[RU] Ministry of Culture publishes procedure for complaint-based content checks under Federal Law 324-FZ

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On 9 February 2026, the Ministry of Culture of the Russian Federation published Order No. 2503 of 29 December 2025 (Ministry of Justice registration No. 85277), establishing the procedure by which the ministry issues conclusions on films lacking a distribution certificate (*prokatnoe udostoverenie*) but suspected of containing material discrediting traditional Russian spiritual-moral values. The order implements Federal Law No. 324-FZ of 31 July 2025, which was the subject of a previous IRIS contribution (IRIS 2026-3:1/4). It came into force on 1 March 2026 and remains effective until 1 September 2030.

The procedure is complaint triggered. Any person may submit a complaint in free form; the order requires a direct link to the audiovisual work. It does not specify whether the complainant must provide a name or other identifying information – a regulatory silence on identification rather than an express authorisation of anonymous complaints. Complaints concerning works of less than 420 minutes in duration must be processed within 20 working days; longer works within 30 working days. The 420-minute threshold captures television series distributed on streaming platforms in addition to feature films.

Substantive assessment is carried out by a special expert council established by the ministry, with decisions being advisory in nature. The ministry may also consult scientific and educational organisations and representatives of the professional cultural community. An expert council for film evaluation has existed since Government Decree No. 2533 of 30 December 2022; as of 17 April 2026, no publicly available list of appointments specifically for the Order 2503 review mechanism had yet been published.

Where the ministry issues a formal conclusion that a work contains material discrediting traditional values, that conclusion is forwarded to the federal media and communications regulator (*Roskomnadzor*). Platforms and social networks must then cease distribution of the work within 24 hours. The obligation is administrative, no court order is required. Non-compliance with the takedown obligation is sanctioned under Article 13.41 of the Code of Administrative Offences (non-compliance with orders restricting access to information). Legislative amendments introducing penalty tiers specific to films discrediting

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traditional values were pending before the State Duma (the lower house of the Federal Assembly) as of April 2026.

No complaints are publicly reported to have been filed under the Order 2503 procedure since 1 March 2026. However, the first certificate denial following the entry into force of Federal Law 324-FZ was issued in a decision of 4 March 2026 refusing a distribution certificate to the film Nuremberg (2025). This decision was adopted under the pre-existing certificate-issuance procedure established by Order No. 942 of 21 May 2024, invoking subparagraph "z" (3) of paragraph 19, rather than under the complaint mechanism of Order No. 2503.

Order of the Ministry of Culture of the Russian Federation No. 2503 of 29 December 2025 "On the approval of the Procedure and cases for issuing conclusions on the presence, in films lacking a distribution certificate, of materials discrediting traditional Russian spiritual-moral values" (registered with the Ministry of Justice under No. 85277, published on pravo.gov.ru on 9 February 2026, document 00012026020900

Federal Law No. 324-FZ of 31 July 2025 "On amendments to the Federal Law 'On state support of cinematography of the Russian Federation'"

Order of the Ministry of Culture of the Russian Federation No. 942 of 21 May 2024 (procedure for issuing, refusing and revoking film distribution certificates; invoked in the Nuremberg distribution certificate denial of 4 March 2026)

Government Decree of the Russian Federation No. 2533 of 30 December 2022 (establishing the Ministry of Culture expert council for film evaluation)

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