

SITE, Stockholm 18 June 2025

Measuring sanctions evasion Focus on Western exports to Russia

Erlend Bjørtvedt, Corisk



Larsi border, Georgia-Russia
South Ossetia, Caucasus

Three years of sanction evasion analysis

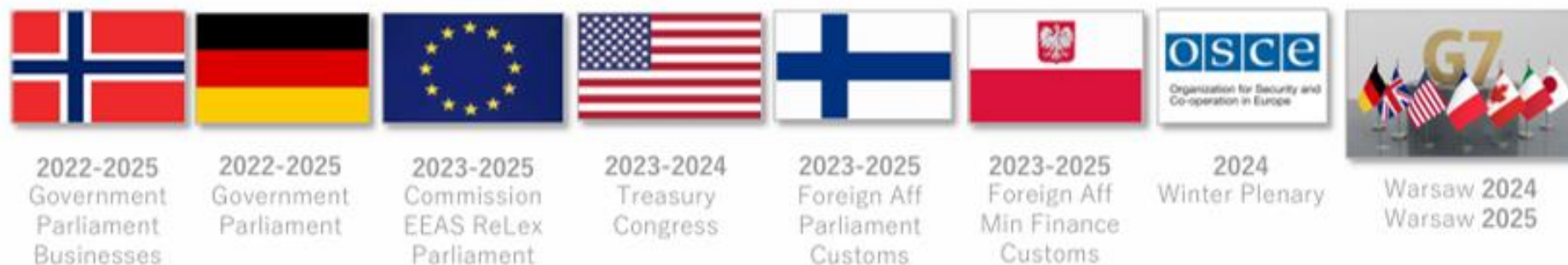
Research



Commentary



Testimony & data



Today's topics

Measuring sanction evasion

Western data vs. Russian data

Some validation of our results

What we know about evasion

| TYPE | Pillar - Composite - Indicator | Armenia |
|---|--------------------------------|--------------|
| | | |
| | | 44,92818325 |
| | | -32,40399251 |
| Composite scores for analysis: | | |
| TOTAL - Country's excessive EXPORTS to 8 intermediaries, or the 8 intermediaries' facilitation of that export | | 991,7483802 |
| TOTAL - Country's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that export | | 1221,438865 |
| TOTAL - Country's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that export | | 939,0866362 |
| TOTAL - Country's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that export | | 22,96881399 |
| Same data annual 2023-2024, as a percentage of same original trade annual 2019-2021 | | -0,353143704 |
| Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 | | 45,19053759 |
| 22 GROUPS - Country's excessive EXPORTS to 8 intermediaries, or the 8 intermediaries' facilitation of that export | | 11,9388886 |
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| 7 GROUPS - Country's excessive EXPORTS to 8 intermediaries, or the 8 intermediaries' facilitation of that export | | -4,236889417 |
| 7 GROUPS - Country's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that export | | 0,44909009 |
| 7 GROUPS - Country's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that export | | -0,1087784 |
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Measuring sanction evasion – country and data coverage



Data sources

Western export data

95-100% coverage

Third-country data

90-100% coverage

Russian customs data

Misses most internal EAEU trade

80-95 % coverage before 2024

Variable coverage in 2024

Bank of Russia data

Only total trade

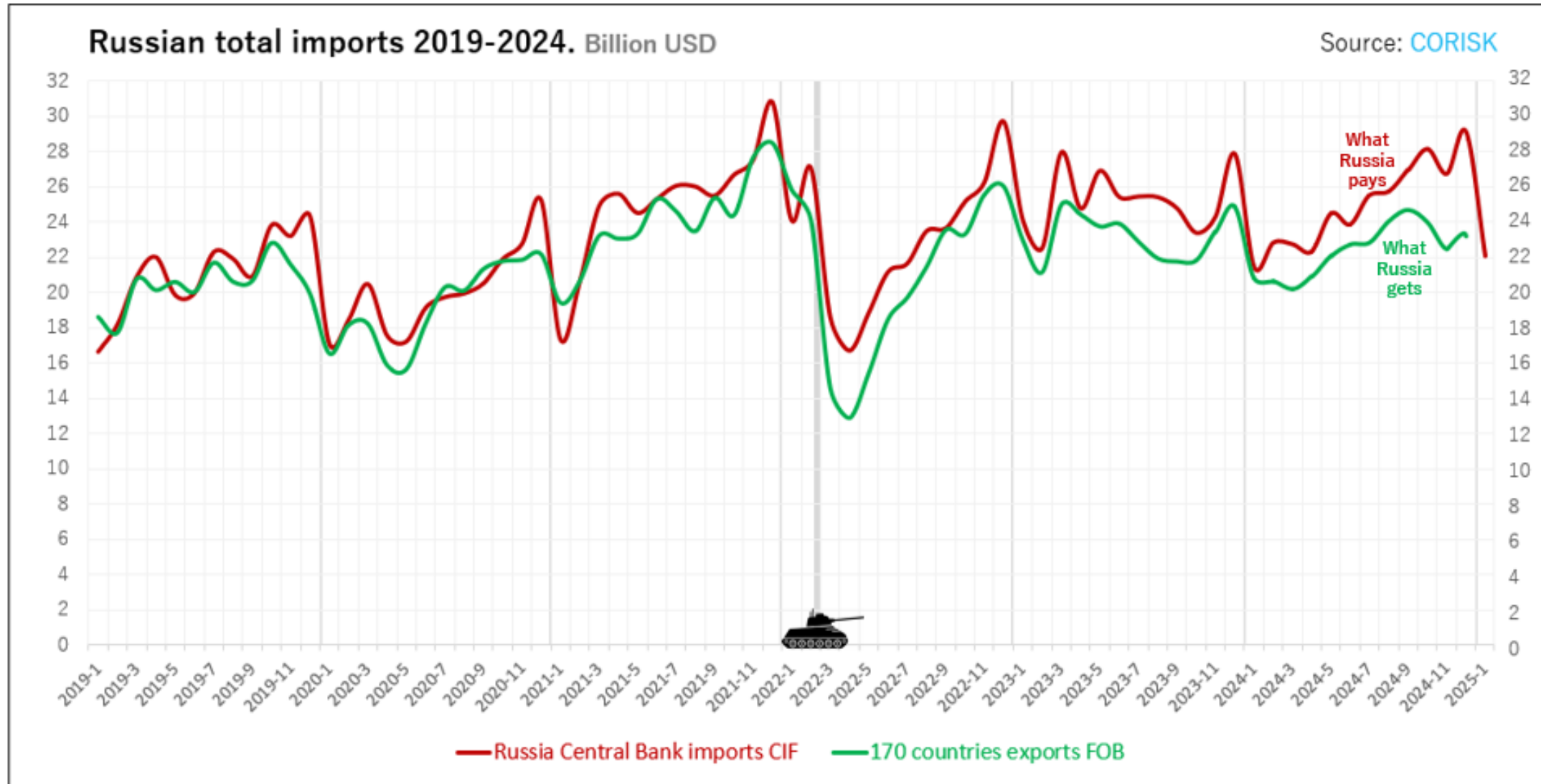
Measuring and validating Western sanction evasion

| | | | |
|---|--|---|-----------------------------------|
| 1 | Western exports to Russia | Direct exports (non-sanctioned trade) | Western data |
| | Russian imports from West | Imports of Western countries' exports | Russian data |
| 2 | Western excessive exports to third-countries | Above-normal exports to third-countries | Western data |
| | | Validate against third-countries' exports to Russia | Third-country data |
| 3 | Russian imports of Western goods | Western-origin goods from any country | Russian data |
| 4 | Third-countries' re-export to Russia | Exports of foreign-origin goods | Third-country data + Russian data |

Total, per country, per commodity

1

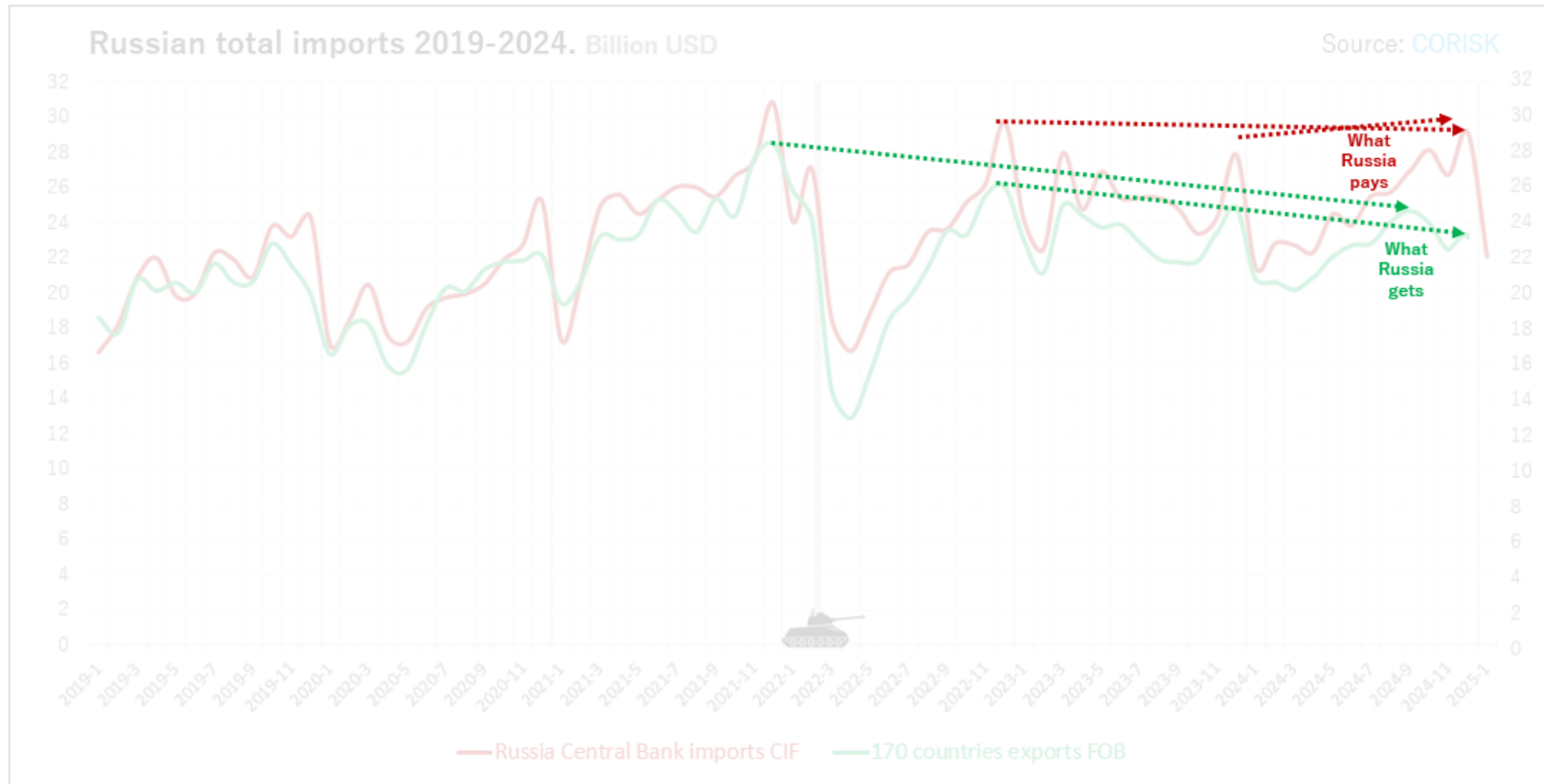
Global exports to Russia vs. Russian total imports



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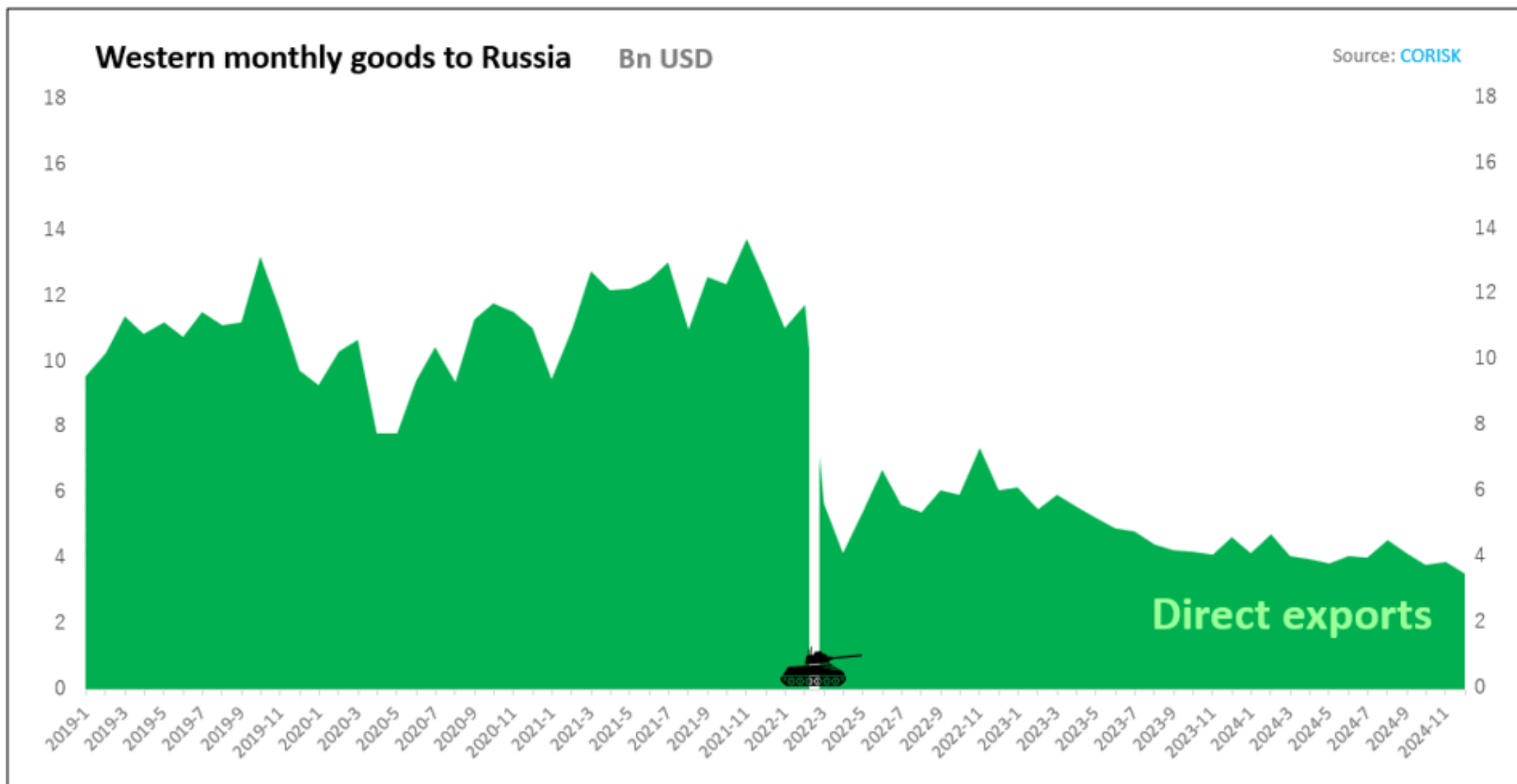
1

Global exports to Russia vs. Russian total imports

15% nominal decline

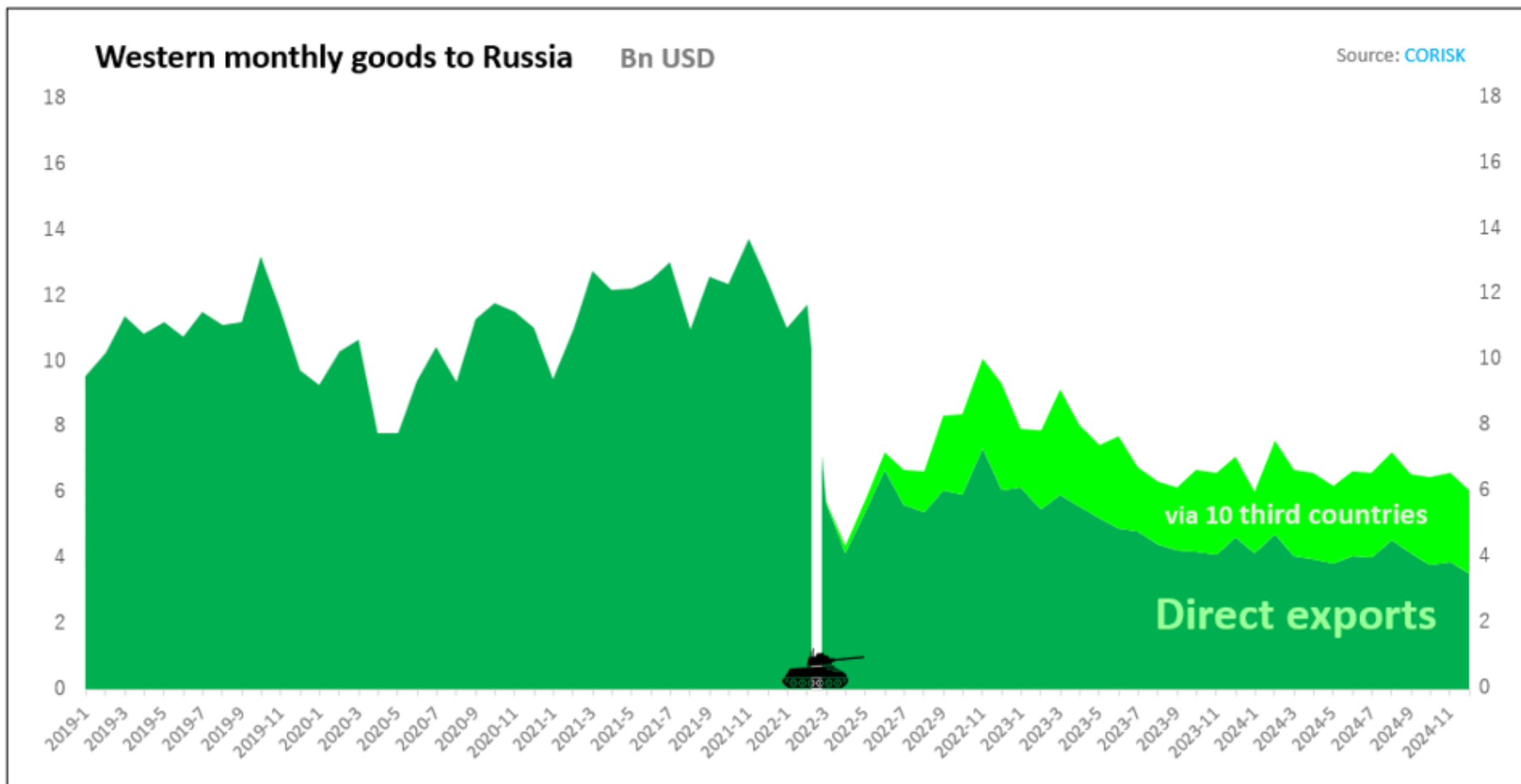
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1 Western direct exports to Russia cut in half 2022



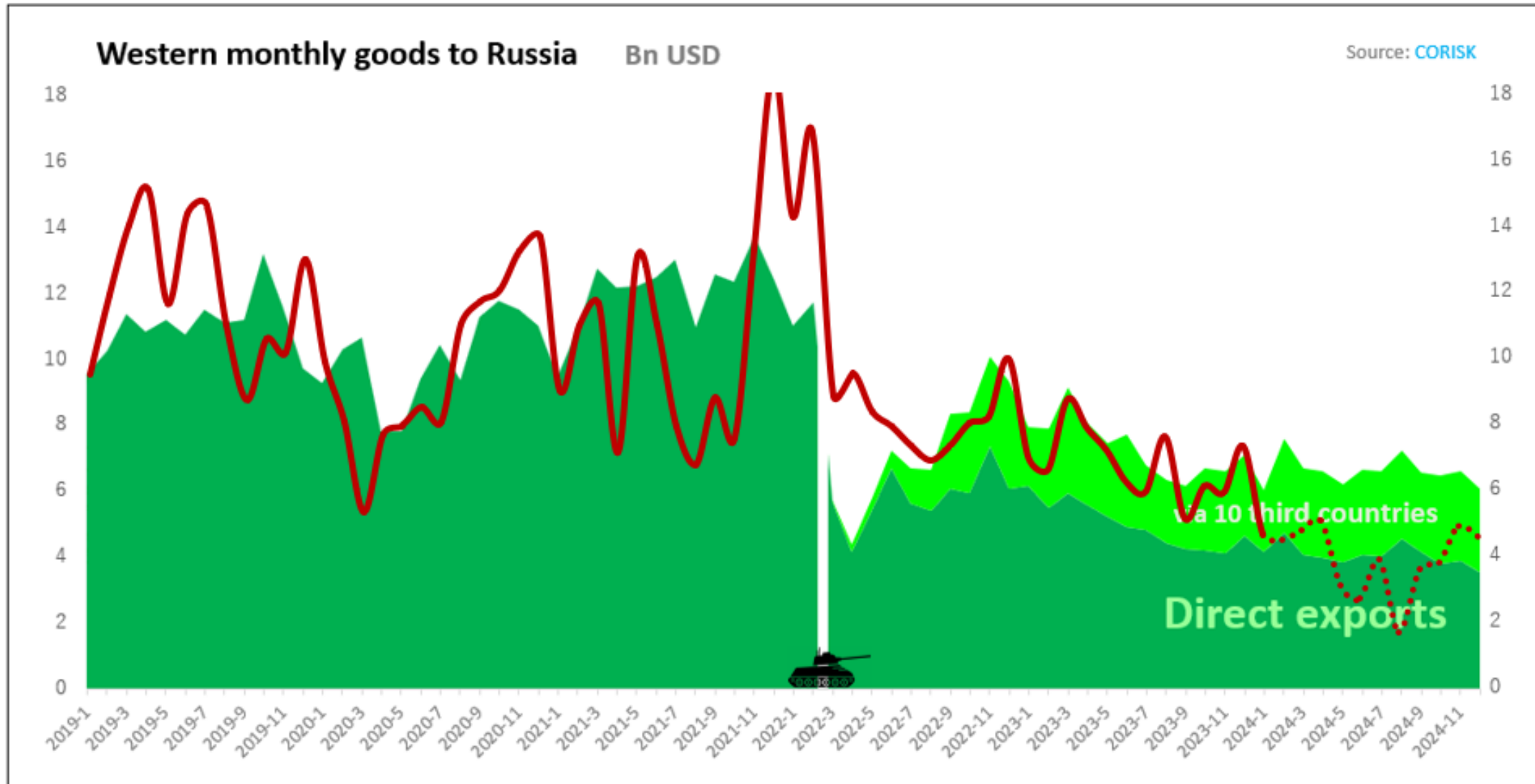
Western direct exports to Russia, Western official export data

1 Western direct exports + 2 excessive exports to third countries



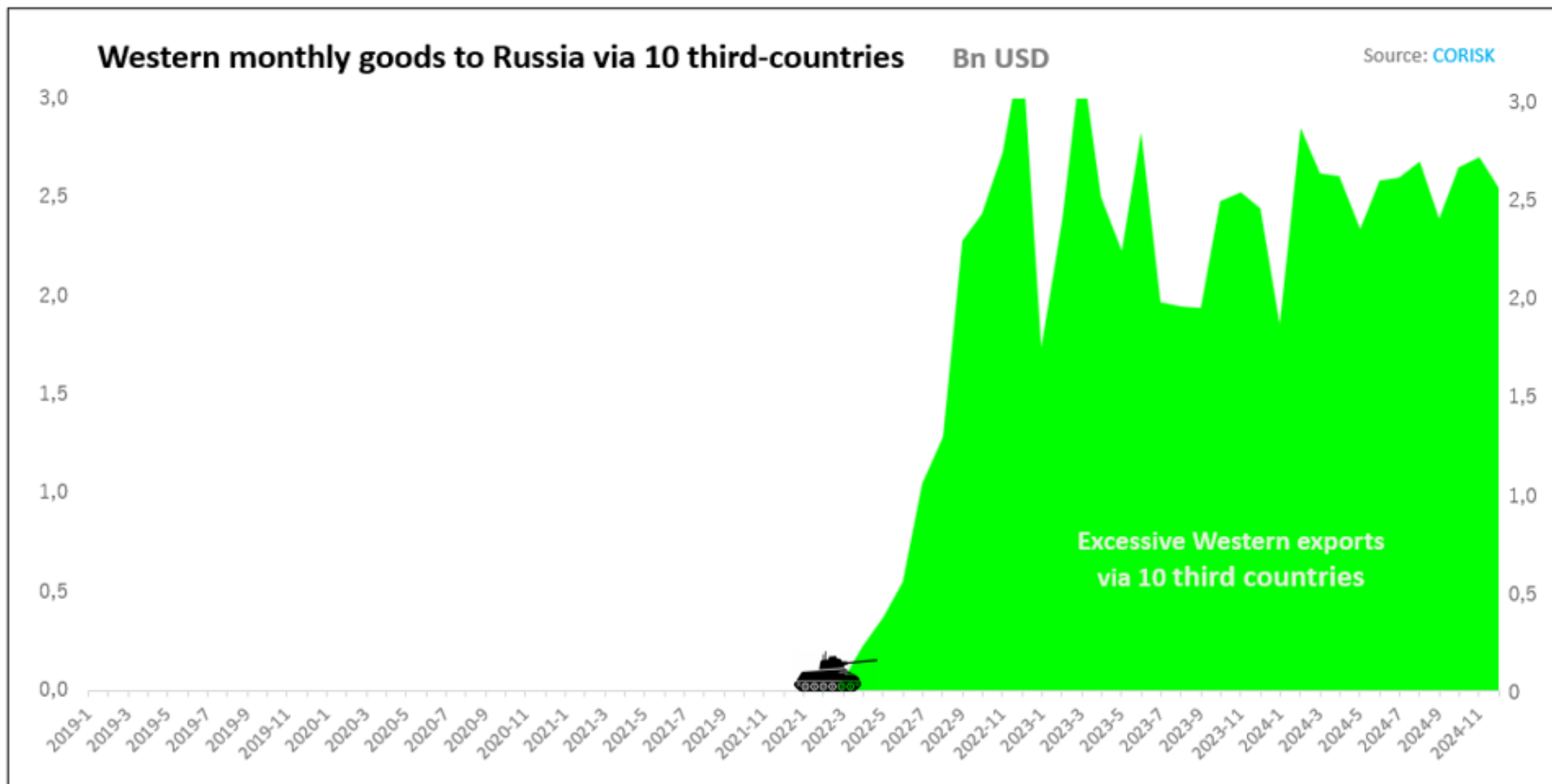
- Western direct exports to Russia, Western official export data
- Western excessive exports to 10 countries, Western export data

1 Western direct exports + 2 excessive exports 3 Russian imports of Western origin



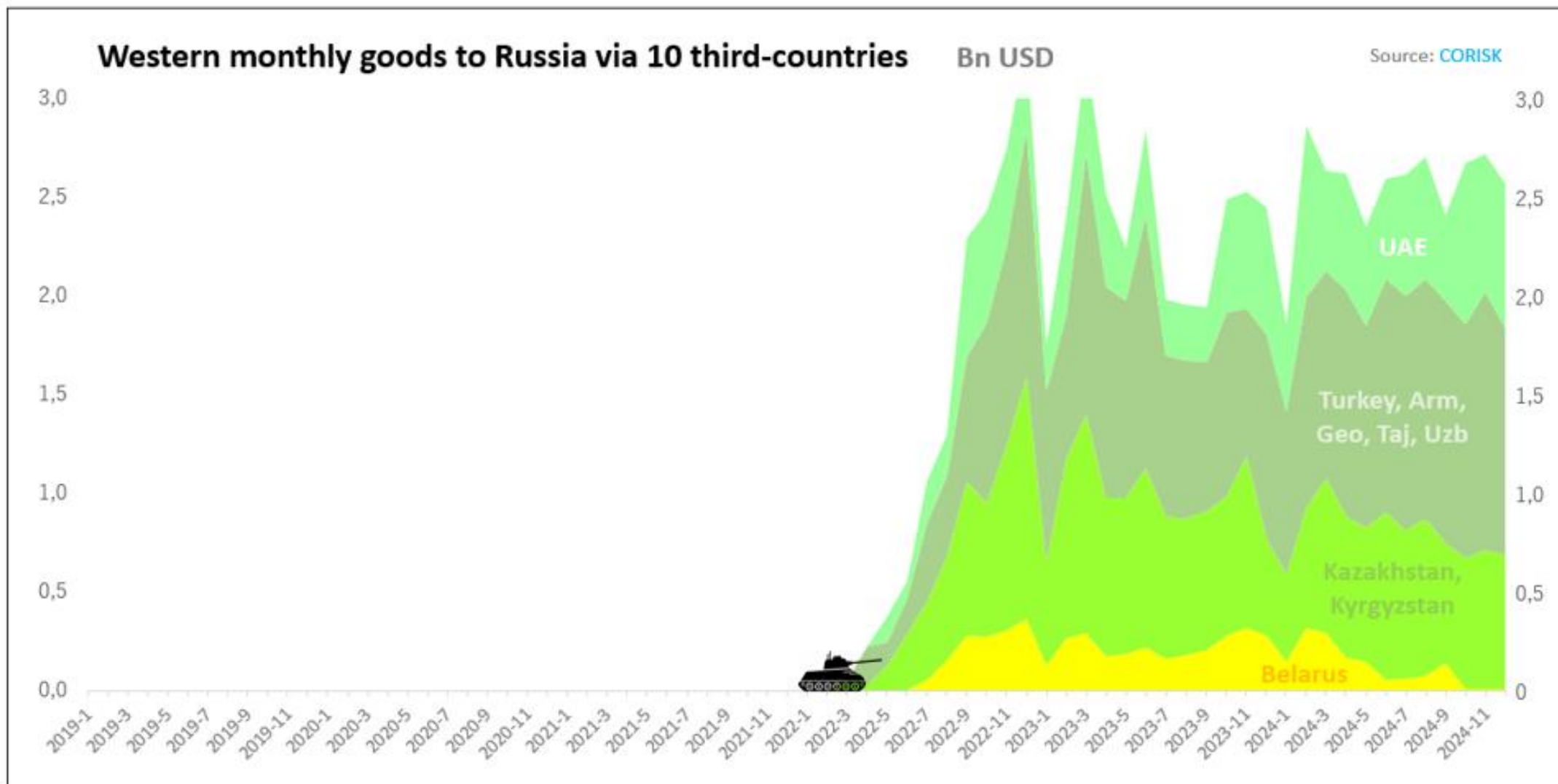
- Western direct exports to Russia, Western official export data
- Western excessive exports to 10 countries, Western export data
- Russian imports of Western-origin goods, Russian customs import data

2 Western excessive exports to third countries are nominally slightly expanding



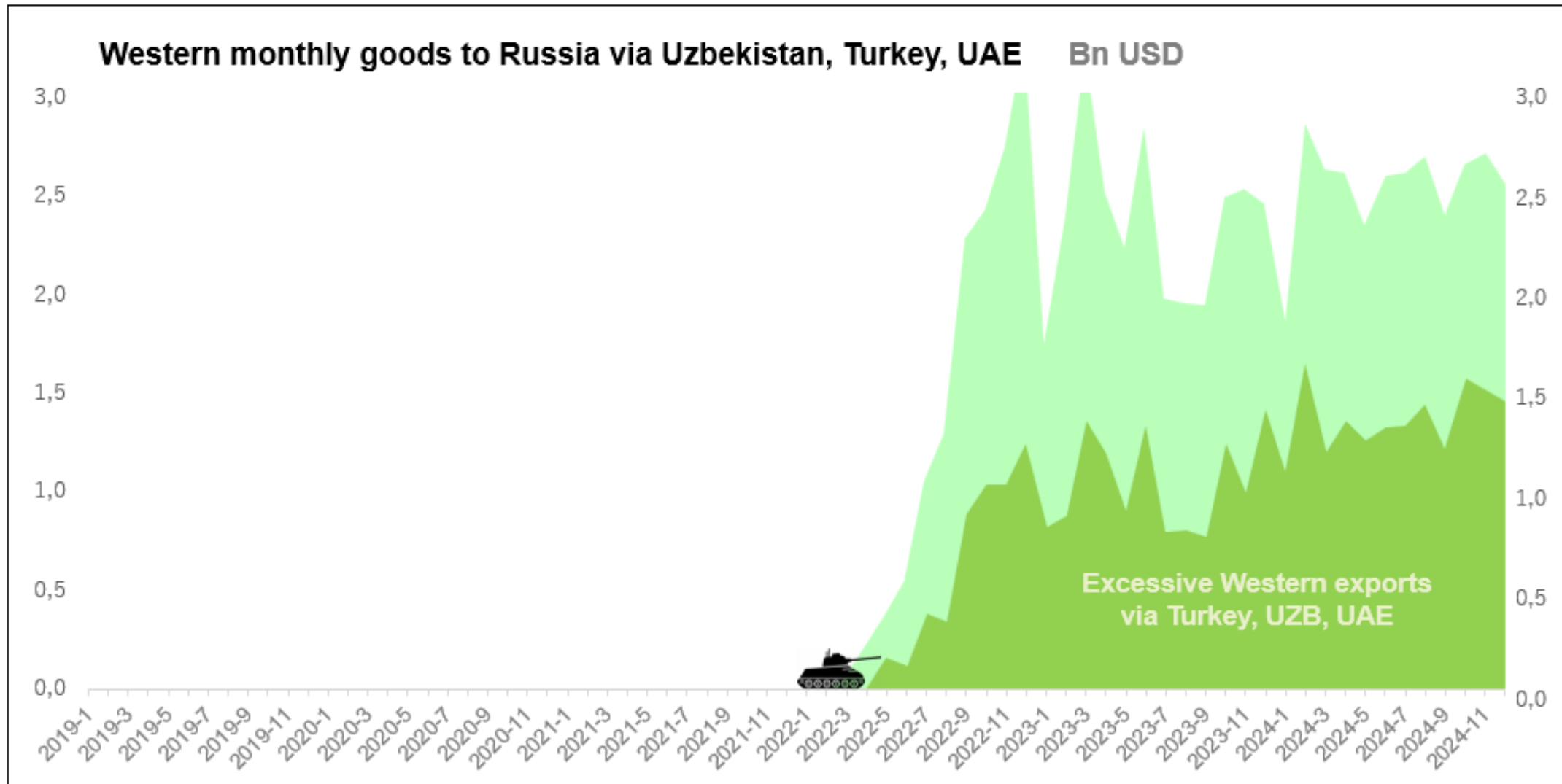
Western excessive exports to 10 countries, Western official export data

2 Excessive exports by major third-country routes – the Shift to the East



Western excessive exports to 10 countries, Western official export data

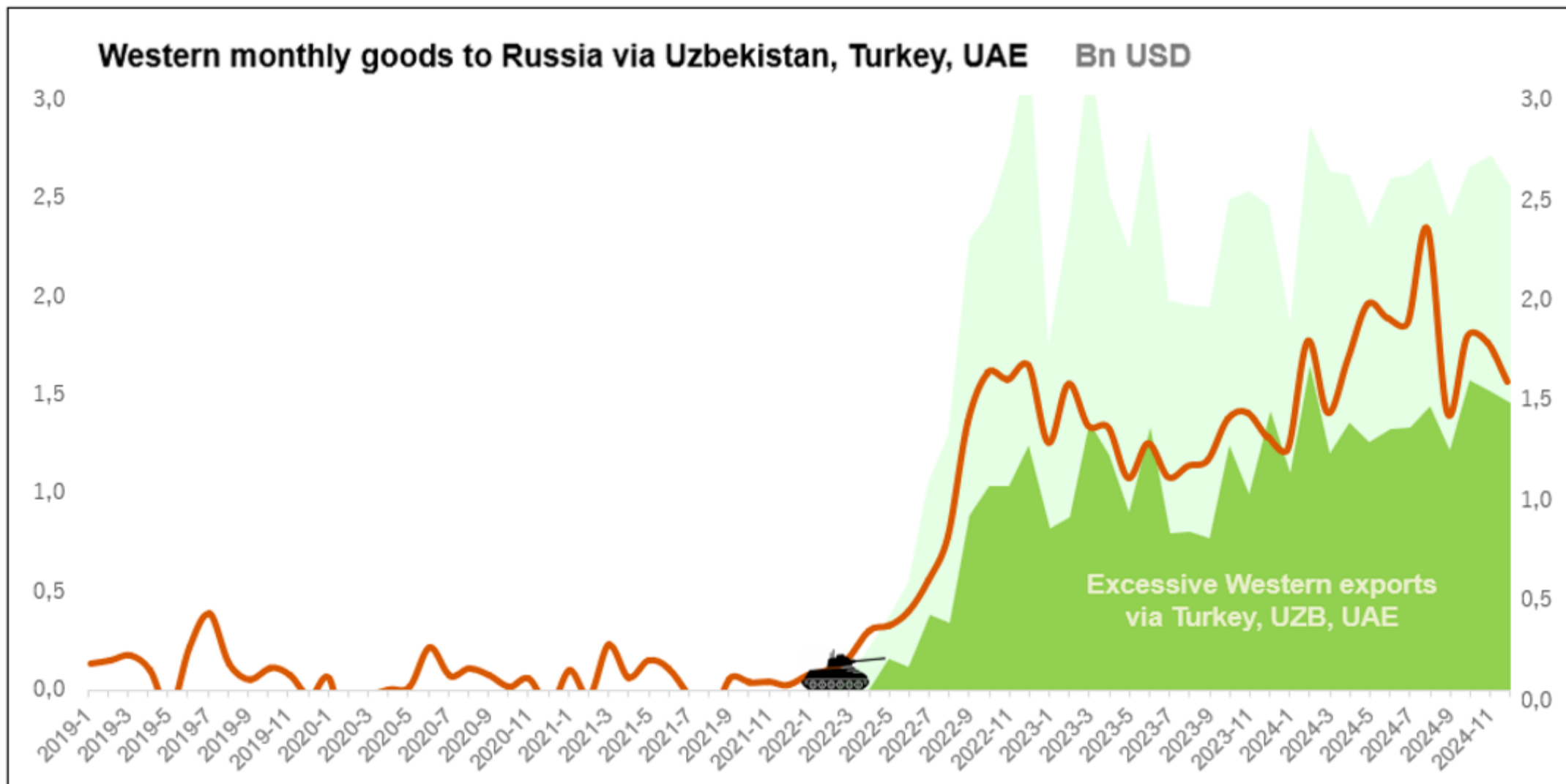
2 Western excessive exports to Turkey, Uzbekistan and United Arab Emirates



- Western excessive exports to 10 countries, Western official export data
- Western excessive exports to Turkey, Uzbekistan, and the UAE, Western export data

2 Western excessive exports

4 Third-countries' re-export of foreign-origin goods



- Western excessive exports to 10 countries, Western official trade data
- Western excessive exports to Uzbekistan, Turkey and the UAE, Western trade data
- Re-exports to Russia of non-domestic origin goods, Third-country export data + Russian customs import data

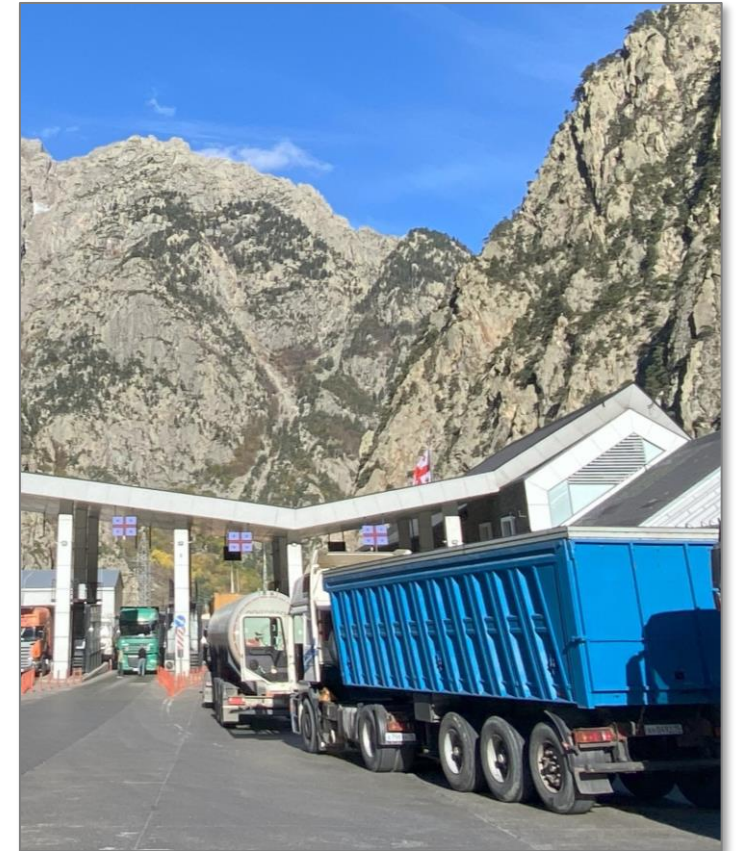
What we know about sanction evasion

Western trade data concur with **Russian customs data**

Russia imports decline under rapidly rising import costs

Closing the Belarus gap resulted in longer evasion routes

Shift to the East is a challenge to European enforcement



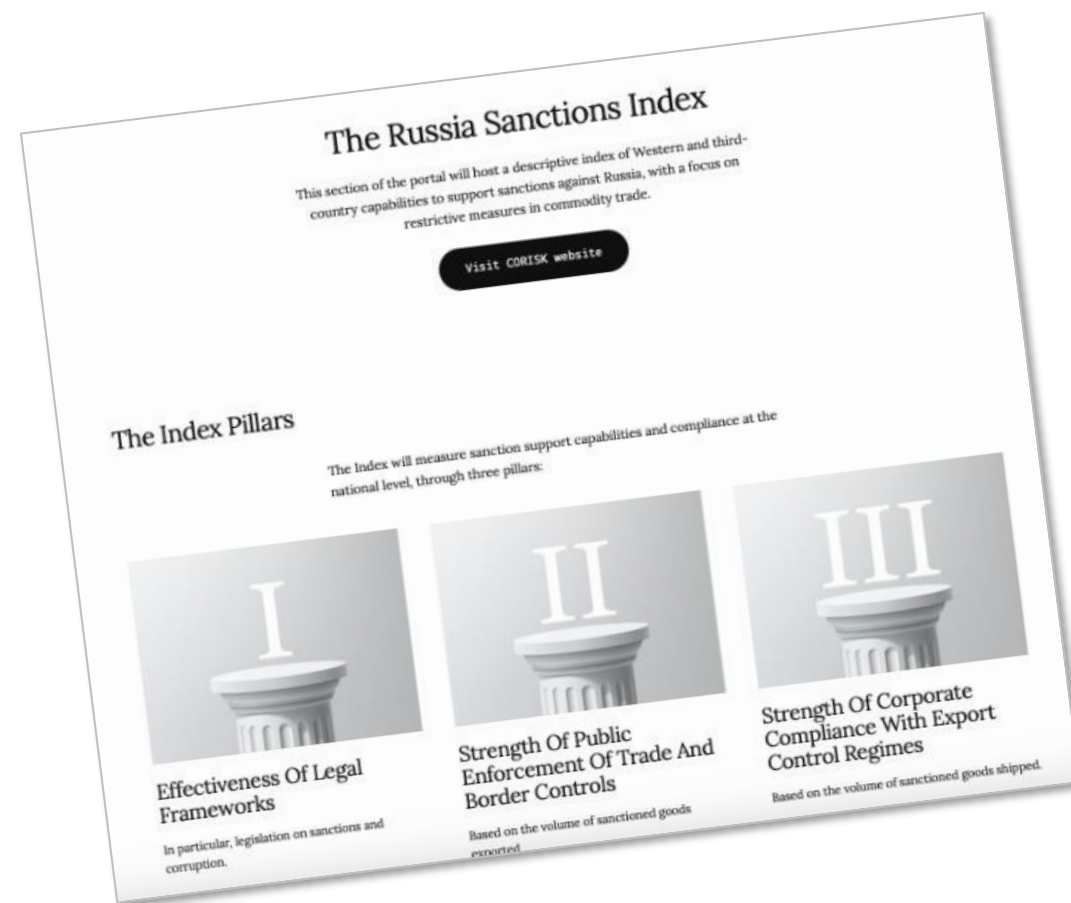
Kashbegi: Larsi border, Georgia-Russia

SITE, Stockholm 18 June 2025

SanctionsRussia.Org

Understanding sanctions impact

Erlend Bjørtvedt, Corisk



Benchmarking sanction evasion - a tool for policymaking and enforcement

What and who to measure

Classification of traded goods

Benchmarking single countries

Regulation and sanction evasion

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What and who to measure

Countries currently in the database

Primary focus:

Western exports

War-relevant goods

Basic legal frameworks

Enforcement and border control

Compliance since 2022

Recent change and trend

Correlations and causalities

17 Western countries

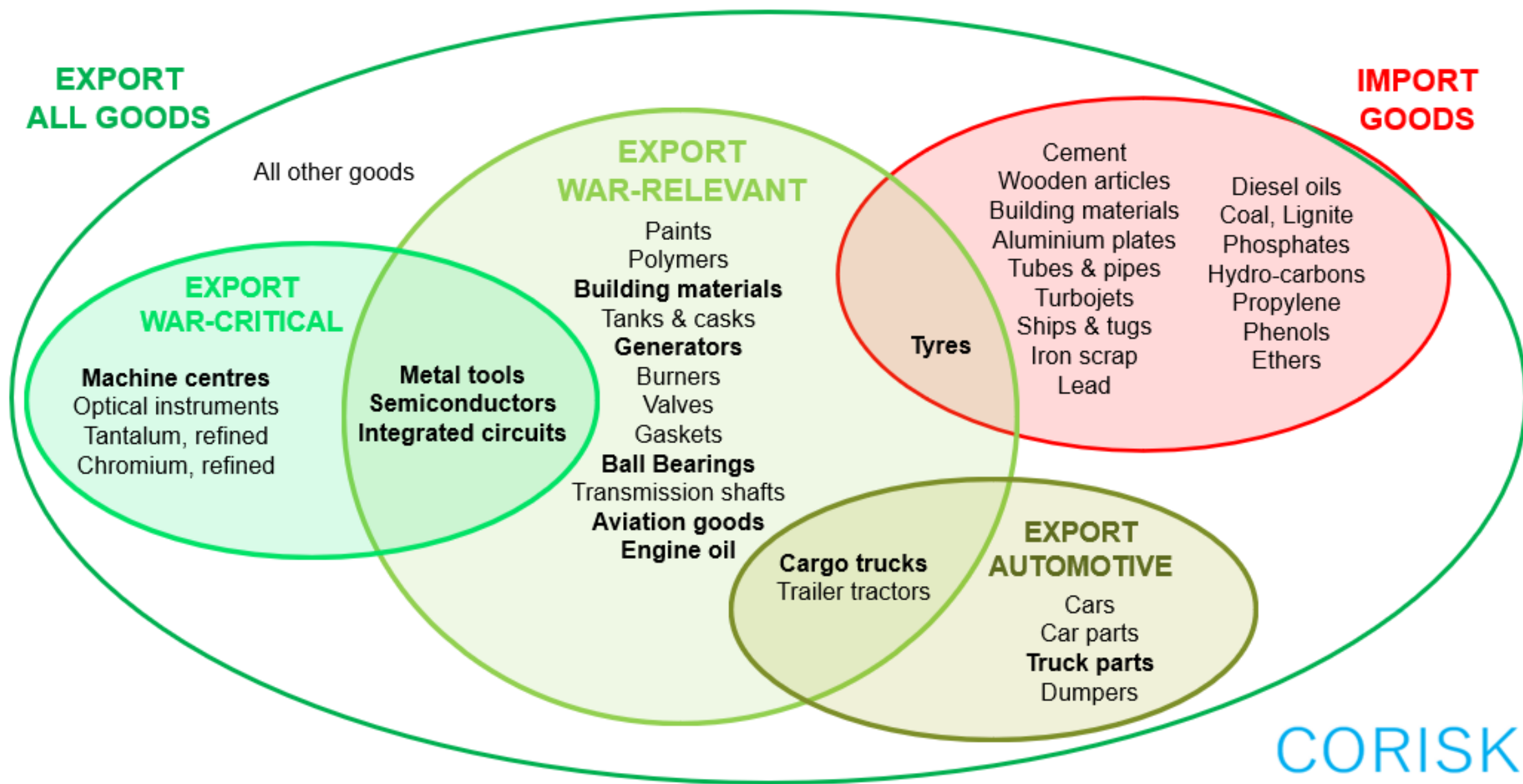
| | | |
|--------|-------------|------------|
| USA | Austria | Albania |
| Canada | Belgium | Bulgaria |
| Japan | Czechia | Cyprus |
| Korea | Denmark | Faeroe |
| Taiwan | Estonia | Greece |
| | Finland | Greenland |
| | France | Iceland |
| | Germany | Luxembourg |
| | Hungary | Macedonia |
| | Ireland | Malta |
| | Italy | Montenegro |
| | Latvia | Portugal |
| | Lithuania | Romania |
| | Netherlands | |
| | Norway | |
| | Poland | |
| | Slovakia | |
| | Spain | |
| | Sweden | |
| | Switzerland | |
| | UK | |

8 third-countries

| | |
|--------------|------------|
| Armenia | Azerbaijan |
| Belarus | Moldova |
| Georgia | Mongolia |
| Kazakhstan | |
| Kyrgyzstan | |
| Tajikistan | |
| Turkey | |
| Turkmenistan | |
| UAE | |
| Uzbekistan | |
| China | |
| Hong Kong | |
| Serbia | |

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Classification of traded goods



The shifting landscape of facilitating third-countries



The Pillars: Effects of regulatory qualities on sanction performance

Some preliminary correlations with less sanction evasion

17 Western

8 Third-countries

General measures against economic crime
Generally effective regulatory enforcement
General investigations & law enforcement
Capacity & quality of customs service
International co-operation (FATF)
Effective control of corruption
Checks & balances by media, civil society
Corporate transparency
Short or no border with Russia

0,77

0,42

0,75

0,66

0,66

1,03

0,79

1,03

0,53

0,42

0,83

1,85

0,74

2,05

> 2

> 2

> 2

> 2

Number = Standard Deviation in sample

Sanction law:

Administrative vs criminal offence
Long maximum prison terms
Strict liability provision
Many convictions and fines

2,90

4,77

0,45

> 10

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