



DYNAMICS AND STRUCTURE OF GEORGIA'S TRADE WITH THE RUSSIAN FEDERATION

Before and After the full-scale
Russian Invasion in Ukraine

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Table of Contents

- 1. INTRODUCTION 2
- 2. SOURCES OF INFORMATION 3
- 3. DESCRIPTION OF THE WORK CONDUCTED AND RESEARCH METHOD 4
- 4. EXPORT STRUCTURE 5
- 5. IMPORT STRUCTURE 8
- 6. GOODS UNDER SANCTION 13
- 7. EXPORT OF GOODS UNDER SANCTION 14
- 8. IMPORT OF GOODS UNDER SANCTION 16
- 9. RE-EXPORT AND RE-IMPORT 20
- 10. CONCLUSIONS 23
- ANNEX #1 24
- ANNEX #2 27
- ANNEX #3 28
- ANNEX #4 30
- SOURCES 34

1

INTRODUCTION

On February 24, 2022, the military forces of the Russian Federation violently entered the territory of Ukraine. The war precipitated a strong reaction from the USA, the European Union, Great Britain, Japan, and other countries, seeing strict economic sanctions imposed on the Russian Federation as an aggressor country and resulting a sharp restriction of trade relations with that country.

Despite the moral, humanitarian, and political support for Ukraine at the international level, Georgia chose not to introduce individual sanctions against the Russian Federation. According to the Georgian government, imposition of such sanctions, taking into account the expected retaliatory measures, would have dealt a great blow to the Georgian economy, which was already weakened by the pandemic.

Georgian society received its government's choice with ambivalence. Sociological research showed that a large part of the population supported this decision, but a certain part perceived it as capitulatory (GORBI, 2022).¹ The issue became even more acute after some representatives of Ukraine, without providing proper evidence, accused Georgia of facilitating circumvention of the international sanctions (Unian, 2022).² Although the aforementioned accusation did not go beyond the scope of rhetoric, it attracted the attention of international media and political circles, raising certain reputational risks for Georgia. It is vitally important to offer an evidence-based response to this allegation.

The goal of the current study is to draw on the available statistical data to reveal whether Georgia's trade with Russian Federation is indeed being utilized as a channel to avoid the international sanctions. The research is based on an analysis of the Georgian exports and re-exports to the Russian Federation, as well as the imports and re-imports from this country before and after Russia's large-scale invasion of Ukraine.

1 <https://www.interpressnews.ge/ka/article/715057-gorbi-s-kvlevis-tanaxmad-responentta-698-etanxmeba-mtavrobis-pozicias-ar-sheerteboda-rusetis-cinaagmdeg-mimartul-ekonomikur-sankciebs-xolo-ar-etanxmeba-271>

2 https://www.unian.net/war/vlasti-gruzii-razreshili-kontrabandu-podsankcionnyh-tovarov-v-rossiyu-gur-novosti-vtorzheniya-rossii-na-ukrainu-11772412.html?fbclid=IwAROWFIHghgn2-xNPPxCqgS4brd2K0B9hOITeF1n0RScvNKA8O-w_tO5axWU

2

SOURCES OF INFORMATION

The study used the data on the foreign trade of Georgia available on the website of the Ministry of Finance of Georgia.³ Such information is also published by the National Statistics Office of Georgia (Geostat),⁴ however, the data of the latter is provided separately according to the countries and goods (at the level of 4- and 6-digit codes of the HS classifier) and not published simultaneously in both contexts, while the data of the Ministry of Finance allows such analysis.

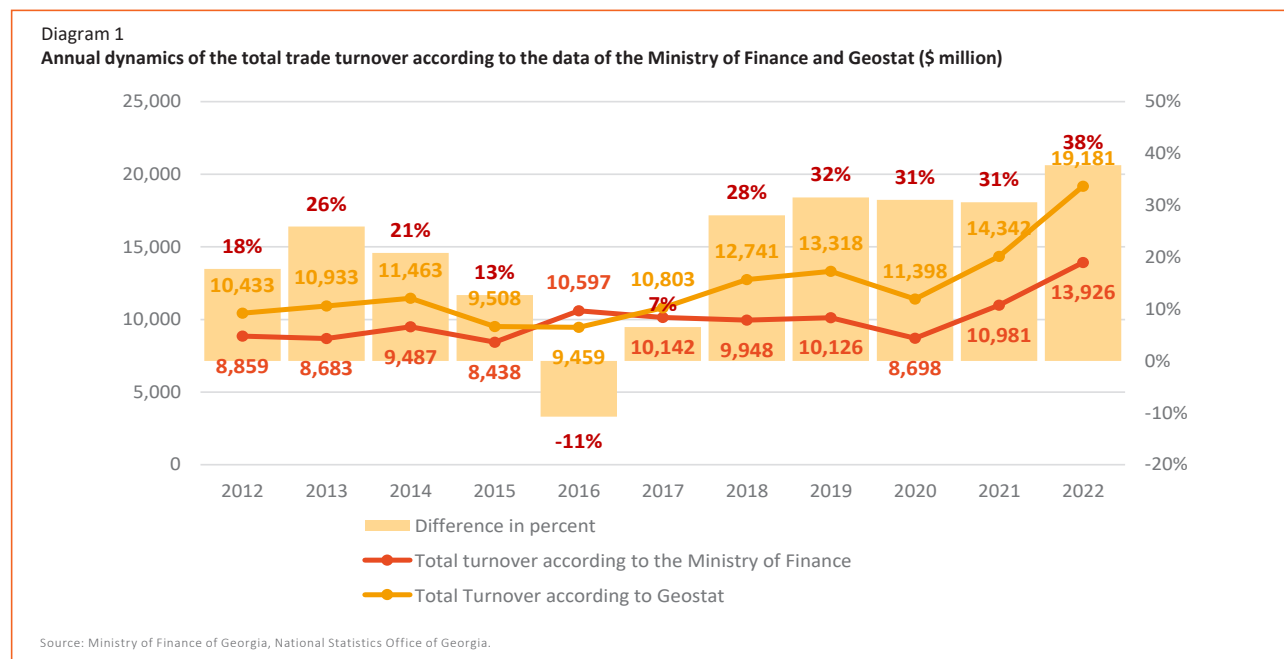
It should be noted here that the data of the Ministry of Finance and that of Geostat usually differ, as illustrated clearly in the diagram below.

We approached both the National Statistics Office and the Ministry of Finance for clarifications on the matter.

As the National Statistics Office informed us, "the data posted on the website of the Ministry of Finance do not fully cover the customs regimes of export and import (for example, re-export, processing) that we include in trade, therefore, its scarcity is quite logical."

For the purpose of this study, a 12-month period from March 2022 to February 2023 was taken and compared with the previous 12-month period (March 2021 to February 2022). In terms of the temporality, it is exactly one year before and after the start of the war.

At the same time, through various sources (see links) we searched for the official list of goods that were restricted by the European Union and the USA within the framework of the sanctions imposed on the Russian Federation (see links).⁵



³ https://www.mof.ge/export_importis_informacia

⁴ <https://www.geostat.ge/ka/modules/categories/35/sagareo-vachroba>

⁵ <https://www.consilium.europa.eu/en/policies/sanctions/restrictive-measures-against-russia-over-ukraine/sanctions-against-russia-explained/>

3

DESCRIPTION OF THE WORK CONDUCTED AND RESEARCH METHOD

At the first stage, the data posted on the website of the Ministry of Finance were consolidated into a single database which contains information on Georgian import-export at the level of 11-digit codes of the HS classifier.

Next, we separated the trade (export and import) data with the Russian Federation for the indicated periods and grouped them at the level of 4-digit codes of the HS classifier.

After that, we calculated the correlation coefficient between comparable periods at the level of 4-digit codes: we compared the structure of exports from March 2022 to February 2023 with similar data for the period from March 2021 to February 2022. Analogously, we compared the import structures in the same vein. This allowed us to assess the degree of structural change of imports and exports with the Russian Federation within a year of the start of hostilities, as compared to the exact same period before the start of the war.

Afterwards, we identified the main commodity groups that showed a significant change in import or export.

The next step was to reduce the list of goods subject to sanctions to the level of 11-digit codes of the HS classifier, and compare this with a similar list from the Revenue Service of the Ministry of Finance of Georgia. We found that the list available at the Revenue Service is identical to the official list of restricted goods we found on the web.

As a result of the comparison, we acquired a complete list, which contains the full category of sanctioned goods at the level of 11-digit codes of the HS classifier.

Finally, we analyzed the structure of foreign trade of Georgia and Russia in the context of the list of sanctioned goods.

<https://sanctionsscanner.com/>
<https://ofac.treasury.gov/sanctions-programs-and-country-information>
<https://www.sanctionsmap.eu/#/main>
<https://www.trade.gov/russia-sanctions-and-export-controls>
<https://www.gov.uk/government/publications/russia-sanctions-guidance/russia-sanctions-guidance>
https://finance.ec.europa.eu/eu-and-world/sanctions-restrictive-measures/sanctions-adopted-following-russias-military-aggression-against-ukraine_en

4

EXPORT STRUCTURE

According to the data of the Ministry of Finance, in the period from March 2022 to February 2023, compared to the previous corresponding period, export from Georgia to the Russian Federation decreased from \$583 million to \$582 million, that is by 0.1 percent. It is safe to say that the export volume is almost unchanged. At the same time, the correlation coefficient between the structures at the level of 4-digit codes of the exports HS classifier in the comparable periods is 0.949, which indicates almost complete similarity in the export structure before and after the war began.

As the provided data shows, 16 products from the list of top twenty exported goods remained unchanged in the comparable periods. The other four products:

1. Potatoes, fresh or frozen;
2. Tomatoes, fresh or frozen;
3. Coffee, tea or mate extracts, essences and concentrates, and
4. Copper waste and scrap

in the corresponding period of 2022-2023 were replaced by the following four products:

1. Fruits and other parts of plants, canned or prepared in other ways;
2. Food products, not specified elsewhere;
3. Mixtures used in the production of beverages;
4. Light vehicles.

It should be noted that the list of goods presented below covers 95 percent of Georgia's exports to the Russian Federation.

Table 1

Top twenty products exported from Georgia to the Russian Federation according to the 4-digit codes of the HS classifier

N	From March 2021 to February 2022	Mln \$	From March 2022 to February 2023	Mln \$
1	Ferroalloys	183.62	Natural grape wines	164.68
2	Natural grape wines	136.57	Ferroalloys	121.30
3	Mineral and fresh waters	62.06	Ethyl alcohol nondenatured, with an alcohol concentration of 80 vol. less than %, alcoholic beverages	64.78
4	Ethyl alcohol nondenatured, with an alcohol concentration of 80 vol. less than %, alcoholic beverages	41.20	Mineral and fresh waters	52.05
5	Waters, including mineral and carbonated waters, containing sugar additives	27.25	Waters, including mineral and carbonated waters, containing sugar additives	41.68
6	Apricots, cherries and berries, peaches, plums and bullace plum, fresh	26.67	Apricots, cherries and berries, peaches, plums and bullace plum, fresh	34.42
7	Potatoes, fresh or frozen	15.55	Fruits other, fresh	13.56
8	Fresh or dried citrus fruits	14.36	Electric water heaters	11.11

N	From March 2021 to February 2022	Mln \$	From March 2022 to February 2023	Mln \$
9	Fruits other, fresh	9.15	Apple, pear and quince, fresh	7.86
10	Electric water heaters	7.53	Manganese oxides	7.25
11	Apple, pear and quince, fresh	7.11	Fresh or dried citrus fruits	7.18
12	Walnuts other, fresh or dried	4.74	Ginger, saffron, thyme, bay leaf, curry, and other spices	5.52
13	Manganese oxides	4.15	Fruit and vegetable juices	4.24
14	Copper waste and scrap	4.08	Walnuts other, fresh or dried	4.12
15	Ginger, saffron, thyme, bay leaf, curry, and other spices	3.90	Food products, not specified elsewhere	2.51
16	Fruit and vegetable juices	2.64	Mixtures used in the production of beverages	2.40
17	Tomatoes, fresh or frozen	2.62	Fruits and other parts of plants, canned or prepared in other ways	2.19
18	Other vegetables, fresh or frozen	2.25	Instruments and devices for medical or veterinary use	2.17
19	Coffee, tea or mate extracts, essences and concentrates	2.05	Light vehicles	1.91
20	Instruments and devices for medical or veterinary use	1.94	Other vegetables, fresh or frozen	1.82
	Top twenty, total	559.44	Top twenty, total	552.74
	Export to Russia, total	582.72	Export to Russia, total	581.95
	Share of top twenty in the total exports	96%	Share of top twenty in the total exports	95%

Source: Ministry of Finance of Georgia, authors' calculations.

It is important to analyze the nature of change in the volume of main export products in the comparable periods.

The most notable was a 34 percent decline in the ferroalloy exports, with a weighted reduction effect of 7.1 percent. The negative effect of the decrease in mineral water exports was also significant - 16 percent. The exports of other goods in the top twenty list also decreased, but due to their small volume, the negative impact was low.

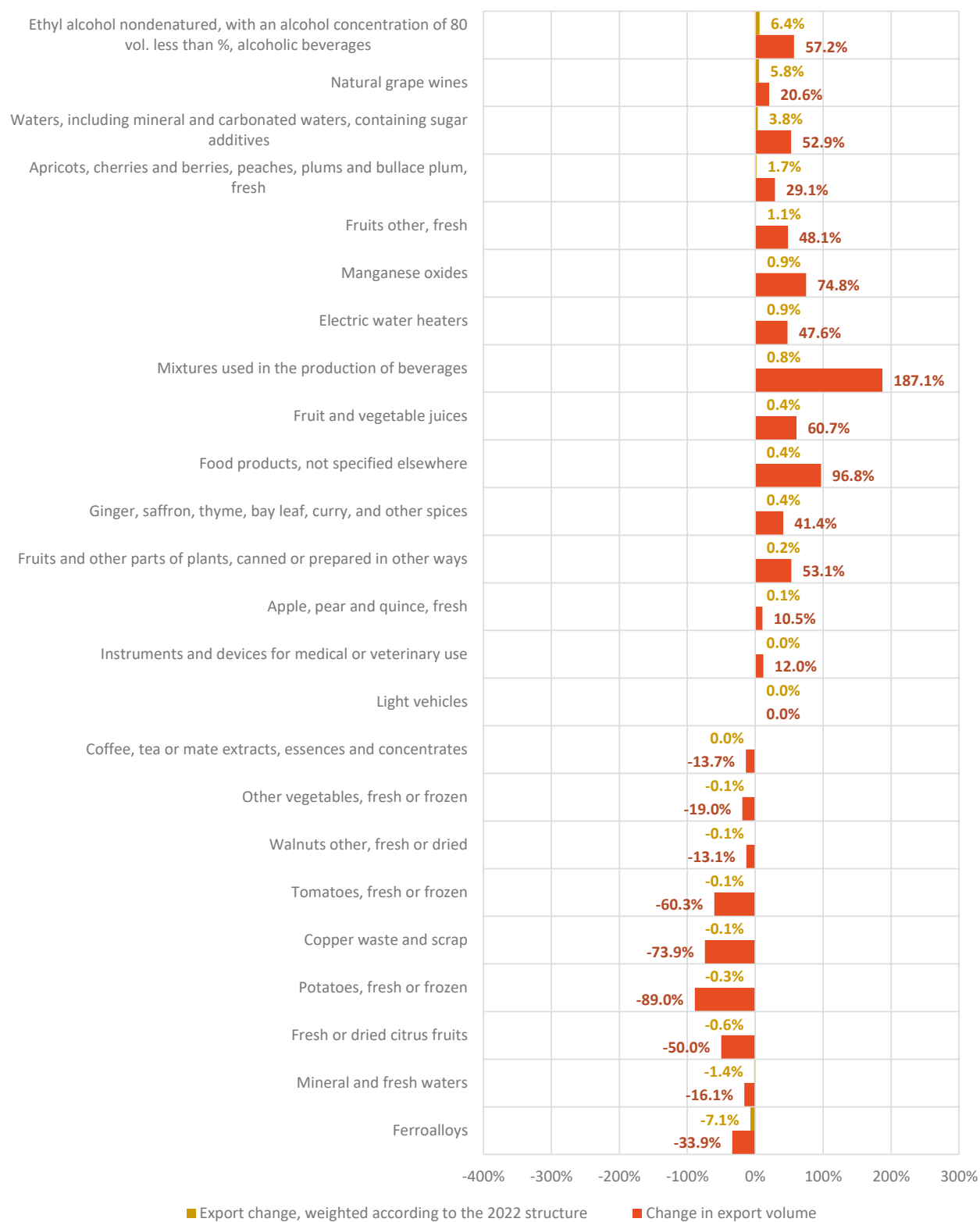
In the compared periods, most significant was the 57 percent increase in alcohol exports. The increase in wine exports by 21 percent was in the same league of significance. Of particular note is the 53 percent increase in exports of sweet and carbonated beverages, with the weighted effect of 3.8 percent. All these products are of local production and belong to traditional export categories to Russia.

None of the listed products, the exports of which have increased, belong to military or dual-use goods.

Among the listed goods, ferroalloys are the only ones that can be used for military purposes, however, the export of these products to the Russian Federation decreased by 34 percent during the analyzed period.

Diagram 2

Changes in the volume of the top twenty export products before and after the war



Source: Ministry of Finance of Georgia, authors' calculations.

5

IMPORT STRUCTURE

According to the data of the Ministry of Finance, in the period from March 2022 to February 2023, compared to the previous corresponding period, imports from the Russian Federation to Georgia increased from \$1,035 million to \$1,879 million, or by 82 percent. The correlation coefficient between the structures at the level of the 4-digit HS imports classifier codes in the comparing periods is 0.824, which indicates a great similarity in the structure of imports in the periods of interest.

As the data presented below shows, in the compared periods (before the war and after), 15 products from the top twenty commodity groups of imported goods remained unchanged. Five products, namely:

1. Telephone devices, including telephones for cellular networks and other wireless networks;
2. Corn;
3. TV receiving equipment;
4. Haircare products, and
5. Surface-active organic material; Washing and cleaning products.

in the corresponding period of 2022-2023 were replaced by the following five products:

1. Rods of carbon steel, without further processing;
2. Coal, types of solid fuel derived from coal;
3. Carbon steel semi-finished products;
4. Electricity;
5. Plywood glued, plywood panels and similar materials from mixed wood.

Table 2
Top twenty products imported from the Russian Federation to Georgia according to the 4-digit codes of the HS classifier

N	From March 2021 to February 2022	Mln \$	From March 2022 to February 2023	Mln \$
1	Oil and petroleum products	140.07	Oil and petroleum products	704.52
2	Wheat and meslin	81.23	Petroleum gases and other gaseous hydrocarbons	79.52
3	Petroleum gases and other gaseous hydrocarbons	76.02	Wheat or wheat-rye flour	67.18
4	Sunflower, safflower, and cottonseed oils and their fractions	39.04	Wheat and meslin	65.27
5	Telephone devices, including telephones for cellular networks and other wireless networks	37.93	Coke and semi-coke from coal, lignite, or peat, retort charcoal	58.00
6	Coke and semi-coke from coal, lignite, or peat, retort charcoal	28.20	Demijohn bottle, bottles, and other glass containers	44.79
7	Chocolate and other prepared food products containing cocoa	26.23	Sunflower, safflower, and cottonseed oils and their fractions	43.42

N	From March 2021 to February 2022	Mln \$	From March 2022 to February 2023	Mln \$
8	Margarine	23.70	Rods of carbon steel, without further processing	43.37
9	Bread, flour confectionery, cookies, cake and other pastries	19.85	A grain of processed legumes	37.29
10	Demijohn bottle, bottles, and other glass containers	19.35	Chocolate and other prepared food products containing cocoa	31.11
11	Wheat or wheat-rye flour	18.55	Margarine	28.94
12	Corn	16.20	Bread, flour confectionery, cookies, cake and other pastries	26.68
13	TV receiving equipment	13.76	Coal, types of solid fuels derived from coal	26.42
14	Products for preparation of sauces and ready-made sauces, mustard	13.63	Pigs alive	21.88
15	Medicinal products, packaged	13.15	Carbon steel semi-finished products	21.75
16	Coffee, tea, and mate extracts, essences and concentrates	11.95	Medicinal products, packaged	21.68
17	Processed legumes	11.88	Electricity	20.96
18	Pigs alive	9.87	Products for preparation of sauces and ready-made sauces, mustard	19.64
19	Means for the hair care	9.25	Coffee, tea, and mate extracts, essences and concentrates	18.25
20	Surface-active organic material; Washing and cleaning products	9.16	Plywood glued, plywood panels and similar materials from mixed wood	13.58
	Top twenty, total	619.04	Top twenty, total	1,394.26
	Imports from Russia, total	1,034.99	Imports from Russia, total	1,878.70
	Share of top twenty in the total imports	60%	Share of top twenty in the total imports	74%

Source: Ministry of Finance of Georgia, authors' calculations.

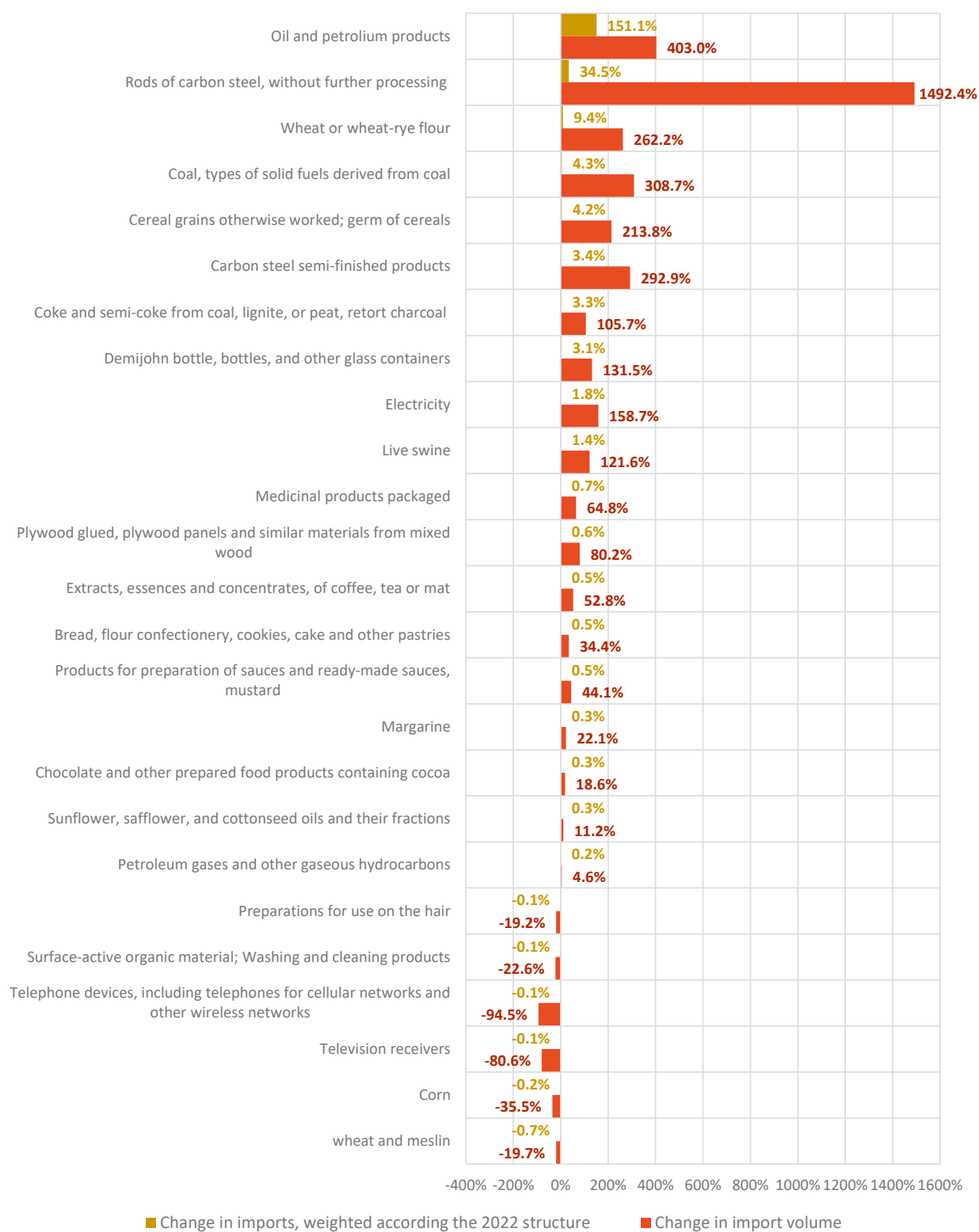
It is important to observe the change in the volume of the main import products in the comparable periods.

The largest weight in the increase of imports, at 403 percent, was in petroleum products, while the highest rate of growth was observed in the import of steel rods (1493 percent), which is due to its low base value. The weighted effect of this increase is much smaller than that of petroleum products.

The imports of primary grain processing goods increased significantly (flour and processed grains, 262 and 309 percent respectively).

The import of telephone equipment (by 94.5 percent) and TV equipment (by 80.6 percent) decreased sharply.

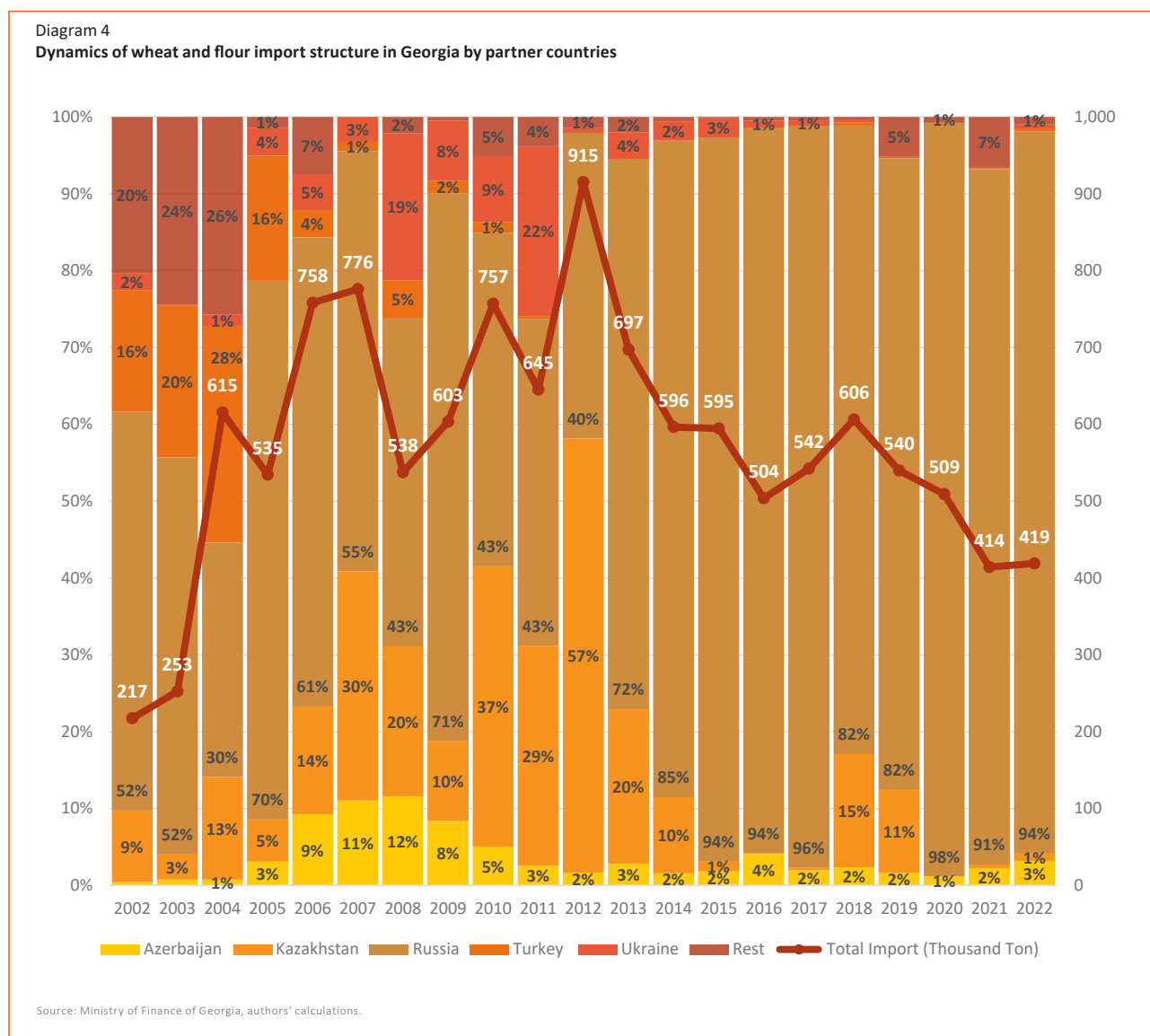
Diagram 3
Changes in the volume of Top twenty import products before and after the war



Source: Ministry of Finance of Georgia, authors' calculations.

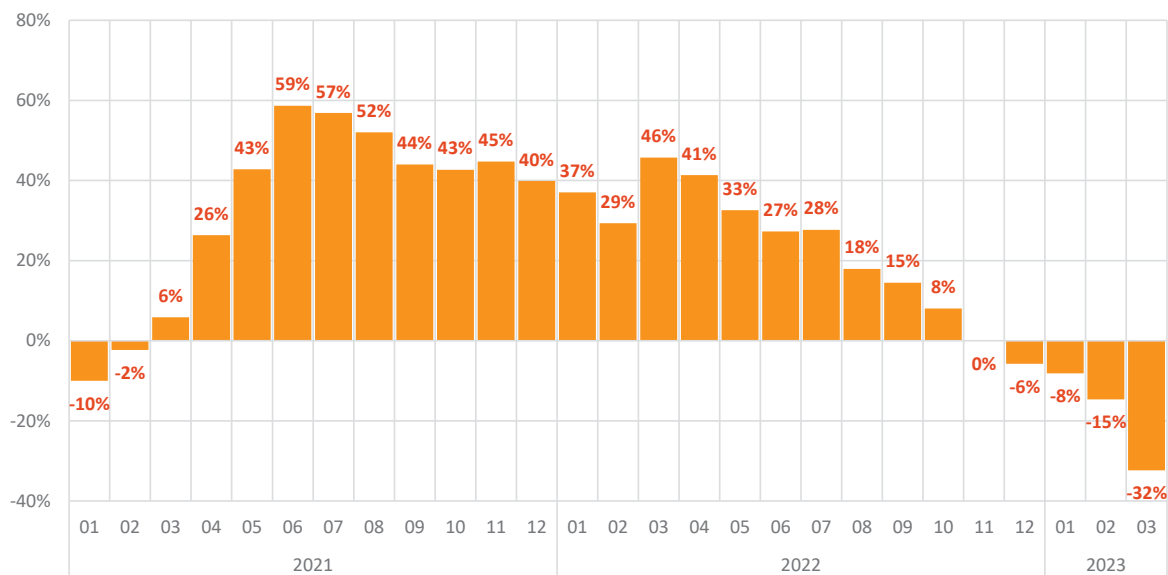
The significant increase in the import of ferrous metallurgy products is completely natural, as the largest supplier of these products before the war was Ukraine. This supply was stopped due to the war, and the alternative source for the aforementioned goods is the Russian Federation, which has replaced Ukrainian-made ferrous metallurgy products in the Georgian construction sector.

The main reason for the sharp increase in the import of primary wheat processing products from Russia can be found in the 19 percent decrease in the import of unprocessed wheat from the same country. The Russian Federation was and remains the main source of wheat import to Georgia.



As mentioned above, the import of petroleum products increased sharply. The increased demand for cheaper petroleum products as a result of the sanctions has led to a decrease in fuel prices in Georgia, a fact confirmed by the Geostat data.

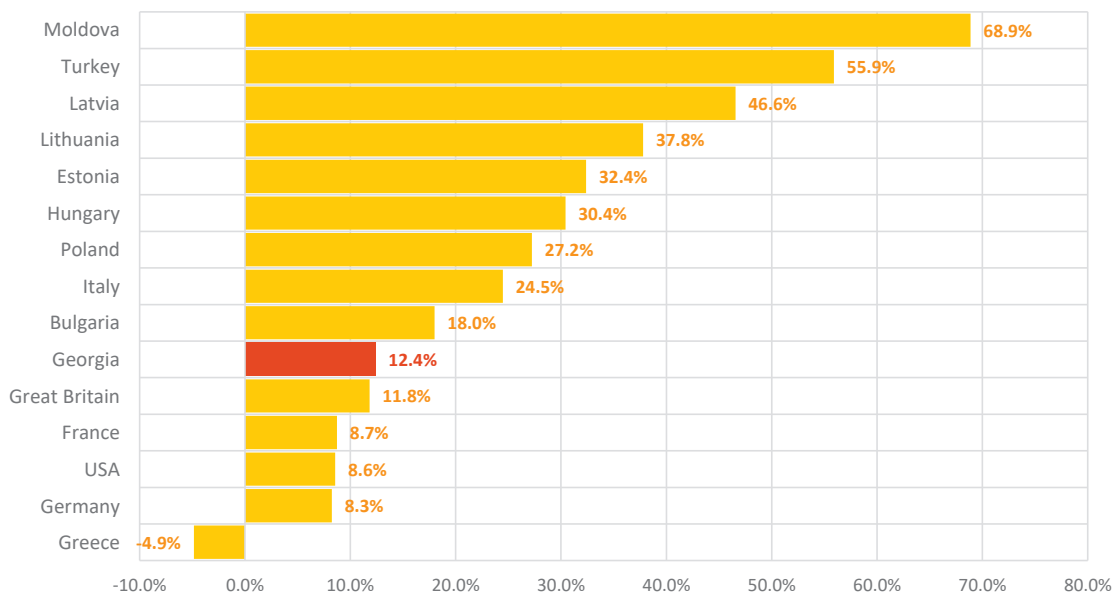
Diagram 5
Change in gasoline prices compared to the corresponding month of the previous year



Source: National Statistics Office of Georgia.

The decrease in fuel prices is an important factor in slowing down the rate of inflation, and this was also reflected in a reduction in the growth rate of the prices of goods and services⁶ of the relevant group. The data presented below show that Georgia is not in such a bad situation in terms of price increases for the goods of the aforementioned group.

Diagram 6
Housing, water, electricity, gas, and other types of heating: annual price increase as of February 2023



Source: International Monetary Fund: <https://data.imf.org/regular.aspx?key=61015894>

6 Source: COICOP Group: Housing, water, electricity, gas, and other types of heating. <https://data.imf.org/regular.aspx?key=61015894>

6

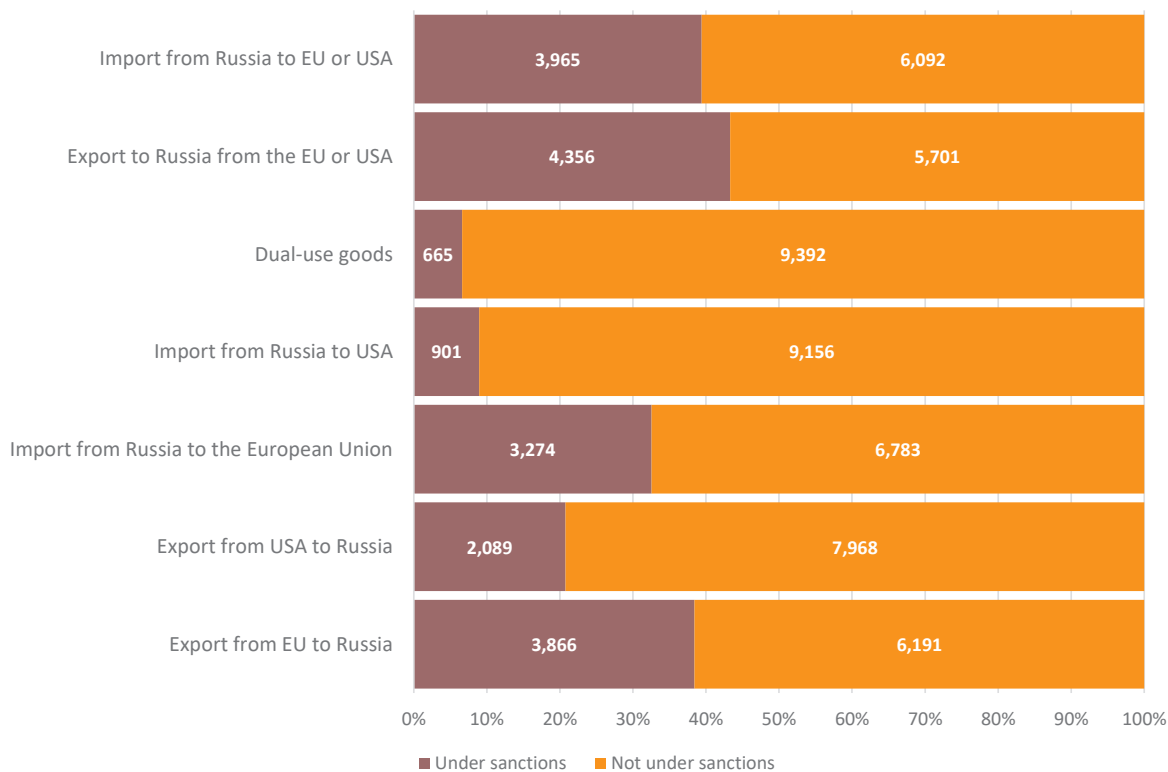
GOODS UNDER SANCTION

According to the retrieved data, as a result of the sanctions imposed on the Russian Federation at different times, the European Union banned or restricted the export of 3,866 products out of 10,057 types of goods at the level of 11-digit codes of the HS classifier. The United States of America introduced sanctions on the export of 2,089 products. The export of 4,356 products in total from the USA and the European Union to the Russian Federation are under sanction.

Of the 10,057 types of products at the level of 11-digit codes of the HS classifier, the European Union has restricted or prohibited the import of 3,274 from the Russian Federation. The USA announced the same type of sanctions on 901 goods. Overall, 3,965 types of goods have been sanctioned for import from the Russian Federation into the US and EU.

Diagram 7

EU and US restrictions on trade relations with Russia out of 10,057 types of products at the level of 11-digit codes of the HS classifier



Source: Indicated links, authors' calculations.

7

EXPORT OF GOODS UNDER SANCTION

According to the data of the Ministry of Finance, in the period from March 2022 to February 2023, \$582 million worth of goods were exported from Georgia to the Russian Federation, of which \$334 million, i.e. 57 percent of the total exports, constitute those products that are not subject to the sanctions imposed on Russia by either the European Union or the United States. \$248 million worth of exports, or 43 percent of the total volume, is made up of goods that are sanctioned by either the European Union or the United States.

Of that identified \$248 million, \$11 million (2% of the total exports) was accumulated from goods sanctioned only by the EU, while \$163 million (28% of the total exports) from those sanctioned by the US, and \$74 million (13% of the total exports) from goods sanctioned by both the EU and the US.

Table 3

The distribution of \$582 million worth of products exported from Georgia to Russia, according to the sanctions introduced against Russia, from March 2022 to February 2023.

	Mln \$	Percent
Exported, Total	582.0	100%
Among them:		
Not under sanction	333.5	57%
Under sanction, total	248.4	43%
Among them:		
Sanctioned only by the EU	10.9	2%
Sanctioned only by the USA	163.5	28%
Sanctioned by the EU and USA	74.1	13%

Source: Ministry of Finance of Georgia, authors' calculations.

The structure of exports of sanctioned goods from Georgia to the Russian Federation by category is noteworthy. As the data shows, 66 percent (\$165 million) of the exports of sanctioned products comes from wine. 26 percent (\$65 million) is alcohol, and 3 percent (\$7 million) is manganese oxides. These are the traditional categories of goods whose export is very important for Georgia. According to the available data, the Russian Federation absorbed almost 70 percent of Georgian wine exports in 2022. This was among the reasons the Georgian government refused to join the sanctions imposed on the Russian Federation as an aggressor country.

The above three products alone account for 95 percent of all sanctioned exports. The share of the same three products in the 12-month period from March 2021 to February 2022 was also 95 percent. The remaining 5 percent by the 4-digit HS classifier codes is distributed among 105 goods, and the share of each is 0.04 percent on average.

Table 4
The distribution of goods exported from Georgia to Russia, sanctioned either by the EU or the USA, according to the 4-digit codes of the HS classifier, from March 2022 to February 2023

	Mln \$	Percent
Exported, Total	248.4	100%
Among them:		
Natural grape wines	164.7	66%
Ethyl alcohol non-denatured, alcohol concentration less than 80% by volume, alcoholic beverages	64.8	26%
Manganese oxides	7.3	3%
Other	11.7	5%

Source: Ministry of Finance of Georgia, authors' calculations.

Of these 105 products, there are only three products whose export exceeds \$1 million. These are:

- Food products not specified elsewhere, the export of which was also recorded in previous years;
- Light vehicles, which were not recorded in previous years, the emergence of this position being only the result of the rearrangement of logistical connections. The volume is insignificant;
- Mixtures used in the production of beverages, the export of which was also recorded in previous years.

See Appendix #1 for a detailed list.

Incidentally, only 0.2 percent of the total exports is of goods that have been given the code of dual-use products in the sanctions packages developed by the USA and the EU. That 0.2 percent is distributed among 17 commodities by the 4-digit codes of the HS classifier. Of these, the commodity group of artificial and primed waxes stands out with the largest volume, its share comprising 0.1 percent of the total export. The average volume of the remaining 16 goods is \$17 thousand, and the average share 0.003 percent.

It should also be noted that the export of this type of product decreased by 23.6 percent in the compared periods.

See Appendix #2 for a detailed list.

Thus, the accusation that Georgia has become a hub for the export of military or dual-use goods to Russia is completely unfounded.

8

IMPORT OF GOODS UNDER SANCTION

According to the data of the Ministry of Finance, in the period from March 2022 to February 2023, \$1,879 million worth of goods were imported from the Russian Federation to Georgia, of which \$629 million, or 33 percent, of the total imports constituted products that are sanctioned neither by the European Union nor the USA. The products that are on either the European Union or the United States' list of sanctions make up \$1,250 million, or 67 percent of the total imports.

The products sanctioned only by the EU make up \$334 million (18% of the total imports) of that \$1,250 million, while \$112 million (6% of the total imports) is the share of goods sanctioned by the US alone. Those sanctioned by both the EU and the US constitute \$805 million (43% of total exports).

Table 5
The distribution of \$1,879 million worth of products imported from Russia to Georgia according to the sanctions imposed on Russia, from March 2022 to February 2023

	MIn \$	Percent
Imported, total	1,878.7	100%
Among them:		
Not under sanction	628.5	33%
Under sanction, total	1,250.2	67%
Among them:		
Sanctioned only by the EU	333.8	18%
Sanctioned only by the USA	111.7	6%
Sanctioned by the EU and USA	804.7	43%

Source: Ministry of Finance of Georgia, authors' calculations.

Petroleum products made up 56.4 percent (\$ 705 million) of the imports of sanctioned goods. Natural gas constituted 6.4 percent. The share of all other products is less than 5 percent.

In this case, more important than the volume of main goods is the list of products. As can be seen from the table below, almost all the sanctioned commodity positions of imports from Russia to Georgia are traditional import categories. There is no particular addition to this list.

It is also worth noting that the volume of imported products according to each commodity position is of such a size that it cannot possibly serve as a reason to circumvent the sanctions: the volume is so small that it can only be intended for the domestic market.

Table 6

The volume and structure of the top twenty sanctioned products imported from the Russian Federation to Georgia according to the 4-digit codes of the HS classifier in the period from March 2022 to February 2023

	Mln \$	Percent
Total	1,250.2	100%
Oil and petroleum products	704.5	56.4%
Petroleum gases and other gaseous hydrocarbons	79.5	6.4%
Coke and semi-coke from coal, lignite, or peat, retort charcoal	58.0	4.6%
Demijohn bottle, bottles, and other glass containers	44.8	3.6%
Carbon steel rods, without further processing	43.4	3.5%
Coal, types of solid fuels derived from coal	26.4	2.1%
Carbon steel semi-finished products	21.7	1.7%
Electricity	21.0	1.7%
Plywood glued, plywood panels and similar materials from mixed wood	13.6	1.1%
Petroleum coke, petroleum bitumen and other petroleum refining residues	9.2	0.7%
Pipes, tubes and hollow profiles, other, of ferrous metals	7.7	0.6%
Means for the hair care	7.5	0.6%
Products made of asphalt or similar materials	7.2	0.6%
Surface-active organic material; Washing and cleaning products	7.1	0.6%
Thermally polished glass and glass with a matt or polished surface	6.9	0.6%
Wooden construction goods	6.9	0.6%
Flat-rolled carbon steel of a width of 600 mm or more, hot rolled steel	6.8	0.5%
Fertilizers with mineral or chemical nitrogen, containing phosphorus and potassium	6.6	0.5%
Angles, shapes and special profiles made of carbon steel	6.2	0.5%
Products of ferrous metals used for railway and tram tracks	6.2	0.5%
Cosmetics or make-up and skin care products	6.1	0.5%
Sawn timber	5.8	0.5%
Food products, not specified elsewhere	5.8	0.5%
Slabs made of sapwood fiber or other lignified materials	5.6	0.4%
Coiled hot-rolled carbon steel, loosely coiled	5.0	0.4%
Soap	4.8	0.4%
Products made of stone or other mineral substances	4.8	0.4%
Slabs of wood chipboard	4.6	0.4%
Paper and paperboard, uncoated, for writing, printing or other graphic purposes	4.5	0.4%
Other uncoated paper and paperboard, in rolls or sheets	4.5	0.4%
Metal constructions and their parts from ferrous metals	4.2	0.3%
Plates, sheets, tapes, foil, and strips of polymeric materials	4.0	0.3%
Plastic pipes, tubes, and hoses and their fittings	3.9	0.3%
Means for oral and dental hygiene	3.7	0.3%
Other	91.7	7.3%

Source: Ministry of Finance of Georgia, authors' calculations.

The only commodity position that could possibly be suspected of being exported through Georgia, bypassing sanctions, are petroleum products. Their import increased 5 times during the reporting period and amounted to \$704.5 million. One might think that much of this oil was imported for export to other countries.

Thus, the export of petroleum products from Georgia slightly increased in 2022,⁷ but its scale does not correspond in any way to the growth rate of import of petroleum products from Russia. Consequently, we can conclude that the petroleum products imported from Russia are almost entirely intended for local consumption.

As the following data shows, from March 2022 to February 2023, petroleum products worth \$23 million were exported from Georgia, which is \$14 million more than in the previous corresponding period. Yet, in the same period, the growth rate and volume of imports are correspondingly higher: from March 2022 to February 2023, the import of petroleum products increased by \$403 million.

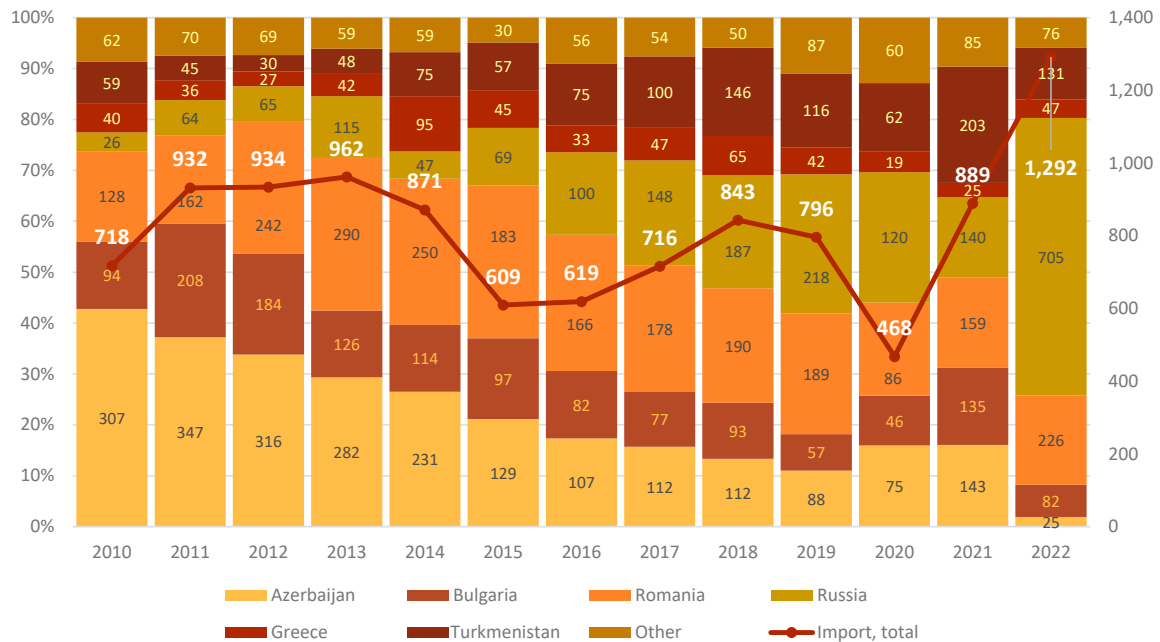


Most likely, the increase in the import of petroleum products from Russia was caused by their lower price. This is also verified by the structure of petroleum product imports by country, which clearly shows a sharp increase in Russia's weight in 2022, at the expense of a decrease in oil imports from other countries.

⁷ იგულისხმება მარტიდან თებერვლის ჩათვლით 12 თვიანი პერიოდი.

Diagram 9

Annual dynamics of the structure of import of petroleum products by country (\$ million)



Source: Ministry of Finance of Georgia, authors' calculations.

All in all, it can be said that the import of sanctioned products from Russia to Georgia is a natural continuation of the trend of previous years, while the nomenclature of imported goods is unchanged.

The following two essential factors that fit into that logic, considering the current processes, are worth noting:

1. The increase in the import of ferrous metallurgy products. These were traditionally supplied by Ukraine, but as it is no longer possible to import from that country, the next most realistic alternative source is the Russian Federation. This should explain the decision of the Georgian government not to close this source of import, it would have caused great damage to the construction sector, which is an important component of Georgia's GDP;
2. The five-fold increase in the import of petroleum products intended for domestic market consumption, as demonstrated by the structure of the import of these goods by country. Given the current global situation, it is hard to imagine how much this source of import could have been diversified.

Here, we note that the share of products that have been assigned a dual use product code in the sanctions packages developed by the US and the EU make up only 1 percent of the total imports. The import of only three of these commodities exceeds \$1 million. These are::

- Pipes, tubes, and hollow profiles, other, made of ferrous metals. The imported volume of this commodity position was the same in the previous corresponding period;
- Products made of stone or other mineral substances, also imported in the same volume as in the previous corresponding period;
- Telephone equipment for cellular or other wireless networks, including phones. The imports of this commodity position decreased by 95 percent compared to the corresponding period.

The remaining volume of these imports is divided among 64 commodity positions according to the 4-digit codes of the HS classifier, and amounts to an average of \$850 thousand, while its average share in the total imports is 0.007 percent.

The total imports according to this list have decreased by 65.5 percent compared to the corresponding period.

See Appendix #1 for a detailed list.

9

RE-EXPORT AND RE-IMPORT

According to the explanations received from the National Statistics Office and the Ministry of Finance, the statistics data presented on the website of the Ministry of Finance do not reflect temporary, diplomatic, transit, or other similar types of cargo. Thus, we can assume with some certainty that the difference between the data of Geostat and the Ministry of Finance is precisely due to these cargo.

In the period from March 2022 to February 2023, the difference between the data of Geostat and the Ministry of Finance was \$105 million, which can be considered to represent the volume of re-exports and transit to the Russian Federation, although this does not by any means indicate that those goods are subject to sanctions. In addition, the representatives of the customs department explained to us that they check the compliance of the cargo with the sanctions policy even during the transit process.

We should not lose sight of the fact that after the "closing" of the Ukrainian channel, a certain part of the cargo entering Russia (primarily not sanctioned) was quite possible diverted towards Georgia.

To verify this hypothesis, we took re-export data from the international trade portal of the United Nations,⁸ where data on Georgia covers the period up to and including December 2022. Afterwards, we compared the aforementioned data with the corresponding data of the Russian Federation from March to December 2022. This period does not cover an entire year, but covers a full ten-month period before and after the start of the war.

From March to December 2022, \$102.8 million worth of re-exports were carried out from Georgia to the Russian Federation, which is 2.1 times higher than the figure of the same period of 2021 (\$48.9 million). These figures are very close to the difference shown in the diagram above, which confirms that re-exports are indeed what takes up the largest chunk of the difference between the data of Geostat and the Ministry of Finance.

The re-exports of light cars constitute 72 percent of that \$102.8 million, from March to December 2022. The re-export of light cars has increased five times compared to the same period in 2021. According to the Revenue Service of the Ministry of Finance of Georgia, the sanctions imposed by the EU and the USA include expensive cars, the value of which exceeds 50,000 Euros and 50,000 US Dollars, respectively. According to the agency, products of this category are subject to strict customs control.⁹ Therefore, we can consider that the increased re-export of light vehicles through Georgia comes as a result of the rearrangement of logistics connections.

11 percent of re-exports in the same period is water heating equipment. The re-export of these products has increased by 1.9 times compared to the same period in 2021. This flow, in our opinion, is also the result of logistical changes.

These two positions alone account for 83 percent of re-exports from March to December 2022. The remaining 17 percent is allocated to 118 commodities at the level of 4-digit code of the HS classifier. The volume of re-exports per position is \$0.15 million on average, and the average share in total re-exports is 0.15 percent. The detailed structure at the level of 4-digit codes of the re-export HS classifier according to commodity spectrum is given in Annex #4.

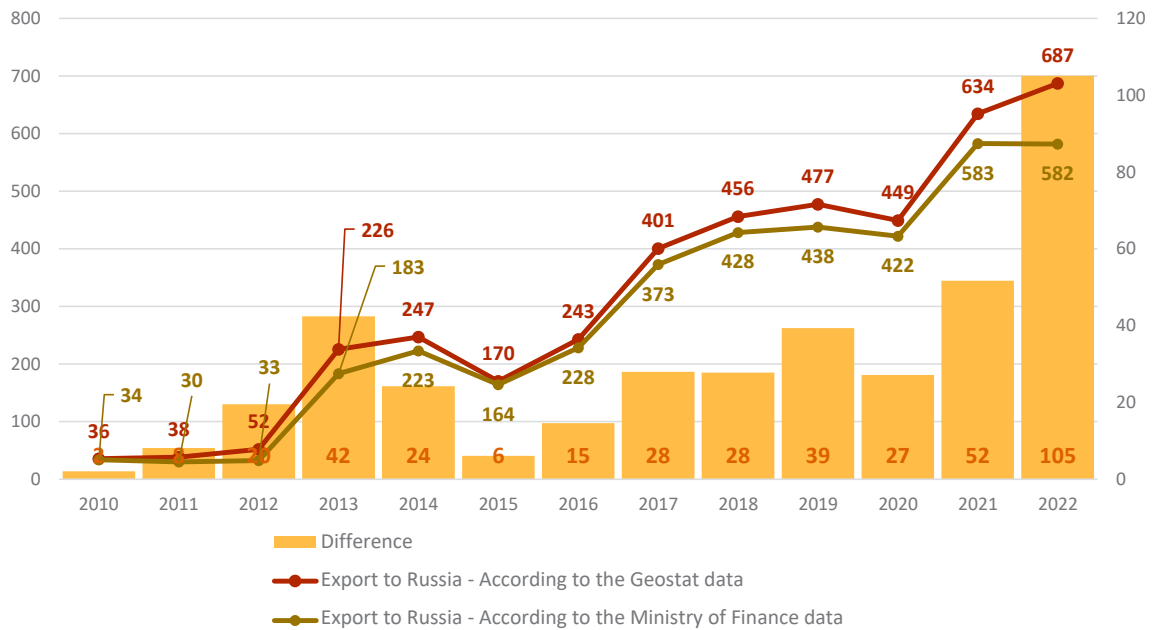
In the period from March to December 2022, the re-export of tobacco and medicinal goods significantly reduced compared to the previous year.

⁸ <https://comtradeplus.un.org/TradeFlow>

⁹ https://www.radiotavisupleba.ge/a/32370998.html?fbclid=IwAR0Ha2_Y8leCO1COMT9LXe1ZE4hYEkJE0KG04BAZ4Bwp8EJ2W_ea2-HQ9iA

Diagram 10

Annual dynamics of exports to the Russian Federation according to the data of the Ministry of Finance and Geostat (\$ million)

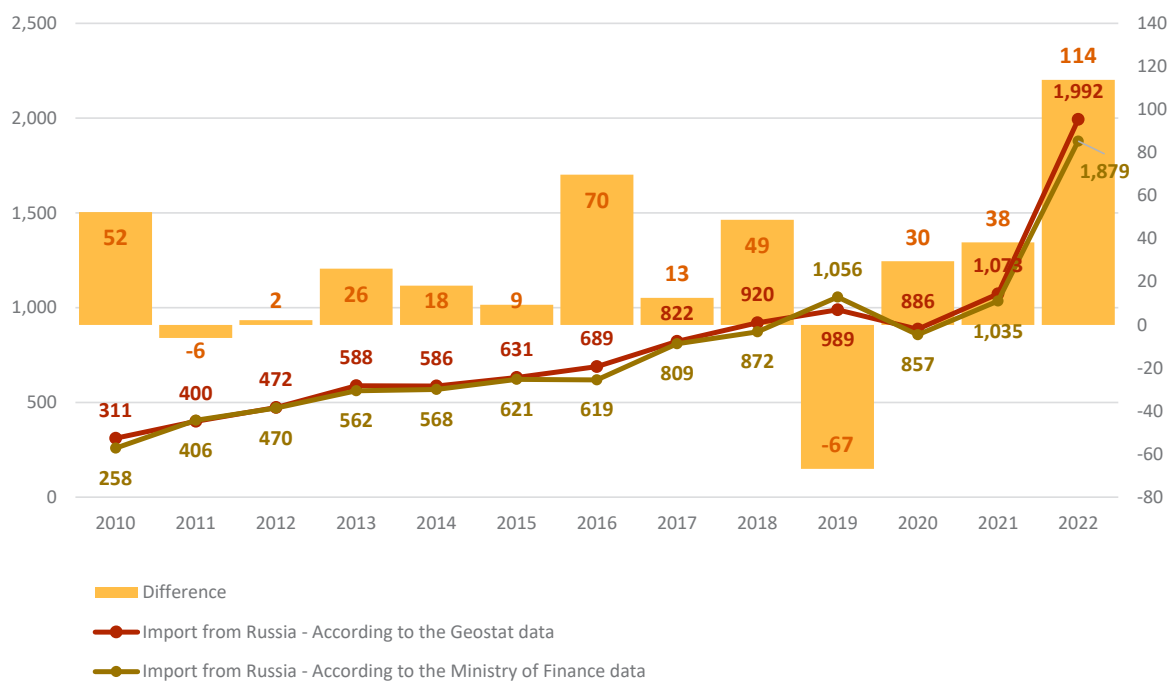


Source: Geostat, Ministry of Finance of Georgia, authors' calculations.

The comparative analysis of import data shows a similar picture. In the period from March 2022 to February 2023, the difference between the data of Geostat and the Ministry of Finance was \$114 million, which can be considered as the volume of re-imports and transit from Russia.

Diagram 11

Annual dynamics of imports from the Russian Federation according to the data of the Ministry of Finance and Geostat (\$ million)



Source: Geostat, Ministry of Finance of Georgia, authors' calculations.

According to the United Nations international trade portal, only \$0.6 million worth of goods were re-imported from Russia to Georgia from March to December 2022. Thus, the difference shown in the diagram above is most likely due to the transit expenditure of goods.

10

CONCLUSIONS

The results of the study allow us to arrive at the following conclusions:

1. Since the Russian aggression in Ukraine began in 2022, the total volume of exports from Georgia to the Russian Federation has hardly changed;
2. The structure of Georgian exports to Russia before and after the war is practically identical;
3. The export of ferroalloys plummeted, causing significant damage to the Georgian economy;
4. The outflow of traditional export goods - alcoholic and non-alcoholic beverages - has increased sharply;
5. The share of dual-use goods is only 0.2 percent of the total export, and its volume decreased by 23.6 percent as opposed to the compared period;
6. Imports from the Russian Federation rocketed after the start of the war, and its absolute majority is intended for the domestic market;
7. The import of ferrous metallurgy products from Russia increased dramatically, replacing the import of these products from Ukraine;
8. The import of petroleum products rose sharply;
9. The volume of re-export has increased, which can be considered as part of the rearrangement of logistics connections;
10. We have not detected any flow of exports from Georgia to the Russian Federation, or vice versa, aimed at circumventing the sanctions.

ANNEX #1

The distribution of goods exported from Georgia to Russia, sanctioned either by the EU or the USA, according to the 4-digit codes of the HS classifier, from March 2022 to February 2023

HS Code	Description	Million \$	Percent
2204	Wine of fresh grapes	164.68	66.282%
2208	Undenatured ethyl alcohol, spirits, liqueurs and other spirituous beverages	64.78	26.075%
2820	Manganese oxides	7.25	2.919%
2106	Other food preparations	2.51	1.009%
8703	Motor cars	1.91	0.770%
3302	Mixtures of odoriferous substances, of a kind used as raw materials in industry	1.74	0.700%
2939	Vegetable alkaloids, natural or reproduced by synthesis, and their derivatives	0.64	0.256%
8516	Electric instantaneous or storage water heaters, space and soil heating apparatus	0.61	0.245%
2203	Beer made from malt	0.57	0.230%
2103	Sauces and preparations therefor; mixed condiments and mixed seasonings	0.55	0.223%
8309	Stoppers, caps and lids and other packing accessories, of base metal	0.41	0.167%
6309	Worn clothing	0.36	0.146%
8607	Parts of railway or tramway locomotives or rolling-stock	0.31	0.124%
3304	Beauty or make-up preparations and preparations for the care of the skin	0.19	0.076%
3004	Medicaments put up in measured doses	0.17	0.070%
8421	Centrifuges; filtering or purifying machinery, for liquids or gases	0.15	0.060%
2909	Ethers, ether-alcohols and their halogenated	0.13	0.051%
2710	Petroleum and petroleum oils	0.13	0.051%
2402	Cigars, cheroots, cigarillos and cigarettes	0.13	0.050%
8450	Household or laundry-type washing machines	0.11	0.044%
6116	Gloves	0.10	0.042%
2821	Iron oxides and hydroxides; earth colours	0.08	0.032%
3203	Colouring matter of vegetable or animal origin	0.06	0.025%
2206	Other fermented beverages	0.06	0.025%
4811	Paper, paperboard, wadding and webs of cellulose fibres, in rolls or sheets	0.06	0.023%
3305	Preparations for use on the hair	0.05	0.022%
2930	Compounds with other nitrogen function	0.05	0.021%
8903	Yachts and other vessels for pleasure or sports	0.05	0.018%
3911	Petroleum resins, polyterpenes and other products, in primary forms	0.04	0.018%
7304	Tubes, pipes and hollow profiles, seamless, of iron or steel	0.04	0.017%
4907	Maps and hydrographic or similar charts of all kinds, printed	0.04	0.016%
8479	Machines and mechanical appliances having individual functions	0.04	0.015%
8462	Machine-tools for working metal by forging, hammering or die-stamping	0.04	0.014%
9026	Instruments for measuring or checking characteristics of liquids or gases	0.03	0.012%

HS Code	Description	Million \$	Percent
9619	Sanitary towels (pads) and tampons, napkins and napkin liners for babies, and similar articles, of any material	0.03	0.011%
8501	Electric motors and generators	0.02	0.010%
4819	Cartons and other packing containers, of paper, paperboard or cellulose	0.02	0.009%
8482	Ball or roller bearings	0.02	0.008%
2515	Marble, tufa, ecaussine and other calcareous monumental or building, alabaster	0.02	0.007%
3201	Tanning extracts of vegetable origin; tannins and their salts and other derivatives	0.02	0.007%
8528	Television receivers	0.02	0.007%
7311	Containers for gases, of iron or steel	0.02	0.006%
2905	Acyclic alcohols and their derivatives	0.02	0.006%
6909	Ceramic wares for laboratory, chemical or other technical uses	0.01	0.006%
0604	Foliage, branches and other parts of plants, for ornamental purposes	0.01	0.005%
8503	Parts suitable for use solely or principally with the electric motors	0.01	0.005%
2915	Saturated acyclic monocarboxylic acids and their anhydrides; their derivatives	0.01	0.005%
2001	Vegetables and other edible parts of plants, prepared or preserved	0.01	0.005%
8431	Parts suitable for use solely or principally with the hoisting machinery	0.01	0.005%
9025	Hydrometers and similar floating instruments and any combination of them	0.01	0.004%
3403	Lubricating preparations	0.01	0.004%
6204	Women's or girls' suits, ensembles, jackets, trousers and similar clothes	0.01	0.004%
8409	Parts suitable for use principally with the internal combustion piston engines	0.01	0.003%
4016	Other articles of vulcanised rubber	0.01	0.003%
6904	Ceramic building bricks, flooring blocks, support or filler tiles and the like	0.01	0.003%
6202	Women's or girls' overcoats, car-coats and similar articles	0.01	0.003%
3307	perfumery, cosmetic or toilet preparations	0.01	0.002%
7326	Other articles of iron or steel	0.01	0.002%
4707	Waste and scrap of paper or paperboard	0.00	0.002%
8504	Electrical transformers, static converters and inductors	0.00	0.002%
8307	Flexible tubing of base metal	0.00	0.002%
9405	Lamps and lighting fittings	0.00	0.002%
8708	Parts and accessories of the motor vehicles	0.00	0.002%
3809	Finishing agents, used in the textile, paper, leather or like industries	0.00	0.001%
6913	Statuettes and other ornamental ceramic articles	0.00	0.001%
3926	Other articles of plastics and articles of other materials	0.00	0.001%
8484	Gaskets and similar joints of metal sheeting	0.00	0.001%
8537	Boards, panels and other bases for electrical apparatus	0.00	0.001%
6102	Women's or girls' overcoats, car-coats, capes and similar articles	0.00	0.001%
6110	Jerseys, pullovers, cardigans and similar articles, knitted or crocheted	0.00	0.001%
6912	Tableware, other household articles and toilet articles, of ceramic	0.00	0.001%

HS Code	Description	Million \$	Percent
8466	Parts and accessories suitable for use with the different machine-tools	0.00	0.001%
8481	Taps, cocks, valves and similar appliances for pipes	0.00	0.001%
8477	Machinery for working rubber or plastics	0.00	0.001%
4203	Articles of apparel and clothing accessories, of leather or of composition leather	0.00	0.001%
9105	Other clocks	0.00	0.001%
5702	Carpets and other textile floor coverings, including hand-woven rugs	0.00	0.000%
7308	Structures and parts of structures of iron or steel	0.00	0.000%
4202	All kind of bags including camera, musical instrument and other cases	0.00	0.000%
7009	Glass mirrors	0.00	0.000%
6206	Women's or girls' blouses, shirts and shirt-blouses	0.00	0.000%
6104	Women's or girls' suits, jackets, shorts and other clothes, knitted or crocheted	0.00	0.000%
7320	Springs and leaves for springs, of iron or steel	0.00	0.000%
8536	Electrical apparatus for switching electrical circuits for a voltage not exceeding 1000	0.00	0.000%
6405	Other footwear	0.00	0.000%
7020	Other articles of glass	0.00	0.000%
6905	Ceramic building bricks, flooring blocks, support or filler tiles and the like	0.00	0.000%
6208	Women's or girls' singlets and other vests, slips and similar articles	0.00	0.000%
3906	Acrylic polymers in primary forms	0.00	0.000%
7610	Aluminium structures and parts of structures	0.00	0.000%
6106	Women's or girls' blouses, knitted or crocheted	0.00	0.000%
9701	Paintings, drawings and pastels, executed entirely by hand	0.00	0.000%
8471	Automatic data processing machines and units thereof	0.00	0.000%
3822	Composite diagnostic or laboratory reagents	0.00	0.000%
8519	Turntables, record- and cassette-players and other sound reproducing apparatus	0.00	0.000%
6217	Other made-up clothing accessories; parts of garments or of clothing accessories	0.00	0.000%
9601	Worked ivory, bone, horn and other animal carving material, and articles thereof	0.00	0.000%
8508	Vacuum cleaners	0.00	0.000%
9506	Articles and equipment for gymnastics, other sports or outdoor games	0.00	0.000%
8527	Reception apparatus for radio-telephony, radio-telegraphy	0.00	0.000%
7010	Carboys, bottles, flasks and other closures, of glass.	0.00	0.000%
3824	Prepared binders for foundry moulds or cores; chemical products and preparations	0.00	0.000%
8215	Spoons, forks, ladles, skimmers, cake-servers and similar kitchen or tableware	0.00	0.000%
8443	Printing machinery	0.00	0.000%
3214	Non-refractory surfacing preparations for walls, floors, ceilings or the like	0.00	0.000%
8512	Electrical lighting or signalling equipment, used for cycles or motor vehicles	0.00	0.000%
9504	Articles for funfair, table or parlour games (billiards, bowling)	0.00	0.000%
9307	Swords, cutlasses and similar arms and parts, scabbards and sheaths therefor	0.00	0.000%

ANNEX #2

The distribution of dual-use goods exported from Georgia to Russia, sanctioned either by the EU or the USA, according to the 4-digit codes of the HS classifier, from March 2022 to February 2023

HS Code	Description	Million \$	Percent
3404	Artificial waxes	0.75	0.129%
3910	Silicones in primary forms	0.06	0.010%
8903	Yachts and other vessels for pleasure or sports	0.05	0.008%
7304	Tubes, pipes and hollow profiles, seamless, of iron or steel	0.04	0.007%
8462	Machine-tools for working metal by forging, hammering or die-stamping	0.04	0.006%
8479	Machines and mechanical appliances having individual functions	0.03	0.005%
8482	Ball or roller bearings	0.02	0.003%
7311	Containers for gases, of iron or steel	0.02	0.003%
3403	Lubricating preparations	0.01	0.002%
8421	Centrifuges; filtering or purifying machinery, for liquids or gases	0.01	0.001%
8504	Electrical transformers, static converters and inductors	0.00	0.001%
3926	Other articles of plastics and articles of other materials	0.00	0.001%
8537	Boards, panels and other bases for electrical apparatus	0.00	0.000%
8466	Parts and accessories suitable for use with the different machine-tools	0.00	0.000%
8481	Taps, cocks, valves and similar appliances for pipes	0.00	0.000%
7306	Other tubes, pipes and hollow profiles, of iron or steel	0.00	0.000%
8471	Automatic data processing machines and units thereof	0.00	0.000%

ANNEX #3

The distribution of goods imported from Russia to Georgia, sanctioned either by the EU or the USA, according to the 4-digit codes of the HS classifier, from March 2022 to February 2023

HS Code	Description	Million \$	Percent
7306	Other tubes, pipes and hollow profiles, of iron or steel	7.71	0.410%
6815	Articles of stone or of other mineral substances	3.45	0.184%
8517	Telephone sets, including telephones for cellular networks or for other wireless networks	2.08	0.111%
3926	Other articles of plastics and articles of other materials	0.85	0.045%
7305	Other tubes and pipes, having circular cross-sections, of iron or steel	0.78	0.042%
8481	Taps, cocks, valves and similar appliances for pipes	0.77	0.041%
8413	Pumps for liquids, liquid elevators	0.61	0.032%
9405	Lamps and lighting fittings	0.57	0.030%
8537	Boards, panels and other bases for electrical apparatus	0.57	0.030%
8430	Other moving, grading, extracting or boring machinery, for earth, minerals or ores	0.49	0.026%
8479	Machines and mechanical appliances having individual functions	0.46	0.025%
7304	Tubes, pipes and hollow profiles, seamless, of iron or steel	0.34	0.018%
8414	Air or vacuum pumps, air or other gas compressors and fans	0.24	0.013%
3921	Other plates, film, foil and strip, of plastics	0.22	0.011%
3819	Hydraulic brake fluids and other prepared liquids, obtained from bituminous minerals	0.20	0.011%
7019	Glass fibres and articles thereof	0.18	0.010%
7307	Tube or pipe fittings, of iron or steel	0.17	0.009%
8419	Machinery, plant or laboratory equipment, whether or not electrically heated	0.13	0.007%
8429	Self-propelled bulldozers, graders, levellers, scrapers, tamping machines	0.12	0.006%
8903	Yachts and other vessels for pleasure or sports	0.11	0.006%
7310	Tanks, and similar containers, for any material, of iron or steel	0.11	0.006%
2930	Organo-sulphur compounds	0.10	0.005%
9031	Measuring or checking instruments, profile projectors	0.07	0.004%
8428	Other lifting, handling, loading or unloading machinery	0.07	0.004%
9030	Oscilloscopes, and other measuring or checking electrical quantities	0.06	0.003%
7219	Flat-rolled products of stainless steel, of a width of 600 mm or more	0.05	0.003%
8482	Ball or roller bearings	0.05	0.003%
8504	Electrical transformers, static converters and inductors	0.05	0.003%
8515	Electric, laser or other light or photon beam machines	0.04	0.002%
7311	Containers for gases, of iron or steel	0.04	0.002%
8421	Centrifuges; filtering or purifying machinery, for liquids or gases	0.04	0.002%
8456	Machine-tools for working any material by removal of material	0.04	0.002%
5407	Woven fabrics of synthetic filament yarn	0.03	0.002%
8543	Electrical machines and apparatus, having individual functions	0.03	0.002%
8471	Automatic data processing machines and units thereof	0.03	0.002%
8514	Industrial or laboratory electric furnaces and ovens	0.03	0.002%
8461	Machine-tools for planing, shaping, slotting and similar	0.03	0.002%

HS Code	Description	Million \$	Percent
3911	Petroleum resins, polyterpenes and other products, in primary forms	0.03	0.001%
9027	Instruments and apparatus for physical or chemical analysis	0.02	0.001%
8466	Parts and accessories suitable for use with the different machine-tools	0.01	0.001%
8207	Interchangeable tools for hand tools, whether or not power-operated	0.01	0.001%
8464	Machine-tools for working stone, ceramics, concrete, or like mineral materials	0.01	0.000%
3404	Artificial waxes	0.01	0.000%
9506	Articles and equipment for gymnastics, other sports or outdoor games	0.01	0.000%
3910	Silicones in primary forms	0.01	0.000%
3403	Lubricating preparations	0.01	0.000%
5903	Textile fabrics impregnated, coated, covered or laminated with plastics	0.01	0.000%
9022	Apparatus based on the use of radiations	0.01	0.000%
8463	Other machine-tools for working metal, sintered metal carbides or cermets	0.01	0.000%
8542	Electronic integrated circuits and microassemblies	0.00	0.000%
8525	Transmission apparatus for radio-telephony, radio-telegraphy	0.00	0.000%
5607	Twine, cordage, ropes and cables	0.00	0.000%
8802	Other aircraft; spacecraft and spacecraft launch vehicles	0.00	0.000%
8505	Electro-magnets, clamps and similar holding devices	0.00	0.000%
8536	Electrical apparatus for switching electrical circuits for a voltage not exceeding 1000	0.00	0.000%
7309	Reservoirs, tanks, vats and similar containers for any material, of iron or steel	0.00	0.000%
8460	Machine-tools for deburring, sharpening, grinding	0.00	0.000%
8502	Electric generating sets and rotary converters	0.00	0.000%
9013	Liquid crystal devices, lasers, other optical appliances and instruments	0.00	0.000%
8541	Diodes, transistors and similar semiconductor devices	0.00	0.000%
8507	Electric accumulators, including separators therefor, whether or not rectangular	0.00	0.000%
5509	Yarn of synthetic staple fibres, not put up for retail sale	0.00	0.000%
8462	Machine-tools for working metal by forging, hammering or die-stamping	0.00	0.000%
9020	Other breathing appliances and gas masks	0.00	0.000%
9014	Compasses; other navigational instruments and appliances	0.00	0.000%
8506	Primary cells and primary batteries.	0.00	0.000%
7303	Tubes, pipes and hollow profiles, of cast iron	0.00	0.000%

ANNEX #4

The distribution of goods re-exported from Georgia to Russia, according to the 4-digit codes of the HS classifier, from March 2022 to December 2022

HS Code	Description	Million \$	Percent
8703	Motor cars	73.89	71.890%
8516	Electric instantaneous or storage water heaters, space and soil heating apparatus	11.22	10.922%
3302	Mixtures of odoriferous substances, of a kind used as raw materials in industry	1.73	1.685%
0805	Citrus fruit, fresh or dried	1.69	1.643%
2402	Cigars, cheroots, cigarillos and cigarettes	1.18	1.144%
8704	Motor vehicles for the transport of goods	1.14	1.112%
7202	Ferro-alloys	1.01	0.984%
8701	Tractors	0.89	0.870%
0801	Coconuts, Brazil nuts and cashew nuts, fresh or dried	0.84	0.821%
0901	Coffee; coffee husks and skins; coffee substitutes	0.79	0.768%
0808	Apples, pears and quinces, fresh	0.66	0.643%
9018	Instruments and appliances used in medicine	0.58	0.565%
8302	Base metal mountings, fittings and similar articles	0.50	0.483%
0803	Bananas	0.43	0.423%
1202	Ground-nuts, not roasted or otherwise cooked	0.42	0.406%
2829	Chlorates and perchlorates; bromates and perbromates; iodates and periodates	0.41	0.398%
3701	Photographic plates and film in the flat, unexposed	0.38	0.370%
9619	Sanitary towels (pads) and tampons, napkins and napkin liners for babies, and similar articles, of any material	0.37	0.361%
9021	Orthopaedic appliances and artificial parts of the body	0.33	0.316%
2309	Preparations of a kind used in animal feeding	0.30	0.293%
0303	Fish, frozen	0.24	0.232%
3305	Preparations for use on the hair	0.23	0.222%
6802	Worked stone and articles thereof, mosaic cubes and the like, of natural stone	0.17	0.163%
3917	Tubes, pipes and hoses, and fittings therefor, of plastics	0.16	0.159%
9022	Apparatus based on the use of radiations	0.16	0.152%
2710	Petroleum and petroleum oils	0.15	0.144%
0802	Hazelnuts and other nuts	0.14	0.140%
2202	Waters, mineral and aerated waters, containing added sugar	0.14	0.135%
8422	Dish washing machines; and similar machinery	0.14	0.135%
6805	Natural or artificial abrasive powder or grain	0.13	0.127%
3702	Photographic film in rolls, sensitised, unexposed, of any material	0.12	0.119%
2208	Undenatured ethyl alcohol, spirits, liqueurs and other spirituous beverages	0.12	0.119%
2403	Other manufactured tobacco and tobacco substitutes; tobacco extracts and essences	0.12	0.118%
8711	Motorcycles and cycles fitted with an auxiliary motor; side-cars	0.12	0.114%

HS Code	Description	Million \$	Percent
9504	Articles for funfair, table or parlour games (billiards, bowling)	0.11	0.108%
4402	Wood charcoal	0.11	0.104%
8418	Refrigerators, freezers and other refrigerating or freezing equipment	0.10	0.099%
4014	Hygienic or pharmaceutical articles, of vulcanised rubber	0.10	0.094%
8518	Microphones and stands therefor	0.09	0.086%
2201	Waters, natural or artificial mineral and aerated waters, not containing added sugar	0.08	0.078%
1509	Olive oil and its fractions, whether or not refined	0.07	0.072%
8438	Machinery for the industrial preparation or manufacture of food or drink	0.07	0.071%
3707	Chemical preparations for photographic uses	0.07	0.069%
8450	Household or laundry-type washing machines	0.06	0.061%
7312	Stranded wire, ropes, cables, plaited bands, and the like, of iron or steel	0.06	0.061%
3506	Prepared glues and other prepared adhesives	0.06	0.061%
8509	Electro-mechanical domestic appliances	0.06	0.057%
2915	Saturated acyclic monocarboxylic acids and their anhydrides; their derivatives	0.05	0.052%
2204	Wine of fresh grapes	0.05	0.047%
0709	Other vegetables,	0.05	0.044%
0710	Vegetables, frozen	0.04	0.035%
2203	Beer made from malt	0.03	0.032%
3919	Self-adhesive plates, sheets, film, foil, tape, and other flat shapes, of plastics	0.03	0.030%
2009	Fruit and vegetable juices	0.03	0.030%
8483	Transmission shafts and cranks	0.03	0.028%
8203	Files, rasps, pliers, shears and similar hand tools	0.03	0.027%
0702	Tomatoes, fresh or chilled.	0.03	0.027%
8414	Air or vacuum pumps, air or other gas compressors and fans	0.03	0.027%
3004	Medicaments put up in measured doses	0.03	0.026%
8508	Vacuum cleaners	0.02	0.024%
8462	Machine-tools for working metal by forging, hammering or die-stamping	0.02	0.023%
8522	Parts and accessories of audio or video apparatus	0.02	0.023%
7323	Table, kitchen or other household articles and parts thereof, of iron or steel	0.02	0.022%
8460	Machine-tools for deburring, sharpening, grinding	0.02	0.020%
9015	Surveying, hydrographic, meteorological, geophysical and the like instruments	0.02	0.019%
0810	Other fruit, fresh	0.02	0.019%
8456	Machine-tools for working any material by removal of material	0.02	0.018%
8702	Motor vehicles for the transport of ten or more persons	0.02	0.018%
9026	Instruments for measuring or checking characteristics of liquids or gases	0.02	0.017%
3303	Perfumes and toilet waters	0.02	0.016%
0704	Cabbages, cauliflowers, kohlrabi, kale and similar edible brassicas	0.02	0.016%
8716	Trailers; other vehicles, not mechanically propelled; parts thereof	0.02	0.015%

HS Code	Description	Million \$	Percent
2401	Unmanufactured tobacco; tobacco refuse	0.01	0.013%
9607	Slide fasteners and parts thereof	0.01	0.013%
1302	Vegetable saps and extracts	0.01	0.013%
6912	Tableware, other household articles and toilet articles, of ceramic	0.01	0.012%
9025	Hydrometers and similar floating instruments and any combination of them	0.01	0.011%
5515	Other woven fabrics of synthetic staple fibres	0.01	0.011%
7326	Other articles of iron or steel	0.01	0.010%
9027	Instruments and apparatus for physical or chemical analysis	0.01	0.009%
8528	Television receivers	0.01	0.008%
8306	Bells and the like, non-electric, statuettes and other ornaments, mirrors of base metal	0.01	0.006%
8208	Knives, for machines or for mechanical appliances	0.01	0.006%
6204	Women's or girls' suits, ensembles, jackets, trousers and similar clothes	0.01	0.005%
3926	Other articles of plastics and articles of other materials	0.00	0.003%
8542	Electronic integrated circuits and microassemblies	0.00	0.002%
9017	Drawing, marking-out or mathematical calculating instruments	0.00	0.002%
8543	Electrical machines and apparatus, having individual functions	0.00	0.002%
4202	All kind of bags including camera, musical instrument and other cases	0.00	0.002%
8517	Telephone sets, including telephones for cellular networks or for other wireless networks	0.00	0.002%
9029	Revolutions counters, production counters, taximeters and the like	0.00	0.002%
8708	Parts and accessories of the motor vehicles	0.00	0.001%
8471	Automatic data processing machines and units thereof	0.00	0.001%
8504	Electrical transformers, static converters and inductors	0.00	0.001%
8525	Transmission apparatus for radio-telephony, radio-telegraphy	0.00	0.001%
8510	Shavers and hair clippers, with self-contained electric motor	0.00	0.001%
6302	Linen for Bed, table, toilet and kitchen	0.00	0.001%
4203	Articles of apparel and clothing accessories, of leather or of composition leather	0.00	0.001%
6211	Track suits, ski suits and swimwear	0.00	0.001%
7020	Other articles of glass	0.00	0.001%
8537	Boards, panels and other bases for electrical apparatus	0.00	0.001%
6506	Other headgear	0.00	0.000%
8481	Taps, cocks, valves and similar appliances for pipes	0.00	0.000%
5703	Carpets and other textile floor coverings, tufted	0.00	0.000%
8409	Parts suitable for use principally with the internal combustion piston engines	0.00	0.000%
4016	Other articles of vulcanised rubber	0.00	0.000%
8544	Insulated wire, cable and other insulated electric conductors	0.00	0.000%
6304	Other furnishing articles	0.00	0.000%
6109	T-shirts and other vests, knitted or crocheted	0.00	0.000%

HS Code	Description	Million \$	Percent
8484	Gaskets and similar joints of metal sheeting	0.00	0.000%
4415	Packing cases, boxes, drums and similar packings, cable-drums, pallets of wood	0.00	0.000%
9032	Automatic regulating or controlling instruments and apparatus	0.00	0.000%
8512	Electrical lighting or signalling equipment, used for cycles or motor vehicles	0.00	0.000%
8467	Tools for working in the hand, pneumatic or with self-contained motor	0.00	0.000%
3924	Tableware, kitchenware, other household and toilet articles of plastics	0.00	0.000%
8309	Stoppers, caps and lids and other packing accessories, of base metal	0.00	0.000%
6203	Men's or boys' suits, ensembles, trousers, and shorts	0.00	0.000%
6812	Asbestos fibres; mixtures with a basis of it or magnesium carbonate; there articles	0.00	0.000%
8507	Electric accumulators, including separators therefor, whether or not rectangular	0.00	0.000%
8539	Electric filament or discharge lamps, arc-lamps	0.00	0.000%

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- 5 <https://ofac.treasury.gov/sanctions-programs-and-country-information>
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- 7 <https://www.trade.gov/russia-sanctions-and-export-controls>
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