



Analysis of U.S. Trade with Belarus, 2022

Summary

Imports and exports reported by U.S. Census Bureau¹

In 2022, both U.S. exports to Belarus and imports from Belarus shrank significantly from 2021. U.S. exports totaled \$40.1 million, a decrease of 81.6% (\$178.0 million), and U.S. imports totaled \$208.9 million, a decrease of 56.4% (\$270.3 million). The trade deficit was \$168.7 million, decreasing 35.4% (\$92.3 million) from 2021.

In 2022, 0.002% of total U.S. global exports of \$2.1 trillion were exported to Belarus and 0.01% of total U.S. imports of \$3.2 trillion from all countries were imported from Belarus.

In 2022, \$14.0 million of U.S. exports of Transportation Equipment to Belarus represented 0.01% of U.S. global exports of those commodities.

In 2022, \$107.6 million of U.S. imports of Chemicals, Plastics, Rubber, and Leather Goods from Belarus constituted 0.02% of the total U.S. imports of those commodities.

BIS export data²

In 2022, U.S. exports to Belarus made under a BIS license exception totaled \$20,711, a decrease of 98.2% from \$1.2 million in 2021.

In 2022, the top license exception utilized under the Export Administration Regulations (EAR) was Encryption commodities, software, and technology (ENC), totaled at \$20,711 (100% of all license exceptions for Belarus).

¹ Export data in this section refers to trade in “goods” as defined by the U.S. Census: “Merchandise, supplies, raw materials, and products or any other item identified by a Harmonized System (HS) code.” Such data does not capture trade in technologies (e.g., exports made as transmissions or transfers); nor does it capture reexports of US-origin goods or technologies from another country. Nor does it include deemed exports or reexports. <https://www.census.gov/foreign-trade/reference/definitions/index.html#goods>.

² Export data in this section is derived from Automated Export System (AES) filings. Data in this section refers to the export of commodities, software, and technology subject to the Export Administration Regulations (EAR) and regulated as “items.” The data includes exports whether made under a license or a license exception. Such data does not capture trade in technologies (e.g., exports made as transmissions or transfers), nor does it capture reexports of US-origin goods from a third country. Nor does it include deemed exports or deemed reexports.



Analysis of U.S. Trade with Belarus, 2022

BIS licensing data³

In 2022, the number of export license applications for Belarus, excluding applications for deemed⁴ exports, amounted to 0.1% of total applications worldwide.

In 2022, for applications involving commodities, software, and technology (excluding deemed exports and reexports of technology and source code to Belarusian nationals in the U.S. or in a third country), BIS reviewed 39 export/re-export license applications valued at \$825.0 million for Belarus. BIS returned 30 license applications without action (RWA) and denied five license applications. BIS approved 4 applications valued at \$9.3 million for an approval rate of 10.3%.

In 2022, BIS reviewed 2 applications for deemed exports or reexports involving Belarusian nationals, representing 0.1% of total deemed export or reexport applications worldwide. BIS approved both of these applications (an approval rate of 100%).

In 2022, the top approved ECCNs on licenses for Belarus were EAR99 for Items subject to the EAR that are not elsewhere specified in this CCL with 4 approvals, followed by 3E001 for “Technology” according to the General Technology Note for the “development” or “production” of commodities controlled by 3A (except 3A980, 3A981, 3A991, 3A992, or 3A999), 3B (except 3B991 or 3B992) or 3C (except 3C992) with 2 approvals, and 3D002 for Software” “specially designed” for the “use” of equipment controlled by 3B001.a to .f, or 3B002 equipment with 1 approval.

In 2022, the average processing time for applications involving Belarus was 45 calendar days.

³ Licensing data in this section is drawn from BIS internal systems. Data pertains to applications for export and/or reexport licenses and their associated outcomes. Reexport and export licenses and applications are not differentiated in this report; therefore, references to export licenses or applications should be interpreted as inclusive of reexport licenses and applications as well. All licensing figures include cases of deemed export and/or deemed reexport, unless otherwise noted.

⁴ Deemed exports are defined in 734.13(b) of the EAR: “Any release in the United States of “technology” or source code to a foreign person is a deemed export to the foreign person's most recent country of citizenship or permanent residency.”

<https://www.ecfr.gov/current/title-15/subtitle-B/chapter-VII/subchapter-C/part-734/section-734.13>



Analysis of U.S. Trade with Belarus, 2022

I. Total U.S. trade in goods with Belarus⁵

In 2022, both U.S. exports to Belarus and imports from Belarus shrank significantly from 2021. U.S. exports totaled \$40.1 million, a decrease of 81.6% (\$178.0 million), and U.S. imports totaled \$208.9 million, a decrease of 56.4% (\$270.3 million). The trade deficit was \$168.7 million, decreasing 35.4% (\$92.3 million) from 2021.



In 2022, the level of U.S. exports to Belarus and U.S. imports from Belarus in goods, merchandise, and commodities as well as the trade deficit with Belarus were less than the prior five-year average level by value (not adjusted for inflation).

	2017	2018	2019	2020	2021	2022	2017-2021 Average
EXPORTS	\$72.7	\$132.5	\$125.1	\$121.9	\$218.1	\$40.1	\$134.1
Δvalue	--	\$59.8	-\$7.3	-\$3.2	\$96.2	-\$178.0	
Δpct	--	82.3%	-5.5%	-2.5%	78.9%	-81.6%	
IMPORTS	\$277.5	\$396.5	\$380.0	\$333.1	\$479.2	\$208.9	\$373.3
Δvalue	--	\$119.0	-\$16.5	-\$46.9	\$146.1	-\$270.3	
Δpct	--	42.9%	-4.2%	-12.4%	43.9%	-56.4%	
BALANCE	\$(204.9)	\$(264.0)	\$(254.9)	\$(211.1)	\$(261.1)	\$(168.7)	\$(239.2)
Δvalue	--	(\$59.2)	\$9.2	\$43.8	(\$50.0)	\$92.3	
Δpct	--	28.9%	-3.5%	-17.2%	23.7%	-35.4%	

Values in Millions of U.S. Dollars. Source: U.S. Census Bureau USA Trade Portal August 30, 2023

⁵ Export data in this section refers to trade in “goods” as defined by the U.S. Census: “Merchandise, supplies, raw materials, and products or any other item identified by a Harmonized System (HS) code.” Such data does not capture trade in technologies (e.g., exports made as transmissions or transfers); nor does it capture reexports of US-origin goods or technologies from another country. Nor does it include deemed exports or reexports. <https://www.census.gov/foreign-trade/reference/definitions/index.html#goods>.



Analysis of U.S. Trade with Belarus, 2022

In 2022, of \$40.1 million in U.S. exports to Belarus, the top commodity sectors were Transportation Equipment (35.0% of the total exports to the country), Machinery & Mechanical Appliances (20.0% of such total), and Optical, Measuring, Medical, Other Instruments (17.3% of such total).

In 2022, of \$208.9 million in U.S. imports from Belarus, the top commodity sectors were Chemicals, Plastics, Rubber, and Leather Goods (51.5% of the total U.S imports from the country), Base Metals, Iron, Steel, Tools (16.0% of such total) and Wood, Cork, Paper, Printed Books (12.7% of such total).

Imports from Belarus By Sector	Belarus Commodity Trade 2022	US Exports to Belarus by Sector
\$208,875,834	Total Value All Commodities	\$40,129,364
3.9%	Agriculture Products (Chapters 01-24)	1.2%
0.1%	Oils, Minerals, Lime, Cement (Chapters 25-27)	0.2%
51.5%	Chemicals, Plastics, Rubber, Leather Goods (Chapters 28-43)	9.8%
12.7%	Wood, Cork, Paper, Printed Books (Chapters 44-49)	0.4%
3.0%	Textiles, Footwear, Headgear (Chapters 50-67)	0.5%
0.2%	Stone, Glass, Metals, Pearls (Chapters 68-71)	13.4%
16.0%	Base Metals, Iron, Steel, Tools (Chapters 72-83)	1.6%
2.3%	Machinery & Mechanical Appliances (Chapters 84-85)	20.0%
0.1%	Transportation Equipment (Chapters 86-89)	35.0%
5.6%	Optical, Measuring, Medical, Other Instruments (Chapters 90-92)	17.3%
0.0%	Arms & Ammunition (Chapter 93)	0.0%
3.6%	Miscellaneous Manufactured Items (Chapters 94-96)	0.3%
0.1%	Art, Collectors' Pieces, Antiques (Chapter 97)	0.0%
0.4%	Special Classification Items (Chapter 98)	0.4%
0.6%	Temporary Legislation (Chapter 99)	0.0%

Source: U.S. Census Bureau USA Trade Portal August 30, 2023

In 2022, 0.002% of total U.S. global exports of \$2.1 trillion were exported to Belarus and 0.01% of total U.S. imports of \$3.2 trillion from all countries were imported from Belarus.

Exports

In 2022, \$14.0 million of U.S. exports of transportation equipment to Belarus represented 0.01% of U.S. global exports of those commodities. Additionally, \$8.0 million of exports of Machinery & Mechanical Appliances represented 0.002%, and \$6.9 million of Optical, Measuring, Medical, Other Instruments represented 0.01% of U.S. global exports of those commodities.

Imports

In 2022, \$107.6 million of U.S. imports of Chemicals, Plastics, Rubber, and Leather Goods from Belarus constituted 0.02% of the total U.S. imports of those commodities. Additionally, \$33.4 million of imports of Base Metals, Iron, Steel, Tools represented 0.02%, and the \$26.6 million of imports wood, cork, paper, printed books represented 0.04% of the global U.S. imports of those commodities.



Analysis of U.S. Trade with Belarus, 2022

II. U.S. Exports to Belarus Subject to BIS Export Controls⁶

In 2022, of the \$40.1 million⁷ in U.S. exports to Belarus:

- \$10,000, or 1.2% of the total value, were exported under a BIS license;
- \$20,711, or 0.1% of the total value, were exported under a BIS license exception;
- \$0.5 million, or 1.1%, were exported under No License Required (NLR) reporting an ECCN⁸;

For comparison, globally:

- 0.4% of U.S. exports by dollar value were exported under a BIS license;
- 0.8% were exported under a BIS license exception;
- 9.6% of exports were exported under NLR reporting an ECCN;

Belarus				
		2020	2021	2022
	Licensed by BIS	\$0.1	\$0.1	\$0.01
	BIS License Exceptions	\$3.8	\$1.2	\$0.02
	NLR reporting an ECCN [8]	\$7.1	\$59.1	\$0.4
	NLR DY6 600-Series .y subparagraph [9]	\$0.0	\$0.0	\$0.0
	NLR YFA 0A501 .y subparagraph firearms [10]	\$0.0	\$0.0	\$0.0

Values in Millions of U.S. Dollars. Source: Automated Export System February 15, 2023

Reasons for Control	Chemical and Biological Weapons			Nuclear Nonproliferation		National Security		Missile Tech	Regional Stability		Firearms Convention	Crime Control			Anti-Terrorism	
	CB:1	CB:2	CB:3	NP:1	NP:2	NS:1	NS:2	MT:1	RS:1	RS:2	FC:1	CC:1	CC:2	CC:3	AT:1	AT:2
Belarus	X	X	X	X	X	X	X	X	X	X		X	X			

⁶ Unless otherwise specified, export data in this section is derived from Automated Export System (AES) filings. Data in this section refers to the export of commodities, software, and technology subject to the Export Administration Regulations (EAR) and regulated as “items.” The data includes exports whether made under a license or a license exception. Such data does not capture trade in technologies (e.g., exports made as transmissions or transfers), nor does it capture reexports of US-origin goods from a third country. Nor does it include deemed exports or deemed reexports.

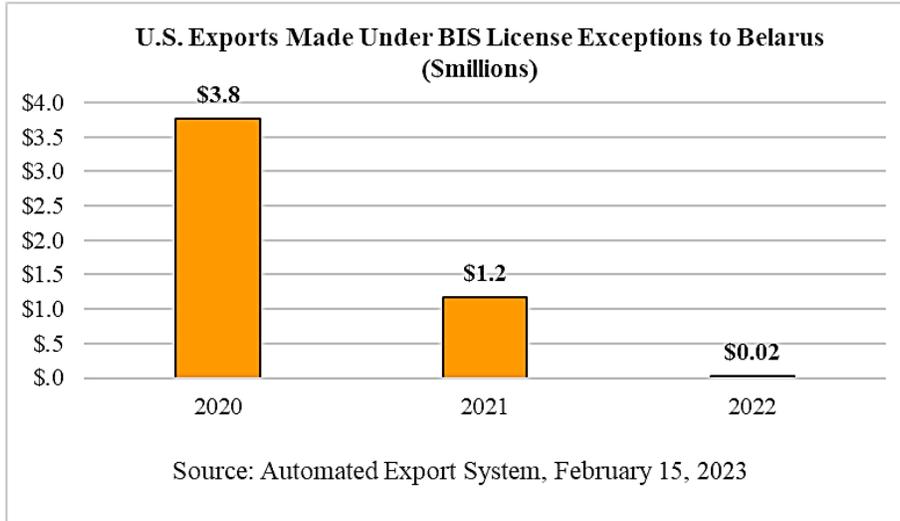
⁷ This figure is reported by the U.S. Census Bureau. “Total exports” refers to “goods” as defined by the U.S. Census: “Merchandise, supplies, raw materials, and products or any other item identified by a Harmonized System (HS) code.” Such data does not capture trade in technologies (e.g., exports and imports made as transmissions or transfers), nor does it capture reexports of US-origin goods from another country <https://www.census.gov/foreign-trade/reference/definitions/index.html#goods>.

⁸ Line items reported in AES as license type C33 with an ECCN. Excludes items classified as EAR99.

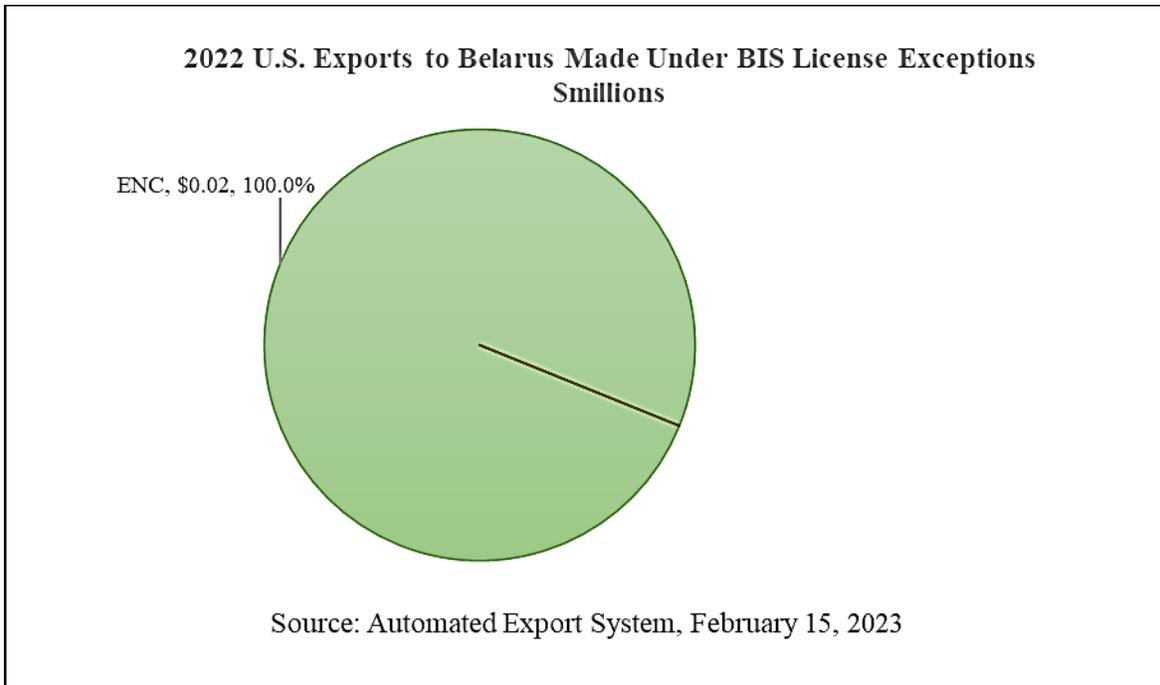


Analysis of U.S. Trade with Belarus, 2022

In 2022, U.S. exports to Belarus made under a BIS license exception totaled \$20,711, a decrease of 98.2% from \$1.2 million in 2021.



In 2022, the top license exception, Encryption commodities, software, and technology (ENC), totaled at \$20,711 (100% of all license exceptions for Belarus).

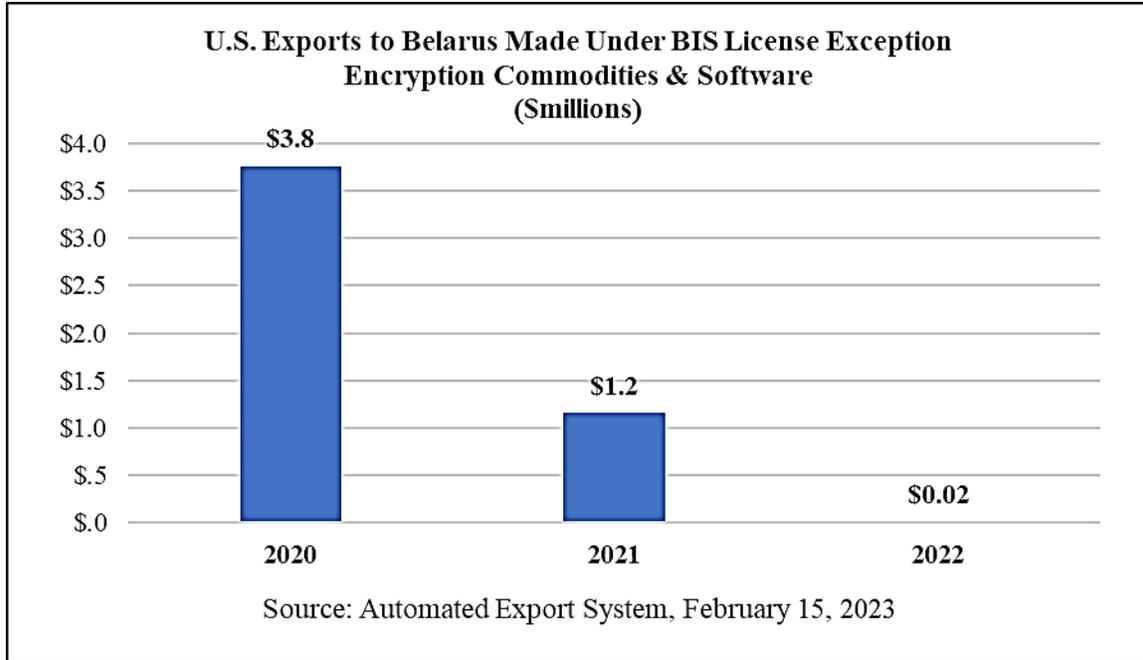


ENC: Encryption commodities, software, and technology



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In 2022, U.S. exports to Belarus shipped under BIS license exception ENC totaled \$20,711, a 98.2% decrease from \$1.2 million in 2021.





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Top ECCNs Reported on Exports to Belarus, by aggregate shipment value (\$millions)		
LICENSED	#1	1C351 Human and animal pathogens and "toxins," as follows (see List of Items

Note: ECCN descriptions have been truncated: please review Commerce Control List for full description

Top ECCNs Reported on Exports to Belarus, by aggregate shipment value (\$millions)		
EXCEPTIONS	#1	5A002 "Information security" systems, equipment and "components," as follows

Note: ECCN descriptions have been truncated: please review Commerce Control List for full description

Top ECCNs Reported on Exports to Belarus, by aggregate shipment value (\$millions)		
NLR with ECCN	#1	7A994 Other navigation direction finding equipment, airborne communication e
	#2	3A999 Specific Processing Equipment, n.e.s., as Follows (See List of Items C
	#3	9A991 "Aircraft," n.e.s., and gas turbine engines not controlled by 9A001 or
	#4	3A991 Electronic devices, and "components" not controlled by 3A001.
	#5	1A999 Specific Processing Equipment, n.e.s., as Follows (See List of Items C
	#6	7E994 "Technology", n.e.s., for the "development", "production", or "use" of
	#7	5A991 Telecommunication equipment, not controlled by 5A001 (see List of Item
	#8	4A994 Computers, "electronic assemblies" and related equipment not controlle
	#9	3B991 Equipment not controlled by 3B001 for the manufacture of electronic "p
	#10	2B999 Specific Processing Equipment, n.e.s., as Follows (See List of Items C

Note: ECCN descriptions have been truncated: please review Commerce Control List for full description

Source: Automated Export System



Analysis of U.S. Trade with Belarus, 2022

LICENSED	Top ECCNs Reported on Exports to Belarus, by shipment count [1]		
	#1	1C351	Human and animal pathogens and "toxins," as follows (see List of Items

Note: ECCN descriptions have been truncated: please review Commerce Control List for full description

EXCEPTIONS	Top ECCNs Reported on Exports to Belarus, by shipment count [1]		
	#1	5A002	"Information security" systems, equipment and "components," as follows

Note: ECCN descriptions have been truncated: please review Commerce Control List for full description

NLR with ECCN	Top ECCNs Reported on Exports to Belarus, by shipment count [1]		
	#1	3A991	Electronic devices, and "components" not controlled by 3A001.
	#2	9A991	"Aircraft," n.e.s., and gas turbine engines not controlled by 9A001 or
	#3	7A994	Other navigation direction finding equipment, airborne communication e
	#4	1A999	Specific Processing Equipment, n.e.s., as Follows (See List of Items C
	#5	5A991	Telecommunication equipment, not controlled by 5A001 (see List of Item
	#6	7E994	"Technology", n.e.s., for the "development", "production", or "use" of
	#7	2B999	Specific Processing Equipment, n.e.s., as Follows (See List of Items C
	#8	3A992	General purpose electronic equipment not controlled by 3A002.
	#9	3A999	Specific Processing Equipment, n.e.s., as Follows (See List of Items C
	#10	3B991	Equipment not controlled by 3B001 for the manufacture of electronic "p

Note: ECCN descriptions have been truncated: please review Commerce Control List for full description

[1] Source: Automated Export System. Shipment count is the number of distinct AES filings containing the given ECCN.

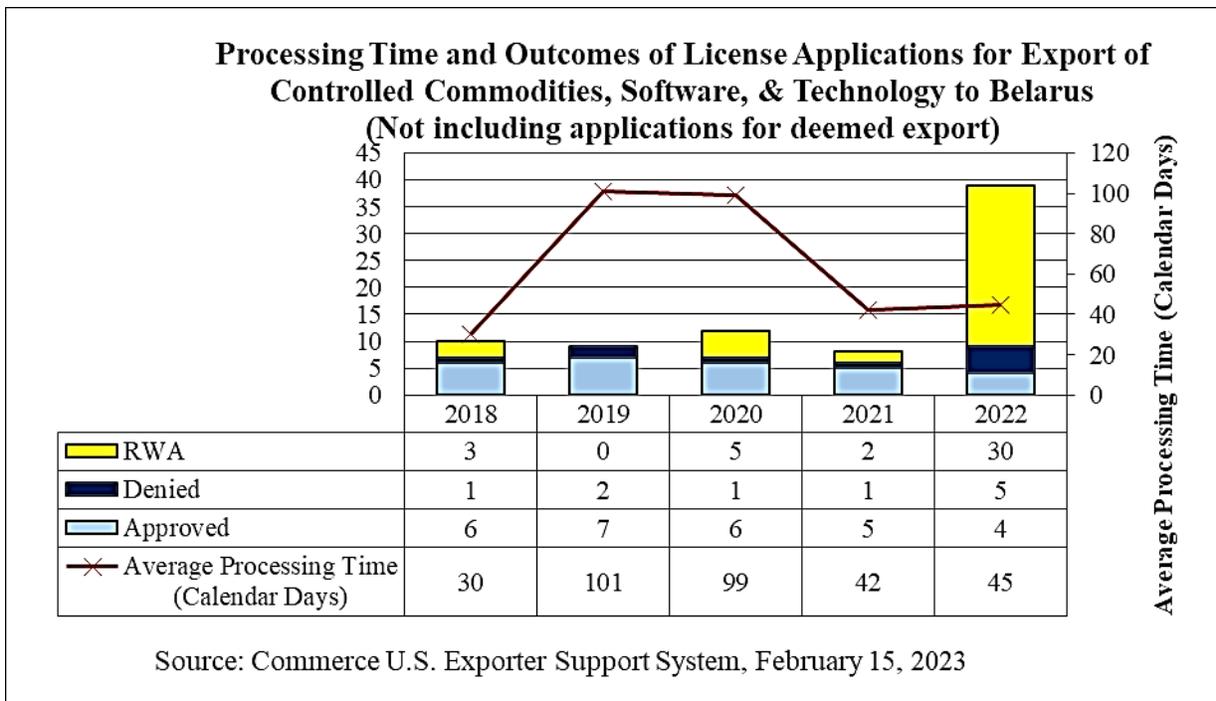


Analysis of U.S. Trade with Belarus, 2022

III. BIS Licensing Involving Belarus⁹

In 2022, the number of export license applications for Belarus, excluding applications for deemed exports and reexports, amounted to 0.1% of total applications worldwide.

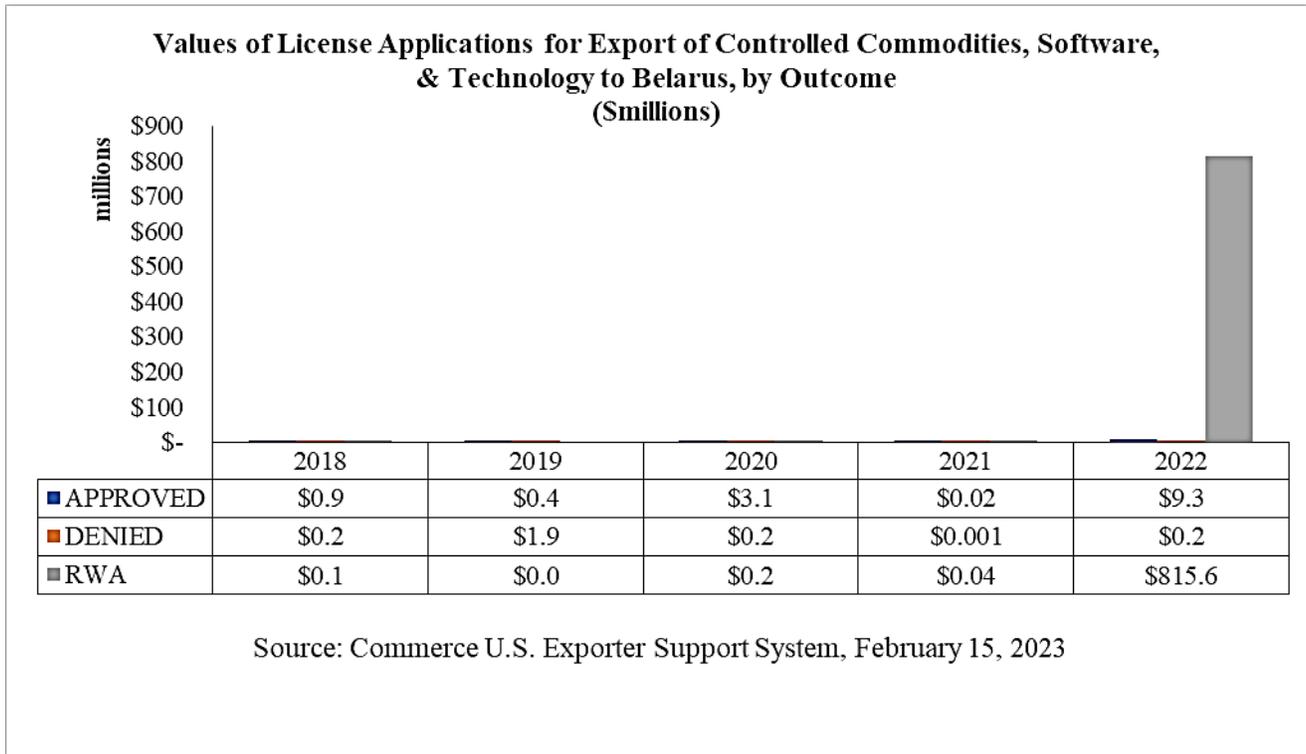
In 2022, for applications involving commodities, software, and technology (excluding deemed exports and reexports of technology and source code to Belarusian nationals in the U.S. or in a third country), BIS reviewed 39 export/re-export license applications valued at \$825.0 million for Belarus, compared to 39,045 applications worldwide valued at \$335.9 billion. BIS denied five license applications and returned 30 license applications without action. BIS approved 4 applications valued at \$9.3 million with an approval rate of 10.3%, compared to 34,068 approvals worldwide and valued at \$226.1 billion with an approval rate of 87.3%.



⁹ Licensing data in this section is drawn from BIS internal systems. Data pertains to applications for export and/or reexport licenses and their associated outcomes. Reexport and export licenses and applications are not differentiated in this report; therefore, references to export licenses or applications should be interpreted as inclusive of reexport licenses and applications as well. All licensing figures include cases of deemed exports and/or deemed reexports, unless otherwise noted.



Analysis of U.S. Trade with Belarus, 2022



In 2022, BIS reviewed 2 applications for deemed exports or reexports involving Belarusian nationals, representing 0.1% of total deemed export or reexport applications worldwide. BIS approved both of these applications (an approval rate of 100%).

In the last five years, there were no denials for applications for deemed exports or reexports involving Belarusian nationals.

Count of License Applications for Deemed Export, By Outcome, For Nationals of Belarus						
2019-2022						
Year	APPROVED	DENIED	RWA	Belarus Total	Worldwide Total	Belarus Total/World Total
2018	0	0	0	0	969	0.0%
2019	2	0	0	2	1,308	0.2%
2020	0	0	0	0	1,207	0.0%
2021	1	0	0	1	924	0.1%
2022	2	0	0	2	1,457	0.1%

Source: Commerce U.S. Exporter Support System, February 15, 2023



Analysis of U.S. Trade with Belarus, 2022

In 2022, the top approved ECCNs on licenses for Belarus were EAR99 for Items subject to the EAR that are not elsewhere specified in this CCL with 4 approvals, followed by 3E001 for “Technology” according to the General Technology Note for the “development” or “production” of commodities controlled by 3A (except 3A980, 3A981, 3A991, 3A992, or 3A999), 3B (except 3B991 or 3B992) or 3C (except 3C992) with 2 approvals, and 3D002 for Software” “specially designed” for the “use” of equipment controlled by 3B001.a to .f, or 3B002 equipment with 1 approval.

Top ECCNs Approved for Export to Belarus, by Number of Licenses			2018	2019	2020	2021	2022	% of worldwide total
APPROVED	#1	EAR99 Items subject to the EAR that are not elsewhere specified in this CCL	-	-	-	-	4	0.3%
	#2	3E001 “Technology” according to the General Technology Note for the “develop	-	1	-	1	2	0.4%
	#3	3D002 “ Software” “specially designed” for the “use” of equipment controlled	-	-	-	-	1	2.3%
	#4	3D003 'Computational lithography' “software” “specially designed” for the “d	-	-	-	-	1	2.4%
	#5	3E002 “Technology” according to the General Technology Note other than that	-	2	-	1	1	0.2%

Source: Commerce U.S. Exporter Support System, February 15, 2023

Note: ECCN Descriptions have been truncated: please review Commerce Control List for Full Description

ECCNs on Denied License Applications for Export to Belarus			2022	% of World Total
Denied	#1	9A991 “Aircraft,” n.e.s., and gas turbine engines not controlled by 9A001 or	2	3.5%
	#2	2B991 Numerical control units for machine tools and “numerically controlled”	1	50.0%
	#3	7A994 Other navigation direction finding equipment, airborne communication e	1	4.3%
	#4	EAR99 Items subject to the EAR that are not elsewhere specified in this CCL	1	0.4%

Source: Commerce U.S. Exporter Support System, February 15, 2023

Note: ECCN Descriptions have been truncated: please review Commerce Control List for Full Description

In 2022, the average processing time for applications involving Belarus was 45 calendar days.



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Summary of U.S. Exports to Belarus Calendar Year 2022				
	2021	2022	% change	% of total exports 2022
Total Exports [1]	\$ 218,102,392	\$ 40,129,364	-81.6%	
EAR Controlled Exports [2]				
	2021	2022	% change	% of total exports 2022
C30 - Licenses	\$ 72,938	\$ 10,000	-86.29%	0.02%
License Exceptions [2]				
	2021	2022	% of total license exceptions 2022	% of total exports 2022
C50 - ENC	\$ 1,155,338	\$ 20,711	100.0%	0.05%
C40 - TMP	\$ 7,553	\$ -	0.0%	0.00%
C42 - GOV	\$ 435	\$ -	0.0%	0.00%
Subtotal License Exceptions	\$ 1,163,326.00	\$ 20,711.00		0.1%
Total of Licensed Exports and License Exceptions				
	\$ 1,236,264.00	\$ 30,711.00		0.1%
NLR [2]				
	2021	2022	% of total NLR 2022	% of total exports 2022
C33 - NLR with an ECCN	\$ 59,102,738	\$ 446,492	100.0%	1.1%
C60 - NLR for 600-series .y subparagraph	\$ -	\$ -	0.0%	0.0%
C63 - NLR for 0A501 .y subparagraph Firearms	\$ -	\$ -	0.0%	0.0%
Subtotal NLR	\$ 59,102,738	\$ 446,492		1.1%

[1] Source: U.S. Census. Refers to trade in “goods” as defined by the U.S. Census: “Merchandise, supplies, raw materials, and products or any other item identified by a Harmonized System (HS) code.” Such data does not capture trade in technologies (e.g., exports made as transmissions or transfers); nor does it capture reexports of US-origin goods or technologies from another country. Nor does it include deemed exports or reexports.

[2] Source: Automated Export System (AES) filings.