

Trade and service employers in Moscow and Moscow Region to ensure at least 60% of employees are COVID-19 vaccinated

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On 16 June 2021, against the background of an increase in COVID-19 cases, the Moscow and Moscow Region authorities announced mandatory vaccinations against COVID-19 in the service and trade sectors, which we have summarised below and in the [attached infographic](#).

Who is affected by the new requirements?

Under the Decrees of the Chief Public Health Officers in Moscow ([No. 1 dated 15 June 2021*](#)) and the Moscow Region ([No. 3 dated 16 June 2021*](#)), at least 60% of employees of organisations and individual entrepreneurs and providers under civil law contracts with the same are subject to compulsory vaccinations in the following sectors:

- trade;
- public catering;
- personal services;
- client departments of financial and postal organisations;
- beauty salons, cosmetic and spa salons, massage parlours, solariums, baths, saunas, fitness centres, fitness clubs, swimming pools;
- public transport and taxis;
- housing and power supply;
- education, healthcare, social protection and social services;
- culture, exhibitions, educational events (including museums, exhibition halls, libraries, lectures, trainings);
- leisure events, entertainment events, shows;
- children's playrooms and entertainment centres, children's camps and other children's recreation facilities, including in parks of culture and rest, shopping and entertainment centres;
- theatres, cinemas, concert halls;
- mass physical culture and sports events;
- multifunctional centres for the provision of state and municipal services; and
- state civil and municipal service.

Persons involved in organising advertising events represent an additional category of those subject to vaccination in the Moscow Region.

The requirement for vaccination does not apply to persons with medical contraindications contained in letters of the Ministry of Health of Russia [No. 1/I/1-332*](#) dated 21 January 2021 and [No. 1/I/1-1221*](#) dated 20 February 2021, in particular:

- age of up to 18 years;
- pregnancy;
- individual intolerance to the components of the vaccine;
- exacerbation of chronic diseases;
- acute infectious and other diseases;

- the presence of a high level of antibodies according to the results of laboratory tests.

What is the time frame?

Depending on the vaccine used, the vaccination must be carried out within the following time frame:

- by 15 July 2021 – for the first component of a two-component vaccine or a one-component vaccine; and
- by 15 August 2021 – for the second component of a two-component vaccine.

What information must employers provide?

Employers must ensure people are vaccinated. The corresponding reporting procedure is established by Moscow Mayor [Executive Order](#)* No. 32-UM dated 16 June 2021 and Moscow Region Governor [Decree](#)* No. 184-PG dated 16 June 2021.

As a result, in the period from 1 to 15 July 2021, employers in Moscow and the Moscow Region are required to provide the following information to the authorities through their personal account on [mos.ru](#)* and [uslugi.mosreg.ru](#)*, respectively:

- information about the employer (as legal entity or individual entrepreneur):
 - full and short name of the organisation, or full name of the individual entrepreneur;
 - tax identification number (INN);
 - main state registration number (OGRN);
 - registered address;
 - main and additional types of activities carried out according to OKVED;
- total number of employees;
- information about vaccinated employees:
 - personal pension account number (SNILS);
 - compulsory health insurance policy number (if any);
 - passport or, for foreign citizens, patent data;
 - mobile phone number.

In the Moscow Region, information is provided both in relation to vaccinated individuals and individuals with a high level of antibodies recorded no earlier than three months before the verification of the relevant information.

In addition, employers in Moscow and the Moscow Region have been instructed to intensify explanatory work among employees about the need for vaccination. Previously, on 12 June 2021, Moscow employers were again recommended to transfer at least 30% of employees to remote work, including all employees over 65 years of age and employees with chronic diseases. In turn, the Moscow Region authorities on 13 June 2021 recommended employers to take measures in relation to employees aimed at encouraging vaccination (including by the mandatory posting of information about the nearest vaccination points in a special form).

Sanctions

In the near future, special sanctions will likely be introduced for non-compliance with vaccination requirements. According to the [statements](#)* of the Moscow authorities, fines for businesses could be up to RUB 1m (EUR 11,584), and enterprises may face suspended operations.

Currently, federal legislation does not provide for sanctions for refusal to vaccinate, but citizens and organisations are liable for violating the requirements for ensuring the sanitary and epidemiological well-being of the population in accordance with Article 6.3 of the Code on Administrative Offences. Thus, a fine from RUB 50,000 to RUB 1m (from EUR 580 to EUR 11,584) is stipulated for individual entrepreneurs and from RUB 200,000 to RUB 1m (from EUR 2,317 to EUR 11,584) for legal entities. Until special vaccination legislation is adopted, individuals and organisations are likely to be held liable under the above article.

Clarifications

Given the broad wording of the Decrees for the areas of activity of affected companies, authorities are expected to issue additional clarifications. For the moment, the Moscow Department of Rospotrebnadzor and the Operational Headquarters have only issued informal [comments](#)* on mandatory vaccinations.

Until then, employers will be able to obtain additional information on the procedure for vaccinations and reporting

by calling the relevant hotlines: +7 495 197 97 77 (for Moscow) and 122 (for the Moscow Region).

We hope you found it an interesting read and, if you would like any more detailed information and advice, do not hesitate to get in touch with CMS Russia experts **Christophe Huet**, **Irina Shurmina**, **Ekaterina Elekchyan** and **Alisa Mikheeva** or your regular contact at CMS Russia.

*CMS has created a **Coronavirus Hub** dedicated to the issues raised by the COVID-19 pandemic. This hub gives you full and permanent access to content created by CMS Russia lawyers and CMS offices around the world in response to the crisis. The hub is updated regularly.*

We remain available at all times to address any requests or difficulties you may have on a one-to-one basis. You can be in immediate contact with our experts by emailing cmsrussia-coronavirus@cmslegal.ru.

** In Russian*

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