

## MILITARY REGISTRATION IN THE ORGANIZATION: 2023 UPDATES

07.12.2023

Dear colleagues,

In accordance with [clause 7 of the article 8](#) of the Federal Law dated 28.03.1998 No. 53-FZ "On Military Duty and Military Service," all organizations in the Russian Federation are required to maintain military registration of their employees.

Please note that starting from 01.10.2023, penalties for violations related to military registration have been significantly increased ([Federal Law dated 31.07.2023 No. 404-FZ](#)).

A penalty can be imposed on both a legal entity and an official (for more details, see below).

### How to start military registration?

Military registration is a set of actions that allows an organization to collect data on conscripts and employees subject to conscription and report to military commissariats.

An organization that has not previously maintained military registration must be registered with the military commissariat **at its location**. If it has, for example, branches, then there is no need to register the organization with the military commissariat in every city where it has a branch.

**Before submitting documents** to the military commissariat, it is recommended to contact the territorial (district) administration at the location of the organization for registration and assignment of an organization number for military registration.

### Who is responsible for maintaining military registration?

Responsibility for maintaining military records is carried by **the head of the organization, as well as the employee or several employees who are assigned to this work**. They are required to prepare documents for registering those subject to conscription and carry out planned work to prepare employees for mobilization when necessary.

With consideration to [clause 12 of the Regulations on military registration](#), approved by Decree of the Government of the Russian Federation dated 27.11.2006 No. 719, the number of persons responsible depends on how many employees of the organization are registered with the military commissariat.

### Who controls maintaining military registration?

Maintaining military registration is controlled by the governing authorities of the Armed Forces of the Russian Federation, military commissariats of the constituent entities of the Russian Federation, military commissariats of municipalities and local government authorities ([clause 33 of the Regulations on military registration](#), approved by Decree of the Government of the Russian Federation dated 27.11.2006 No. 719, [clauses 55 – 57 of the Instruction on organization of work to ensure the functioning of the military registration system](#), approved by Order of Minister of Defense of the Russian Federation dated 22.11.2021 No. 700).

If an organization has more than 500 employees, the inspection will be annual. If 500 or less, at least once every three years.

### Responsibility for violation of military registration obligations

From 01.10.2023 the punishment for those employers who do not fulfill their military registration obligations has been **significantly** tightened.

SWILAR 000

CEO  
Daria Pogodina  
Chistoprudny Boulevard, 5  
101000 Moscow  
Tel.: +7 (495) 648-69-44

swilar GmbH

CEO  
Tobias Schmid  
Erikaweg 32  
D-86899 Landsberg / Lech  
Tel.: +49 8191 9898377

CEO  
Dr. Georg Schneider  
Schlehenweg 14  
D-53913 Swisttal  
Tel.: +49 2226 908258

SWILAR TOO

Director  
Daria Pogodina  
Tole bi str., 155A,  
office 604  
050000 Almaty  
T. +7 (717) 264 06 59

Thus, [article 21.1 of the Code of the Russian Federation on Administrative Offenses](#) provides that failure to submit to the military commissariat (another authority carrying out military registration) within the prescribed period the lists of citizens subject to initial military registration entails the imposition of an administrative penalty:

- for officials - from 40.000 to 50.000 rubles;
- for legal entities - from 350.000 to 400.000 rubles.

Failure to submit or untimely submission by officials of organizations in the manner established by federal law of information necessary for maintaining military registration shall entail the imposition on such officials of an administrative penalty in the amount of 40.000 to 50.000 rubles ([article 21.4 of the Code of the Russian Federation on Administrative Offenses](#)).

In addition, the employer faces liability in the form of an administrative penalty under [article 21.2 of the Code of the Russian Federation on Administrative Offenses](#), if the employer does not notify the employee of the call (conscription notice) from the military commissariat (another authority carrying out military registration) upon receipt, including in electronic form, of such a call (conscription notice), or does not provide the employee with the opportunity to appear on such a call (conscription notice) in a timely manner:

- for officials - from 40.000 to 50.000 rubles;
- for legal entities - from 350.000 to 400.000 rubles.

When failing to provide timely notification and appearance of citizens subject to conscription for military service for mobilization, to assembly stations or military bases, not providing assistance in organizing such notification and attendance, the penalty will be ([part 1 of the article 19.38 of the Code of the Russian Federation on Administrative Offenses](#)):

- for officials - from 60.000 to 80 000 rubles;
- for legal entities - from 400 000 to 500 000 rubles.

Limitation period for bringing to administrative responsibility ([part 1 of the article 4.5 of the Code of the Russian Federation on Administrative Offenses](#)):

- 60 calendar days – for failure to provide assistance to military commissariats in their mobilization work when mobilization is announced;
- 3 years – for violations regarding military registration.

We will be happy to answer your questions!

*Contacts:*

Maria Matrossowa, Project leader **swilar** OOO  
M: [maria.matrossowa@swilar.ru](mailto:maria.matrossowa@swilar.ru), T: + 7 495 648 69 44 (ext. 308)

Yulia Belokon, Deputy Project leader **swilar** OOO  
M: [yulia.belokon@swilar.ru](mailto:yulia.belokon@swilar.ru), T: +7 495 648 69 44 (ext. 309)