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Extended Producer Responsibility in Russia - rules for importers clarified



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As we previously [reported](#), the experimental period for the new Extended Producer Responsibility (EPR) mechanism for specific categories of imported goods was extended at the end of last year.

At that time, however, the rules for conducting the experiment during its extended period had not yet been established. Therefore, importers of goods covered by the experiment were required to pay the environmental fee and submit reports according to the general procedure – by 15 April of the year following the reporting period.

Government [Decree](#)* No. 650 as of 30 May 2026 has now clarified the position. For goods participating in the experiment that will be imported into Russia **between 1 September 2026 and 1 September 2027**, importers will be required to pay the environmental fee in advance (prior to customs clearance) and submit report on the weight of imported goods separately for each consignment. For goods supplied outside this period, the general procedure will apply.

No other significant changes have been made to the experimental rules so far. At the same time, discussions continue on a [draft law](#)* which, inter alia, provides for:

- Introduction of a deferral of up to 90 days from the date of import for payment of the environmental fee and submission of the report on the weight of imported goods; and
- Removal of the suretyship agreement from the list of available methods for securing the environmental fee payment in case of failure to independently fulfil waste disposal obligations.

If the draft law is adopted, we can expect further clarification to the experimental procedure.

We will continue to monitor developments in EPR regulation.

* *In Russian*

Author:

Dmitry Bogdanov, Counsel, Head of Environmental Law,
dmitry.bogdanov@sl-legal.ru