

LEGAL IMPACT OF THE CORONAVIRUS COVID-19 PANDEMIC IN RUSSIA

01 April 2020

The coronavirus COVID-19 pandemic has brought about unprecedented challenges for both the global and Russian economy. As the situation caused by the coronavirus COVID-19 pandemic is rapidly exacerbating, the Russian authorities are taking measures to prevent the spread of coronavirus COVID-19 and support those who are being harmed by of the pandemic. This alert outlines the main legal issues and legislative measures taken by the Russian authorities to face the spread of coronavirus COVID-19 and the related economic challenges. We hope this overview will help you navigate this rapidly changing landscape.

1. Contractual Relations: Force Majeure and Other Concepts

The economic turmoil caused by the coronavirus COVID-19 pandemic may largely affect contractual obligations. Under Russian law, events such as the coronavirus COVID-19 pandemic may have the following effect on contractual relations.

a. *Force Majeure Event*

Russian law provides that a party that has breached its obligation is exposed to liability unless it proves that the performance was impossible due to a force majeure event, ie an act of God, emergency or other unavoidable circumstances.¹

In Russia, force majeure is generally evidenced by a certificate issued by the Russian Chamber for Commerce and Industry ("**CCI**").

In March 2020, the CCI announced the issuance of force majeure certificates with regard to the coronavirus COVID-19 pandemic for both international and domestic trade contracts. However, apparently, it is not the coronavirus COVID-19 pandemic itself that the CCI recognises as a force majeure event, but the restrictive measures the Russian authorities have been taking to prevent the spread of the pandemic, if such measures resulted in a breach of obligations.² The Moscow CCI specifically emphasised that a financial crisis or a deterioration in the company's financial standing are standard entrepreneurial risks and are not treated as force majeure events.

Some Russian authorities have also declared the coronavirus COVID-19 pandemic to be a force majeure event, in particular:

- on 13 and 14 March 2020 the "high alert regime" imposed due to the spread of coronavirus COVID-19

¹ Para. 3 of Article 401 of the Russian Civil Code.

² Q&A of the Moscow Chamber for Commerce and Industry with regard to coronavirus COVID-19, available at: <https://mostpp.ru/news/deyatelnost-mtpp/fors-mazhor-iz-za-koronavirusa-voprosy-i-otvety/>.

was declared an "unavoidable circumstance" in the Moscow Region³ and Moscow,⁴ respectively;

- on 18 March 2020 the Russian Federal Antimonopoly Service declared the coronavirus COVID-19 pandemic a force majeure event for the purposes of legislation on public procurement, inspections and administrative proceedings;⁵ and
- on 19 March 2020 the Russian Ministry of Finance declared the spread of coronavirus COVID-19 to be a force majeure event for purposes of public procurement legislation.⁶

b. *Material Change of Circumstances*

Russian law provides that a contract may be amended or terminated in court due to a '*material change of circumstances*'. The change of circumstances is deemed material where the parties would have not entered into a contract or would enter into it on substantially different terms, if they could reasonably foresee this change. A contract may be amended or terminated in court only if the parties have failed to reach agreement on the new terms of such contract.⁷

Depending on the industry and other particularities of the case, the coronavirus COVID-19 pandemic itself in *conjunction* with the restrictive measures undertaken in its regard may result in an event which would be treated as a material change of circumstances. Here we note that neither the foreign sanctions⁸ imposed against Russia during the Ukrainian crisis, nor the global financial crisis of 2008⁹ were generally recognised by Russian courts as force majeure events or material adverse changes.

c. *Impossibility of Performance*

Russian law allows the termination of an obligation due to:

- the impossibility to perform resulting from an event beyond the control of either party ("**Factual Impossibility**");¹⁰ and
- the impossibility to perform caused by an act of state or municipal authorities ("**Legal Impossibility**").¹¹

The Legal Impossibility concept may potentially apply in certain industries which were affected by restrictions imposed by public authorities in connection with the coronavirus COVID-19 pandemic.

³ Resolution No. 115-PG of the Governor of the Moscow Region dated 13 March 2020 available at: <https://mosreg.ru/dokumenty/normotvorchestvo/prinyato-gubernatorom/postanovleniya/14-03-2020-09-55-45-postanovlenie-gubernatora-moskovskoy-oblasti-ot-13>.

⁴ Decree No. 20-UM of the Moscow Mayor dated 14 March 2020, available at: <https://www.mos.ru/upload/documents/docs/20-YM.pdf>.

⁵ Letter No. IA/21684/20 from the executive of the Russian Federal Antimonopoly Service I.Yu. Artemyev to the executives of territorial bodies of the Russian Federal Antimonopoly Service dated 18 March 2020, available at: https://fas.gov.ru/ckeditor_assets/attachments/1049/doc02512220200319161729.pdf.

⁶ Letter No. 24-06-06/21324 of the Russian Ministry of Finance dated 19 March 2020, available at: https://www.minfin.ru/common/upload/library/2020/03/main/24-06-06_21324.pdf.

⁷ Article 451 of the Russian Civil Code.

⁸ Resolution of the 18th Arbitrazh Appeal Court dated 27 November 2015 in case No. A07-12459/2015; Resolution of the 7th Arbitrazh Appeal Court dated 17 June 2015 in case No. A27-819/2015, Appeal Resolution of the Moscow City Court dated 16 April 2015 in case No. 33-12784; Decision No. 301-ES16-18586 of the Commercial Division of the Russian Supreme Court dated 23 May 2017 in case No. A39-5782/2015.

⁹ Resolution of the Federal Arbitrazh Court for the Volga-Vyatka District dated 7 February 2011 in case No. A82-4924/2010; Resolution of the Federal Arbitrazh Court for the North-Caucasus District dated 8 June 2011 in case No. A18-348/2010; Decision No. VAS-10734/10 of the Russian Supreme Arbitrazh Court dated 18 August 2010 in case No. A42-2857/2009.

¹⁰ Article 416 of the Russian Civil Code.

¹¹ Article 417 of the Russian Civil Code.

The courts have previously held that in order for Factual Impossibility to apply, it needs to be objective,¹² *ie* where no person or legal entity can perform the obligation in question. For instance, a supplier should not theoretically be able to claim Factual Impossibility due to a shortage of certain goods if other suppliers are not affected by such shortage.

Further to our discussion above, we note that there is not yet any uniform position among Russian courts in respect of the applicability of the abovementioned concepts to the coronavirus COVID-19 pandemic. Given that Russian courts have suspended hearings until at least 10 April 2020 (please see paragraph 3 below for further detail), further court practice on the matter is to be awaited once the courts reopen.

2. Employment and Migration

a. *Non-Working Days from 30 March until 3 April 2020*

The Russian President declared¹³ that the week starting from 30 March until 3 April 2020 inclusive is to be "non-working" days.

The "non-working week" does not apply only to certain employers, including:

- continuously operating organisations (eg heat and energy suppliers);
- healthcare and pharmacy organisations;
- organisations supplying the population with food products and essential goods;¹⁴
- organisations performing urgent work in emergencies and other extraordinary situations;
- organisations engaged in urgent repairs and loading and unloading works.

Federal, regional and municipal authorities and mass media will also continue working, but must reduce the number of employees working during the non-working week.

As clarified by the Russian Ministry of Labour, employees who work remotely may also continue working remotely during this period.

Employers must pay to employees their normal remuneration for these days regardless of whether an employee is working or not. Those who continue to work are not entitled to a higher remuneration as "non-working" days are not treated as weekends or public holidays.¹⁵

b. *Suspension of the Issuance of Work Permits*

On 18 March 2020, the Russian government temporarily suspended¹⁶ the issuance of (i) official invitations to undertake employment activities in Russia, (ii) work permits and (iii) permits for employers to hire foreign citizens.

¹² Item 21 of the Review No. 2 (2017) of the court practice by the Russian Supreme Court approved by the Presidium of the Russian Supreme Court on 26 April 2017; Decision of the Commercial Division of the Russian Supreme Court dated 30 January 2017 in case No. 305-ES16-14210, A40-85057/2015.

¹³ Presidential Decree No. 206 "On the Declaration of Non-Working Days in the Russian Federation" dated 25 March 2020. Available at: <http://publication.pravo.gov.ru/Document/View/0001202003250021>.

¹⁴ The list of essential goods was specified by Order No. 762-r of the Russian Government dated 27 March 2020, available at: <http://static.government.ru/media/files/44ZU60lhQrKZY5frWXGrlyZp5lbe95jY.pdf>.

¹⁵ Recommendations of the Russian Ministry of Labor to employees and employers in connection with the Decree of the President of the Russian Federation dated 25 March 2020 No. 206 "On Announcement of Non-Working days in the Russian Federation", circulated by the Letter of the Russian Ministry of Labor No. 14-4/10/P-2696, available at <https://rosmintrud.ru/docs/1368> (the "**Recommendations**").

Addendum to the Recommendations, available at: <https://rosmintrud.ru/docs/1368> and <https://rosmintrud.ru/docs/1370>.

¹⁶ Item 5 of Resolution of the Russian Government No. 635-r dated 16 March 2020, available at: <http://publication.pravo.gov.ru/Document/View/0001202003170002?index=1&rangeSize=1>.

c. *Prolongation of Temporary Stay in Russia*

On 19 March 2020 the Russian Ministry of Foreign Affairs issued a clarification¹⁷ that the term of stay of foreign citizens currently staying in Russia will be prolonged, including by means of prolongating visas and residence permits. This applies even if the relevant documents have already expired. It is also not necessary to leave Russia to obtain a new work patent.

3. Restrictions on Movement and Operations

a. *Restriction on Movement*

Numerous Russian constituent entities, including Moscow,¹⁸ have introduced¹⁹ a self-isolation regime. The introduced measures may vary between Russian constituent entities, but generally include:

- a prohibition on leaving the place of residence, except for certain reasons, such as (i) going to and from work and (ii) going to the nearest stores; and
- mandatory social distancing for at least 1.5 metres between people.

b. *Suspension of the Operation of Courts*

From 19 March 2020 until 10 April 2020 inclusive Russian courts have suspend personal appointments and case hearings except for undelayable cases and summary procedures.²⁰

It is still possible in most cases to submit procedural documents via electronic resources ("*Moy Arbitr*") or postal services. However, the Moscow Arbitrazh Court has also suspended the electronic filing of procedural documents from 27 March 2020 until 6 April 2020.²¹

4. Regulatory

a. *Moratorium on Inspections*

Russian authorities have suspended until 1 May 2020 the scheduling of certain types of inspections of legal entities, including on-site customs and tax inspections.²² In addition, federal executive authorities have the right (but not the obligation) to suspend inspections that have already been started.

This moratorium does not apply to inspections in respect of human life and health or emergency situations and to office (documentary) customs and tax inspections.

¹⁷ The Clarification of the Russian Ministry of Internal Affairs is available at: <https://xn--b1aew.xn--p1ai/news/item/19812878>.

¹⁸ Decree No. 34-UM of the Mayor of Moscow dated 29 March 2020, available at: <https://www.mos.ru/upload/documents/docs/34-YM.pdf>.

¹⁹ The list is available at: <https://xn--80aesfpebagmfb1c0a.xn--p1ai/news/20200331-0704.html>.

²⁰ Resolution No. 808 of the Presidium of the Russian Supreme Court and the Presidium of the Russian Council of Judges dated 18 March 2020, available at: <http://www.supcourt.ru/files/28814/>.

²¹ Order No. 6-k of Chairman of Moscow Arbitrazh Court dated 26 March 2020 as stated on the website my.arbitr.ru. At the same time, the publication regarding this Order on the website of the Moscow Arbitrazh Court (<https://msk.arbitr.ru/node/15916>) states that receiving and sending of correspondence is postponed from 30 March until 3 April inclusive. The publication does not mention directly suspension of submission of procedural documents via electronic resources.

²² Item 1 of the Instruction of the Russian Prime Minister dated 18 March 2020, available at: <http://government.ru/orders/selection/401/39205/>.

Order No. ED-7-2/181@ of the Russian Federal Tax Service dated 20 March 2020, available at: https://www.nalog.ru/rn77/about_fts/docs_fts/9685945/.

b. Online Retail Sale of Drugs

The Russian President has issued a decree²³ introducing the online retail sale of non-prescription drugs, which was previously prohibited in Russia. Only licensed pharmacies with the requisite authorisation will be allowed to sell drugs online. The Russian Government is yet to adopt the procedure for issuing such authorisation, or the requirements for eligible pharmacies and rules of delivery.

c. Regulation of Prices for Drugs and Medical Devices

A newly passed law granted the Russian Government²⁴ powers to limit prices for medical devices and drugs. Such powers may be exercised in the following cases:

- an emergency or threat of the spread of a dangerous disease; or
- if retail prices of medical devices or drugs increase by 30% or more within 30 days of a resolution of the Government on monitoring retail prices.

d. Public Tenders

Certain medical products originating from outside of the Eurasian Economic Union ("**EAEU**") were limited from participating in public tenders: if at least two offers involving products of EAEU-origin were offered at the public tender, all other offers involving products originating from outside of EAEU had to be declined without consideration. From 25 March 2020 this rule is temporary not applicable, and non-EAEU medical products can be offered in public tenders without any restrictions²⁵.

e. Export of Medical Devices

Starting from 2 March 2020 until 1 June 2020, the export of certain products including masks, individual means of protection, professional protective clothes and gloves, respiration equipment and accessories, and similar products has been banned.²⁶ The ban does not apply to the export of products under humanitarian aid programs.

f. Certification

The Russian Ministry of Industry and Trade together with the Russian Ministry of Economic Development have issued recommendations on production sites inspection visits in connection with the coronavirus COVID-19 pandemic²⁷. These recommendations propose the following measures relating to goods originating from countries with an adverse epidemiological situation:

- six-month deferral of planned production sites inspection visits to assess the conditions of serial production of goods;
- soon to expire conformity certificates for serial goods may be renewed subject to the last periodical assessment of such certified goods being positive; and
- goods released for the first time as well as goods with an expired certificate may be certified on the basis of certification rules for separate lots or single devices.

²³ Decree No. 187 of the President of Russia dated 17 March 2020, available at: <http://publication.pravo.gov.ru/Document/View/0001202003170037>.

²⁴ Federal Law No 67-FZ dated 26 March 2020, available at: <https://rg.ru/2020/03/30/a1852309-dok.html>.

²⁵ Item 1.16 of the plan of priority measures to ensure sustainable economic development in connection with the spread of coronavirus COVID-19 dated 17 March 2020, available at: <http://static.government.ru/media/files/vBHd4YRxpULCaUNNTFLVpPSZbMCIA2Zq.pdf>.

²⁶ The Governmental Resolution No. 223 dated 2 March 2020, available at: <http://static.government.ru/media/files/odPVbEJwgG6QH0ryeIXGwqAIBTnzjfMm.pdf>.

²⁷ Available at: <http://minpromtorg.gov.ru/common/upload/docVersions/5e7118fbb9cbf/actual/koronavirus.pdf>.

These rules may also apply to goods originating from Russia subject to the consent of the applicant.

5. Customs and Borders

a. *Relief from Import Customs Duty for Medical Products*

On 16 March 2020 the Council of the Eurasian Economic Commission introduced relief from import customs duty for medical products needed to prevent the spread of coronavirus COVID-19. The list of such products includes masks, sanitisers, vaccines and their components, certain medical devices, instruments and equipment.²⁸

Relief from import customs duty applies subject to (i) registration by 30 September 2020 of a customs declaration for the procedure of release for domestic consumption; and (ii) confirmation of the designated purpose issued by a competent public health authority of EAEU member state (in Russia – the Ministry of Health).

b. *Priority of Essential Goods*

As a general rule, trucks and trailers must pass weight control in order to be admitted onto public roads in Russia. Often the controlling procedure takes much time owing to long queues at the controlling points. From 17 March 2020 until 25 April 2020, vehicles transporting food and non-food essential goods are exempted from weight control.²⁹ In addition, starting from 20 March 2020, a "green customs channel" regime will be applied for the customs clearance of "essential goods".³⁰ The green channel regime gives priority to paperwork and allows less strict control over essential goods.

On 28 March 2020, the Russian Government published a list of essential goods (except for food products) ("**List**")³¹.

The List covers many categories, including inter alia:

- baby products (including dummies);
- soap and washing items, cleaning and polishing items;
- sanitary-hygienic items and personal care items;
- items for individual protection; and
- medical products and disinfectants.

Regional authorities are authorised to supplement the List in their region, depending on the situation in the specific region.

While all other retailers have been forced to close (please see para 2.a above for further details), retailers that sell at least one group of products from the List, are allowed to remain open and sell other goods not included in the List.

²⁸ The Decision of the Council of the Eurasian Economic Commission No. 21 dated 16 March 2020 "On amending some decisions of the Commission of the Customs Union and on approving the list of goods imported into the customs territory of the Eurasian Economic Union in order to implement measures by the Member States of the Eurasian Economic Union to prevent and avert the spread of coronavirus infection 2019-nCoV", available at: https://docs.eaeunion.org/docs/ru-ru/01025251/err_24032020_21.

²⁹ The letter of Rostransnadzor dated 20 March 2020 is available at: <https://rostransnadzor.ru/Press-sluzhba/novosti-i-sobytiya/document/62229>.

³⁰ Available at: <https://tass.ru/ekonomika/8023637>.

³¹ The Governmental Resolution No. 762-r dated 27 March 2019, available at: <http://static.government.ru/media/files/HOOzuybpJ2FAXS9gljaXaSsVB4GeO2Bl.pdf>.

The List only refers to finished products and does not refer to any raw materials. However, it may be argued that they are still part of the production chain of goods mentioned in the List and fall within the purpose to continue production.

c. Border Restrictions

Russia suspended almost all international flights from 27 March 2020. There are certain limited exemptions from these restrictions, eg return of Russian citizens to Russia.³²

Starting from 30 March 2020, movements through automobile, railway, pedestrian and river border checkpoints of the Russian Federation, including the Russia-Belarus land border are restricted.³³

These restrictions do not apply to, inter alia, Russian citizens returning from other countries as well as to drivers of cargo trucks, railway and vessel crews independent of their citizenship.³⁴

We note that those who arrive from abroad need to comply with the quarantine regime for the period of 14 days.³⁵

6. Corporate: Absentee Meetings in 2020

In accordance with Russian law, resolutions of shareholders of joint-stock companies on certain matters³⁶ may only be passed by a general shareholder meeting held in person. A board of directors (supervisory board) of a joint-stock company may pass a resolution that a general shareholder meeting in 2020 is to be held in the form of absentee meeting, even if its agenda includes matters requiring a general shareholder meeting to be held in person.³⁷ This does not apply to general participant meetings in limited liability companies – the approval of annual reports and annual balance sheets still requires a general participant meeting to be held in person.

7. Insolvency: Moratorium on Bankruptcy Petitions

a. Suspension of Bankruptcy Petitions by Federal Executive Bodies and State Corporations

The Russian Prime Minister Mikhail Mishustin instructed the Russian Federal Tax Service, state corporations and federal executive bodies to suspend until 1 May 2020 the filing of bankruptcy petitions against persons or entities having overdue debt to (i) the budgets of the Russian Federation, (ii) state corporations, (iii) federal executive bodies and (iv) organisations subordinate to such federal executive bodies.

Prime Minister Mishustin also recommended head officials of the Russian constituent entities and the Russian Central Bank also refrain from filing bankruptcy petitions against persons and entities having overdue debt to (i) the budgets of the Russian constituent entities; (ii) executive bodies of the Russian

³² Decisions of the Meeting of the Presidium of the Coordination Council of the Russian Government on fighting a spread of new coronavirus infection held on 25 March 2020 are available at: <http://government.ru/orders/selection/401/39276/>.

Instruction of the Russian Prime Minister dated 27 March 2020, available at: <http://government.ru/orders/selection/401/39286/>.

³³ The Governmental Resolution No. 763-r dated 27 March 2019, available at: <http://static.government.ru/media/files/uPySAqzA9AV39jD1h71za3OR9eslxlDj.pdf>.

³⁴ The Clarification of the Russian Federal Customs Service, available at: <http://customs.ru/press/federal/document/233009>.

³⁵ Resolution No. 7 of the Chief Sanitary Officer of Russian dated 18 March 2020, available at: <https://www.rospotrebnadzor.ru/upload/iblock/361/posatnovlenie-izolyatsiya.pdf>.

³⁶ Para. 2 of Article 50 of Federal Law No. 208-FZ "On Joint-Stock Companies" dated 26 December 1995 (as amended).

³⁷ Article 2 of Federal Law No. 50-FZ "On the Acquisition by the Government of the Russian Federation from the Central Bank of the Russian Federation of ordinary shares of public joint-stock company "Sberbank of Russia" and repealing certain provisions of legislative acts of the Russian Federation" dated 18 March 2020.

constituent entities; (iii) organisations subordinate to such executive bodies of the constituent entities; and (iv) credit organisations³⁸.

We note that there is a currently pending draft Resolution of the Russian Government that can affect the suspension of bankruptcy petitions as well as tax issues regarding the coronavirus COVID-19 pandemic.³⁹

b. Proposed Moratorium

On 25 March 2020 the Russian President also proposed to introduce a six-month moratorium on filing bankruptcy petitions against affected businesses.⁴⁰

On 26 March 2020 the Russian Government introduced to the Russian State Duma a bill that would allow the Russian Government to introduce a moratorium on filing creditor bankruptcy petitions. These powers would be exercisable in extraordinary circumstances, including emergency cases and a substantial change in the exchange rate of the Russian rouble.⁴¹

Furthermore, this bill, if passed, would also allow bankruptcy meetings of (i) creditors, (ii) the creditors committee; (iii) the debtor's current and former employees and (iv) construction participants to be held in the form of absentee meetings, provided that a moratorium is introduced.

8. Other Measures

In addition to the measures listed above, Russian authorities also adopted other measures, including the following:

- the deferral of tax payments and social insurance payments due before 1 May 2020 for tourism and air travel businesses⁴² as well as for businesses acting in the spheres of sports, arts, culture and cinematography;⁴³
- the deferral of rent payments under rental agreements in respect of federal property for small and medium-sized enterprises;⁴⁴
- the suspension of activities of the foodservice industry from 28 March 2020 to 5 April 2020, except for remote services (eg delivery);⁴⁵

³⁸ Items 4, 5 of the Instruction of the Russian Prime Minister dated 18 March 2020, available at: <http://government.ru/orders/selection/401/39204/>.

³⁹ The draft Resolution of the Russian Government On the Measures of Provision of Sustainable Development of Economy is available at: <https://regulation.gov.ru/projects#npa=100768>.

⁴⁰ Address of the President of Russia to Russian citizens of 25 March 2020, available at: <http://kremlin.ru/events/president/news/63061>.

⁴¹ Article 3 of Bill No. 931192-7, available at: <https://sozd.duma.gov.ru/bill/931192-7>.

⁴² Item 1 of the Instruction of the Russian Prime Minister dated 18 March 2020, available at: <http://government.ru/orders/selection/401/39204/>.

⁴³ The Instruction of the Russian Prime Minister dated 20 March 2020, available at: <http://government.ru/orders/selection/401/39230/>.

⁴⁴ Order No. 670-r of the Russian Government dated 19 March 2020, available at: <http://static.government.ru/media/files/2S8tyUY1Ev1qJrZe3zJe9s3pEpFYh1i.pdf>.

⁴⁵ Item 2 of the Instruction of the Russian Prime Minister dated 27 March 2020, available at: <http://government.ru/orders/selection/401/39288/>.

The Russian authorities have also announced other measures mainly set out in the plan of the Russian Government dated 17 March 2020⁴⁶ and the address of the Russian President on 25 March 2020⁴⁷, which are to be introduced in the future and will include:

- a six-month deferral of all taxes, excluding VAT, for small and medium-sized enterprises;
- a six-month deferral of payments due from small and medium-sized enterprises to banks under loan agreements;
- the expansion of the preferential crediting program, including the removal of restrictions on certain types of lending, the increase in the amount of subsidies and the expansion of the guarantee support program for small and medium-sized enterprises;
- a reduction in social insurance payments for small and medium-sized enterprises from 30% to 15% (on the amount of wages exceeding the minimum wage);
- a 15% tax on dividends transferred to foreign accounts and the revision of double taxation treaties. The Russian President announced that should other parties to these treaties not accept the amendments proposed by Russia, Russia may unilaterally withdraw from such treaties;
- the introduction of personal income tax on interest income on bank deposits (on the amount of such investments exceeding RUB 1,000,000) and debt securities;⁴⁸
- the restructuring of loans affected by a deterioration in the situation due to the coronavirus COVID-19 pandemic.

Authored by Evgeny Glukhov and Ivan Sezin (Corporate / Finance), Angelika Yakhneva and Aleksey Aronov (Regulatory / Commercial).

⁴⁶ Plan of primary measures on the provision of the sustainable development of the economy under the conditions of worsening the situation in connection with the spread of the novel coronavirus infection approved by the Russian Prime Minister dated 17 March 2020, available at: <http://static.government.ru/media/files/vBHd4YRxpULCaUNNTFLVpPSZbMCIA2Zq.pdf>.

⁴⁷ Address of the President of Russia to Russian citizens of 25 March 2020, available at: <http://kremlin.ru/events/president/news/63061>.