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# The Ecology of Authoritarianism:

## Tracking Russia's Environmental Retreat Since the 2022 Invasion and Its Implications for Global Climate Action

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## **Table of Contents**

Executive Summary.....	1
Background.....	3
<b>Chapter 1. The Post-Invasion Acceleration of Russia's Anti-Environmental Governance.....</b>	<b>4</b>
1.1 A Pre-Existing Trajectory of Environmental Decline.....	9
1.2 The Erosion of Transparency and Public Oversight.....	10
1.3 What the Remaining Evidence Reveals.....	11
1.4 Escalating Gas Flaring Under Weakening Regulation.....	12
1.5 Corporate Emissions Trends: Rising Pollution Behind Closed Doors.....	13
1.6 Atmospheric Indicators of Worsening Emissions.....	15
1.7 A Growing Crisis of Oil Spills and Pipeline Failures.....	15
1.8 Conclusion: Mounting Environmental Pressures in a Deregulated System.....	16
<b>Chapter 2. Russia's Climate Policy: New Times, Old Tricks.....</b>	<b>17</b>
2.1 Repackaging "Hot Air": How Russia Manipulates Its Climate Commitments.....	19
2.2 Methane: The Invisible Driver of Russia's Rising Emissions.....	23
2.3 Climate Policy as Geopolitical Instrument.....	24
2.4 Fossil Fuel Capture of Russia's Climate Agenda.....	26
2.5 The Sakhalin Carbon Experiment: Symbolism Without Substance.....	28
<b>Chapter 3. Confronting the Global Consequences: Strategies for Collective Action..</b>	<b>30</b>
3.1 Why the Awareness Gap Matters: Global Risks and Strategic Blind Spots.....	32
3.2 Countering Russia's Environmental Deregulation: A Framework for Collective International Action.....	33
Endnotes.....	35

# Executive Summary

Russia's 2022 invasion of Ukraine accelerated an already entrenched trajectory: the steady erosion of environmental protections, the weakening of climate ambition, and the strategic use of fossil-fuel dependence as a geopolitical instrument. What had long been a gradual dismantling of oversight became, after the invasion, a deliberate political project—one reinforced by Europe's and the international community's remilitarization response, which Moscow now interprets as license to disrupt global consensus and undermine multilateral climate cooperation. At a moment when global emissions must urgently decline, Russia's strategic escalation of environmental deregulation introduces a destabilizing wildcard into the global effort to contain climate risk.

The result is a rapid de-environmentalization of the Russian state that directly threatens global climate stability.

Since February 24, 2022, when Russia launched its full-scale invasion, wartime censorship and sanctions pressure have been used to justify a sweeping rollback of environmental norms. The Russian government has weakened or postponed core standards, abolished independent environmental impact assessments, expelled or criminalized major NGOs, and restricted access to emissions and pollution data, including by allowing state-controlled corporations to stop sustainability reporting altogether.

Even within this shrinking evidence base, the trend is unmistakable: pollution and greenhouse gas emissions are rising. Satellite data show record gas flaring and methane super-emitter events. Company reports—before being curtailed—showed increased emissions intensity across oil and gas operations. Russia's forest fires continue to destroy carbon sinks even as the government uses forests as an accounting device to defer meaningful decarbonization.

Russia's climate policy has been captured by fossil-fuel and industrial lobbies. Targets remain tied to 1990 baselines that mask contemporary increases; methodological revisions create reductions on paper; and outdated gas, hydro, and nuclear infrastructure is marketed as "low-carbon." Policy documents funded by coal and fertilizer oligarchs prioritize adaptation over mitigation, frame emissions controls as a threat to economic growth, and position tools like the EU's Carbon Border Adjustment Mechanism as hostile acts. Internationally, Russia works to dilute fossil-fuel phaseout language while promoting divisive narratives—especially among the Global South—designed to weaken collective climate action.

The implications for the world are stark:

- A free-riding Russia compresses the remaining global carbon budget and forces other countries to accelerate decarbonization at a moment of spreading economic uncertainty.
- Russia has shifted from passive reluctance to active obstruction, becoming a systemic spoiler in climate governance.
- The transboundary impacts of rising pollution, methane leakage, and forest loss will extend far beyond Russia's borders

To prevent Russia's domestic trajectory from undermining the remaining global carbon budget, the international community must respond with coordinated, mutually reinforcing actions. This report posits actionable steps:

- 1. Define Russia's trajectory clearly and publicly.** Treat Russia's de-environmentalization and climate obstruction as structural to the current regime. This clarity is essential for coherent multilateral policy.
- 2. Rebuild a shared evidence base.** Invest in independent satellite monitoring, open-source intelligence, and support for Russian and international experts documenting environmental harm. Support the creation of shared analytical platforms—including with partners in the Global South—to ensure timely, transparent assessments of Russia's environmental and climate impacts.
- 3. Align climate, trade, and security tools.** Coordinate just transition policy mechanisms, environmental due-diligence requirements, and targeted sanctions so that Russian exports cannot profit from deregulation, concealed pollution, or artificially lowered costs of production.
- 4. Update global climate models and risk assessments.** Integrate a realistic "free-riding Russia" pathway into IPCC-relevant scenarios, climate finance decisions, and national decarbonization plans. Make explicit the additional mitigation burden that Russia's trajectory imposes on others.
- 5. Strengthen strategic engagement with the Global South.** Offer credible, finance-backed pathways for decarbonization that counter Russia's narrative of deregulation as climate "justice." Highlight the concrete risks that rising Russian emissions and unmanaged forest loss pose to vulnerable regions.
- 6. Reassert the need for collective governance.** Use COP processes, the Paris Agreement Implementation and Compliance Committee, and emerging climate-security forums to build a coordinated response that links environmental harm, transparency, and international stability.

Russia's environmental rollback is not a temporary aberration. It is a governing strategy—accelerated by war, reinforced by global remilitarization, and aimed at weakening collective climate action. Counteracting it requires sustained, coordinated engagement across climate diplomacy, trade policy, environmental monitoring, and geopolitical strategy. Without such collective action, global climate goals—and the frameworks designed to achieve them—will grow increasingly difficult to realize.

Researched and written by Vladimir Milov from the Free Russia Foundation and with support from the Heinrich Böll Foundation, Washington DC, this report offers policymakers in the EU and the United States a clear set of tools to counter Russia's de-environmentalization and a sober accounting of the costs of inaction so that the international community can respond with the coherence, urgency, and strategic resolve that this moment demands.

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# Background

Russia ratified the Paris Agreement under the United Nations Framework Convention on Climate Change (UNFCCC), setting a national target to limit greenhouse gas (GHG) emissions to 70 percent of the 1990 level by 2030. Nominally, this appeared to represent progress compared to Russia's previous GHG reduction goal: Presidential Decree No. 752 of September 30, 2013, had established an emissions ceiling of 75 percent of the 1990 level to be achieved by 2020. In the lead-up to the 30th Session of the Conference of the Parties (COP30) to the UNFCCC, convened November 11–22, 2025, in Belém, Brazil, President Putin signed Decree No. 547 on August 6, 2025, setting a new target to reduce GHG emissions to 65–67 percent of 1990 levels by 2035.

These climate targets have been widely criticized by the international community as lacking genuine ambition. The stated goals still exceed Russia's current emissions levels, and most industrial sectors, with only a few exceptions, have recorded consistent growth in emissions over the past decade. Russia has also publicly opposed the global phaseout of fossil fuels, and its most recent Climate Doctrine (see below) makes no mention of fossil fuels or their contribution to climate change. Nevertheless, many parties to the Paris Agreement continue to hold the view that "it is better to have Russia onboard than excluded" from international climate negotiations.

On paper, Russia also promotes an ostensibly ambitious environmental policy agenda, nominally designed to contribute to emissions reductions. Among the "national projects" implemented under presidential decrees is the project Environmental Well-Being, which comprises six federal sub-projects such as Clean Air, Forest Conservation, and Biodiversity Conservation and Ecotourism Development. At the same time, Russia is advancing the argument that its vast forest resources, considered a major carbon sink, justify its limited progress in phasing out fossil fuels. However, a closer examination reveals that Russia is not acting in good faith in pursuing its declared environmental and climate objectives. Since the onset of its full-scale invasion of Ukraine in 2022, the situation has deteriorated markedly. The Russian government has effectively dismantled many of the regulatory checks constraining business activities in the environmental and climate policy domains. The details of this process are examined in the sections that follow.

A major consequence of these developments may be an undeclared and substantial increase in Russia's GHG emissions, potentially exceeding even its nominally agreed limits. This emerging trend, so far largely unaccounted for, poses a serious challenge to the global path toward net zero and merits close international attention as the global climate consensus charts its path beyond COP30.

# Chapter 1. The Post-Invasion Acceleration of Russia's Anti-Environmental Governance

Russian authorities and major corporations began rapidly dismantling the remaining societal checks on the country's environmental and climate policies in the immediate aftermath of the 2022 invasion of Ukraine. This was driven by multiple key factors:

1. **Mitigation of the economic and financial consequences of the war and Western sanctions** for Russian businesses by increasing their profits through the reduction of mandated expenditures on environmental protection measures;
2. **Exploitation of the general climate of lawlessness** enabled by the transition to a repressive wartime political regime and the introduction of military censorship; and
3. **Continuation of Russia's de facto withdrawal from the international rules-based order** which has freed authorities from the need to maintain even the appearance of environmental responsibility, simply put: "because we can."

Exploiting the environment to broaden the space for Putin's oligarchic elite to increase profits is not new to authoritarian Russia. In the years preceding the 2022 invasion of Ukraine, the country witnessed widespread grassroots environmental protests against environmentally damaging oligarchic projects from Arkhangelsk to Bashkortostan to Kuzbass and beyond. These cases are well known and need not be repeated here.

However, the wartime censorship and repressive political climate imposed after the invasion created far greater opportunities to suppress local environmental protest movements, paving the way for the adoption and implementation of policies causing even greater environmental harm. At the same time, businesses struggling with the economic and financial repercussions of the war and Western sanctions sought relief, and the Russian government was readily willing to sacrifice environmental and climate considerations to sustain the profitability of oligarchic enterprises. In the weeks following the 2022 invasion of Ukraine, the first anti-environmental policy measures began to be adopted, and further steps were soon proposed.

On March 15, 2022, Russian Prime Minister Mikhail Mishustin approved the "Plan of Priority Actions to Ensure the Development of the Russian Economy under the Conditions of External Sanctions Pressure,"<sup>1</sup> which included a significant relaxation of environmental rules and regulations as part of Section 3.3, "Reducing Regulatory Costs for Domestic Entrepreneurs."<sup>2</sup> The plan envisaged the postponement of enforcement of environmental requirements and norms for hazard class I and II production and waste disposal facilities, as well as deadline extensions for submitting applications for integrated environmental permits and for the establishment of automatic pollutant emission control systems. While many of the plan's measures were initially considered temporary, they have since evolved into a de facto long-term policy of relaxed environmental regulation for Russian businesses.

On March 26, 2022, the federal law "On Amendments to Certain Legislative Acts of the Russian Federation" No. 71-FZ was adopted, which delayed the introduction of environmental impact fees and the implementation deadlines for automated emission monitoring systems (SAKV) compared to earlier requirements.<sup>3</sup> Overall, the federal law "On Environmental Protection," the foundational legislative act governing environmental regulation in Russia, has been amended 18 times since the beginning of the 2022 invasion of Ukraine (including these initial amendments from March 26), with the cumulative effect of further weakening environmental requirements for businesses.

In late March 2022, Russia's main industrial lobbying association, the Russian Union of Industrialists and Entrepreneurs (RSPP), sent a letter to the government signed by RSPP Chairman Alexander Shokhin. The letter contained an extensive set of proposals calling for unprecedented large-scale environmental deregulation in favor of Russian business, arguing that such measures were necessary to offset losses caused by the war and Western sanctions.<sup>4</sup> The RSPP proposals included postponing and softening key environmental regulations and requirements, such as penalties and fees for environmental damage, the introduction of automated emissions monitoring systems, and mandatory obligations for the remediation and reclamation of completed mining projects. Although Shokhin's proposal, sometimes referred to as the "RSPP Plan for Environmental Deregulation," was never formally approved or adopted in full by the Russian government, subsequent actions by the authorities suggest that they treated it as a de facto official state policy agenda and in practice implemented many of the key proposals. First, the government quietly abandoned its pre-war plan to stimulate environmentally friendly technological modernization of Russian enterprises through the system of integrated environmental permitting, known by its Russian abbreviation KER. Introduced on January 1, 2019, KERs were intended to serve as the cornerstone of the announced transition to best available environmentally friendly technologies and to ensure enterprises' compliance with environmental regulations.<sup>5</sup>

However, as of 2025, the program appears substantially weakened due to lax implementation enforcement. As the Moscow-based newspaper Kommersant reported in mid-2025 ("Large Enterprises Fit into Nature: Top 300 Industrial Polluters in Russia Will Hardly Be Affected by the Growth of Environmental Payments"), only a small number of enterprises face meaningful environmental fines or penalties for environmental damage, while the overwhelming majority continue to operate as usual. This effectively renders the entire environmental modernization program, and the KER mechanism in particular, largely symbolic. According to Kommersant, this outcome reflects "the result of rather soft technological standards applied, close to actual operating conditions, with the purpose of not halting Russian industry."<sup>6</sup>

Another key environmental commitment from which the Russian government has substantially retreated concerns the requirement for businesses to install automatic pollutant emission control systems (SAKV).

Companies were permitted to extend the installation period for such systems to six years from the date of receiving a Comprehensive Environmental Permit (CEP). This provision was enacted through the aforementioned Federal Law No. 71-FZ of March 26, 2022. In practice, the establishment of the much-advertised nationwide automated emission control system has been postponed indefinitely.

Perhaps the most damaging and consequential anti-environmental action taken by the Russian government in the aftermath of the 2022 invasion of Ukraine was the effective dismantling of the independent environmental impact assessment infrastructure. In December 2023, President Vladimir Putin signed Federal Law No. 681-FZ, "On Amendments to the Federal Law on Environmental Expertise," dated December 25, 2023), introducing sweeping changes to the environmental impact assessment procedure that took effect on September 1, 2024.<sup>7</sup> Since these amendments took effect, "public environmental impact assessment has ceased to exist," in the words of Alexander Veselov, Chairman of the Union of Environmentalists of the Republic of Bashkortostan.<sup>8</sup> Previously, environmental impact assessments had represented one of the few remaining instruments with which Russia's independent civil society could exercise oversight over potentially harmful industrial projects. Once projects receive approval and are implemented, statutory compliance is monitored solely by a state regulatory agency that lacks independence by any objective criterion. It is therefore unsurprising that the actual enforcement of environmental regulations and standards for Russian enterprises remains weak and non-demanding, as the case of issuing Comprehensive Environmental Permits (CEP) illustrates.

Russia's current environmental regulator, Rosprirodnadzor, operates as a subsidiary of the Ministry of Natural Resources, which is simultaneously responsible for developing the country's resource potential, creating a fundamental conflict of interest in matters of environmental protection. In fact, Vladimir Putin abolished Russia's last stand-alone environmental regulator, the State Committee on Environmental Protection (Goskomekologiya), in May 2000, immediately after coming to power. Since then, environmental oversight functions have been handled by a succession of secondary, industry-dependent agencies. The current head of Rosprirodnadzor, Svetlana Radionova, lacks a professional background in environmental protection and is reportedly a close associate of Anton Ustinov, Vladimir Putin's aide on energy affairs between 2012 and 2016 and a long-time associate of Rosneft CEO Igor Sechin. In 2020, Russian opposition leader and anti-corruption activist Alexei Navalny published a detailed investigation into Radionova's business connections and alleged involvement in corrupt practices.<sup>9</sup>

In the absence of effective environmental regulatory oversight of corporate activities, the de facto last remaining check on environmentally harmful corporate interests had been the environmental impact assessment, which provided civil society with a limited procedural safeguard. However, the legislative amendments approved in December 2023 effectively abolished the ability of independent civil society actors to participate in this process. Since September 1, 2024, the right to conduct environmental impact assessments has been restricted to NGOs and experts who have obtained mandatory state accreditation and are included in Rosprirodnadzor's official register.

It is evident that government-unfriendly experts will be unable to pass this accreditation. Moreover, the amendments explicitly prohibit participation in environmental impact assessment procedures by the following categories of individuals:

- foreigners (persons without Russian citizenship);
- persons designated as "foreign agents" in Russia (a label broadly and arbitrarily applied to critics of the authorities); and
- representatives and employees of foreign or international organizations.<sup>10,11</sup>

From 2024 onward, these groups are no longer permitted to initiate, organize, or conduct state environmental impact assessments. Notably, a significant number of environmental organizations were declared "foreign agents" or "international organizations" shortly before the adoption of this law, strongly suggesting that the measure was deliberately designed to dismantle the institution of independent, transparent, and society-driven environmental oversight. As a result, the ability to conduct environmental impact assessments is now effectively confined to GONGOs (government-organized non-governmental organizations), entities and experts fully loyal to the authorities and aligned with corporate interests.

"In general, we are seeing a trend toward further de-ecologization of Russian legislation. Environmental restrictions are being lifted or, at least, diluted. Environmental supervision is being simplified to facilitate business activities," says Alexander Veselov, Chairman of the Union of Environmentalists of the Republic of Bashkortostan. "Unfortunately, public environmental expertise has been placed almost completely under state control and, in fact, can no longer be independent. This represents a significant restriction on the rights of NGOs and citizens to participate in public environmental expertise. And we have been trying to fight this for a long time," says Mikhail Kreindlin, expert of the project "Earth Concerns Everyone."<sup>12</sup>

In May 2022, when the draft legislation effectively abolishing independent environmental impact assessments was first introduced in the immediate aftermath of the 2022 invasion of Ukraine, 63 representatives of public environmental organizations sent a collective appeal to the State Duma opposing the bill ("An Open Letter from Environmental Public Organizations and Associations on Draft Law No. 196416-8, Which Threatens the Institution of Public Environmental Expertise and Environmental Safety in Russia"). "If this bill is adopted, the quality of public environmental expertise and state environmental expertise will be significantly reduced. This will create threats to the environmental safety of Russia and may lead to massive violations of citizens' rights to a favorable environment," the appeal stated.<sup>13</sup> This collective protest was ignored, and the draft bill placing environmental impact assessments under full government and GONGO control was signed into law by Vladimir Putin in December 2023.

In May 2025, the Russian Ministry of Natural Resources published draft amendments to environmental impact assessment legislation proposing to further deregulate the process in the interests of large Russian businesses. The amendments would allow applicants to submit only a limited number of documents for re-examination in cases of initial refusal to approve a project, rather than a full package of materials for re-evaluation. According to commentators, these changes would enable the arbitrary and expedited “rubber-stamping” of project approvals without comprehensive environmental review.<sup>14</sup>

Many other environmentally damaging legislative acts were also adopted in the aftermath of the 2022 invasion of Ukraine, in addition to the 18 amendments made since 2022 to the Federal Law “On Environmental Protection” mentioned above. These include, for example, draft legislation permitting the clear-cutting of forests around Lake Baikal, posing potentially severe risks to the Baikal ecosystem.<sup>15</sup> Although the law has not yet been formally enacted, it has already received final approval from the Russian government, signaling its imminent adoption.<sup>16</sup> Following the 2022 invasion of Ukraine, Russia designated nearly all independent environmental organizations as “undesirable”—a status that criminalizes their operations and imposes penalties, including imprisonment, for collaboration with them. This designation has affected prominent global environmental NGOs such as Greenpeace, WWF, Bellona, Ecodefense, Sakhalin Environmental Watch, and many others.<sup>17,18</sup> Most independent environmental organizations that have not been labeled “undesirable” have been designated as “foreign agents,” which effectively bars them from participation in any public procedures related to environmental protection.

The level of repression against environmental activists has also increased substantially since the 2022 invasion of Ukraine, with hundreds of activists persecuted and the intensity of repression growing over time.<sup>19,20</sup> Today, repression against environmental defenders is no less severe than that directed against political opposition members or participants in anti-war protests in Russia.

It can therefore be said that, in the aftermath of the 2022 invasion of Ukraine, the Russian authorities have eliminated the last remaining societal checks on environmentally harmful activities, establishing a new political, economic, and legal regime characterized by its anti-environmental orientation. This system grants government and business virtually unlimited freedom to exploit Russia’s natural resources in environmentally destructive ways, without accountability or responsibility.

# 1.1 A Pre-Existing Trajectory of Environmental Decline

It is important to understand that the de-environmentalization of Russia did not begin with the 2022 invasion of Ukraine. The invasion merely acted as a trigger that accelerated an already existing anti-environmental policy trend that had been developing for years—an organic outcome of Putin’s unaccountable, monopolistic, and corrupt model of crony capitalism.

As mentioned earlier, Putin abolished the independent environmental regulator Goskomekologiya in May 2000, immediately after coming to power. Industrial lobbyists with no background in environmental protection had been heading the state’s environmental regulatory authorities long before the 2022 invasion of Ukraine. Repression against environmental activists also began years earlier: the first independent environmental organization, Ecodefense, was declared a “foreign agent” as early as 2014, in direct violation of a Constitutional Court ruling that explicitly prohibited labeling environmental NGOs as “foreign agents.”<sup>21</sup> Russia also experienced sweeping nationwide protests against environmental destruction well before 2022, which were frequently met with brutal crackdowns by the authorities and fierce attacks by state-controlled propaganda.<sup>22, 23</sup> Russian authorities, regulators, and businesses had repeatedly been exposed by independent monitors and whistleblowers for gross negligence regarding environmental protection and for attempting to conceal major cases of environmental pollution, such as the disastrous 2020 Norilsk oil spill or the rising number of oil pipeline ruptures and spills across the country, well before the 2022 invasion of Ukraine.<sup>24, 25</sup>

Russia’s Indigenous peoples have long protested the environmentally destructive practices of Gazprom and other corporations operating in the Arctic, only to face increased repression, “foreign agent” designations, and the forced closure of independent organizations defending Indigenous rights.<sup>26, 27, 28</sup> These patterns were firmly established before the invasion. All of this had been taking place long before 2022, which means it would be mistaken to interpret the post-2022 de-environmentalization trend merely as a temporary protective measure to mitigate the economic consequences of war and international isolation. Rather, it represents the continuation of a longstanding anti-environmental trajectory—one that was simply intensified by the atmosphere of unchecked lawlessness that emerged after the invasion of Ukraine.

Another factor that must be considered is the overwhelming dominance of industrial lobby groups in the Russian government’s decision-making process on environmental policy. As shown repeatedly in this report, lobbyists representing large businesses, such as the Russian Union of Industrialists and Entrepreneurs (RSPP), routinely participate in policy discussions where environmentalists are largely absent. Proposals from RSPP and other business associations to relax environmental regulations were already in advanced stages when the 2022 invasion began, and many were swiftly adopted by the authorities.

Several such proposals, including the abolition of independent environmental impact assessments for major industrial projects, had been openly promoted by Russian big business well before the invasion. For instance, a 2021 joint proposal by Russian oil companies to eliminate environmental impact assessments for Arctic drilling projects was promptly endorsed by the government and subsequently implemented.<sup>29, 30</sup>

## 1.2 The Erosion of Transparency and Public Oversight

Following the 2022 invasion of Ukraine, Russian authorities and corporations took deliberate steps to reduce the availability of publicly accessible data related to environmental pollution and climate indicators. As of August 2025, publications by the official statistics agency Rosstat provide only aggregated data on environmental pollution for 2023 and on greenhouse gas emissions for 2022. In 2023, Rosprirodnadzor, the environmental regulator, ceased publishing detailed data on pollutant emissions by individual enterprises, following a change in the format of its electronic public register. Until 2023, the state register included a complete list of all harmful substances emitted by each enterprise, along with the corresponding declared emissions volumes. This data had allowed activists to identify major polluters and to argue against the construction of new facilities emitting the same pollutants in areas where concentrations were already persistently high. In response to public complaints, Rosprirodnadzor stated that current legislation no longer requires the publication of this information.<sup>31</sup>

Russian companies have also been actively concealing their sustainability data. Already in 2023, participants at the National Forum on Sustainable Development, organized by the newspaper Vedomosti, noted that since the 2022 invasion of Ukraine, "companies began to disclose fewer reports... due to the fact that at the beginning of last year, government decrees and a letter from the Central Bank allowed Russian companies to not publish reports for 2021. A number of organizations decided not to post annual reports, sustainability reports, and other documents in the public domain, despite the fact that most of them were already prepared. Moreover, some decided to remove reports for previous periods from the public domain. Many companies published reports for 2021 in significantly reduced forms, which also reduces the ability to obtain an objective picture of the organization's performance."<sup>32</sup>

In 2025, Gazprom announced that it would cease publishing its annual sustainable development reports.

## 1.3 What the Remaining Evidence Reveals

Official Russian statistics do not indicate a notable increase in emissions of pollutants or greenhouse gases. However, as noted above, the available data currently extends only through 2022–2023, with no more recent figures published as of August 2025. Even within this limited dataset, there is no evidence of any meaningful reduction in pollutant or greenhouse gas emissions during 2022–2023, with volumes having remained largely stable. This flat trend stands in contrast to the Russian government's earlier pledges to significantly reduce atmospheric pollution; for example, the National Project "Environment," approved in 2019, envisioned a substantial decrease in pollutant emissions by 2024.<sup>33</sup>

**Table 1. Official Russian data on emissions of air pollutants and greenhouse gases, 2019–2023**

	2019	2020	2021	2022	2023
Total emissions of air pollutants in Russia (million metric tons)	22.74	22.23	22.30	22.21	21.98
Total greenhouse gas emissions in Russia (million metric tons CO <sub>2</sub> -eq.)	2.08	2.00	2.10	2.04	n/a*

*Source: Russian Federal Service of State Statistics (Rosstat), "Environmental protection in Russia, 2024."<sup>34</sup> The European Union's EDGAR database (Emissions Database for Global Atmospheric Research) suggests that Russian GHG emissions grew by an additional 2% in 2023.<sup>35</sup>*

However, other data sources beyond official Russian government statistics make it possible to assess that pollution and greenhouse gas emissions have continued to grow in recent years, despite economic challenges and reduced oil and gas output. In particular, it is worth examining internationally available data on gas flaring, Russian corporate emissions reports, and atmospheric measurements from Russian meteorological stations.

We do not include relative measurements of Russia's pollution and emissions against its GDP, as the current calculation of Russia's GDP is highly questionable. According to the Stockholm Institute of Transition Economics (SITE) at the Stockholm School of Economics, there are substantial reasons to doubt the reliability of official Russian data.<sup>36</sup> In particular, the price levels used to convert nominal GDP into real GDP (the deflator) are problematic, since official inflation figures are likely underreported, potentially by as much as a factor of two. This distortion has serious implications for real GDP estimates: if nominal GDP were deflated using actual inflation levels rather than understated official figures, Russia's real GDP would appear significantly lower than what official statistics suggest. For this reason, we do not measure Russia's pollution or greenhouse gas emissions in 2022–2024 relative to GDP. Instead, we prefer to assess them in relation to physical output data where available (for example, per barrel of oil equivalent produced by oil and gas companies). This approach provides a more accurate picture of the growth in relative pollution and emissions per comparable unit of production.

# 1.4 Escalating Gas Flaring Under Weakening Regulation

According to the World Bank's Global Gas Flaring Tracker, Russia has significantly increased the volume of gas flaring during 2023–2024. This occurred against the backdrop of a decline in oil output. In 2024, based on World Bank data, Russia's gas flaring intensity (the volume of gas flared per barrel of oil produced) was 15% higher than in 2021 and 35% higher than in 2019. The World Bank also notes that Russia remains the world's largest gas-flaring country, despite ranking only third globally in oil production, behind the United States and Saudi Arabia.

**Table 2. Gas flaring in Russia, 2019-2024**

	2019	2020	2021	2022	2023	2024
Gas flaring (billion m <sup>3</sup> )	23.2	24.1	25.4	25.5	28.4	28.8
Gas flaring intensity (m <sup>3</sup> per barrel of oil produced)	5.7	6.4	6.6	6.5	7.3	7.6

Source: Worldbank Global Gas Flaring Tracker<sup>37</sup>

The World Bank's data contradicts the reporting published by Russia's largest oil and gas companies. Gazprom has claimed a reduction in gas flaring during 2022–2024, reporting an associated petroleum gas (APG) utilization rate exceeding 96% in 2024, compared to 90% in 2021.<sup>38</sup> Rosneft provides few details or numerical data beyond a vague figure on the overall APG utilization rate for its "matured assets" only (without offering a clear definition of this term), which has remained nearly flat at around 93% in recent years.<sup>39</sup> Lukoil reports total APG flaring in 2024 to be just below 0.3 billion cubic meters, or merely 1% of the total gas flared in Russia in 2024 according to World Bank data, an implausible figure given Lukoil's share of over 15% in total Russian oil output.<sup>40</sup> However, Lukoil also includes a disclaimer that these figures are provided "within the greenhouse gas accounting limits," another vague phrase that leaves ample room for interpretation and conceals parts of the data. The discrepancies between the World Bank's Global Gas Flaring Tracker satellite-based estimates and the figures reported by Russian oil and gas companies are striking. Certain ambiguous clauses in corporate sustainability reports suggest that a significant portion of the information on flaring is being deliberately withheld.

It is also worth noting that, in May 2022, immediately following Russia's invasion of Ukraine, the Russian Union of Industrialists and Entrepreneurs (RSPP), the country's main industrial lobbying association, sent a letter to the government signed by RSPP Chairman Aleksandr Shokhin, requesting that the permitted share of associated petroleum gas flaring without penalties be increased from 5% to 30% of total production.<sup>41</sup> Although no formal decision to this effect was adopted by the government, it is plausible that a de facto relaxation occurred, serving as an informal relief measure for oil and gas companies. This would be consistent with the broader pattern of lenient enforcement observed in other areas, such as compliance with technological modernization requirements under the comprehensive environmental permits (CEP) mechanism described earlier.

According to the World Bank, “the largest flare volume increases in Russia over the past few years have occurred in East Siberia, where major oilfield developments are ongoing. In 2024, this region contributed 40 percent of Russia’s total flaring and saw an 8 percent increase in gas flaring.”<sup>42</sup> Eastern Siberian oil and gas fields, for logistical reasons, are almost exclusively oriented toward hydrocarbon exports to China, other export destinations are too distant, and domestic demand in these regions remains minimal. This indicates a direct link between the growth of Russia’s oil and gas exports to China and the marked increase in gas flaring.

## 1.5 Corporate Emissions Trends: Rising Pollution Behind Closed Doors

Some data on air pollution is published by Russia’s largest oil and gas corporations. Unlike the more limited and aggregated information available on gas flaring, these datasets are somewhat more detailed and allow for broader conclusions regarding trends in air pollution. The following observations are based on data disclosed by Gazprom and Rosneft, the two largest Russian oil and gas producers, whose combined hydrocarbon output (oil and gas) amounts to approximately 13.5 million barrels of oil equivalent per day. Gazprom, for instance, reported an increase in pollutant emissions in 2023–2024. While this rise corresponds with the recovery of hydrocarbon production, the relative intensity of air pollutant emissions (measured per unit of output) was significantly higher, by more than 9% in 2024 compared to 2021.

**Table 3. Emission of air pollutants by Gazprom, 2021–2024**

	2021	2022	2023	2024
Gazprom – Total emission of air pollutants (million metric tons)	2.51	2.16	2.21	2.36
Gazprom – Total hydrocarbon production (billion barrels of oil equivalent)	3.51	2.93	2.64	3.03
Gazprom – Natural gas production only (billion cubic meters)	515.6	412.9	359.0	420.1
Gazprom – Air pollution intensity (tons of air pollutants emitted per million barrels of oil equivalent produced)	714.9	736.4	837.7	780.2
Gazprom – Air pollution intensity for core gas business only (tons of air pollutants emitted per million cubic meters of natural gas produced)	3.32	3.34	3.93	3.48

Source: Gazprom, annual and sustainability reports<sup>43</sup>

For Rosneft, levels of air pollutant emissions were notably higher in 2024 despite a decline in output. The intensity of air pollution in 2024 was 7.4% higher compared to 2021.

**Table 4. Emission of air pollutants by Rosneft, 2021–2024**

	2021	2022	2023	2024
Rosneft – Total emission of air pollutants (million metric tons)	1.34	1.31	1.34	1.50
Rosneft – Total hydrocarbon production (billion barrels of oil equivalent)	1.80	1.84	1.98	1.88
Rosneft – Air pollution intensity (tons of air pollutants emitted per million barrels of oil equivalent produced)	743.0	714.4	677.1	798.1

Source: Rosneft, annual reports and annual sustainability reports<sup>44, 45</sup>

This data aligns more closely with the trends indicated by the World Bank’s satellite-based Global Gas Flaring Tracker than with official Russian statistics showing “stable” air pollution levels or corporate reports claiming “reduced gas flaring.” It demonstrates that air pollution levels for both Gazprom and Rosneft in 2023—and especially in 2024—were significantly higher than before the 2022 invasion of Ukraine. The intensity of air pollution (measured as tons of air pollutants emitted per million barrels of oil equivalent produced) increased by more than 9% for Gazprom and by 7.4% for Rosneft in 2024 compared to 2021. Together, Gazprom and Rosneft account for roughly one-fifth of Russia’s total annual emissions of air pollutants, making them a highly representative sample.

Recently, Gazprom has taken a major step toward reducing environmental transparency. In March 2025, the company’s board of directors decided to cease publication of its annual sustainability report, which includes data on environmental pollution.<sup>46</sup> The analysis above draws on the last available report, which contained 2024 data. Given that Gazprom is a state-controlled company, such a decision could not have been made without government approval. The very intention of Gazprom’s board of directors to conceal information about environmental pollution, amid rising pollution levels confirmed by its own last public report, serves as further indirect evidence that the concealment of environmental consequences has effectively become an official element of Russia’s policy to weaken environmental regulation.

## 1.6 Atmospheric Indicators of Worsening Emissions

Another valuable source of data comes from measurements in the surface layer of the atmosphere at Russian meteorological stations, as reported by the Russian Federal Service for Hydrometeorology and Environmental Monitoring (Roshydromet) in its annual Report on the Climate Features in the Russian Federation for 2024.<sup>47</sup> The 2024 report states (p. 94):

“The increase in both CO<sub>2</sub> and CH<sub>4</sub> concentrations continues. The average annual CO<sub>2</sub> concentration at the Teriberka station reached 426.2 ppm, and the maximum monthly average values observed in the winter months exceeded 433 ppm. The rate of growth of CO<sub>2</sub> concentration, which had decreased in the period 2022–2023, again became higher than the global average, amounting to 2.8 ppm/year for the period 2023–2024.”

The continued growth in greenhouse gas concentrations in Russia is consistent with the observed increase in pollution and greenhouse gas emissions over the past two years.

## 1.7 A Growing Crisis of Oil Spills and Pipeline Failures

Data on oil spills in Russia is not widely available, and transparency has declined further in recent years. Nonetheless, occasional disclosures by the authorities provide critical insights into the rapidly growing scale of the problem, largely caused by the country’s aging and poorly monitored oil pipeline infrastructure. According to data from the Central Dispatch Unit of the Fuel and Energy Complex (CDU TEK), a subsidiary of the Russian Ministry of Energy, presented at a roundtable in the State Duma in December 2024, the number of oil pipeline ruptures resulting in spills increased from 8.6 thousand in 2020 to 14 thousand in 2023, nearly doubling within just three years.<sup>48</sup>

As noted by participants in the roundtable discussion, oil companies lack sufficient incentives to maintain industrial pipelines in a safe condition through regular inspections and repairs. Ruptures frequently occur in aging pipelines that have exceeded their service life but were negligently cleared for extended operation by industrial safety experts. Moreover, fines for oil spills remain so low that it is often more cost-effective for companies to tolerate spills and conceal evidence rather than invest in pipeline diagnostics and maintenance.

## 1.8 Conclusion: Mounting Environmental Pressures in a Deregulated System

As demonstrated above, multiple independent data sources, the World Bank's Global Gas Flaring Tracker, Russia's own atmospheric measurements of greenhouse gas concentrations, and corporate air pollution data, all indicate that pollution levels in 2024 were higher than pre-war levels. Even official Rosstat data suggests that pollution and emission levels were not meaningfully lower during 2022–2023. These patterns are consistent with the conclusion that changes to Russia's environmental regulatory regime adopted since 2022 have enabled businesses to exploit both de facto and de jure relaxations in environmental oversight for commercial gain, resulting in increased pollution. This process of "quiet environmental deregulation" in the interests of large corporations appears to have become an official policy direction of the Russian government in the aftermath of the war, Western sanctions, and the broader atmosphere of lawlessness that has taken hold within Russia.

## Chapter 2. Russia's Climate Policy: New Times, Old Tricks

Since the 1990s, Russia has been known for trading so-called "hot air" in international climate negotiations, insisting on using 1990 greenhouse gas (GHG) emission levels as the benchmark for its national reduction targets. There is little need to dwell on the flaws of this approach: the structure of the Russian economy has changed dramatically since the collapse of the Soviet Union, rendering the 1990 baseline largely irrelevant. Nevertheless, the Russian government continues to measure its purported "reductions" in GHG emissions against this outdated benchmark.

To gain a sense of how this 1990-based approach compares with actual developments, one need only consult official Russian data on sectoral GHG emission dynamics over the past decade. According to the First Annual National Report on the Climate Agenda in Russia, published in 2025 by the Climate Policy and Economy of Russia Center of the Institute of Economic Forecasting of the Russian Academy of Sciences, the Melnichenko Foundation, and MIA Russia Today, emissions in Russia increased between 2015 and 2022 across most sectors of the economy as well as overall (the only notable exception being a roughly 5% decrease in emissions from road transport, primarily due to the gradual transition to a more modern, foreign-designed vehicle fleet).

**Table 5. Dynamics of greenhouse gas (GHG) emissions in Russia by sector of the economy**

Greenhouse gas (GHG) emissions, million tons of CO <sub>2</sub> equivalent	2015	2022	Change 2015–2022, %
Russia in total	1988	2042	+3%
including:			
Power & heat generation	734	740	+1%
Oil & Gas	251	252	+0,4%
Road transport	180	171	-5%
Buildings	137	155	+13%
Metals	148	145	-2%
Agriculture	111	121	+9%
Chemicals	70	95	+35%
Other industry	86	93	+8%
Waste treatment	81	86	+6%
Coal	72	78	+9%
Construction materials	63	63	-1%
Air, railroad and water transport	22	27	+24%

Source: "First Annual National Report on Climate Agenda in Russia", by the "Climate Policy and Economy of Russia" Center of the Institute of Economic Forecasting of the Russian Academy of Sciences<sup>49</sup>

As shown by available data, greenhouse gas (GHG) emissions in Russia have grown substantially over the past decade. In some emission-intensive sectors, this growth can be described as nothing short of explosive; for instance, a 35% increase in emissions in the chemical industry and a 13% increase in the building sector. According to the Russian statistics agency Rosstat, the total residential floor area increased by only 10% between 2015 and 2022, meaning that the growth in emissions outpaced the rate of new building construction. The key conclusion from this is that the Russian government has failed to implement effective emission control standards for new buildings.

Other major sources of additional GHG emissions, as identified in the First Annual National Report on the Climate Agenda in Russia, include “the increased share of flared associated petroleum gas” and “the outpacing growth of coal production associated with the development of the eastern export direction.”<sup>50</sup> As noted earlier in the section on gas flaring, the World Bank reported that “the largest flare volume increases in Russia over the past few years have occurred in East Siberia,” and that “this region contributed 40 percent of Russia’s total flaring and saw an 8 percent increase in gas flaring.” Data from the European Union’s Emissions Database for Global Atmospheric Research (EDGAR) also indicate that Russian GHG emissions have shown steady growth in recent years, contradicting official data published by the Russian government. If this trend continues, Russia will likely see further increases in GHG emissions, far exceeding its current target of capping emissions at 65–67% of 1990 levels by 2035.

**Table 6. European data on Russian GHG emissions, 2020-2023**

	2020	2021	2022	2023
Total Russian greenhouse gas emissions (million tons of CO <sub>2</sub> equivalent)	2.40	2.61	2.62	2.67

Source: EU's EDGAR database (Emissions Database for Global Atmospheric Research)<sup>51</sup>

It becomes evident from these data sources that the expansion of Russia's oil, natural gas, and coal exports to China has been a major driver of rising environmental pollution and greenhouse gas (GHG) emissions within Russia. Given the consistent growth of GHG emissions across nearly all sectors of the Russian economy over the past decade—with few, if any, exceptions—it is clear that Russia's continued reliance on 1990 emission levels as the benchmark for its national climate goals is both outdated and misleading. This methodological choice serves primarily to obscure the ongoing increase in actual GHG emissions. Moreover, Russia's strategic pivot toward deeper economic cooperation and energy trade with China in the years following the 2022 invasion of Ukraine has become an additional key factor behind the rise in air pollution and GHG emissions. As demonstrated above, this shift has been accompanied by increased coal, oil, and gas production directed toward eastern export routes, as well as a corresponding surge in gas flaring and overall emissions.

## 2.1 Repackaging “Hot Air”: How Russia Manipulates Its Climate Commitments

However, Russia's insistence on using 1990 as the benchmark year for its national climate goals is not its only form of manipulation. Recently, the government recalculated the national conversion factors used to translate economic performance indicators into greenhouse gas (GHG) emissions. This technical adjustment produced remarkable, and highly convenient, results. As stated in the First Annual National Report on the Climate Agenda in Russia:

“The result of the revision was a significant reduction in net emissions for the entire period since 1990. Previously, Russia's net emissions in 2021 amounted to 1,650 million tCO<sub>2</sub>-eq., or 53% of the 1990 level. In the current inventory, net emissions in 2021 are approximately 30% lower—amounting to 1,137 million tCO<sub>2</sub>-eq., or 44% of the 1990 level; and in 2022, due to favorable fire conditions and higher absorption, net emissions are estimated at 813 million tCO<sub>2</sub>-eq., or 31% of the 1990 level.”

In other words, while Russia's actual GHG emissions continue to rise, its officially reported figures have “miraculously” declined—an achievement made possible through technical and statistical manipulation rather than genuine decarbonization.

Another well-known distortion in Russia's climate accounting concerns the exaggerated role of its forests as carbon sinks. According to Climate Action Tracker, Russia's claims in this regard are entirely unfounded:

“Russia does not provide transparent assumptions on carbon dioxide removal. Russia's projected negative emissions in 2050 are more than double current levels of land sinks, reaching -1,200 MtCO<sub>2e</sub>. These negative emissions are projected to be achieved from the LULUCF sector, and there is no information available in the strategy to substantiate the increase or any assumptions on technical carbon dioxide removal approaches.<sup>52, 53</sup> An increase of this magnitude should be transparently explained to justify it as part of the strategy to reach net zero. There is also no projection to 2060 to outline the level of reductions required to reach net zero emissions.”<sup>54</sup>

While Russia seeks to use its vast forests as an accounting device to offset growing anthropogenic emissions, it simultaneously demonstrates widespread negligence in forest management and conservation. According to Global Forest Watch, between 2001 and 2024 Russia recorded the highest rate of tree-cover loss in the world due to wildfires, averaging 2.60 million hectares per year.

**Table 7. Russia among top countries by rate of tree-cover loss from wildfires**

Country	Tree-cover loss, 2021–2024 (Mha)
Russia	2.60
Canada	1.68
United States of America	0.55
Brazil	0.54
Australia	0.28
Bolivia	0.13
Indonesia	0.12
China	0.04
Mexico	0.04
Argentina	0.03

Source: Global Forest Watch<sup>55</sup>

Since 2006, Vladimir Putin has enacted a new Forest Code that effectively abolished the institution of professional foresters, previously responsible for direct patrols and on-the-ground forest management, and replaced them with a remote monitoring system.<sup>56</sup> As a result, approximately one-third of Russia’s forests are now classified as “control zones,” where wildfires are not actively extinguished but merely observed, as these areas are deemed too remote from populated regions to cause immediate economic damage.<sup>57</sup> In practice, these forests are largely left to burn. As of 2025, only about 40% of Russia’s total forest area is monitored via satellite.<sup>58</sup> Consequently, the total area of forests destroyed by wildfires has increased substantially over the past quarter century.

**Table 8. Forest area burned by wildfires in Russia, by year**

	2000	2010	2015	2020	2021	2022	2023	2024	2025
Total forest area burned by wildfires (Mha/year)	1,33	1,96	2,75	7,02	8,20	2,82	3,21	7,70	4,51

Source: Russian Federal Service of State Statistics (Rosstat), "Environmental protection in Russia", 2024 and earlier; \* - 2024 data provided by Rosleskhoz (Federal Forestry Agency).<sup>59</sup> 2025 data provided by State Budgetary Institution "Avialesokhrana" (aero forest protection), as of August 18, 2025.<sup>60</sup>

These figures demonstrate that Russia fails to provide adequate management and conservation of its national forests, even as it seeks to exploit its vast forest area to justify exemptions from international obligations to reduce greenhouse gas (GHG) emissions. Another example of Russia's reliance on "hot air" to minimize its net zero commitments is its attempt to classify outdated power generation infrastructure as "green energy." Russia's Strategy of Socio-Economic Development of the Russian Federation with Low Greenhouse Gas Emissions until 2050 lists traditional combined-cycle power plants, as well as hydro and nuclear power stations, as "technologies reducing the carbon footprint of existing coal-fired generation."<sup>61</sup> As Vladimir Putin stated at the Valdai Club in 2024:

"We [Russia] have one of the world's greenest energy systems, 40 percent of which comes from gas and nuclear generation, as well as hydro generation. Overall, low-emission energy accounts for 85 percent of total energy generation in Russia, which makes it one of the greenest operations globally. Also, I believe Russia is home to about 20 percent of the world's forests, which represents a significant absorption capacity."<sup>62</sup>

Such claims, that Russia's power generation is "85% green," are demonstrably false. The share of renewable energy in total Russian power generation remained below 0.7% in 2024 and has shown little growth over the years.<sup>63</sup> Most renewable power is generated by a handful of small plants in remote regions (for example, a geothermal power station in Kamchatka and a wind power station in Kalmykia), while the share of renewables in power generation across Russia's industrial heartlands remains close to zero. The average age of Russia's nuclear reactors exceeds 30 years, its hydropower stations average more than 50 years, and its combined-cycle gas plants are over 30 years old—projected to reach nearly 50 years by 2035.<sup>64</sup>

In short, Russia continues to rely on aging Soviet-era infrastructure that is inefficient, environmentally damaging, and carbon-intensive. Large-dam hydropower and nuclear power, each accounting for roughly 21% of total Russian electricity generation, also cause significant environmental harm and cannot reasonably be classified as "green."<sup>65</sup> Despite Putin's claim of "85% low-emission power generation," Russia's electricity sector performs only moderately in comparative terms. It emits an average of 449 gCO<sub>2</sub> per kilowatt-hour, slightly below the global average of 473 gCO<sub>2</sub>, but still well above truly low-emission economies. Far from being "one of the greenest," Russia's power sector remains among the country's largest sources of carbon emissions, as shown in Table 5 ("GHG Emissions Dynamics in Russia by Sector of the Economy").

**Table 9. Top 20 global economies by GDP, ranked by carbon intensity of electricity generation**

Country	Carbon intensity of electricity generation (gCO <sub>2</sub> e/kWh)
France	44
Brazil	103
Spain	146
Canada	175
United Kingdom	211
Netherlands	253
Italy	288
Germany	344
United States of America	384
South Korea	414
Russia	449
Turkey	470
Japan	482
Mexico	485
Australia	552
China	560
Poland	615
Indonesia	682
Saudi-Arabia	696
India	708

Source: Calculations based on data by Ember and Energy Institute (2024)<sup>66</sup>

The bottom line is that, in international climate negotiations, Russia is attempting to sell “hot air” to the greatest extent possible, while simultaneously:

- Effectively increasing, rather than reducing, its GHG emissions;
- Maximizing claims of carbon sequestration by national forests, while at the same time neglecting proper management and conservation of these forests;
- Portraying its outdated, environmentally harmful, and carbon-intensive power generation infrastructure as “green” or “low-carbon” energy – an assertion that could not be further from the truth.

## 2.2 Methane: The Invisible Driver of Russia's Rising Emissions

Russia is notorious for its methane emissions and leaks, a problem that remains largely unaddressed by the authorities and is often outright denied. According to Kayrros Methane Watch,<sup>67</sup> Russia ranks among the three worst countries globally in terms of methane "super-emitter" sites, locations releasing exceptionally high levels of methane with global climate significance,<sup>68</sup> identified through satellite data by Kayrros. Satellite observations have repeatedly captured massive methane leaks from Gazprom facilities.<sup>69, 70</sup> Even official data provided by Gazprom and Rosneft (as shown in Table 10 below) indicate a significant increase in methane emissions in 2023–2024, despite a decline in hydrocarbon production. Methane emission intensity (emissions per unit of oil and gas output) has risen to levels notably higher than those recorded before the 2022 invasion of Ukraine.

**Table 10. Officially declared methane emissions by Gazprom and Rosneft (2021–2024)**

	2021	2022	2023	2024
Gazprom, total methane emissions (thousand tons)	981.1	810.2	900.43	903.76
Gazprom, methane emissions intensity (tons per million barrels of oil equivalent produced)	279.8	276.8	340.8	298.5
Rosneft, total methane emissions (thousand tons)	122.5	158.8	168.4	147.6
Rosneft, methane emissions intensity (tons per million barrels of oil equivalent produced)	68.1	86.3	85.2	78.9

Source: Gazprom and Rosneft, annual reports and annual sustainability reports (see above)

As shown in Table 10 above, the intensity of publicly declared (and quite likely underreported) methane emissions per barrel of oil equivalent produced increased in 2024 by nearly 7% for Gazprom and by approximately 16% for Rosneft, compared to 2021. In what appears to be a further attempt to conceal large-scale methane leaks, Gazprom officials proposed in August 2025 to remove methane from the official list of air pollutants.<sup>71</sup> While the broader debate over whether methane should be formally classified as a pollutant is ongoing, one immediate consequence of such reclassification would be reduced transparency in methane emissions reporting.

This move coincides with Gazprom's earlier decision, taken by its board of directors in early 2025, to cease publication of the company's annual sustainability report, which had previously included data on methane leaks. Taken together, these actions indicate a deliberate effort to obscure methane leakage data, an effort clearly supported by the Russian government, Gazprom's majority shareholder, which has formally endorsed these decisions.

It is also important to recall that, in 2017, Russia significantly altered its methodology for calculating methane emissions. The revision, conducted by the Russian Federal Service for Hydrometeorology and Environmental Monitoring (Roshydromet), resulted in an almost 50% reduction in reported emissions, primarily through adjustments affecting methane from energy sources, namely, coal mine emissions and gas pipeline leaks<sup>72</sup>. Consequently, Russian methane emissions remain seriously underreported. By all accounts, Russia is not demonstrating responsible behavior in addressing methane emissions, which experts identify as one of the key obstacles to achieving the goals of the Paris Agreement and keeping global temperature increases below 1.5°C.

## 2.3 Climate Policy as Geopolitical Instrument

Despite the evident manipulation and "hot air" masking Russia's unwillingness to genuinely reduce carbon emissions, Russian authorities have recently sought to maintain their international image as a responsible player on climate issues. This effort is clearly designed to divert attention from the invasion of Ukraine, enhance Russia's standing among countries of the Global South, and partially repair relations with the West by presenting an image of constructive engagement in addressing global challenges.

This is, in essence, a familiar tactic. The Kremlin has long attempted to leverage selective cooperation in areas of global importance, such as climate policy, arms control, nuclear non-proliferation, or crisis mediation in the Middle East, in exchange for tolerance of its aggressive, imperialist behavior in its own neighborhood. Unfortunately, there remain many observers worldwide, including within the climate community, who continue to fall for this strategy.

Amid its ongoing war against Ukraine, Vladimir Putin has continued to issue policy decisions formally aligned with the Paris Agreement, aiming to portray Russia as a responsible climate actor. In October 2023, Putin signed a decree approving a new Climate Doctrine, replacing the earlier version adopted in 2009.<sup>73</sup> In August 2025, he issued another decree, "On the Reduction of Greenhouse Gas Emissions,<sup>74</sup>" which again referenced the Paris Agreement and directed the government to reduce GHG emissions by 2035 to 65–67% of 1990 levels (revising the previous target of 70% by 2030).

The new target was immediately met with ridicule, even within Russia. As the *Kommersant* newspaper observed, "the tightening, however, can be called symbolic—today, according to the RSPP estimates, the indicator is already at the level of 63%." In other words, Russia is once again attempting to trade "hot air."

The Climate Action Tracker (CAT) currently rates Russia's policy goals as "critically insufficient."<sup>75</sup> Closer examination of Russia's official climate positions reveals deep inconsistencies with the "responsible" image its leadership seeks to project. To begin with, Russian authorities rarely miss an opportunity to cast doubt on the anthropogenic origins of climate change. The Climate Doctrine approved by Putin (paragraph 5), while acknowledging the human contribution to climate change, simultaneously emphasizes the role of "natural variability." In recent years, senior Russian officials have increasingly and openly questioned the scientific evidence for anthropogenic climate change:

"Climate change and global warming are what is happening. Why is it happening? Is it caused by human activity, or are there other factors at play, including outer space, or is it something that happens to Earth now and then, which we do not really understand?"

- Vladimir Putin, Valdai Discussion Club meeting, November<sup>76</sup>

"The research being conducted there [in Antarctica] is of significant scientific importance and can provide insight into the causes of climate change [implying that these causes have not yet been scientifically defined]."

- Mikhail Mishustin, Prime Minister of the Russian Federation, International Environmental Conference, Altai, Russia, July 2025<sup>77</sup>

In this context, Russia's official climate policy documents, including the above-mentioned Climate Doctrine, place a much stronger emphasis on adaptation to climate change, while reducing greenhouse gas emissions is treated as a secondary objective. Although Vladimir Putin himself has recently refrained from repeating his earlier assertions that climate change may be beneficial for Russia, several government-affiliated institutions have explicitly advanced this view, claiming that climate change will yield economic benefits and thus does not warrant an aggressive mitigation effort:

"With an increase in the average annual temperature in the country by 1°C, the annual GDP increases by more than 1 trillion rubles. The main benefits from climate change will be received by agriculture and the transport sector due to the development of the Northern Sea Route."<sup>78</sup>

— Institute of Economic Forecasting of the Russian Academy of Sciences

"Russian agriculture will most likely benefit from the climate changes that we are currently observing. Moreover, this is a long-term trend. We have vast territories in permafrost conditions, so it is fundamentally important for Russia that the country becomes warmer and sunnier."<sup>79</sup>

— Alexander Nikulin, Director, Center for Agricultural Research, Russian Presidential Academy of National Economy and Public Administration

## 2.4 Fossil Fuel Capture of Russia's Climate Agenda

While discussing the pro-warming rhetoric of institutions such as the Institute of Economic Forecasting of the Russian Academy of Sciences, which has taken an informal lead in providing the research backing for Russia's climate policy and published the First Annual National Report on Climate Agenda in Russia in 2025, it is essential to note the extent to which Russia's climate policy is shaped and captured by the industrial lobby.

The aforementioned First Annual National Report, prepared by the Climate Policy and Economy of Russia Center of the Institute of Economic Forecasting, was co-authored with the Melnichenko Foundation, an organization established by Andrei Melnichenko, a sanctioned Russian oligarch and founder of SUEK (Siberian Coal Energy Company). SUEK is Russia's largest coal producer and operator of coal-fired power generation facilities, making it the country's single largest corporate emitter in its most carbon-intensive sectors. The combined activities of power and heat generation and coal production account for roughly 40% of Russia's total GHG emissions. Melnichenko also owns EuroChem, one of the world's largest fertilizer producers and one of Russia's top industrial greenhouse gas emitters. According to official Russian statistics, the chemical industry, including fertilizer production, was the largest relative contributor to the overall growth of national GHG emissions between 2015 and 2022, increasing by 35% over that period (see Table 5).

SUEK ranks among the world's largest coal and energy companies, with an annual coal output of around 100 million metric tons.<sup>80</sup> Until 2024, it also controlled a significant share of Russia's power generation assets through its subsidiary, the Siberian Generation Company (SGC)—the third-largest producer of thermal energy in Russia and one of Siberia's main electricity providers, operating 27 thermal power plants and serving more than 6 million consumers. Although Melnichenko nominally sold his stake in SUEK in 2022 following Russia's invasion of Ukraine, apparently in an attempt to avoid Western sanctions (which were imposed regardless), and SUEK subsequently divested SGC in 2024 to undisclosed domestic investors, both Melnichenko's influence and SUEK's operational dominance remain intact. The foundation's activities continue to align closely with the lobbying interests of the coal, power, and fertilizer sectors. Despite his formal departure from SUEK, Melnichenko retains ownership of EuroChem, the second-largest fertilizer producer in Russia and a major global player.<sup>81</sup> The company is also a significant source of GHG emissions. Together, the sectors historically central to Melnichenko's business empire—coal production, power and heat generation, and chemical manufacturing—account for approximately 45% of Russia's total GHG emissions, as shown in Table 5. The Melnichenko Foundation, established in 2016—well before Russia's 2022 invasion of Ukraine—has consistently promoted narratives that challenge the mainstream understanding of climate change and question the necessity of emissions reductions. In a 2024 interview with Tucker Carlson, Melnichenko openly cast doubt on the anthropogenic nature of climate change and called for "alternative approaches to mitigating climate change," explicitly opposing strategies focused on reducing greenhouse gas emissions.<sup>82</sup>

It is no surprise that the Institute of Economic Forecasting of the Russian Academy of Sciences (IEF RAS)—an institution backed and bankrolled by fossil fuel interests—has effectively aligned its agenda with the priorities of the industrial lobby. Its First Annual National Report on Climate Agenda in Russia, published in 2025, openly favors continued global climate change and proposes measures that would undermine international climate mitigation efforts. A closer look at some of the “recommendations for the development of national climate policy for 2025–2026” in the First National Report, prepared jointly by IEF RAS and the Melnichenko Foundation, reveals the following:

- Prioritizing adaptation as the key element of Russia’s climate policy response, effectively pushing greenhouse gas (GHG) reduction efforts to the sidelines;
- Linking emission reduction targets to economic growth, recommending that Russia avoid any mitigation measures that could restrain GDP expansion;
- Opposing the EU’s Carbon Border Adjustment Mechanism (CBAM), described in the report in entirely negative terms as an “unfair method of imposing trade barriers”;
- Declaring that the Paris Agreement “is in crisis,” and advocating for a renegotiated framework based on cumulative per capita emissions—a system that would shift the burden of climate commitments away from developing countries and disproportionately onto advanced economies.<sup>83</sup>

As the report’s authors note, such an approach would ensure that “developing countries, which have very low emissions per capita, will not need to limit fuel consumption and, therefore, economic growth.” In essence, the First National Report, developed with the involvement of fossil fuel–affiliated oligarch Andrei Melnichenko, outlines a political and economic blueprint aimed at eliminating Russia’s international climate obligations, sabotaging the EU’s CBAM mechanism, and mobilizing developing countries to support a global climate policy framework that exempts non-Western economies from serious emissions reduction commitments.

The Climate Policy and Economy of Russia Center of IEF RAS, which authored the report, operates as a de facto captive structure of Melnichenko’s industrial empire. One of its trustees is Tatiana Larionova<sup>84</sup>, a representative of the Melnichenko Foundation who also chairs the Committee on Climate Policy and Carbon Regulation at the Russian Union of Industrialists and Entrepreneurs (RSPP), the country’s most powerful business lobby<sup>85</sup>. Unsurprisingly, Russia’s climate agenda is therefore fully captured by the fossil fuel oligarchy. The IEF RAS plays an active institutional role in shaping Russia’s Climate Doctrine. Its Scientific Director, Boris Porfiryev, serves as Deputy Chairman of the Scientific Council of the Russian Academy of Sciences on Earth’s Climate Problems—one of the key bodies responsible for formulating national climate policy<sup>86</sup>. Due to its exclusive mandate to assess the economic impacts of climate regulation, IEF RAS effectively wields veto power within the Russian Academy of Sciences over climate-related policy proposals. Given this influence, and its deep entanglement with fossil fuel interests, the capture of Russia’s climate policy by the country’s largest greenhouse gas emitters is complete.

The Russian Climate Doctrine, approved in 2023,<sup>87</sup> is less overt in its rejection of responsible climate policy than the Melnichenko-backed recommendations of IEF RAS. However, it still places greater emphasis on adaptation than on mitigation, highlights supposed “benefits” of climate change for Russia, and devotes far more attention to the economic risks of climate regulation than to decarbonization goals. Overall, the Doctrine is a vague document lacking political will, with unambitious objectives tied to 1990 emissions levels that have already been effectively met. Its text clearly bears the imprint of industrial lobbying. Russia’s actions on the international stage confirm this pattern. The country has consistently resisted any commitments that would restrict fossil fuel production or consumption. As reported by The New York Times (“Saudi Arabia and Russia to U.N.: Don’t Talk About a Fossil Fuel Exit,”<sup>88</sup> November 26, 2024), Russia joined other oil-producing nations in blocking a UN General Assembly resolution that would have called for a transition away from fossil fuels.

Domestically, the Russian government continues to reassure businesses that no serious pressure toward decarbonization will be applied. Speaking at the RSPP Climate Forum in February 2025, Minister of Economic Development Maxim Reshetnikov stated explicitly that “the goal of fulfilling the task of decarbonization at any cost has never been set”, signaling that emission reductions will not be pursued at the expense of economic growth. Reshetnikov further clarified that carbon pricing will not be discussed before 2027–2028, well beyond the current planning horizon of the Russian government, and emphasized that the authorities would continue to test a “soft model” of voluntary reporting and climate projects without binding quotas.

As Kommersant summarized in an article aptly titled “Paris Agreement Fades into Oblivion” (approximate translation of the Russian idiom “приказали долго жить”), “the climate agenda remains, but will be more flexible.” In other words, Russian industries have been given a clear signal: there will be no excessive pressure on them in terms of the climate agenda.<sup>89</sup>

## 2.5 The Sakhalin Carbon Experiment: Symbolism Without Substance

In recent years, Russia has been actively publicizing its Sakhalin pilot experiment introducing an emissions cap-and-trade system (“Sakhalin Becomes First Russian Region to Reach Carbon Neutrality, Officials Say,” Moscow Times, August 4, 2025). To put it briefly, this initiative appears to be yet another greenwashing exercise, designed to convince international observers that Russia is shifting toward responsible climate policies. Some international commentators initially seemed impressed:

“An encouraging signal in global efforts to tackle the climate crisis has come from the remote Far East of Russia... A pilot carbon emissions trading scheme was given the go-ahead on the country’s largest island of Sakhalin as part of a roadmap to achieve net-zero carbon emissions by 2025. Russia is considering scaling up the results of this initiative to cover all its territory, a boost for global efforts to achieve net zero greenhouse gas emissions by the middle of the century,”

— UN Climate Change News release, March 2021<sup>90</sup>

"Climate change was long neglected by Russian politics. However, from 2019 to 2021, substantial changes were observable. During this time, climate change mitigation became both the subject of considerable debate and the launching point for a number of initiatives, with the most striking example being the case of Sakhalin. Beginning in autumn 2020, this Far Eastern island region and oblast was singled out as a Russian pilot area for various climate policies with the aim of achieving carbon neutrality by the end of 2025,"  
— Benjamin Beuerle, *Zeitschrift für Vergleichende Politikwissenschaft* (German Journal of Comparative Politics)<sup>91</sup>

In practice, however, the Sakhalin experiment offers little reason for optimism. First, it has not been subjected to any independent international audit, which would be essential to assess its credibility and results.<sup>92</sup> Second, within Russia, the project has been dismissed by the official expert community as unsuitable for nationwide replication—partly due to Sakhalin's geographical isolation and relatively low concentration of major carbon emitters, and partly due to the "institutional incompatibility" of the island's Japan-inspired cap-and-trade model with broader global carbon markets beyond Japan and Saudi Arabia.<sup>93</sup>

No concrete proposals regarding a nationwide expansion of the Sakhalin model have been put forward or seriously discussed. Given the remarks of Minister of Economic Development Maxim Reshetnikov at the RSPP Climate Forum in February 2025, it is evident that no such plans exist. Therefore, the Sakhalin carbon trading experiment should be treated as irrelevant to the general trajectory of Russian climate policy and to the country's actual emission reduction trends.

The UN Climate Change News claim that "Russia is considering scaling up the results of this initiative [the Sakhalin experiment] to cover all its territory, a boost for global efforts to achieve net zero greenhouse gas emissions by the middle of the century," is therefore misleading. Russia is not planning any expansion of the Sakhalin experiment, which remains a symbolic and largely performative project rather than a substantive policy measure.

# Chapter 3. Confronting the Global Consequences: Strategies for Collective Action

The above analysis demonstrates how much further away from responsible environmental and climate policies Russia has drifted in the aftermath of the 2022 invasion of Ukraine. As stated above, this was not merely a tactical response to the consequences of the invasion; rather, it represents a continuation of the long-term trend of anti-environmental evolution within the system of oligarchic crony capitalism that has developed under Vladimir Putin and that began long before 2022. Some of the conclusions on the rapid de-environmentalization of Russia in 2022–2025 and its consequences are as follows:

- Russia's environmental protection rules, regulations, and standards in 2022–2025 have been relaxed to such an extent that public environmental oversight has effectively ceased to exist in its previous form.
- The Russian government and business have made efforts to conceal data about increasing environmental pollution in recent years.
- However, the available data suggest that pollution is visibly increasing, not least due to the relaxation of environmental protection rules.
- For instance, while lagging behind the United States and Saudi Arabia in oil production volumes, Russia remains the largest country in the world by gas flaring, according to satellite tracking data. Gas flaring intensity (gas flaring per barrel of oil produced) increased in 2024 by 15% compared to 2021 and by 35% compared to 2019.
- The number of oil pipeline ruptures and oil spills has nearly doubled between 2020 and 2023.
- Corporate sustainability reports by Gazprom and Rosneft show a notable relative increase in air pollution and methane emissions in recent years. Air pollution intensity (tons of air pollutant emissions per million barrels of oil equivalent produced) for Gazprom increased by over 9% in 2024 as compared to 2021, and for Rosneft – by 7.4%.
- Methane leaks in Russia are of particularly alarming scale. The country is among those identified via satellite tracking as hosting super-emitter sites releasing exceptionally high levels of methane into the atmosphere. The intensity of publicly declared methane emissions per barrel of oil equivalent produced increased in 2024 for Gazprom by nearly 7% as compared to 2021, and for Rosneft – by nearly 16%.
- Russia is attempting to conceal and underreport methane leaks. Gazprom has made a formal decision to stop publishing sustainability reports containing information on environmental pollution and methane leaks, and has initiated motions to declassify methane as a pollutant in order to further obscure the scale of emissions.

On GHG emissions and climate policy, some of the main conclusions from the above analysis are as follows:

- In 2021–2022, Russia increased the level of greenhouse gas (GHG) emissions both overall and across the vast majority of sectors of the economy.
- There is no practical policy intent to reduce GHG emissions visible from the declared policy positions of the Russian government. Russian climate policy documents (including Vladimir Putin's decree of August 2025) set unambitious goals that have de facto already been met. In these documents, Russia makes repeated reservations about emissions control being potentially harmful to economic growth, demonstrating a clear reluctance to take decisive measures aimed at the decarbonization of the economy.
- Russia continues to trade significant volumes of "hot air" – using the outdated 1990 benchmark to set emission goals, reclassifying emissions to achieve reductions on paper, excessively presenting national forests as a carbon sink, and portraying its old, environmentally harmful Soviet-era power generation stock as "low-carbon energy." All of these measures obscure the absence of genuine political will to reduce GHG emissions.
- Lobbyist policy documents currently circulating openly promote approaches to climate policy that avoid setting the goal of actual GHG emission reduction.
- Russian Economic Minister Maxim Reshetnikov publicly stated at the February 2025 gathering of the Russian Union of Industrialists and Entrepreneurs (RSPP) that reducing GHG emissions "at the expense of economic growth" is out of the question, and that the Russian government is not considering imposing strict emission reduction requirements on Russian businesses in the reasonably foreseeable future.
- Despite Russia's attempts to trade its national forests as a major carbon sink offsetting its GHG emissions, there is widespread negligence regarding the conservation and management of these forests, resulting in significant forest loss.
- Russian climate policy documents place disproportionate emphasis on adaptation to climate change and on the potential advantages of a warmer climate for Russia (such as increased availability of arable land and the opening of the Northern Sea Route for commercial traffic). Consequently, emission reduction objectives are clearly secondary in this context.
- These policy documents also contain explicitly hostile references to the European Union's Carbon Border Adjustment Mechanism (CBAM), implying that Russia intends to actively oppose its implementation.
- Russia's messaging to developing countries and the Global South on climate policy is distinctly divisive: it promotes hostile narratives toward developed economies for political purposes, attempting to persuade developing nations to support policy solutions that shift the full costs of climate change mitigation solely onto the developed world, while ensuring that developing countries (to quote directly) "will not need to limit fuel consumption" and related carbon emissions. While differentiated approaches to emissions between developed and developing countries are reasonable in principle, Russia's proposed framework appears divisive, politically motivated, and grossly unfair in its distribution of responsibility for reducing current GHG emissions.

In sum, Russian climate policy is visibly shaped by the fossil fuel and industrial lobby, as demonstrated throughout this report.

## 3.1 Why the Awareness Gap Matters: Global Risks and Strategic Blind Spots

At present, there is a considerable lack of international awareness regarding the anti-environmental and anti-climate policy trends that characterize contemporary Russia. This gap in awareness is problematic for several reasons:

- 1. Russia remains a significant environmental polluter and greenhouse gas (GHG) emitter.** It is the fourth-largest emitter of GHGs globally and a substantial contributor to overall pollution levels. Russia's deteriorating record on pollution and GHG emissions, deliberately enabled by the authorities through rapid de-environmentalization, implies that other states will be forced to adopt even more ambitious decarbonization and green transition goals if Russia continues to free-ride. Despite the gravity of this situation, it is not yet fully acknowledged internationally. The global community largely assumes that Russia will somehow contain its GHG emissions, however modest its targets may be. In reality, given current trajectories and the Russian government's deliberate tolerance of environmentally and climatically irresponsible practices, Russia's GHG emissions are likely to grow substantially faster, thereby increasing the burden on other countries.
- 2. Russian propaganda and greenwashing tactics have proven highly effective.** Many observers are easily misled by Russia's climate rhetoric and public declarations, interpreting them as signs of genuine commitment. Even limited policy gestures or official statements are often met with headlines such as "Russia is beginning to take climate change seriously" or "Russia changing the tone on climate." Others, prioritizing inclusion over accountability, prefer to keep Russia engaged in global climate frameworks such as the Paris Agreement, even as a largely symbolic participant. Such perceptions are misleading. Russia should be regarded not as a constructive partner, but as a systematically obstructive actor within international climate governance.
- 3. Environmental consequences extend far beyond climate change.** Russia's escalating and largely unrestrained pollution now constitutes a severe environmental threat in its own right. In addition to its contribution to global temperature increase, it is degrading ecosystems, accelerating biodiversity loss, endangering public health, and compounding regional environmental instability.
- 4. This awareness gap is especially consequential for countries in the Global South, many of which are expanding cooperation with Moscow without a clear picture of Russia's accelerating environmental deterioration, climate obstruction, and use of fossil-fuel dependency as geopolitical leverage.** Closing this gap empowers governments to engage more strategically, strengthen multilateral cooperation, and build the trust necessary for resilient regional development and effective global climate action.

It is therefore essential for the international community to explicitly acknowledge the extent to which the current Russian government has become a hostile actor in relation to global environmental protection and climate change mitigation. Among major economies, there is arguably no other state whose policy conduct demonstrates such persistent irresponsibility and disregard for international environmental norms. While some other countries may also act negligently, in Russia's case this behavior has evolved into a defining principle of state governance—an assessment supported by empirical evidence. If left unaddressed, Russia's irresponsible environmental and climate policies will have global repercussions.

# Countering Russia's Environmental Deregulation: A Framework for Collective International Action

Russia's accelerating retreat from environmental and climate accountability is no longer a domestic issue; it is a growing international problem with direct implications for global climate stability, environmental security, and the integrity of multilateral governance. Yet many of the most troubling developments remain poorly understood outside specialist circles. Closing this awareness gap and equipping policymakers with coordinated tools is now essential. The steps below outline a practical foundation for an international response capable of limiting the global consequences of Russia's de-environmentalization and persistent climate obstruction.

## 1. Launch a Global Awareness and Information Campaign

Russia's environmentally harmful policies receive far too little international visibility. A coordinated information effort should:

- Publish detailed analytical reports on Russia's environmental rollback and climate obstruction.
- Organize high-profile conferences and dedicated panels at major global fora.
- Mobilize traditional and social media to reach both public audiences and policymakers.
- Prioritize outreach in the Global South, where Russia actively promotes misleading narratives about its climate posture.

A formal inquiry should also be submitted to the Paris Agreement Implementation and Compliance Committee (PAICC) regarding Russia's obstruction of global climate action.

## 2. Update Global Climate and Emissions Assumptions

International climate modeling and policy planning must incorporate a realistic "free-riding Russia" trajectory.

- Adjust global emissions scenarios upward to reflect Russia's deteriorating environmental record.
- Use these recalibrations as a wake-up call underscoring the urgency of stronger collective mitigation efforts elsewhere.

This provides policymakers with a clearer understanding of the additional burden Russia's behavior imposes on global climate pathways.

## 3. Deploy Coordinated Trade, Legal, and Due-Diligence Measures

- Russian exports increasingly benefit from weakened environmental standards and limited transparency. International actors should therefore:
- Expand industrial decarbonization policy mechanisms and strengthen environmental due-diligence rules.
- Coordinate trade restrictions or penalties targeting sectors that profit from deregulation.
- Ensure that Russia cannot gain a competitive advantage from concealed pollution, underreported emissions, or artificially low production costs.

Russia's own policy discussions make clear how sensitive the regime is to these instruments.

#### **4. Engage Global South Partners with a Clear Counter-Strategy**

Russia is courting the Global South with proposals for a renegotiated climate framework that would exempt major emitters from meaningful reductions. A counter-strategy should:

- Highlight how Russia's agenda shifts emissions burdens onto developing countries rather than relieving them.
- Offer credible, cooperative pathways for climate action and economic development that support—not undermine—regional resilience.
- Strengthen multilateral dialogue to ensure that countries have a full picture of how Russia's environmental deterioration affects global and regional stability.

#### **5. Support Independent Monitoring and Civil Society Oversight**

With transparency collapsing inside Russia, independent monitors are indispensable.

- Provide financial and institutional support to international organizations and Russian experts working in exile.
- Invest in advanced remote monitoring tools—including satellite datasets, atmospheric measurements, and open-source intelligence.
- Build mechanisms to ensure that environmental and climate data related to Russia remain accessible and systematically analyzed.

These actors provide much of the evidence base that makes Russia's behavior visible.

#### **6. Expand Research and Policy Coordination on Russia's Environmental Decline**

Russia's de-environmentalization is still unfolding, and its long-term impacts remain poorly understood.

- Support multidisciplinary research to map its consequences for global emissions, biodiversity, public health, and regional security.
- Coordinate findings across governments and international institutions to form a coherent policy response.

These steps offer policymakers a structured approach to confronting Russia's environmental and climate retreat. By acting collectively and with strategic clarity, the international community can limit the global fallout of Russia's deregulation agenda and reinforce a rules-based climate order at a moment when it is under sustained pressure.

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