

## A decree enforcing a waste recycling experiment for specific groups of imported goods

On 1 June 2024, the Government of the Russian Federation issued a [Decree](#)\* ("the **Decree**") to conduct an experiment on specific groups of goods, including packaged goods.

We previously [discussed](#) the draft of this Decree ("the **Draft**").

According to the Decree, from 1 September 2024 to 31 December 2025, importers of certain types of goods will be required to pay an environmental fee in advance, before customs clearance, rather than post-factum as per the usual procedure. From 1 January 2026, this rule will become mandatory for all importers bringing in goods from non-EAEU countries. Thus, the experiment aims to test this new mechanism.

Importers may opt out of paying the environmental fee by submitting a notification of their intent to independently recycle waste, along with a security for the environmental fee (in the form of a bank guarantee or surety) in case they fail to carry out the recycling.

It is important to note that the law provides two options for independent waste recycling by importers:

- i) Utilising their own infrastructure; or
- ii) Entering into a contract with a specialised recycling organisation (recycler).

Compared to the Draft, the Decree has expanded the list of goods (including packaged goods) subject to the experiment. The list now includes:

- Trousers and breeches;
- Pneumatic tires and inner tubes;
- Household washing machines;
- Lead-acid batteries;
- Plastic (polypropylene) packaging;
- Aluminium packaging with a capacity of up to 1 litre; and
- Consumer packaging made from composite materials based on paper and cardboard.

The Decree clarifies that the experiment also covers the packaging of these goods, even if the packaging is not explicitly listed. Conversely, if a non-experimental good is imported in packaging listed in the Decree, the experiment does not apply to such packaging.

In accordance with the Decree, importers are required to submit reports to the unified federal state information system for recording the waste from using goods ("the **System**") detailing the mass of imported goods and packaging, as well as reports on the independent recycling of waste from these goods. The Decree includes forms for the respective reports.

The Federal Customs Service is also required to submit information about imported goods to the System.

All reports uploaded to the System during the experiment will be reviewed by Rosprirodnadzor, which will issue an order to the importer to rectify any revealed violations within ten business days.

By 15 September 2025, importers must submit to the Ministry of Natural Resources any issues encountered while forming and submitting reports to the System.

By 1 October 2025, Rosprirodnadzor will also submit its findings on the experiment to the Ministry of Natural Resources.

The Ministry of Natural Resources is expected to present a report analysing the experiment's results to the Government of the Russian Federation by 1 November 2025. This will give the Government about two months to assess the results and, if necessary, propose legislative amendments.

Like the Draft, the Decree does not exempt importers from penalties for violating the established rules during the experiment. Accordingly, under general legal provisions, importers failing to fulfil their waste recycling obligations (e.g., not submitting or providing false information to the System or failing to ensure independent recycling) may face administrative penalties under Article 8.2 of the Administrative Offences Code of the Russian Federation. It is likely, however, that administrative liability will be subject to the importer's failure to comply with a corresponding order from Rosprirodnadzor.

### Conclusion

This experiment can be seen as a transitional period before the full implementation of the new waste recycling obligations for importers.

It is unlikely that the legislative requirements will be repealed based on the experiment's results. Instead, the mechanism will likely be refined, and the level of coordination and interaction among participants will be enhanced.

We recommend all importers to check now whether their imported goods fall under the experiment's scope to be prepared to meet the Decree's requirements. Additionally, they should decide in advance how they will fulfil their waste recycling obligations: by paying the environmental fee or through independent recycling (securing a bank guarantee or a surety contract with a recycler).

\* *In Russian*

For further information, please email the author or your usual contact at our firm.

## Author



**Dmitry Bogdanov**  
Counsel  
Real Estate & Construction | ESG  
[E dmitry.bogdanov@seamless.legal](mailto:dmitry.bogdanov@seamless.legal)

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