



New procedure of immigration registration: when the dust of first days has settled

The new procedure of immigration registration came into effect on 8 July in pursuance of the amended Federal Law No. FZ-109 of 18 July 2006 **“On immigration registration of foreign citizens and stateless persons in the Russian Federation”**.

This date came as a watershed, dividing the history of immigration registration into “before” and “after”. Until the bill was signed into a law, there were those who did not believe that owners of residential properties might be made the official hosts/inviting parties, responsible for having their tenants duly registered with the immigration authorities. The business community was additionally flustered by the legislators’ agility who launched the new rules even before the special immigration regime for the period of FIFA World Championship was over.

Now that several days passed and the emotional response has somewhat subsided, it is just the time that Deloitte’s immigration team updated you on the practical issues of the new procedure, its interpretation by the state authorities and the reaction of business.

While the special registration procedure is in force (i.e., until 25 July 2018):

- Companies now advise their foreign assignees who are currently staying in Russia based on a previously obtained registration to minimise their trips within Russia and abroad.
- If there is an urgent need to leave/come to Russia before this period

over and no registration is available through the landlord/property owner, the majority of employers believes it is preferable to consider hotels for accommodation for foreigners and their dependents until 25 July.

- After checking out from the hotel on/after 25 July, it is recommended (especially for highly-qualified specialists (HQS)) to re-enter the country to 'activate' their grace period allotted for registration (for HQS is 90 days upon arrival to Russia).

After the regular procedure kicks back in (after 25 July 2018):

- We observe that employers and foreign nationals are actively communicating with the landlords informing them of the new rules, specifics and exact procedure trying to set up an agreed way of further cooperation.
- Based on our experience and comments from the local immigration offices, we understand that immigration registration can be sponsored not only by the property's owner, but also by a person who is officially registered at the respective address and can present a special passport stamp ('propiska stamp') to prove it. This is crucial for those tenants who rent from foreign nationals or owners who permanently live abroad.
- There is still a chance that third parties and/or employers will continue to have the right to assist the foreign employees and their family members with completing the immigration registration process, in particular, based on a power of attorney from the landlord and if a properly executed rent agreement signed by the employer/on its behalf is in place. We understand that many companies consider this scenario as the most preferable and are currently re-structuring the rent agreements respectively. This, however, needs to be additionally confirmed by the authorities. Currently, most local immigration offices refuse to process applications for registration, submitted based on a power of attorney.

Deloitte's immigration team will keep you posted on how the new procedure is implemented and on the related practical issues of immigration compliance.



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