

Mr. Alexander Kononov  
Justice Minister  
Moscow, 119991,  
Zhitnaya st., 14  
Russia.

26 September 2016.

Dear Mr. Kononov,

We write to you on behalf of ESOMAR, the World Association for Market, Opinion and Social Research and WAPOR, the World Association for Public Opinion Research. Our associations are responsible for setting and enforcing globally accepted professional standards governing the conduct of opinion polls and social research.

It is with deep concern that we learned of the decision to declare the Yury Levada Centre 'a foreign agent,' as a consequence of the 2012 Bill 102766-6, On Amendments to Legislative Acts of the Russian Federation regarding the Regulation of the Activities of Non-profit Organisations Performing the Functions of a Foreign Agent.

The measure will hamper the Centre in conducting research since they must misrepresent themselves as being a foreign agent and not as a research organisation, thus impacting their ability to assemble representative samples through voluntary participation of respondents in line with internationally accepted professional standards.

We request that you intervene to rescind this decision for the following reasons:

### Social and opinion research informs decision makers and society; it is politically neutral

Opinion researchers, whether they research for private for-profit or non-profit entities, are bound by the ICC/ESOMAR International Code and the WAPOR Code. Both professional codes of conduct require researchers internationally to execute research projects on the basis of scientific research principles and to objectively report only on results which can be verified by the data collected. These principles comply with the spirit of the Council of Europe's Council of Ministers Recommendation 2007 (15).

Our sector has always recognised the importance of impartiality and public trust and confidence. This is underlined by the ICC/ESOMAR Code under Article 1<sup>i</sup>, 2<sup>ii</sup>, and 11<sup>iii</sup> and WAPOR's Code under II(a)5<sup>iv</sup>, II(a)9<sup>v</sup> which require that all reporting be supported by the evidence and that researchers' own views be clearly distinguished from the results.

Far from seeking to advocate opinions or promote specific political views, the role of the researcher is to measure and report views and behaviour on the basis of statistical evidence. Accordingly, opinion and social research is a politically neutral activity which provides decision makers and other stakeholders with the most objective reflection of citizens' views on subjects such as education and healthcare where otherwise only hearsay and unsupported assertions would be circulated. Social research is used by decision makers around the world to improve decision-making through better insight into citizens' beliefs, attitudes and behaviours, and by the media to report on citizens' views about the society in which they live.

As an organisation whose members are in good standing with ESOMAR, WAPOR, and OIROM (the Russian Association for Market and Opinion Research), the Yury Levada Centre undersigns and is subject to the oversight provided by our associations in the event any party including the Ministry has concerns that the Centre is not complying with these requirements.

#### ESOMAR

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## Diversification of funding sources and international cooperation

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In line with good organisational practice to sustain activities and maintain expertise, the Centre diversifies its funding sources to uphold and improve professional standards to an international level. After all, academics and social scientists have a long established history of international cooperation and exchange to improve their expertise. Such international funding is an advantage to not only the organisations involved, but also to the Russian research community in general. International cooperation reflects the global community's interest in Russia and a desire to include it in academic and comparative studies.

In addition, the WAPOR Code does not preclude receiving grants from foreign governments or working with international scholars that are funded by their governments. In fact, doing so is routine for many ESOMAR and WAPOR members all over the world. When study results are published, however, the source of funding should be reported.

The source of funding of the Yury Levada Centre therefore should not be interpreted to position it as a 'foreign agent.' The Centre has a solid international reputation amongst peers for the professionalism of its work and more importantly, has published both critical and favourable poll results about the Government, thus attesting to its neutrality.<sup>vi</sup> In addition, the publication of poll results, whether critical or favourable, allows for their verification by other research organisations and/or real life developments (e.g., actual election results).

## Opinion research is a key fundament of democratic ideals embodied by the ECHR

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The conduct and sharing of independent opinion and social research, regardless of the source of funding, is one of the indispensable democratic values of modern society. The conduct of polls allows governments to demonstrate their full compliance with the European Convention on Human Rights' Article 5 which guarantees a right to liberty and security, Article 9 which guarantees a right to freedom of thought, and Article 10 which safeguards freedom of expression. Independent polling can also be an important prerequisite for compliance of Article 3 of the 1952 Protocol to the European Convention on Human Rights which guarantees a right to free elections. The decision to restrain an independent research organisation from carrying out these activities could therefore endanger Russia's ability to comply with these Articles exposing it to possible legal challenges.

## Independent self-regulation mechanisms to address

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Should you or another department of the Russian Government have concerns about the professional standards of any published polls, we would be happy for you to lodge a complaint that can be investigated by our independent Disciplinary Committee which can if necessary enforce sanctions.

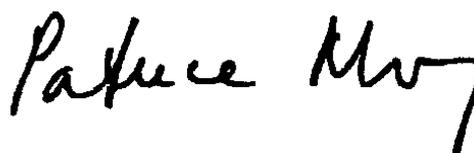
We hope that you will grant our request to intervene and rescind the decision affecting the Yury Levada Centre and remain at your disposal should you wish further information about our self-regulation.

Sincerely,

On behalf of the international market, opinion and social research sector:



Finn Raben  
Director General  
ESOMAR



Patricia Moy  
President  
WAPOR

Founded in 1948, ESOMAR gathers nearly 5000 professionals and over 400 companies in 130+ countries providing or commissioning research, including public and academic bodies. For further information on ESOMAR and its activities, contact Kim Smouter, Head Professional Standards and Government Affairs.

## ESOMAR

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Founded in 1947, WAPOR is the international leading association in the field of public opinion research with approximately 500 members in more than 65 countries. For further information on WAPOR and its activities, contact Patricia Moy, President.

### WAPOR

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<sup>i</sup> Article 1: Market research shall be legal, truthful and objective and be carried out in accordance with appropriate scientific principles.

<sup>ii</sup> Article 2: Researchers shall not make false statements about their skills, experience or activities, or about those of their organisation.

<sup>iii</sup> Article 11: When reporting on the results of a market research project, researchers shall make a clear distinction between the findings, the researchers' interpretation of these findings, and any recommendations based on them.

<sup>iv</sup> 5. Article II(a)5: The objective study of facts and data, conducted as accurately as permitted by the available resources and techniques, is a guiding principle of all research

<sup>v</sup> 9. Article II(a)9: The researcher shall in every report and other presentation of the findings distinguish her/his actual data from observations or judgments that may be based on other evidence.

<sup>vi</sup> "Electoral ratings of political parties" (press-release from 01.09.2016)

<http://www.levada.ru/2016/09/01/gotovnost-golosovat-i-predvybornye-rejtingi/>

"Vladimir Putin's public image" (press-release from 08.08.2016) <http://www.levada.ru/2016/08/08/vladimir-putin-vospriyatie-i-doverie/>

"Public views on sanctions" (press-release from 18.08.2016) <http://www.levada.ru/2016/08/18/sanktsii-zapada-i-produktovoe-embargo-rossii/>

"Russia doping scandal" (press-release from 29.07.2016) <http://www.levada.ru/2016/07/29/doping-skandal/>

"Family arguments" (press-release from 04.08.2016) <http://www.levada.ru/2016/08/04/semejnye-ssory-i-nasilie/>

"Public opinion on situation of Kurile Islands" (press-release from 05.08.2016)

<http://www.levada.ru/2016/08/05/spor-rossii-i-yaponii-vokrug-kurilskih-ostrovov/>