

The new rules apply to manufacturers of footwear, light industry goods, perfumes, eaux de toilette, tires, and dietary supplements. Before issuing labelling codes, the system operator may conduct either a documentary assessment or an on-site inspection to verify that the applicant operates genuine production facilities. The assessment may include verification of production equipment, personnel, finished goods and other indicators of manufacturing activity.

Data matrix codes may be refused where a company fails to submit the required supporting information, does not consent to an on-site inspection, cannot demonstrate actual manufacturing activities, or provides information inconsistent with its registration status in the monitoring system. The Resolution also establishes procedures for manufacturer assessments and for appealing adverse decisions.

The amendments are intended to prevent fictitious manufacturers from obtaining labelling codes and reduce the circulation of counterfeit products. The Government has indicated that similar verification mechanisms may be introduced for additional product categories in the future.

Automated enforcement and digital compliance monitoring

The role of Chestny ZNAK is also expanding beyond supervision into administrative enforcement.

Recent amendments to the Code of Administrative Offences introduce administrative liability directly linked to data generated by the digital monitoring system[21].

Beginning from 01 September 2026, retailers selling expired products after receiving automated prohibition notifications from the system will face administrative fines calculated for each individual product sold, amounting to RUB 10,000 per unit for individual entrepreneurs and RUB 20,000 per unit for legal entities.

[21] Federal Law No. 120-FZ dated 02 May 2026 “On Amendments to the Code of Administrative Offences of the Russian Federation”.

Russia expands the list of products subject to mandatory retail sales restrictions under the Chestny ZNAK system

Russia has expanded the list of goods that cannot be sold at retail where the state product traceability system Chestny ZNAK (GIS MT) identifies compliance issues. The changes were introduced by Government Resolution No. 161 as of 19 February 2026, amending the existing retail sales restriction mechanism[22].

The new rules extend the automatic sales prohibition to automotive fluids, grocery products, perfumes, cosmetics, and household chemicals. As with the previously covered product categories, retailers must not sell products where the system indicates, for example, that the item has not been properly labelled, has been withdrawn from circulation, has been suspended or prohibited from sale, or has expired.

The Resolution also introduces a new ground for blocking the sale of footwear, tyres, perfumes, packaged drinking water, and beer where the relevant conformity assessment documents have been declared invalid by the competent technical regulation authorities. This restriction applies from 01 April 2026 to products introduced to the market on or after 01 September 2025. In addition, the rules governing the sale of tobacco and nicotine-containing products have been updated by specifying the dates from which the minimum retail price restrictions apply to certain product categories.

Conclusion

Overall, the 2026 developments confirm the transition of the Chestny ZNAK system from a product-specific traceability mechanism into a general digital compliance infrastructure. Businesses operating in affected sectors should therefore focus not only on obtaining labeling codes but also on ensuring integration of internal accounting systems, electronic document flow and regulatory reporting procedures with the state monitoring framework.

[22] Government Decree of the Russian Federation No. 161 dated 19 February 2026 “On Amendments to Government Decree of the Russian Federation No. 1944 dated 21 November 2023”.

Toward A Unified EAEU Seed Market: Integration Accompanied By Enhanced Regulatory Scrutiny

Several developments in the first half of 2026 indicate that the harmonization of seed regulation within the Eurasian Economic Union (**EAEU**) is becoming an increasingly prominent policy priority. Although no binding legislative changes have yet been adopted, discussions at both the EAEU and Russian levels suggest a gradual shift toward facilitating the cross-border circulation of seed material within the Union.

At the EAEU level, the heads of the member states announced plans to establish a unified EAEU seed market to harmonize the rules governing the circulation of seed material across the Union. While the initiative remains at the political stage, its implementation could significantly reshape the regulatory framework for the intra-EAEU seed trade. For international seed companies, a harmonized market may create additional opportunities to structure breeding, seed production and distribution activities through other EAEU jurisdictions while maintaining access to the Russian market. This is particularly relevant given that certain EAEU member states do not currently apply the same restrictions on foreign breeding material and seed producers as those currently in force in Russia.

The initiative has been accompanied by discussions in Russia regarding existing regulatory barriers affecting seed circulation within the EAEU. During a roundtable convened by the Federation Council Committee on Agrarian and Food Policy, industry representatives questioned the current approach to maintaining the State Register of Breeding Achievements, under which varieties and hybrids originating from EAEU member states are effectively subject to the same regulatory treatment as those originating from non-EAEU jurisdictions. Although the discussion did not result in any immediate legislative proposals, the fact that the issue was raised at the level of the Federation Council, rather than solely by industry associations, may indicate growing political attention to reducing regulatory barriers affecting intra-EAEU seed circulation.

At the same time, recent regulatory developments demonstrate that the Russian authorities remain focused on preventing the use of EAEU supply chains to circumvent national restrictions on seed material. In particular, Rosselkhoznadzor requested that Kazakhstan suspend shipments of sunflower products to Russia after identifying consignments that had allegedly been declared as food products while containing parental sunflower seed lines of foreign origin. According to the regulator, such practices may allow market participants to bypass the stricter requirements applicable to seed material, including those relating to origin, phytosanitary control and market access. Although formally presented as a phytosanitary measure, the request may also be viewed as illustrating the authorities' willingness to use existing regulatory mechanisms to address perceived attempts to circumvent Russia's seed import regime.

Taken together, these developments suggest that the evolution of the EAEU seed market is likely to be characterized by two parallel trends. On the one hand, policymakers appear to be moving toward greater regulatory integration and the gradual removal of barriers to the circulation of seed material within the EAEU. On the other hand, Russian regulators continue to strengthen oversight aimed at ensuring that the EAEU framework is not used to bypass domestic restrictions applicable to seed imports. For international seed companies, these developments may create new opportunities to optimize regional supply chains, while at the same time increasing the importance of robust product traceability, accurate classification and comprehensive compliance across EAEU operations.

Digitalization Of Agricultural Regulation: State Information Systems Become The Primary Compliance Tool

The first half of 2026 confirmed the Russian Government's continued commitment to expanding the use of sector-specific state information systems ("**FGIS**") as the cornerstone of agricultural regulation. These digital platforms support regulatory oversight across virtually all stages of agricultural production, including seed production, the circulation and application of pesticides and agrochemicals, grain, livestock and land management. While originally introduced as electronic reporting tools, they have evolved into an integrated compliance infrastructure enabling regulators to collect, cross-check and analyze data from multiple sources, increasingly replacing traditional supervisory mechanisms.

Against this backdrop, the Ministry of Agriculture has reaffirmed that it does not intend to reconsider its approach to agricultural digitalization despite persistent concerns expressed by market participants. During consultations with industry representatives, the Ministry rejected proposals to make certain reporting functions voluntary or to shift the focus of the platforms from regulatory oversight to operational efficiency. Instead, it confirmed that compliance with FGIS requirements will remain a mandatory element of doing business in the agricultural sector.

The authorities are also continuing to integrate individual digital platforms into a unified regulatory ecosystem. In July 2026, Rosselkhoznadzor announced the integration of FGIS "Saturn", which records the circulation and application of pesticides and agrochemicals, with FGIS "Seed Production", which tracks seed production and circulation. The new functionality enables the automatic exchange of information between the two systems by linking seed batches with pesticide treatment records, reducing manual data entry and improving data consistency. More importantly, the integration significantly enhances the regulator's ability to verify information submitted through different state databases and identify discrepancies in the reporting of seed treatment and circulation.

The expansion of the FGIS framework has, however, continued to expose practical implementation challenges. Industry associations have repeatedly highlighted technical shortcomings, including unstable system performance, delays in data exchange between government platforms and limited internet connectivity in certain agricultural regions. Against this background, the Government recently removed from a draft resolution provisions that would have imposed direct liability on agricultural producers for the accuracy of information submitted through FGIS "Saturn". Although reporting obligations remain unchanged, the decision suggests a growing recognition on the part of the regulator that technical limitations of the digital infrastructure should not automatically result in enforcement against users. The amendment may therefore be viewed as an indication of a more constructive dialogue between the authorities and the agricultural sector, while leaving the overall direction of regulatory policy unchanged.

Approximately 90 violations detected

At the same time, recent enforcement practice demonstrates the growing regulatory value of the FGIS ecosystem. Throughout June 2026, Rosselkhoznadzor reported numerous compliance violations identified through FGIS "Seed Production" in several Russian regions. In one notable case, the regulator detected approximately 90 violations in the Orenburg Region after identifying businesses that had failed to upload documentation confirming the varietal identity and sowing qualities of seed material. Similar monitoring exercises in other regions uncovered hundreds of additional cases involving the circulation of unregistered seed varieties, deficiencies in the supporting documentation and non-compliance with the seed labelling requirements. These developments illustrate that FGIS is no longer merely a reporting platform but has become an effective enforcement tool, enabling the regulator to detect potential violations through automated analysis of digital data rather than relying solely on traditional inspections.

Conclusion

Taken together, these developments suggest that Russian agricultural regulation is entering a new phase in which digital compliance is becoming an integral component of regulatory oversight. Although the authorities appear increasingly willing to address practical concerns associated with the implementation of FGIS, there is no indication of any relaxation of the underlying regulatory approach. On the contrary, businesses should expect the continued expansion and integration of state information systems, accompanied by increasing regulatory reliance on automated data verification and cross-platform analytics. As a result, the accuracy, consistency and traceability of digital data are becoming as important to regulatory compliance as that with the substantive legal requirements.

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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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