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**Subject: Deep concern on proposed amendments to laws governing the operation of NGOs**

Your Excellency

Civil society groups from around the world are shocked by the proposed amendments to various laws governing the operation of NGOs requiring organizations receiving foreign funding to label themselves as “foreign agents” if they are involved in “political activities.”

We believe the proposed changes to the existing legislation through the so called “*Introducing Amendments to Legislative Acts of the Russian Federation in Part Regulating Activities of Non-commercial Organisations, which Carry Functions of Foreign Agents*” will severely undermine the work of civil society and be a blow to international solidarity activities. We outline our concerns with various aspects of the draft legislation below.

Firstly, requiring NGOs that receive funding from respected and legal international sources to label themselves as “foreign agents,” a term with negative connotations is highly arbitrary. It would expose civil society activists engaged in nation building activities to unnecessary ridicule and undermine their work. Additionally, it may also put them at risk of physical attacks from extreme nationalist groups.

Secondly, “political activities” are loosely defined in the draft law and cover activities relating to changing public policies and influencing public opinion towards that end. These are activities that NGOs carry out in the normal course of their operations anywhere in the world. Labelling advocacy and campaigning activities to promote good governance as political work is highly misleading and wrongly conflates the activities of watchdog NGOs with those of political parties.

Thirdly, the draft legislation contains a number of arbitrary provisions requiring foreign funded NGOs to identify themselves as foreign “agents” within 90 days and to include this label in all public activities including their website and publications, or else face up to four year prison terms or heavy fines of up to 300,000 roubles ($9,250).

Fourthly, NGOs that register as “foreign agents” will face increased and unwarranted government oversight through burdensome reporting and auditing procedures. This will make them vulnerable to excessive bureaucratic red tape and require them to spend a disproportionate amount of their time on reporting to government agencies at the expense of project activities.

Coming close on the heels of recently passed legislation in June 2012 imposing exorbitant fines for minor infractions of the rules regarding public assemblies, the proposed legislation constitutes another setback for civil society and democratic freedoms in Russia.

We urge Members of the Duma on July 13 when the draft legislation will be considered to completely reject the proposed restrictions as they severely undermine freedom of association guaranteed under Russia’s Constitution as well as the International Covenant on Civil and Political Rights (ICCPR), which Russia is a party to. We believe adoption of the draft legislation would lead Russia away from the democratic goals contained in its constitution and impose crippling barriers on people’s ability to join participate and interact with civil society organisations.

**Signed:**