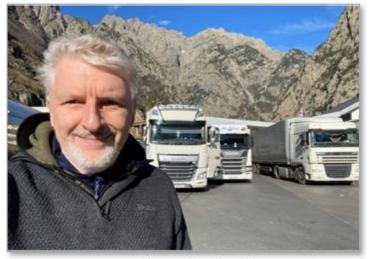
CORISK

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









2023-2025

Foreign Aff

Parliament

Customs





Testimony & data



Government

Parliament

Businesses





2023-2025 Commission EEAS ReLex Parliament



2023-2024 Treasury Congress



2023-2025 Foreign Aff Min Finance Customs



2024 Winter Plenary



Warsaw 2024 Warsaw 2025



Today's topics

Measuring sanction evasion

Western data vs. Russian data

Some validation of our results

What we know about evasion

		Armenia
	Pillar - Composite - Indicator	44,92818325
	Allion and a second	-32,40399251
TYPE		
		991,7483802
	and weight and the second seco	1221,438865
	Composite scores for analysis. On the 8 intermediaries facilitation of that expenses a strate expenses and that expenses a strate expenses and that expenses are that expenses and that expenses are the expenses are that expenses are that expenses are the expense are the expenses are the expenses are the expenses are the ex	939,0866362 22,96881399
	Composite scores for analysis: Output Composite scores for analysis: Output Composite scores for analysis: Output Output	0.353143704
TOTAL - COU	Composite scores for analysis: Attry's excessive EXPORTS to 8 intermediaries, or the 8 intermediaries' facilitation of that export Attry's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that export Attry's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that export Attry's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that export Same data annual 2023-2024, as a percentage of same original trade annual 2019-2021 Attraction of that export Attraction of	45 19053759
TOTAL - COU	intry's excessive exports 4223-2024, as a percentage of same original trade with the export	11 9388886
TOTAL	ntry's excessive exports to 8 intermediaries, or the 8 intermediaries annual 2019-2021 intry's excessive exports to 8 intermediaries, or the 8 intermediarial trade annual 2019-2021 Same data annual 2023-2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 8 intermediaries, or the 8 intermediaries' facilitation of that Same Country's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that Same Country's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that Same Country's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that	11,74518365 0,579053725
	Same data service EXPORTS to 8 intermediaries, or the 8 intermediaries' facilitation of the	0,579033722
22 GROUPS	Same data change from 2023 to 2024; so 57 same data change from 2023 to 2024; so 57 same data change from 2023 to 8 intermediaries, or the 8 intermediaries' facilitation of that 58 - Country's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that 58 - Country's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that 58 - Country's excessive exports to 8 intermediaries, or the 8 intermediaries' values Same data annual 2023-2024, as a percentage of all group countries' values Same data annual 2023-2024, as a percentage of all group countries' facilitation of that export that annual 2023-2024, as a percentage of the 8 intermediaries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitation of that 64 states annual 2023-2024, as a percentage of all group countries' facilitati	11 9388886
122 GRUUI	a percentage of seventries' values	11 74518365
22 GROS	Same data annual 2023-2024, as a percentage of the 8 intermediaries recommediaries of that 6	6,843704707 8,034214288
		-4,236889417
7 GROUP	S - Country's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that imps - Country's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that imps - Country's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that imps - Country's excessive exports to 8 intermediaries of same original trade annual 2019-2021 Same data annual 2023-2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of all group countries' values Same data change from 2023 to 2024, as a percentage of all group countries' facilitation of that impulse that annual 2023-2024, as a percentage of all group countries' facilitation of that impulse the same original trade annual 2019-2021	0,44909009
17 GRUUT	ariginal trade of seriainal trad	-0,1087784
1	teta change from	11
	Same data annual 2023-2024, as a percentage of same original. Same data change from 2023 to 2024, as a percentage of all group countries' values Same data annual 2023-2024, as a percentage of all group countries' facilitation of that im Same data annual 2023-2024, as a percentage of all group countries' facilitation of that im Same data annual 2023-2024, as a percentage of all group countries' facilitation of that im Same data annual 2023-2024, as a percentage of all group countries' facilitation of that im Same data annual 2023-2024, as a percentage of all group countries' facilitation of that im Same data annual 2023-2024, as a percentage of all group countries' facilitation of that im Same data annual 2023-2024, as a percentage of all group countries' facilitation of that im Same data annual 2023-2024, as a percentage of all group countries' values Same data annual 2023-2024, as a percentage of all group countries' values Same data annual 2023-2024, as a percentage of all group countries' values	tl 8,39598864 tl 6,949352544
		12,86197247
22 GR	OUPS - Country's excessive imports from 8 intermediaries, or original trade annual 2019 - 2021	
22 GR	Same data annual 2023-2024, as a percentage of same original trade annual 2019-2021 Same data annual 2023-2024, as a percentage of same original trade annual 2019-2021 Same data annual 2023-2024, as a percentage of same original trade annual 2019-2021 Same data annual 2023-2024, as a percentage of same original trade annual 2019-2021	
22 0.0	OUPS - Country's excessive imports from 8 intermediaries, or the 8 intermediaries of the 8 intermediaries. OUPS - Country's excessive imports from 8 intermediaries, or the 8 intermediaries of the 8 intermediaries. OUPS - Country's excessive imports from 8 intermediaries, or the 8 intermediaries. Same data annual 2019-2021 Same data annual 2023-2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021	



Measuring sanction evasion – country and data coverage

26 Western countries

USA Canada Japan Korea

Taiwan

Austria Belgium Czechia Denmark

Albania

Bulgaria

Cyprus

Faeroe

Greece

Iceland

Malta

Greenland

Luxembourg

Macedonia

Montenegro

Portugal

Romania

Estonia Finland France Germany Hungary

Ireland Italy

Latvia Lithuania

Netherlands

Norway Poland Slovakia Spain Sweden

Switzerland

UK

10-14 third-countries

Azerbaijan

Moldova

Mongolia

Armenia Belarus Georgia

Kazakhstan Kyrgyzstan

Tajikistan

Turkey

Turkmenistan

UAE

Uzbekistan

Serbia

China Hong Kong

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

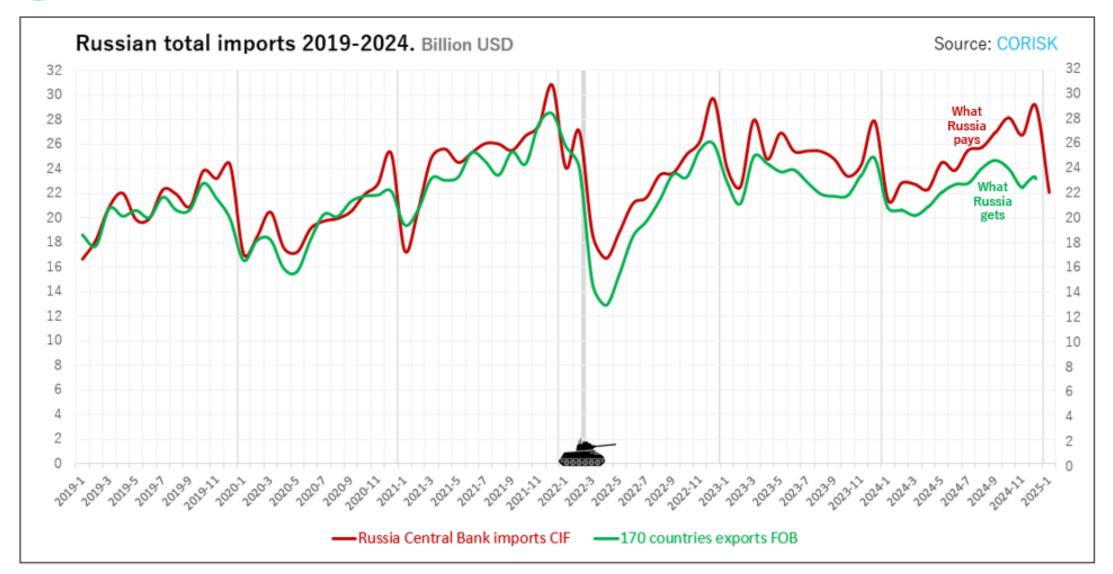
1	Western exports to Russia	Direct exports (non-sanctioned trade)	Western data
	Russian imports from West	Imports of Western countries' exports	Russian data
2	Western excessive exports to third-countries	Above-normal exports to third-countries Validate against third-countries' exports to Russia	Western data 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





Global exports to Russia vs. Russian total imports

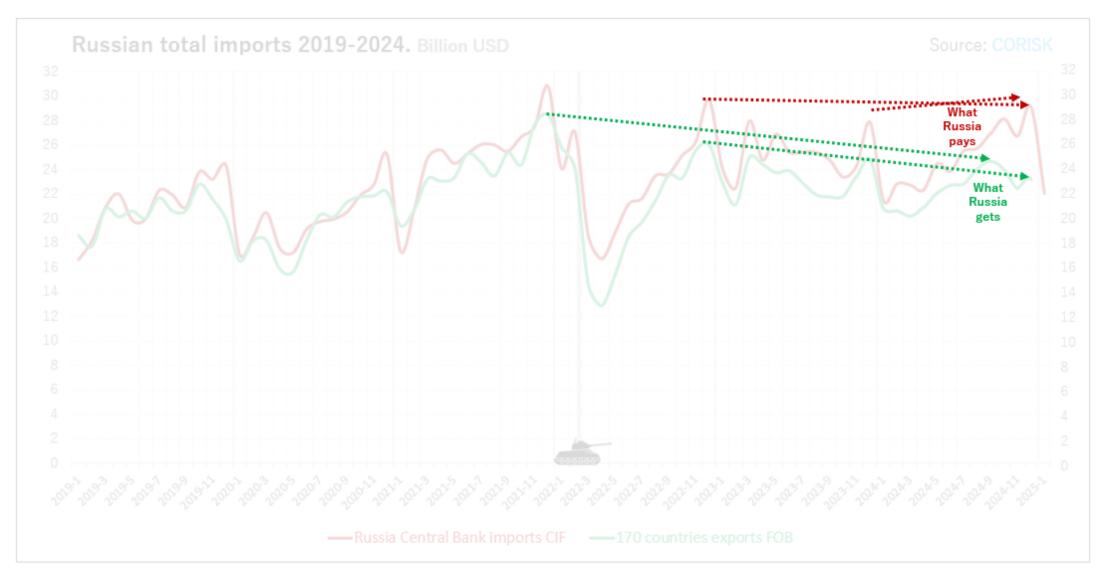






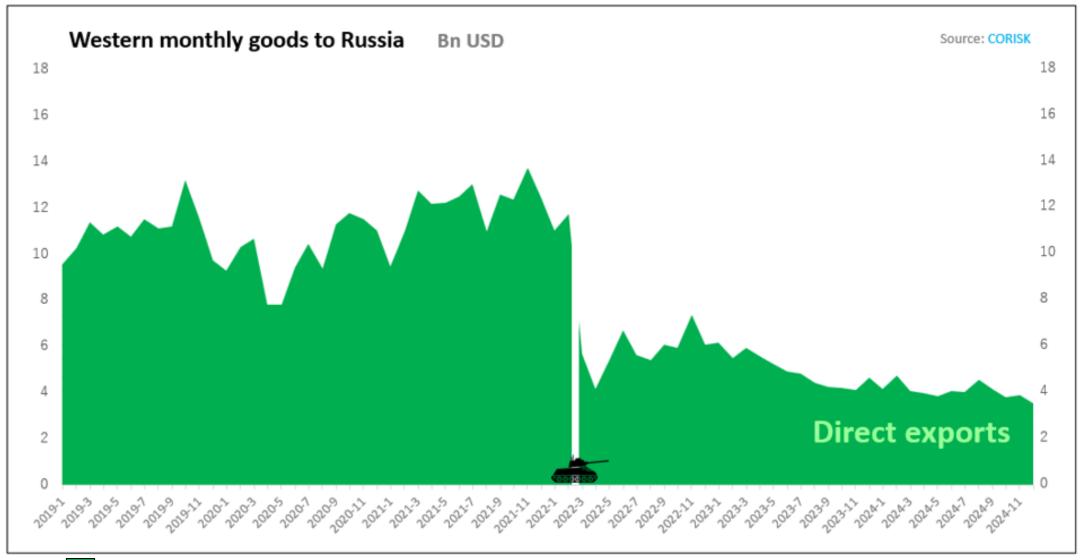
Global exports to Russia vs. Russian total imports

15% nominal decline





Western direct exports to Russia cut in half 2022



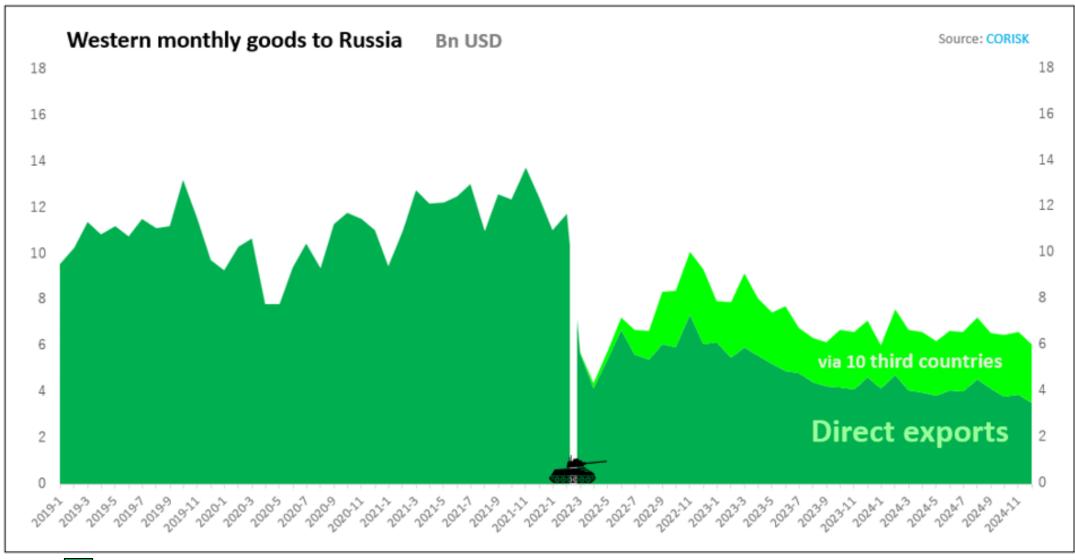




1 Western direct exports +

2

excessive exports to third countries





Western excessive exports to 10 countries, Western export data



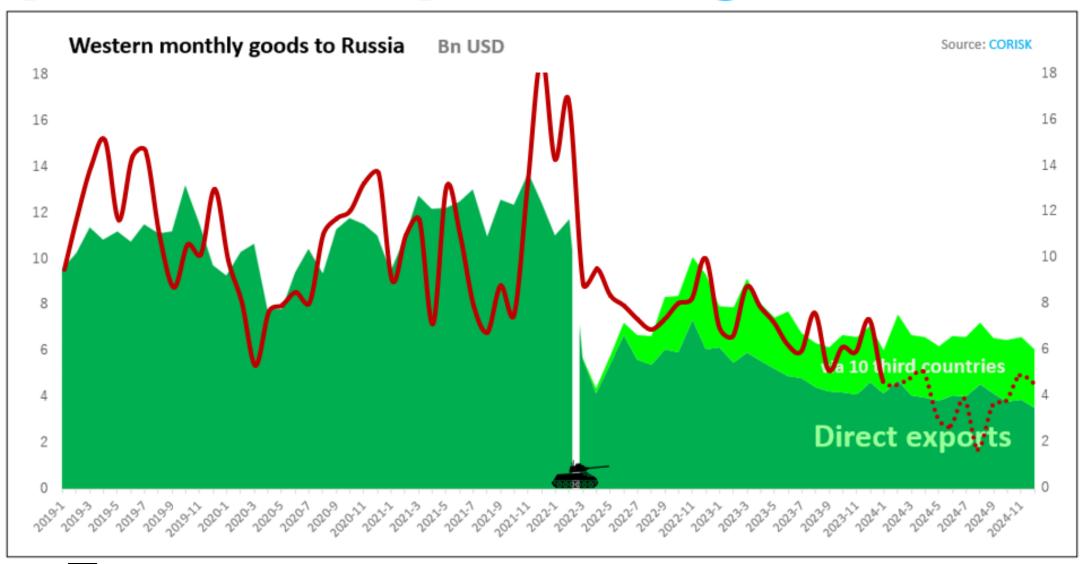
Western direct exports +

2

excessive exports

3

Russian imports of Western origin



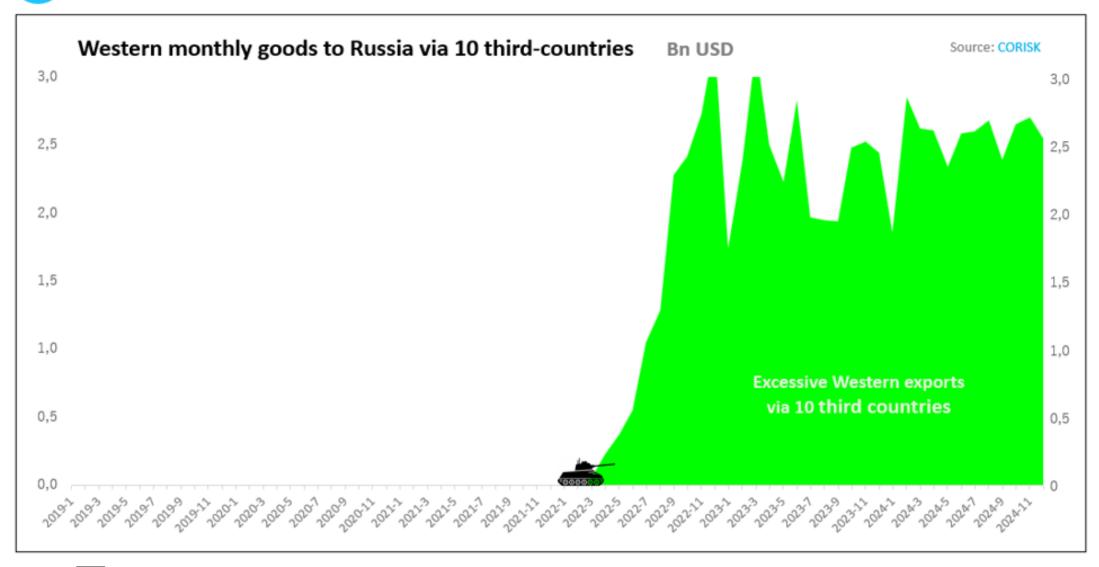


Western excessive exports to 10 countries, Western export data

Russian imports of Western-origin goods, Russian customs import data



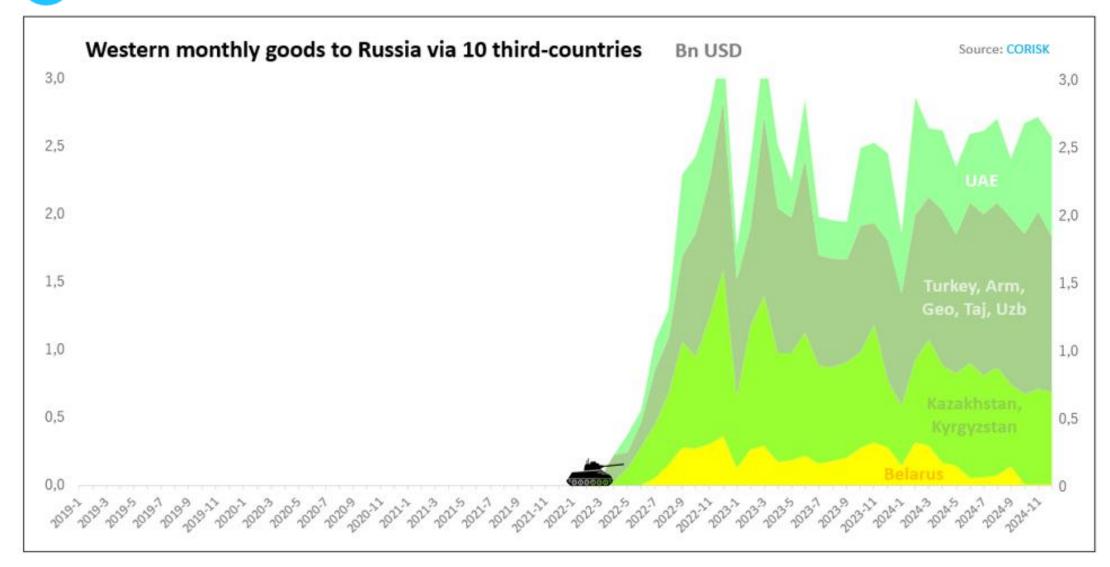
Western excessive exports to third countries are nominally slightly expanding







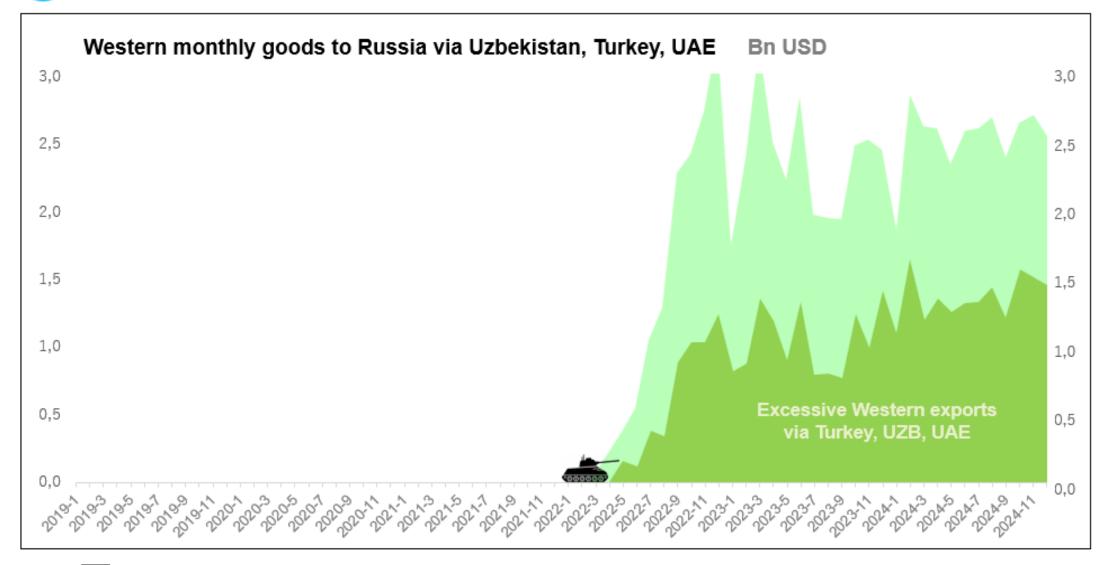
Excessive exports by major third-country routes – the Shift to the East







Western excessive exports to Turkey, Uzbekistan and United Arab Emirates





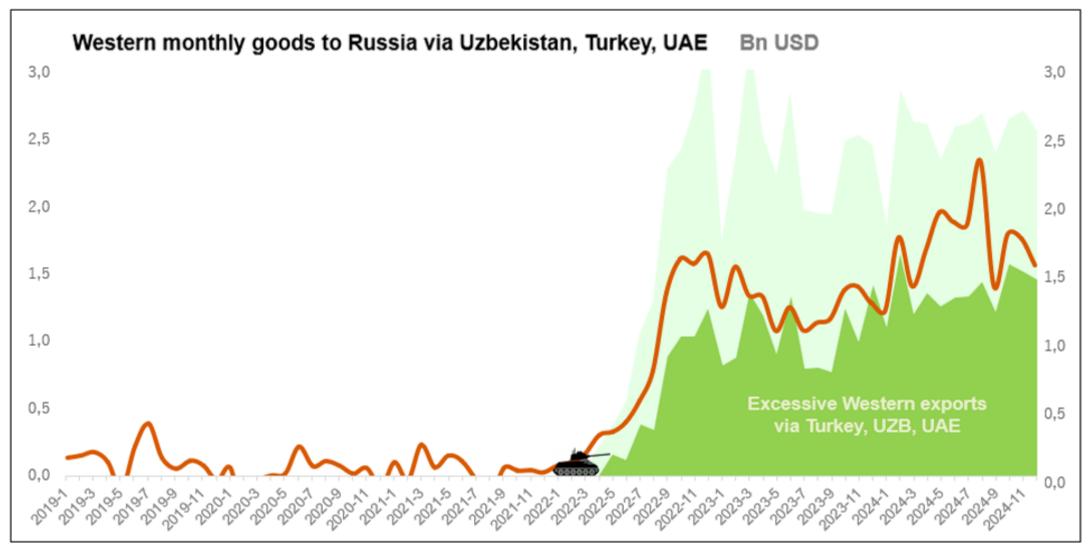




Western excessive exports



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





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



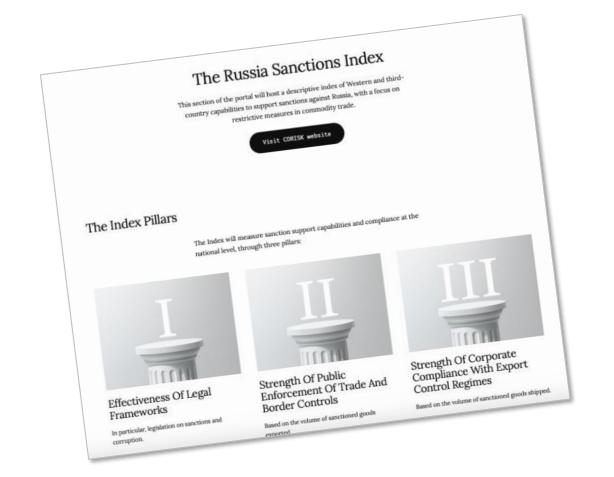
CORISK

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

		Armenia
	Pillar - Composite - Indicator	44,92818325
TYPE	The state of the s	-32,40399251
		991,7483802
	Composite scores for analysis: untry's excessive EXPORTS to 8 intermediaries, or the 8 intermediaries' facilitation of that expo untry's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that expo untry's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that expo untry's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that expo	1221.438865
	the scores for analysis:	939.0866362
	Composite scores to 8 intermediaries, or the 8 intermediaries facilitation of that expo	22,96881399
TOTAL - COL	Composite scores for analysis: Intry's excessive EXPORTS to 8 intermediaries, or the 8 intermediaries' facilitation of that export Intry's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that export Intry's excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that export Intry's excessive exports to 8 intermediaries, or the 8 intermediaries annual 2019-2021 Same data annual 2023-2024, as a percentage of same original trade annual 2019-2021 Introduction of that export and the export and the export and the export annual 2023-2024, as a percentage of same original trade annual 2019-2021 Introduction of that export and the exp	-0,353143704
TOTAL - CO	untry's excessive exports to 8 intermediaries, or the 8 intermediar trade annual 2019-2021 Same data annual 2023-2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021	45,19053759
TOTAL - CO	ountry's excessive experienced, as a percentage of same original description of that export	11,9388886
10.0	Same data annual 2023-2024, as a percentage of same original trade annual 2019-2022 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2022 Same data change from 2023 to 2024, as a percentage of same original trade annual 2019-2021 Same data change from 2023 to 2024, as a percentage of same original trade in the same of that export same data change from 2023 to 2024, as a percentage, or the 8 intermediaries' facilitation of that export sexcessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that export sex excessive exports to 8 intermediaries, or the 8 intermediaries' facilitation of that export sex excessive exports to 8 intermediaries of same original trade annual 2019-2021 Same data annual 2023-2024, as a percentage of all group countries' values Same data annual 2023-2024, as a percentage of all group countries' facilitation of that export	11,74518365 0,579053725
	Same data structure of the Sintermediaries, or the Sintermediaries' facilitation of the	0,579033723
22 GROU	PS - Country's excessive EXPORTS to 8 intermediaries, or the 8 intermediaries Tachman PS - Country's excessive exports to 8 intermediaries, or the 8 intermediaries Tachman PS - Country's excessive exports to 8 intermediaries, or the 8 intermediaries' values Same data annual 2023-2024, as a percentage of all group countries' values Taxa annual 2023-2024, as a percentage of all group countries' facilitation of that export that a same data annual 2023-2024, as a percentage of all group countries' values Taxa annual 2023-2024, as a percentage of all group countries' values Taxa annual 2023-2024, as a percentage of all group countries' values Taxa annual 2023-2024, as a percentage of all group countries' values Taxa annual 2023-2024, as a percentage of all group countries' values Taxa annual 2023-2024, as a percentage of all group countries' values	11,9388886
122 GRUU	a percentage of sometries' values	11,74518365
122 GKUU	annual 2020 - nercentage of the grandlaries Idellites	6.843704707
	Same data annual 2020 to 8 intermediaries, or the 8 intermediaries light ation of that 6	8.034214288
		4 236889417
7 GROU	ups - Country's excessive exports to 8 intermediaries, or the original trade annual 2019-2021	0.4490900
17 GRUU	JPS - argentage of seriainal trade of	
17 GRU	ors annual zozo	
1	data change from	8,3959886
	same data amongs from a literal are or the a literal facilitation of	6,9493525
22 GF		12,861972
22 GI	ROUPS - Country's excessive imports from 8 intermediate of same original trade annual 2019-2021	
22 G	ROUPS - Country's excession and 2023-2024, as a percentage of same original and a same	
22.0	ROUPS - Country's excessive imports from a intermediaries, or the a int	
	Same dot	



What and who to measure

Countries currently in the database

Albania

Bulgaria

Cyprus

Faeroe

Greece

Iceland

Malta

Greenland

Luxembourg

Macedonia

Montenegro

Portugal

Romania

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 Canada

Japan Korea

Taiwan

Czechia Denmark Estonia Finland

Austria

Belgium

France Germany

Hungary Ireland

Italy

Latvia

Lithuania Netherlands

Norway

Poland

Slovakia

Spain Sweden

Switzerland

UK

8 third-countries

Armenia

Belarus

Georgia

Kazakhstan

Kyrgyzstan Tajikistan

Turkey

Turkmenistan

UAE

Uzbekistan

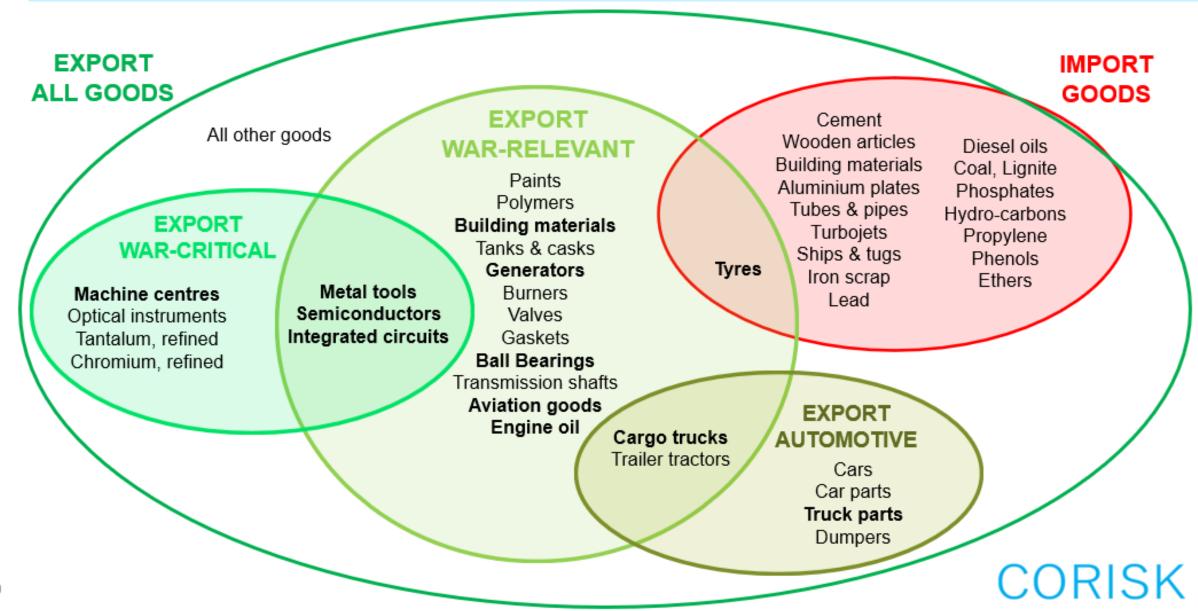
China

Hong Kong

Serbia

Azerbaijan Moldova Mongolia

Classification of traded goods



The shifting landscape of facilitating third-countries

	Total evasion 2022-24	Relative trade	War-relevant	Change 2024
Armenia	bn\$ 3			
Georgia	bn\$ <mark>6</mark>			
Kazakhstan	bn\$ 10			
Kyrgyzstan	bn\$ <mark>8</mark>			
Serbia	bn\$ 2.5			
Tajikistan	bn\$ <mark>0.2</mark>			
Turkey	bn\$ 20			
Uzbekistan	bn\$ 1.5			
				CORISK

The Pillars: Effects of regulatory qualities on sanction performance

Some preliminary correlations with less sanction evasion

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

Sanction law:

Administrative vs criminal offence

Long maximum prison terms

Strict liability provision

Many convictions and fines

17 Western 8 Third-countries

0,77

0,75

0,66

0,79

0,53

0,83

0,74

> 2

> 2

0,42

0,66

1,03

1,03

0,42

1,85

2,05

> 2

> 2

Number = Standard Deviation in sample



4,77

0,45

> 10

