**Bypassing Barriers: Analysing the Impact of Circumventing EU Sanctions on Russia**

Final Paper

International sanctions

*Jad Farhat, Nikita Dvurechenskii, Ziya Kazimzada, David Levíček, Marie Rychtecká*

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**Abstract**

Since 2014, major western countries have imposed sanctions on the Russian Federation for breaches of international law, illegal annexation, interference in other nations sovereignty, and aggression. Starting with the sanctions after the annexation of Crimea in 2014 and ending with the invasion of Ukraine in 2022, this paper will tackle the sanction regimes used.

Discussed will be the existing sanction regime, the limitations of the sanctioning party, the targeting deficiencies, the side effects of the sanctions, future opportunities, and how circumvention happens. The paper will also assess and propose viable improvements or alternatives to the regime.

**Introduction and analysis of the existing sanction’s regime**

In response to the Russian aggression against Ukraine, more precisely with the beginning of its newest phase starting on February 24, 2022, the European Union (EU) has imposed unprecedented restrictive measures. The new sanctions regime incomparably exceeds the scope and effect of sanctions implemented prior to the war. Russia’s act of aggression prompted a large international response in general, and as of February 2023, Russia is by far the most sanctioned country in the world in terms of the number of currently active sanctions on individuals and entities (Zandt 2023).

Prior to the war, there had already been EU sanctions in place, most notably in reaction to Russia’s annexation of Crimea, its activities in Donetsk and Luhansk regions, and the non-implementation of the Minsk agreements (Portela, Pospieszna, Skrzypenska, and Walentek 2020). The sanction regime developing since 2014 was primarily designed to target individuals and entities affiliated with Putin’s regime and also tackled the energy and defence sectors, although not comprehensively (Hanousek and Bln 2019). As for concrete measures, the sanctions imposed between 2014 and 2022 included restrictions on access to capital markets, for example, asset freezes of tens of companies and individuals and an economic embargo on Crimea; they also included visa bans, an embargo on arms and dual-use goods for military purposes, and limited access to technology and services for oil production and exploration (Portela, Pospieszna, Skrzypenska, and Walentek 2020; Drier and Popescu 2014, p. 1-2). The sanctions as well as the list of sanctioned persons and entities have been continually developed. Furthermore, Russian individuals were also sanctioned based on human rights violations, as the European Union established the EU Global Human Rights Sanctions Regime in 2020 (Council of the EU 2021).

Overall, the sanctions prior to the Russian war against Ukraine were shifting from signalling sanctions to constraining sanctions (Drier and Popescu 2014, p. 1–3). The effectivity of those sanctions spurred debates, as for some they were too limited, ineffective, and easily circumvented (Kusa 2020), whilst others (Drier and Popescu 2014; Hunter Christie 2015) emphasised their signalling and constraining effect and its relative success, taking into account its limited scope, as sanctions against targeted entities and individuals were implemented and had a negative effect on them and on the Russian economy, plus EU member states managed to continually coordinate a common approach (Portela, Pospieszna, Skrzypenska, and Walentek 2020).

The EU was thoroughly condemning Russia’s actions even before the conflict escalated into war. As Russia recognised the separatist areas of Donetsk and Luhansk as independent entities and began sending troops to the regions, the EU adopted further sectoral restrictive measures on February 23, 2022, which "introduced a prohibition to finance the Russian Federation, its government, and its central bank." (EU sanctions map, n.d.)

Since the war started, the EU has been continually working on sanction packages that aim to "weaken Russia's economic base, depriving it of critical technologies and markets, and significantly curtailing its ability to wage war." (European Council 2023) This is a noteworthy change in reasoning, as sanctions linked to the annexed Crimea in 2014 were officially described as "not punitive but designed to bring about a change in policy or activity by the target country, entities, or individuals." (Council of the European Union, 2014) This change of rhetoric signals that the EU has become aware that a change of Putin’s regime or more significant changes in its policies might be too ambitious goals, but sanctions usefulness still lies in signalling, constraining, and, in some regards, coercing the adversary, to put it simply, to hurt the opponent and its capabilities.

As provided by the European Council (n.d.), the current sanctions regime involves:

1. Sanctions against individual and entities

This involves asset freeze and travel bans against Putin and his inner circle, Russian State Duma members, military staff and high-ranking officials, as well as businesspeople, propagandists and oligarchs. Asset freezes are also specifically aimed against:

* Banks and financial institutions
* Companies in the military and defence sectors
* Companies in the aviation, shipbuilding, and machine building sectors
* Armed forces and paramilitary groups
* Political parties
* Media organizations responsible for propaganda and disinformation

As for the issuances of visas, the EU suspended the visa facilitation agreement between the EU and Russia and stopped facilitating visas for Russian diplomats and businesspeople.

1. Economic sanctions

In the financial sphere, the biggest step, labelled as “financial nuclear bomb” (Wilkes, Mccrank and Jones 2022) was the SWIFT ban which was over time imposed on 10 Russian banks. The EU also restricted Russia’s access to the EU’s capital and financial markets, banned transactions with the Russian Central Bank, supply of euro-denominated banknotes to Russia and also crypto-wallets to Russian persons.

In transportation, the EU closed airspace and ports for Russian-owned means of transport, banned Russian road transport operators and maritime transport of Russian oil to third countries, and banned export of goods and technology in the aviation, maritime and space sectors.

1. Energy

Sanctions in the field of energy has become one of the major steps taken, as Russian energy export amounted to a large proportion of the state’s GDP and tens of percent was export into Europe, which was dependent on Russian resources (Eurostat n.d.). Russian export to Europe amounted to 74 % of gas and 49 % of crude oil and condensate of all export destinations in 2021 (U.S. Energy Information Administration 2022). The sanctions in the energy sector currently involve:

* Ban on imports of oil and coal
* Price cap on Russian oil transported by sea
* Ban on exports to Russia of goods and technologies in the oil refining sector
* Ban on new investments in the Russian energy and mining sector
* Ban on providing gas storage capacity to Russian nationals
1. Defence

As for defence sector, the EU banned export of arms (including civilian firearms), ammunition, military vehicles and paramilitary equipment, dual-use goods and technology for military use, including drone engines, chemicals etc.

1. Raw materials and other goods

This involves ban on EU’s export of luxury goods and ban of Union’s import of steel, iron, cement and asphalt, wood, paper, synthetic rubber and plastics, seafood, spirits, cigarettes and cosmetics and gold.

1. Services

This ban prohibits different types of services, such as engineering, IT consultancy and legal advisory services, advertising, or market research for Russia or Russian persons.

1. Restrictions on media

The EU suspended broadcasting activities of major Russian media outlets, such as Sputnik, Russia today, Rossiya and their subsidiaries.

As already indicated, the sanctions regime has been continually developed through sanctions packages. Until now, there have been 10 packages adopted. The packages have not only consisted of sanctions against Russia but also targeted its affiliates like Belarus and Iran and included a small part of financial and material help to Ukraine (Kneppelhout n.d.). The increasing number of packages has mostly been concerned with A) broadening and deepening the scope of sanctions and B) ensuring better effectiveness, for example, through efforts to tackle circumvention. As of May 2023, EU restrictive measures linked to the Russian aggression against Ukraine amount to a total of 1,473 individuals and 207 entities (European Council n.d.b.) and have unprecedentedly targeted crucial sectors.

The question of whether the sanctions have the desired effect has become incredibly scrutinised, even though a clear answer is still missing. One of the discussed points is whether the Russian economy suffers as much damage as was expected, as some indicators disprove the expectations (Snegovaya, Dolbaia, Fenton, and Bergmann, 2023; The Economist 2022). However, as experts point out, the sanctions effect, especially when it comes to causing economic hardships, comes after a delay, during which it can even initially look as if sanctions are counterproductive (Ibid; Guárdia and Cooper 2023). In 2023, the macroeconomic circumstances are expected to get much worse (Snegovaya, Dolbaia, Fenton, and Bergmann, 2023). Moreover, the negative impact on the Russian economy is already apparent. Currently, the energy sanctions—especially the mentioned embargoes and price caps—are causing massive damage to the Russian economy, and the change in the chain of supply is not going to substitute for it (Ibid).

Another success has been the limitation and control of exports, as Russia is experiencing a shortage of technologies and crucial advanced materials (Ibid.). The situation for Russia is dire in various spheres, for example in aviation, the machine-building industry, car manufacturing, and pharmacy (Ibid; BBC 2022). The sanctions in the defence sector have also had their results, as Russia must turn to less technologically advanced countries and the black market to obtain military equipment (Snegovaya, Dolbaia, Fenton, and Bergmann 2023).

As for the sanctions on individuals, a small part of the Russian elite distanced themselves from Putin’s aggression, although this has not resulted in noticeable rifts in the Kremlin's elite, and it is hard to prove whether sanctions played a role in the decisions of the few who did so (Ibid). However, sanctions have massively contributed to limiting resources for persons affiliated with the Russian regime, and in this regard, they could have fuelled some of the disagreements (Ibid ), as recently seen, for example, in Wagner Group’s leader Prigozhin’s critical assessment of Russia’s lack of military-related resources and the incompetence of people like defence minister Sojgu.

To conclude the evaluation of the existing regime, more nuanced work balances the accomplishments and failures and takes the goals and long-term vision into account. As Drier and Popescu (2014, p. 3-4) point out, economic sanctions are not a sprint but a marathon. Yet there is already a visible impact of sanctions, with even more negative future perspectives for Russia. Interestingly enough, within the European political elite, it is mostly the pro-Russian circles that criticise the sanctions and label them as ineffective (Demarais 2022). When we evaluate the sanction regime by its goals, which can be described as 1) signalling unity and resolve, 2) limiting Russia’s ability to wage war, and 3) damaging its economy, the results show that the EU and the West in general have been successful (Ibid.). Moreover, the West has been gradually strengthening the sanctions but still has not used some of its strongest measures, like cutting all of the banks from the SWIFT system, banning the use of the US dollar, or implementing tough secondary sanctions (Ibid).

However, there are still plenty of complications on the side of the West and the EU in particular. The next parts of this paper identify some of the crucial weaknesses and propose recommendations on how to address them.

**Design limitations of the sender**

The development sanctions regime of the European Union is a complex activity. Policy decisions about adopting, renewing, or lifting sanctions regimes are made by the Council of the EU (the Council), based on proposals of the European Commission together with the High Representative of the Union for Foreign Affairs. These proposals should be adopted unanimously.

The Council and the European Parliament are the legislative bodies of the EU. The Council's decision must be approved by all ministers in all member states. However, ministers make decisions only formally; the basis for the council's decisions is therefore prepared through sometimes long discussions and compromises among representatives in working groups and in Coreper meetings (Committee of Permanent Representatives, ambassadors of member states).

There is an internal limitation to the imposition of sanctions that is associated with the internal functioning of the European Union. The Union can only impose sanctions that will pass this complex decision-making process. Some sanctions that could be more effective can be discredited at the same time because of the diversity of opinions among individual states. Therefore, the Union must find a compromise among the most effective sanctions that would be tolerated by all member states.

Making a compromise between all 27 states is not an easy task when each country may have slightly different interests. Above all, countries such as Hungary, whose populist representatives criticise the sanctions, may pose a potential threat to the non-acceptance of further sanctions against Russia.

**Targeting deficiencies**

International politics have grown polarised on the topic of imposing sanctions on Russia, with many nations and organisations taking opposing stances. Sanctions were employed as a tactic to put hardship on Russia to alter its actions in a number of instances, such as the annexation of Crimea in 2014, the invasion of Ukraine in 2022, and violations of human rights (European Council 2023). Although some contend that sanctions are a successful means to change Russia's conduct, others have faulted them due to their poor targeting, which may lead to unwanted repercussions and have a detrimental impact on the designated nation's economy and population. In this section, we shall examine the targeting deficiencies of the sanctions against Russia.

Sanctions against Russia set by the EU started in 2014 after the annexation of Crimea and destabilising Eastern Ukraine regions. They were a response to Russia’s breach of international law and illegal actions in breaching the sovereignty of a country. However, after the Russian invasion of Ukraine in February 2022, the EU imposed massive and much harder sanctions on Russia in order to deprive the regime of technologies and impact its economy in a way to deflect its actions and war in Ukraine (European Commission 2023).

Starting with the 2014 sanctions, which were considered effective by most sanctioning parties as they achieved their goal, various factors played against this sanction regime. These sanctions caused a huge loss for the sanctioning party for several reasons. First, the banning of the export of technologies and machines, especially for militarily and oil production, from the EU and the USA to Russia caused a big loss and a strike to the economies of these parties, knowing that Russia is a major player in the fields of natural resource production and military. Second, the countersanctions imposed by Russia on western food imports caused another hit to the sanctioning party’s economy. Those were recognised as the direct effects and losses of the sanction. The lower request for imports by Russia following its economic depression due to sanctions caused an indirect effect as well. However, most EU member states were capable of finding new markets after a little time, and their net exports actually increased after this recession (NATO 2015).

The sanctions in 2022, after the Russian invasion of Ukraine, took a wider stance. They banned the travel of affluent and prominent Russian citizens and seized their financial holdings. They placed restrictions on the export of Russian energy and material goods and attempted to restrict Russia from obtaining a variety of information and military technologies. Additionally, they slapped economic sanctions on Russian banks and limited Russia's participation in international finance and financial markets. However, all this didn’t crush and subjugate Russia (Hirsch, P. 2022). The gross domestic product [GDP], according to the International Monetary Fund [IMF], decreased by only 2.1% and is projected to improve by 0.7% in 2023. However, both the World Bank and the Organisation for Economic Cooperation and Development [OECD] show a decrease in GDP of 0.2% and 2.5%, respectively. Under all this western pressure, the Russian economy is still on its feet, and the war in Ukraine continues (European Council 2023). Somewhere within this sanction regime lie some limitations that should be addressed.

First, the goal of individual sanctions was to form some sort of rift in the regime’s high society. However, after the implementation of sanctions against the upper-class players, this caused very few splits and much fewer reactions than expected. And since some of his oligarchs denounced and condemned the war on Ukraine, Mr. Putin attacked those with "villas in Miami and the French Riviera," calling them traitors. Since the sanction regime didn’t hit the goal in most individual sanction cases, now the sanctioned oligarchs have their holidays and travel in Turkey, the United Arab Emirates, and other countries that kept their distance from sanctioning Russia instead of their regular destination, the European Union (Snegovaya, M. et al 2023). This brings us to the second limitation in the sanctioning regime.

The non-compliance of other emerging economic and financial powers such as Turkey, India, and the United Arab Emirates, along with China, found ways to trade with Russia mainly through neighbouring non-sanctioned countries such as Georgia, Belarus, and Kazakhstan. Some technologies, as well as other products and possibly even military services, were exported to Russia (Khan, S. 2023). Even Russia is suspected of illegally smuggling goods from neighbouring countries. For example, EU exports to Kazakhstan nearly doubled from 2021 (5.5 billion euros) to 2022 (10.4 billion euros) (European Commission 2023).

Another important setback is some of the EU member states’ opposition to some sanctions. Hungary was one of the most opposed to sanctions, along with Bulgaria, which was completely dependent on Russian gas, and lastly, France and Belgium were against the prohibition of nuclear cooperation with Russia and importing diamonds (Baczynska, G. 2023).

Finally, Russia is very dependent on its hydrocarbon sector. Oil and gas profits, which accounted for 45% of Russia's federal budget in 2021, are a major source of income for the country (International Energy Agency 2022). Moscow depends on oil and gas revenues to pay for its expenditures on its spending plan and has been obliged to start selling foreign reserves to make up for a shortfall brought on by the price of its invasion of Ukraine. In 2022, the revenue from oil and gas reached 165 billion dollars (Korsunskaya et al., 2023). The EU was in turn very dependent on Russian oil and gas, at a percentage of 24.4 of the total consumption (Eurostat 2022). Cutting off this huge amount directly was absurd. The EU needed time to figure out new sources, thus gradually decreasing its imports of Russian gas and oil. The partial embargo implemented in the sixth package of sanctions stated that after February 2023, there will be a ban on Russian imports of petroleum. But until then, EU states kept on importing huge amounts of oil and gas, thus increasing revenue for the Russian economy. Some states were even given longer notice and partial exceptions because of their dependency on Russian petroleum imports. But Russia was successful in moving its exports from Europe to Asia (Cahill, B. 2022).

Cutting off Russian banks from the SWIFT system was an extreme course of action. However, not all banks were entitled to this ban. Because they are the primary method of payment for Russian oil and gas, which EU nations continue to purchase despite the turmoil in Ukraine, Sberbank and Gazprombank were off the list (Blenkinsop, P. 2022).

Russia opened its market for oil in non-sanctioned third countries, where these countries enjoyed cheap petroleum products. India, for example, boosted its imports of Russian oil in 2022 to 22 times the amount imported in 2021 and became the largest importer of Urals crude, marking more than half the total exports. This brought back massive revenues and is aiding in the improvement of the Russian economy (Shea, J. 2023).

In summary, the targeting deficiencies in the sanctions against Russia have had serious detrimental effects on the country's ordinary individuals, increasing their suffering and poverty. Instead, Russia keeps up its aggressive behaviour, continuing its attack on Ukraine and violating international law. Furthermore, the sanctions' effectiveness has been further diminished by the weak international backing for them as well as Russia's capacity for adapting and finding new allies. It is obvious that if the global community wishes to affect Russia's behaviour and advance adherence to human rights and international law, a more focused and effective strategy is required.

**Side-effects of sanctions and further opportunities**

Implementing the sanctions, especially trade limitations or more severe ones such as embargoes, generally affects not only the actor who is targeted and considered to be impacted but also the sender, supporters of its sanction regime, and even neutral actors. Before spring 2014, Russia, as the most sanctioned country today, was not believed to be a perfect example of how the put-in-action sanctions may have side-effects on the EU, the USA, Japan, Canada, Australia, and states that are either publicly neutral, friendly, or at the same time seek profits by providing opportunities for Russia to bypass the implemented measures. (Zandt 2023) In this part of the paper, it’s better to examine and describe the side-effects and opportunities from different points of view, not only the negative ones but the positive ones for Russia, senders, and third parties as well. In this case, looking at the two sides of the same coin helps to find out which effects and opportunities appear and which ways exist to either strengthen the sanctions or revise the methods or apply new ones.

After the annexation of Crimea in 2014 and the emergence of a Russian hybrid war in the east of Ukraine, and later the shooting down of a Malaysian aeroplane, MH-17, the first sanctions to be authorised, for example, by the United States were mainly concerning the issue of banning individuals and arresting their property who were both alleged to be within Vladimir Putin’s circle and responsible for the illegal activity in Ukraine. In addition to that, 14 defence industry companies were sanctioned, and the activities of six of the largest banks and four energy companies were in certain ways financially limited (Åslund and Snegovaya, 2021; U.S. Department of State, n.d.). It’s necessary to mention that these subjects are directly and indirectly connected with the Russian government, which generally means that the government executives and close actors (interconnected businesses and persons) were sanctioned then. The countersanctions that were later implemented by Russia caused trade chains to be disrupted, resulting in economic losses for European countries and the United States. (Sanandaji 2018) Nevertheless, Russia faced an economic recession, further stagnation, decreasing investments in the country’s economy, and capital outflow, but the side effects of the applied measures assisted in creating an opportunity for Vladimir Putin’s regime to benefit from the sanctions by presenting them as an attack on the whole nation, not on the exact political figures. Back in the day, it provoked the rally around the flag effect in Russia that allowed Vladimir Putin to (based on official presidential election results) crush his opponents in 2018. However, since non-systemic candidates were banned and most of the opposition was weakened, sanctions ironically created an opportunity for the regime to keep its political prestige. Russia was generally still able to lead and participate in significant international projects such as Nord Stream. The neutral states were also touched by the measures, such as Switzerland and Israel (Sanandaji 2018). Even some years later, under Donald Trump’s administration, the sanctions implemented against a close Vladimir Putin oligarch, Oleg Deripaska, disrupted the Russian aluminium factories in Ireland and Sweden. (Åndrus and Snegovaya 2021) Generally, it had a relatively little negative side-effect for the western economies, but more importantly, it undoubtedly created an opportunity for the US and the EU to better witness that surgical limitations arguably worked in the case of Russia, as the main sources of Moscow’s income were nonetheless active.

One should not forget that another opportunity to empower limitations is to create a threat of implementing secondary sanctions against actors that can be involved in aiding a sanctioned side to circumvent the existing limitations. It is a functioning method that was once actually used. The French banking group BNP Paribas pleaded guilty and was fined a record $8.9 billion by the U.S. District Judge for violating sanctions against Cuba, Sudan, and Iran. The group was responsible for being, according to authorities, "the central bank of the Sudan government" (Reuters 2015) and gathering information from wire transfers to help some sanctioned groups in Cuba and Iran evade U.S. control over financial transfers. In 2014–2015, this threat, for example, stopped China and some Middle Eastern states from offering financial credits for the decreasing and later stagnating Russian economy, as it could presumably cause secondary sanctions. (ndrus and Snegovaya 2021) Undoubtedly, sanctions may have stopped the further Russian interception in the east of Ukraine in 2014 and led to the 8-year conflict freezing. In the past few days (before the invasion), they could be improved to probably prevent the war in 2022. (Åndrus and Snegovaya 2021) Sanctions do not stop the current war but prevent the next one which unfortunately didn’t happen in 2022.

The visible improvement in how the United States, EU, and their allies could more efficiently implement the new sanctions came after Joe Biden’s administration took charge in the White House. Before the full-scale invasion of Ukraine in 2022, the EU and the US were still targeting specific parts of the Russian economy, Putin’s cronies, and its businesses. The war with Ukraine followed by EU measurement packages and US limitations are stricter than those sanctions that were implemented earlier and complement them; hence, they have side effects for all of the parties involved in relations with Russia, Ukraine, the US, and the EU. There are also opportunities for these actors to either bypass or use the sanctions for their own goals.

Measures that were adopted by the US and EU after Russia relaunched an active phase of war with Ukraine were a continuation of the previous ones but more severe than surgical bans on cronies, oligarchs, and sectors of the economy. West had two jokers in the deck that were used in new packages of sanctions. Freezing the reserves of the Russian Central Bank and taking the country out of the SWIFT payment system, together with Europe banning gas, metal, and oil imports and cutting-edge, dual-use goods and technology trade with Russia, make the country more dependable on the government and third parties such as Iran, China, and India (European Council 2023; Kantchev and Gershkovich 2023).

The first side effect of the applied measures was the legalisation of parallel imports by Moscow, which in reality are contraband. It also created an opportunity for third parties to profit from reselling banned goods to Russia and for the government to forget about the failed import substitution by getting the same western products for a higher price. For the West, it means that a new and functioning smuggling zone in Middle Asia needs to be eliminated or at least officially declared illegal by the governments of Georgia, Armenia, and Kazakhstan. The same side-effect can be seen in relation to India and China that buy Russian hydrocarbons (oil) with discounts, which means that sanctions do not function properly as Moscow still has an opportunity to prosper from energy source trade (Kantchev and Gershkovich 2023). However, the discount means that the Russian state budget cannot be fulfilled by oil dollars in a necessary and wishful capacity for Moscow, as was the case for years after Vladimir Putin became president in the early 2000s.

The second side effect of the implemented sanctions was the increasing inflation in the EU and the US, which especially impacted food and energy prices. According to the news article from Eurostat, the annual inflation rates "more than tripled" in 2022. (Eurostat 2023) Nevertheless, in reality, there was an opportunity for the EU not only to find new suppliers but also to cut gas consumption.

In addition to the further opportunities that may enforce the present measurements, it’s vital to remember that sanctions shake the Russian war machine as well, causing conflicts between the Russian Defence Ministry and paramilitary groups such as Wagner or Ramzan Kadyrov’s forces. The shortage of ammunition and the inability of the Russian military industry to produce in the necessary quantities drones and artillery ammunition (the basic element of Russian military culture) lead to misunderstanding, scapegoating, and public arguments as Moscow suffers from the lack of technology that can be used in the military sector too. It can be seen now that the leader of PMC Wagner has an argument with the Russian Ministry of Defence and threatens to leave the positions in Bakhmut because the ministry, according to Prigozhin’s statement, does not give the artillery ammunition to his mercenaries. (Wheaton 2023)  In that case, Russia is forced to buy equipment and weapons from Iran (the case of Shahed drones), which also creates a threat for Iran to be sanctioned or at least for the West to look for a functioning solution to prevent Iran from supplying Russian troops (Melkozerova 2023).

**Circumvention challenges and their prevention**

Following the incursion into Ukraine on February 24, 2022, the European Union (EU) imposed a series of ten sanctions on Russia (EU 2023). These measures encompass the identification and restriction of specific individuals, limitations on the export and import of goods, sector-specific actions targeting the banking and transportation sectors, and the imposition of a prohibition on Russian flights within EU airspace. Notably significant among the imposed sanctions are the embargo on Russian maritime transportation of crude oil and the establishment of a price ceiling for crude oil and petroleum products. However, despite the comprehensive nature of these sanction packages, the Russian economy has not experienced the degree of contraction initially forecasted in 2022 (Sullivan 2023).

In this section, we will analyse how Russia circumvents the sanctions via the Caucasus and Central Asian countries and by utilising alternative ways by trading with Turkey, as well as other post-Soviet and some European countries. We will briefly examine the statistics and then analyse how the EU and US plan to prevent these cases and which tools they use to implement their goals.

The term "enforcement," in the context of sanctions, encompasses the phenomenon of circumventing imposed restrictions, as evidenced by instances where European Union (EU) goods subject to export bans still manage to reach Russia. In a document published in February, the German Economy Ministry highlighted that the foreign trade data available to them indicates a significant level of EU-sanctioned goods being exported from the EU to specific third countries and subsequently finding their way to Russia (Reuters 2023). Economy Minister Robert Habeck of the Green Party, who presented the document to the press in late February, emphasised the scrutiny placed on high-tech goods and other dual-use items that possess the potential for military application.

The absence of official records regarding the suspects raises suspicions about countries that have not imposed sanctions on Russia. Two countries of particular significance in this context are Turkey and China. Beata Javorcik, the chief economist of the European Bank for Reconstruction and Development (EBRD), conducted a study on trade data and identified three additional countries involved: Armenia, Kazakhstan, and Kyrgyzstan. Javorcik noted that there was a significant decline of approximately 60% in the volume of European Union exports to Russia, while Western European exports to countries like Armenia, Kazakhstan, and Kyrgyzstan experienced an increase. These countries, along with Belarus and Russia, belong to the Eurasian Customs Union (EACU), which resulted in minimal inspections once goods entered any of these countries. Javorcik suggested that this trend indicates a diversion of exports previously destined for Russia through these intermediary countries. Javorcik further highlighted the challenge of trade data not providing information on whether firms are aware that their products ultimately reach Russia. Nevertheless, EU member states and the EU Commission are actively investigating this issue (Reuters 2023).

Elizabeth Rosenberg, the U.S. Assistant Secretary of Treasury for Terrorist Financing, expressed the administration's apprehension regarding the export activities of UAE-based companies. It was revealed that these companies had exported goods amounting to over $18 million to entities designated by the U.S. as Russian entities between the months of July and November 2022. Furthermore, she highlighted that UAE firms had shipped over $5 million worth of U.S.-origin export-controlled goods to Russia, which included semiconductor devices (Farivar, 2023; Berriault 2022).

Furthermore, neighbouring countries of the Russian Federation are increasingly buying German goods and selling them to Moscow in order to evade Western sanctions (Usov, 2022). According to Spiegel, one notable example is Armenia, which has experienced a fourfold increase in its exports to Russia, amounting to approximately $2.5 billion over a span of two years. In addition to traditional exports such as fruits, nuts, wine, and the renowned brandy "Ararat," Armenia has recently begun exporting various high-tech and industrial goods. In 2022 alone, Armenia supplied Russian customers with electronic equipment valued at $460 million, with sales of such equipment surging from $14 million to $158 million. Notably, in December, the export revenues of German companies through Armenian enterprises were 287% higher compared to the average for the years 2018–2020 (Gerald Traufetter, Benjamin Bidder, DER SPIEGEL 2023).



Furthermore, the European Union (EU) has observed an abnormal increase in trade flows in Armenia and is engaging in discussions with the authorities of the country regarding this matter. Peter Stano, Lead Spokesperson for Foreign Affairs and Security Policy, stated that the EU is closely monitoring trade flows of sanctioned goods from the EU to third countries and from third countries to Russia (Report News Agency 2023). In the case of Armenia, they have noticed unusual trade flows and are actively addressing the issue through dialogue with Armenian authorities. The EU has implemented comprehensive sanctions against Russia due to its illegal aggression in Ukraine, violations of the UN Charter, and committing atrocities considered war crimes. The EU has called on all countries to align with these sanctions, adopt similar measures at the national level, or, at the very least, prevent any circumvention of these sanctions. In previous sanctions packages, the EU has introduced the possibility of imposing sanctions on individuals or entities involved in facilitating the circumvention of sanctions. According to a document from the US Bureau of Industry and Security, Armenia saw a significant increase in the import of chips and processors from the US (515%) and the EU (212% more) in 2022 compared to the previous year. During the same period, Armenia exported 97% of the same products to Russia. These observations and statistics indicate a potential concern regarding the trade flows of sanctioned goods and the possibility of circumvention. The EU's engagement with Armenian authorities demonstrates its commitment to addressing these issues and ensuring compliance with sanctions against Russia.

Analysing Central Asian countries, in 2022, the export of Finnish goods to Central Asia, particularly Kyrgyzstan, experienced significant growth, surpassing 800%. The most notable positive changes were observed in the year's second half, as supply chains had the opportunity to adapt and optimise trade relations. Kyrgyzstan, with an annual GDP of US$9.75 billion, generated US$411.5 million through intermediary trade with Russia in the same year. While this trend is expected to continue, it is worth noting that Russian-made alternatives may gradually enter the market, displacing some imported products. However, Western brands that are highly regarded will likely remain in demand. Russia's bilateral trade with Uzbekistan also saw growth, increasing by 23% to reach US$9.3 billion. This trade included exports of textiles and agricultural products from Uzbekistan to Russia. In the case of Kazakhstan, its timber exports to the European Union skyrocketed by 74 times, while exports from Kyrgyzstan surged by almost 18,000 times as EU buyers sought alternatives to Russian timber. However, it is important to note that Kazakhstan and Kyrgyzstan have minimal timber reserves, meaning that the wood sold to the EU is of Russian origin (European Bank for Reconstruction and Development, 2022). Kazakhstan has also witnessed a surge in its purchase of German goods, resulting in a remarkable 210% increase in export revenues for German companies compared to the average recorded between 2018 and 2020. Similarly, in Kyrgyzstan, the increase in the acquisition of German goods is even more pronounced, reaching an impressive 1157%. These developments highlight the growing demand and trade flows between these countries and Germany, indicating a significant rise in economic activity and trade partnerships (European Pravda 2023).

Following the Russian invasion of Ukraine, Turkey has not only refrained from joining Western sanctions but has, in fact, emerged as one of the major beneficiaries of the restrictions imposed on Russia. In August 2022, Turkey and Russia signed an agreement to enhance economic and energy cooperation, leading to increased trade and investment between the two countries (Daily Sabah 2022). Turkey has become a channel for circumventing sanctions, resulting in a significant surge in Turkish exports to Russia by 60% year-on-year in 2022, amounting to $9.3 billion. Additionally, Turkey has doubled its purchases of Russian oil and has become a key recipient of petroleum products from Russia since the EU embargo was imposed (Financial Times 2022). Pressure from the US and the EU has played a role in Turkey's decision to suspend the transit of goods subject to sanctions through its territory to Russia. The US Department of the Treasury warned Turkish business associations about potential sanctions on entities cooperating with restricted Russian companies (Ersoz 2023). US government delegations have engaged in consultations with Turkey to express concerns and highlight the consequences of intensified trade relations with Russia. The US, along with the European Union, has intensified efforts to prevent the circumvention of sanctions. Although Turkey's decision to introduce transit restrictions does not imply formal participation in the Western sanctions regime, it aims to curb opportunities for circumvention. This move is driven by a desire to minimise criticism of increased economic involvement with Moscow and influence the easing of Western threats of potential sanctions on Turkish companies and the financial sector. However, Turkey is unlikely to completely abandon its trade relations with Russia. Entrepreneurs anticipated Turkey's decision to introduce restrictions, and Russian businesses are exploring ways to overcome these new obstacles. One approach involves importing sanctioned goods directly to Turkey, including through Russian companies registered in Turkey, and then re-exporting them to Russia as Turkish goods. However, this method incurs higher delivery costs due to customs procedures and longer delivery times. Obtaining certificates of origin for goods poses another significant challenge. The future policy approach of Ankara in this area remains uncertain. Restrictive measures for issuing certificates would severely impact the supply of goods to Russia via Turkey, potentially forcing Russian companies to seek alternative import routes.

Moreover, Russia's Federal Security Service (FSB) has been utilising a spy network to procure technology and goods for its military-industrial complex, enabling it to bypass sanctions. Since the commencement of the full-scale war, Russia has made purchases worth $900,000 through this network. The U.S. Department of Justice has revealed that the Sernia network carries out classified procurement activities under the guidance of the FSB, including procurement for the Office of Scientific and Technical Intelligence. The network also serves the foreign intelligence service of the Kremlin, the state defence conglomerate Rostekh, the Ministry of Defence, and the state-owned company Rosatom. FT journalists have uncovered that the Russian company "Tradetools," along with "Sernia," both controlled by Oleksiy Zibirov, engages in the acquisition of microchips and industrial production goods from the European Union. It has been discovered that "Tradetools" and "Robin Trade" (a part of the Sernia network) are registered at the same address. By April 2022, "Robin Trade" had imported goods worth $12.2 million into Russia. However, once sanctions were imposed on the company, its revenue declined by 90%. Subsequently, "Tradetools" shifted its focus to importing equipment that is currently not subject to sanctions (Financial Times 2023).

Following ten rounds of sanctions against Russia, the European Union (EU) is now shifting its attention towards enforcement and addressing circumvention strategies. The EU is currently preparing a new set of sanctions that specifically target companies and countries believed to be aiding the Kremlin in evading the extensive penalties imposed by the bloc since February 2022. To achieve this, the application of extraterritoriality, a debated legal principle, may be employed to sanction entities that fall beyond the EU's jurisdiction. The draft proposal, formulated by the European Commission, was shared with member states on May 5 and is anticipated to be further deliberated by ambassadors in a meeting scheduled for May 10. The primary objective of this sanction package is to ensure the effective implementation of sanctions, prevent circumvention tactics, and impede the banned goods from reaching Russia and its military-industrial complex. A spokesperson from the European Commission confirmed these developments on May 8, aligning with media reports on the matter (Liboreiro 2023).

Simultaneously, the European Union (EU) has been engaged in deliberations regarding its upcoming package of sanctions targeting Russia, which would constitute the 11th round of restrictive measures. The EU's approach aligns with its advocacy for the G7 countries to adopt a similar strategy aimed at closing loopholes and thwarting Russia's efforts to evade sanctions. To bolster its efforts, the European Union has appointed a dedicated EU envoy on sanctions, David O'Sullivan, who is conducting a comprehensive examination of the situation. Recently, O'Sullivan visited Kazakhstan to engage with the country's authorities and caution them about the EU's intention to prevent Kazakhstan from serving as a platform for circumventing Western sanctions (The Astana Times 2023). It is worth noting that the EU currently lacks mechanisms to directly impose sanctions on third-party nations that indirectly facilitate Russia's importation of Western products. However, individual EU member states retain the possibility of implementing such measures, according to sources in Brussels. Presently, the European Commission is analysing the deployment of various tools to impede Russia's evasion of sanctions. These measures may encompass incentivizing companies to include commercial clauses specifying the usage and ultimate destination of products, as well as establishing mechanisms to restrict the sale of certain goods to specific countries, as indicated by diplomatic sources. David O'Sullivan, the EU sanctions envoy, embarked on recent visits to the UAE, Turkey, and Kyrgyzstan to effectively communicate the firm stance of the Western nations. O'Sullivan will proceed to Uzbekistan, Serbia, Georgia, and Armenia (News Armenia 2023) before the conclusion of May (Chazan et al. 2023).

In order to raise awareness among companies regarding the risk of violating U.S. sanctions on Russia, the U.S. departments of Justice, Treasury, and Commerce recently issued a compliance note. This note aims to highlight one of the most prevalent tactics employed to evade sanctions, which involves the utilisation of third-party intermediaries and transshipment points. The joint notice issued by the three enforcement agencies identifies over a dozen indicative "red flags" that suggest the involvement of a third-party intermediary or a foreign company situated outside Russia in evading sanctions. Some of these warning signs include the use of shell companies to facilitate international wire transfers, a reluctance to disclose information about the ultimate recipient of the goods, and the routing of shipments through specific transshipment points that are commonly exploited to unlawfully redirect restricted items to Russia or Belarus (US Department of Justice 2023).

As we stated above, some EU countries also try to signal sanctions separately and without joint EU statements. For example, Polish Prime Minister Mateusz Morawiecki has declared Poland's endorsement for the implementation of potential sanctions on countries that assist Russia in transporting goods that are prohibited from export. The European Union (EU) is planning to prohibit the transit of numerous goods via Russian territory, aiming to enhance adherence to previously imposed sanctions. This ban would specifically target technologies and products that pass through Russian territory en route to third countries. The objective is to reinforce compliance with existing sanctions and curtail any circumvention of the restrictions in place (Telewizja Polska 2023).

What the EU and US are doing to prevent the circumvention of sanctions is signalling to third countries not to participate in illegal trade with Russia and implementing sanctions’ recommendations and obligations. As stated above, visits of officials from the US, joint and separate statements from the EU countries on sanctioning the post-Soviet countries’ circumvention of sanctions, and numerous visits (also planned) also from the EU side to the Central Asian countries exert the EU and US’ strategy on how they deal with the issue. The sender side refrains from pushing more and imposing secondary sanctions on the post-Soviet countries, especially Central Asia, for not throwing them fully into Russia’s hands by isolating them from trade relations with West countries. In the case of Armenia, the sender side would think that it will further weaken Armenia’s position in the region, taking into account the current conflict in Nagorno-Karabakh and the country’s fragile economic performance, and fully accept Armenia as a near-term issue with Russia.

It should be noted that the tactic of the sender side starts to work, as on May 9, after talks with the US representatives, Kazakhstan closed borders for parallel imports to Russia. Also, after Kazakhstan’s decision, Bloomberg reported that the new sanctions of the European Union will target the companies of China, the UAE, Armenia, Uzbekistan, and Iran (Bloomberg 2023).

The next section will analyse viable improvements and alternatives to the current regime of sanctions and try to find out which ways of improving alternatives we have on the table to enhance already applied measures.

**Assessing and proposing viable improvements or alternatives to the regime**

Nevertheless, the current regime of sanctions has several ways of improving; alternatives can also be found and later implemented to enhance already applied measures. In other words, there is space for strengthening. Further improvements may include the following points: broadening and deepening the sanctions, encouraging companies to self-sanction, more functioning sanctions circumvention, and prolonging the renewal periods of sanctions. (Taran 2022)

For example, there is still room for expanding the scope of the sanctions on Russian exports. A large part of the Russian Federation’s trade remains unsanctioned. After full implementation of the eighth package, more than 60% of all imports from Russia to the EU are under sanctions. We can find capacity for broadening not only in the energy sector on natural gas but also on other commodities such as diamonds, cast iron, direct reduced iron, or ferroalloys. Importation of these materials is still possible even after the eighth package because the import bans on Russian products do not include most Russian firms dealing with these commodities. As for diamonds, only Russia's biggest diamond mining firm, Alrosa, is under sanction. Russia’s diamond trade works with Belgium, where approx. 85% of all Russian diamonds are imported, and the purchase of diamonds from Russia in EU states has even increased in 2022. The Russian origin of diamonds in Belgium could be replaced by other deliveries. On the other hand, the EU should also consider broadening its export restrictions towards Russia. The sanctions on exports can be better targeted to cause Russia trouble with its substitutions. Those are primarily products for which Russia has low capacity: parts for vehicles, parts of motors, vehicle bodies, taps, valves, appliances, automatic controlling equipment, and also machinery temperature change. International companies also have the capacity to damage the Russian economy. Various companies may impose so-called "self-sanctions' ' , which have the potential for a much larger impact on the Russian economy than country sanctions. Self-sanctions are voluntary decisions of companies to curtail operations in sanctioned territories; they include, for example, holding off investments or their withdrawal, suspending Russian brands, and cutting off Russian products from supply chains. There is an example of several companies (Novelis, Hindalco Industries or Norsk Hydro) that have said to stop using Russian aluminium. The EU representatives can make these stories of companies imposing "self-sanctions" more visible and set them as examples for others, so they will create public pressure on other firms (Taran 2022).

The other severe measure that can be applied is adding more or all of the Russian banks to the list of those banned from using SWIFT. Technically, the Russian banking system will be able to provide necessary transactions, but it will take much more time and basically look like the past days with faxes and phones. (European Council, Council of the European Union 2023)

The huge role is also played by the European Commission, which has established some tools for more effective collection of information about sanctions violations, such as EU sanctions whistle-blowers. The circumvention is also strongly aided by Russian disinformation, which is actively tried to be fought with by enabling special diplomatic and information channels to clarify that the international sanctions regime is connected with the Russian invasion of Ukraine. It is mostly developing countries that can be affected by the effects of these measures. The further improvement of the regime involves determining the violations of sanctions as serious criminal activity towards the EU (European Parliamentary Research Service 2023).

**Conclusion**

To sum up, the sanctions system in place against Russia at the moment has succeeded in sending a clear message and applying pressure to the Kremlin in reaction to its aggressive activities in Ukraine. However, there is still opportunity for these measures to be strengthened and improved upon.

Increasing the breadth and depth of the punishments is one way to make changes. Even though there has been a lot of progress in the sanctions against Russian exports, a lot of business with Russia is still going on as usual. Russia's economic potential would be further constrained, and its capacity to identify alternatives to items that are subject to sanctions would decline, if the restrictions were to be extended to encompass commodities like diamonds, cast iron, direct reduced iron, and ferroalloys.

Additionally, promoting corporate self-sanctions may have a more substantial effect on the Russian economy than sanctions imposed just at the national level. Companies' voluntary decisions to stop doing business in sanctioned areas, suspend Russian brands, or remove Russian goods from supply chains may put significant pressure on Russia. Companies who have previously implemented such measures might be highlighted and promoted as role models, motivating other businesses to do the same.

The Russian banking system might be disrupted, and financial transactions could be considerably slowed down, by considering steps like adding more or all Russian institutions to the list of those barred from using SWIFT. Transactions would not stop entirely as a result, but there would be huge delays that would make the Russian banking industry very uncomfortable.

It's important to remember the European Commission's contribution to improving the efficacy of the sanctions system. The development of instruments for more efficient data gathering on sanctions violations and the promotion of programmes like EU sanctions whistleblowers can help identify and combat circumvention attempts. It is essential to address Russian misinformation through focused diplomatic and communication channels to ensure that everyone is aware of how closely the international sanctions system is related to Russia's invasion of Ukraine.

It is crucial to understand that these actions may have a disproportionately negative impact on developing nations. Therefore, it is essential to take into account probable outcomes and implement required measures to lessen negative effects on these countries.

In the end, strengthening the sanctions regime requires considering transgressions as grave crimes against the European Union. A clear message that sanctions infractions won't be allowed might be sent by strengthening enforcement measures and enforcing suitable penalties.

Implementing these recommended changes can increase the efficacy of the present sanctions regime, which has already put Russia under a lot of strain, while also keeping Russia accountable for its deeds. The international community can send a unified message that aggressive behaviour and disregard for international norms will not go unanswered by enlarging the scope of sanctions, encouraging self-sanctions, exploring disruptive measures, addressing circumvention attempts, and strengthening enforcement.

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