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Answer given by Ms Albuquerque
on behalf of the European Commission
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Addressing circumvention of sanctions, which is now a crime under EU law, is a key priority for the EU. The Commission monitors trade flows, especially goods on Common High Priority (CHP)¹ and Economically Critical Goods (ECG)² lists, from EU to third countries considered to be at high risk of being used as a platform for circumvention, and from these countries to Russia. The EU has several anti-circumvention tools at its disposal. These include imposing sanctions on individuals and entities facilitating circumvention of EU sanctions³; strengthening export controls towards entities involved in the circumvention of sensitive items to Russia⁴; or the prohibition on export of sensitive goods to a country whose jurisdiction is used to circumvent EU sanctions⁵.

Jurisdictions monitored include Georgia. Latest data from Georgian authorities indicate that no exports of CHP items from Georgia to Russia were reported between January 2024 and October 2025. In November 2025, Georgia committed to halt re-export of ECG. Nonetheless, re-export of these items from Georgia to Russia remains a concern for EU and the Commission has called on Georgia to step up efforts to prevent that its territory or operators are used to circumvent EU sanctions. As a candidate country, Georgia is subject to heightened expectations and scrutiny regarding its alignment with EU acquis, including Common Foreign and Security Policy and EU restrictive measures. As a result of the Georgian authorities' course of action, leading to democratic backsliding and human rights violations, Georgia's EU accession process has come to a standstill. The Commission will continue rigorous monitoring of the situation on the ground and targeted outreach on the issue of sanctions circumvention.

¹ https://finance.ec.europa.eu/publications/list-common-high-priority-items_en.

² https://finance.ec.europa.eu/publications/list-economically-critical-goods_en.

³ As per Council Decision 2014/145/CFSP and Council Regulation (EU) No 269/2014.

⁴ Annex IV of Council Regulation (EU) No 833/2014.

⁵ Article 12f of Council Regulation (EU) No 833/2014.