Catch me if you can: Trade mis-invoicing and capital flight revisited

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Abstract

With increased globalization comes increased opportunities to manipulate export and import invoices (trade mis-invoicing) as a vehicle to move capital across borders unrecorded and hence illegally out of a country. Trade mis-invoicing, which is seemingly negligible in other parts of the world, is significant for developing countries in general and African countries in particular. This paper presents the extent of trade mis-invoicing and the resulting capital flight for the case of Ethiopia. Using commodity group level trade flows between Ethiopia and its trading partners as well as disaggregated CIF-FOB ratios, this paper sheds light on commodity groups and trading partners that contribute to trade mis-invoicing in a significant way. Results show that previous studies underestimated trade mis-invoicing and capital flight from Ethiopia underestimated due to the exclusion of major trading partners (like China and India) and use of a fixed CIF-FOB ratio that doesn't reflect variations across commodity groups and trading partners. Results also show, for trade with advanced countries alone, trade mis-invoicing cost Ethiopia \$6-36 billion between 2008 and 2016. For trade flow with emerging trading partners (including China and India), Ethiopia has lost \$15-78 billion to trade mis-invoicing during the same period. A handful of commodity groups (vegetables, hides and skins, machinery, and transport equipment) contribute to trade mis-invoicing in a significant way. Results also show that India, United Arab Emirates (UAE), Finland, New Zealand, China (Hong Kong), Ireland, Australia, the U.S, Japan, and Czech Republic are the top trading partners with the highest trade mis-invoicing share in total trade with Ethiopia.

Key Words: Trade, mis-invoicing, Ethiopia

JEL Codes: F1, F2

I. Introduction

Trade mis-invoicing is not a new phenomenon although its impacts and implications only grew faster in recent years as previously marginalized countries increased their engagement in global trade and investment. The prevalence and extent of trade mis-invoicing have been well documented (Naya and Morgan, 1969; Yeats, 1990; Beja, 2007; Berger and Nitsch, 2008) without going into motivations and determinants. The question often asked in recent years is not as such on its prevalence, but on the motives behind it and the magnitude of mis-invoicing (Buehn and Eichler, 2011; Geda and Yimer, 2016; Bahmani-Oskooee and Goswami, 2003; Fisman and Wei, 2004; Fismand and Wei, 2007; Farzanegan, 2008, Ndikumana and Boyce, 2010; Ndikumana, et. al, 2015). The welfare implication of trade mis-invoicing is also another strand in the literature, although very few studies subject the theoretical implications of mis-invoicing on welfare to empirical test (Buehn and Eichler, 2011).

In those studies that use African countries as a case study, the motivation is to estimate the magnitude of trade mis-invoicing as part of the overall capital flight that is robbing the continent of the much-needed capital (Ndikumana and Boyce, 2010; Ndikumana et al., 2015; Geda and Yimer, 2016). Ndikumana and Boyce (2010) provide estimates of capital flight from most African countries, and they note the significance of trade mis-invoicing in their capital flight estimation.

One common feature of most previous studies is that they lump sample countries together to estimate trade discrepancy equations; this is especially true for the case of African countries, where there is limited information on an individual country. Since sample countries have different customs regulations, exchange rate regimes, and tax and tariff structures, it is warranted to conduct such estimation at a country level for which sufficient data is available.

The focus of the present study is to estimate trade mis-invoicing for Ethiopia between 2008 and 2016. As an improvement over previous studies, the present study looks into previously ignored or assumed away dimensions of trade mis-invoicing. Trade flow from recently expanding trading partners from Asia, and commodity level variations in estimated cost insurance and freight values (CIF-FOB ratio) have often been ignored as insignificant or assumed away as inaccurate. To account for this, the present study zooms in trade mis-invoicing activities in Ethiopia to highlight on the commodities and countries involved in such practice. The aim is to identify the commodities and countries affected/involved in trade mis-invoicing practices to help authorities in Ethiopia and its trading partners to design targeted policies to curb the ever-increasing capital flight due to trade mis-invoicing. For each trading partner country and commodity group, I have disaggregated estimates of trade mis-invoicing into their export and import components.

The specific questions I ask in this study are: Was there systematic discrepancies in trade flow data between Ethiopia and its trading partners? Which commodity groups and partner countries are susceptible to this practice? How much does non-advanced trading partners contribute to trade mis-invoicing in Ethiopia? I investigate these questions both by country and by commodity group to get to the bottom of the issue and to relate the findings to local anecdotes. I will also compare the findings of this study to previous studies to highlight on the discrepancies in trade mis-invoicing numbers for Ethiopia.

Illicit capital outflow from developing countries in general and Africa, in particular, is estimated to be in tens of billions (Kar and Spanjers, 2015; Global Financial Integrity, 2017). Ethiopia is not an exception within African countries; in fact, trade mis-invoicing accounts for one of the most significant shares of capital flight in Ethiopia compared to other African countries (Ndukmana and Boyce, 2010; Spanjers and Salamon, 2017).

For a country that only recently started integration into the world market and with weak institutions to support these increased transactions, it is not difficult to imagine the existence of unrecognized loopholes that could easily be used by traders. It is necessary for developing countries' governments to understand the determinants of trade misinvoicing to design custom regulations in line with the changing nature of global transactions. For instance, in places where it is difficult to countercheck invoices supplied by traders for the values of imports and exports, customs authorities should design price determination formula to close some of the loopholes.

Traders who buy and sell goods from and to overseas businesses or customers engage in mis-invoicing import and export values for various reasons. Some of the reasons are tax evasion, gains from black market premium, and the opportunity to save in a convertible currency in a foreign bank (i.e., capital flight). These possible explanations provide insight into whether the gain (it could be in local or foreign currency) from mis-invoicing stay in the country or leave the country through the back doors. The implication is paramount for policy-makers to cope with the fast-changing and integrated world.

I have organized the remaining parts of this study as follows. The next section presents a literature review on estimation and determinants of trade mis-invoicing with a focus on studies on African countries. Section three presents description of data, data sources, and methodology. I discuss results of the study in section four. The final section concludes and draws implications.

II. Literature Review

The literature on the implications of trade mis-invoicing falls into two strands. The first strand looks attempts to build a theoretical framework to understand the channels through which trade mis-invoicing affects and economy and how individuals make decisions on trade mis-invoicing to maximize individual welfare. The second strand

focuses on empirically estimating the magnitude of trade mis-invoicing to shed light on the resulting amount of capital flight, in a sense this is an empirical test of one component of the broader welfare implication that the first stand presents. Both the theoretical and empirical works look at the determinants and deterrents of trade mis-invoicing. The focus of the most recent studies on this issue is on the motives and deterrents behind trade mis-invoicing. The present student, taking Ethiopia as a case study, adds to this strand by attempting to fill a void in a country-level analysis of the implications of trade mis-invoicing on capital flight. In the paragraphs that follow, I have presented specific motivations of trade mis-invoicing and their implications.

Motivations of Trade Mis-invoicing

Why does a trader mis-invoice import and export transactions? Whatever the motivation, such practice is often portrayed as harmful for a country (UNCTAD, 2016), although there are cases where this practice may end up helping a country positively in the form of capital inflow or allocation of resources free of regulatory barriers. The debate on whether trade mis-invoicing result in positive or negative welfare effect is not yet settled (Buehn and Eichler, 2011).

Some of the motivations are in response to the foreign currency control (to take hard currency out of the country through illegal means) while others are to bring in foreign currency illegally (to benefit from the wide gap between the official and the parallel exchange rate). Tax evasion and customs administrative burden are also recognized as factors in Africa in influencing both the decision to engage in and the amount of trade mis-invoicing (Buehn and Eichler, 2011). As such, UNCTAD (2016), based on a review of the literature (Buehn and Eichler, 2011; Patnaik et al., 2012), classifies the motives for exporting and importing firms to engage in trade mis-invoicing into three. These motives are related to tax evasion, exchange rate controls, and administrative burden.

Financial motives, through tax evasion, are driven by profit maximization. This motivation can be done through under-invoicing of exports and imports to minimize tax liabilities. In a country where trade barriers (tariffs, quotas, etc.) are discouragingly high, tax evasion seems to be the main driving force to result in trade mis-invoicing, several studies provide empirical evidence on this (see Bhagwati, 1964; McDonald, 1985; Epaphra, 2015; Fisman and Wei, 2004; Buehn, et al., 2011). In a reverse case, where there is an incentive to export (through export subsidies) and import of intermediate input (through import tariff exemptions), firms tend to over-invoice (overstate) exports and imports to maximize profit. Such scenario may seem rare, but it may happen in a country where promotion of trade is at the center of its development strategy. In a country like Ethiopia where the tariff rates are significantly high for some products (up to 150% tariff on some automobiles) and where there is taxation on exports (for instance, 6.5% tax on coffee exports (Minten, et al. (2014)), traders may be tempted to under-invoice both

imports and exports to minimize tax/tariff burdens. Minten, et al. (2014) also report anecdotal evidence of coffee hoarding in Ethiopia, which may eventually result in export under-invoicing.

A country with excessive customs and exchange controls may also experience trade misinvoicing as traders try to jump over or hide from such control mechanisms. Under such circumstances, traders attempt to hide foreign currency from official channels. One way to do this is to mis-invoice trade to take advantage of the prevailing Black Market Premium (BMP) or to hoard cash in foreign currency in a foreign bank account (hence engage in capital flight). Under such motives, traders engage in over-invoicing of imports so that they obtain undeserving foreign currency from the authority that controls foreign currency and under-invoicing of exports so that they can hide some of their export earnings abroad. Trade may use this ill-obtained foreign currency for various purposes including paying for smuggled imports and selling it in a black market for a higher premium (for empirical evidence on this see, Bahmani-Oskooee and Goswami, 2003; Barnett, 2003; and Biswas and Marjit, 2005). For a country like Ethiopia, this channel is the best way to take money out of the country in the form of hard currency. For instance, between 2004 and 2013, on average, there was an illicit outflow of capital from Ethiopia to the tune of \$2.6 billion per year (Kar and Spanjers, 2015). Trade mis-invoicing is suspected to be one of the channels through which this illicit capital outflow occurs. For instance, between 2000 and 2009 Ethiopia had lost over \$11 billion due to trade misinvoicing (Kar and Freitas, 2011). . In fact, Ndikumana and Boyce (2010) estimated that trade mis-invoicing account for 60% of capital flight in Ethiopia between 1970 and 2004; of the \$11 billion capital flight in Kar and Freitas (2011), over \$7 billion was due to trade mis-invoicing.

Another motive for traders to engage in trade mis-invoicing is to minimize administrative burden. This motive is somewhat related to the second motive above, but in this case, the attempt is to hide exports and imports from customs authorities through under-invoicing. The less the volume of the trade, the less the time and administrative hurdles it needs to pass through to clear customs. Corruption and ease of smuggling drive this motive. Therefore, in a country like Ethiopia where the incident of corruption is growing (as evidenced in a recent arrest of high profile officials), this motive encourages traders to under-invoice both imports and exports. Fisman and Wei (2007), and Berger and Nitsch (2012) provide empirical evidence to support the correlation between trade mis-invoicing and corruption.

Finally, traders mis-invoice trade to bring in foreign currency stashe-d in a foreign country. This is not one of the top motives that previous studies have documented, but

it is another possible reason for emerging economies where there is sever shortage of foreign currency. One reason to try to bring money previously sent abroad illegally into the country is for investment purposes. Traders implement this through export over-invoicing, which is a practice to launder illegal money back into a country through legal channel. This has been less of a concern for studies that estimate capital flight from African countries for the reason that the money is coming back to the country, which is good for a country if one looks at this from just economic growth perspective. It, however, comes through illegal means and may be spent on activities not that helpful for the country. As I discuss the practice of trade mis-invoicing in Ethiopia, this motivation was driving part of the mis-invoicing at least until 2010.

As to which of these motives are more important and prevalent in a country like Ethiopia is an empirical question. To reach to the bottom of this issue, one needs to use disaggregated data by commodity and trading partners to pinpoint to the conditions facilitating one motive over the other for each commodity and partner. The net effect of these motives varies by partner country, year, and commodity group. That is, it may be easier to under-invoice or over-invoice trade with a partner whose customs system is not as sophisticated; similarly, it may be easier to mis-invoice some commodities that are cumbersome to count or weight. It is also possible that during periods when there are political and security concerns in a country smuggling may be easier which results in under-invoicing of both imports and exports.

Estimates of Capital Flight and Trade Misinvocing in Ethiopia

A handful of studies present estimates for trade mis-invoicing and capital flight from Ethiopia. Almost all of these estimates follow the traditional estimation method to arrive at capital flight numbers and adjusted their estimates with trade mis-invoicing and other factors. Table 1 below provides estimates from four previous studies (Ndikumana and Boyce, 2010; Spanjers and Salamon, 2017; Kar and Spanjers, 2015; Kar and Freitas, 2011) that report capital flight from Ethiopia for various years. Geda and Yimer (2016) also report estimates of capital flight from Ethiopia between 1970 and 2012 with adjustment for trade mis-invoicing, though they didn't report estimates for the trade mis-invoicing component separately.

Ndikumana and Boyce (2010) report that during the period 1970-2004 Ethiopia had lost \$17 billion to capital flight and \$10 billion (60% of capital flight) of that was through positive trade misinvoicing (capital inflow). The study covers periods when the country had experienced a regime change and moved from strict exchange control (1970-1990) to a bit more relaxed exchange control system (1991-2004) that may explain inflow of capital through trade mis-invoicing. However, this trend has been reversed in the subsequent decades as trade mis-invoicing contributed to capital outflow. Results from Kar and Freitas (2011) confirm this reversal, in that between 2000 and 2009,

Ethiopia has lost over \$7 billion due to trade mis-invoicing, which accounts for 65% of cumulative illicit financial outflow (\$11.7 billion) during the same period. This trend confirms that as the country expanded its trade engagement with the rest of the world, trade mis-invoicing grew with it. Kar and Spanjers (2015) break the trade mis-invoicing part of capital flight into its two components: Import and export mis-invoicing. According to their study, Ethiopia has been experiencing over-invoicing of both exports and imports. Over the study period that covers between 2004 and 2013, import over-invoicing (capital outflow) resulted in a loss of over \$19 billion whereas export over-invoicing (capital inflow) brought in over \$6 billion, with a net outflow of \$13 billion during the same period (Kar and Spanjers, 2015). Spanjers and Salamon (2017) report similar statistics in percentage terms (see Table 1 for more). Although the motives for import over-invoicing is clear from the literature summarized above, the motivation behind export over-invoicing has not be addressed in the literature as it has been considered either as insignificant or unimportant. As the above estimates indicate, though, this is not the case for Ethiopia.

Table 1. Estimates of Capital flight from Ethiopia

1970-2004 ^a		2005-2014	4 ^b (% of to	tal trade)	2004-2013 ^c (in billion	USD)	2000-2009d (in billions USD)
Real Capital Flight (2004 US\$ Billion)	\$17.031	Illicit Outflows	Financial	11-29%	Cumulative Illicit Financial Outflow	\$25,835	Cumulative Illicit financial flows (high-end)	\$11.694
Total Real Capital Flight/GDP in 2004 (%)	175%	Outflows trade invoicing	due to mis-	6-23%	Cumulative outflows due to trade mis-invoicing	\$19,712	Cumulative illicit financial flows (conservative	\$7.944
Trade mis-invoicing (2004 US\$ Billion)	-\$10.234	Balance Payment Leakages	of (BOP)	5-6%	Cumulative outflow due to import over-invoicing	\$19,709	Cumulative illicit capital flow (using the World Bank's residual method)	-\$5.62
Trade mis-invoicing as % of total capital flight	-60.1%	Import invoicing	over-	6-23%	Cumulative inflow due to export over-invoicing	\$6,482	Cumulative illicit capital flow due to trade mis- invoicing (traditional method)	\$7.569
Remittance Adjustment (2004 US\$ Billion)	\$3.801	Import invoicing	under-	0%	Total trade mis- invoicing inflows	\$6,482	Cumulative Financial Flow (traditional method)	\$1.949
Stock of capital flight/debt in 2004 (%)	342.6%	Export invoicing	over-	3-5%	Gross trade mis- invoicing	\$26,194		
Net foreign assets in 2004 (in Billion)	\$15.95	Export invoicing	under-	0%				

Source: a Ndikumana and Boyce, 2010; b Spanjers and Salamon, 2017; c Kar and Spanjers, 2015; dKar and Freitas, 2011.

In the present study, I attempt to provide similar results with expanded coverage to previously excluded trading partners and commodity groups for recent years.

III. Data and Methodology

To arrive at the estimated amount of trade mis-invoicing and to generate corresponding capital flight numbers, one needs a data on exports and imports as reported by a country under consideration (Ethiopia in this case) and its export and import trading partners (mirror trade data). For the case of Ethiopia, I have extracted these export and import flow values from the UN COMTRADE using the World Bank's WITS (World Integrated

Trade Solution) tool by two-digit commodity groups. UN's COMTRADE database is the only source that provides data at such level of disaggregation.

Based on trade flow data from COMTRADE, Table 2 reports Ethiopia's major trading partners from 2013-2016 ranked by the value of total trade in 2016. The top ten trading partners are dominated by advanced countries, but also by two emerging economies, China and India. China tops the list whereas India holds 7th place. Previous studies that estimate trade mis-invoicing in Africa (and developing countries of Asia and Latin America) often calculate estimates from trade flows only with advanced countries, excluding these emerging economies. Needless to say, this approach underestimates trade mis-invoicing numbers. The justification to exclude these emerging economies from the list rests on the idea that data from these economies are not reliable and hence should not be used to estimate trade mis-invoicing. This argument might have been acceptable before these countries started their economic success and technical advances, at least, since the early 2000s and even before (for the case of India). For recent years, statistical reporting from such countries are believed to be high quality and comparable to those of advanced nations. I argue that such emerging countries should be included when estimating trade mis-invoicing for African countries. To fill this void, the present study reports results both for advanced countries (as in previous studies) and for other major trading partners (including emerging economies that are major trading partners of Ethiopia) for purposes of comparison.

Table 2. Ethiopia's top 20 trading partners, ranked by total trade in 2016

		01 /		
Country	2013	2014	2015	2016
China	127.33	234.35	283.13	287.31
United States	115.47	193.99	225.11	145.01
Germany	86.99	99.71	91.31	99.27
France	55.46	35.81	53.27	91.44
Italy	92.51	85.35	76.02	81.85
Netherlands	44.70	38.82	59.71	79.89
India	79.77	65.08	68.37	66.16
Switzerland	49.12	64.71	100.79	55.71
United Kingdom	40.61	46.04	71.60	54.41
Belgium	104.97	92.27	46.35	46.84
Turkey	46.58	37.06	35.85	41.76
Japan	52.18	45.61	48.44	35.45
Korea	23.10	45.78	37.48	31.23
Spain	18.30	13.91	25.14	19.23
Canada	6.75	31.73	8.16	16.17
Israel	19.73	21.91	14.58	15.87
Sweden	10.28	12.16	43.20	13.50

Russia	9.65	11.14	11.68	13.06
Finland	5.79	2.20	2.87	9.94
Czech Republic	2.83	8.33	7.60	9.17
Singapore	8.22	6.01	6.60	8.81

Source: author's computation form COMTRADE data, various years.

The other dataset needed to compare trade flows between two trading partners is transport and insurance costs associated with imports. That is, the cost-insurance-freight to free-on-board (CIF-FOB) ratios that one needs to convert exports of a country into its mirror flow of imports reported by a country's trading partners. To compare exports (reported by Ethiopia) to imports (reported by Ethiopia's trading partners), I need to convert free on board (F.O.B.) export values into their import equivalents using cost-insurance-freight (C.I.F) values. Similarly, I need to convert exports that Ethiopia's trading partners reported into equivalent Ethiopia's imports using CIF values.

Previous studies have used fixed proportions of exports (10% or 5%) as an approximation for CIF values and assumed a fixed CIF value o, 2016).f exports for all commodities and trading partners. Reports from Global Financial Integrity (GFI) and other studies (Ndikumana and Boyce, 2010, UNCTAD, 2016) have used ten percent (or five percent) of FOB value of exports to approximate CIF values. Studies that opted for a fixed CIF-FOB has criticized the CIF-FOB values computed from the IMF's direction of trade has been criticized as inconsistent (Ndikumana and Boyce, 2010; Ndikumana, et al., 2015; UNCTAD, 2016; CEPII, 2008; Miao and Fortanier, 2016). However, the fixed CIF-FOB values that these studies (UNCTAD, 2016; Ndikumana and Boyce, 2010) adopted in their estimation is not perfect either since it assumes fixed CIF values for all trading partners and all commodity groups.

I argue that use of a fixed CIF_FOB ratio may underestimate or overestimate trade misinvoicing depending on the commodities and how far a country is from its trading partners. In an improvement over previous studies, OECD and CEPII have estimated country and commodity specific CIF values to highlight the significant variation across commodities and trading partners.

As part of a related project, Miao and Fortanier (2016)'s work on international transport and insurance cost (ITIC) of merchandise trade provide estimates of CIF-FOB values as a fraction of imports (at CIF value) for each country over time by trading partners and commodity groups. Following their estimation, unlike previous studies, the present study uses OECD's estimated CIF-FOB values (Miao and Fortanier, 2016) to convert exports to import equivalents. Estimated CIF-FOB values take into account distance, trade volume and other factors to arrive at a better approximation of the CIF values. Specifically, OECD's approach uses a gravity model with a list of independent variables identified as relevant in previous studies. These independent variables include the

geographical distance between trading partners, the infrastructure quality of importing and exporting country (measured using GDP per Capita), the median unit value of each 6-digit product, dummies for partner contiguity and for partners being on the same continent, and a set of product and year dummies to arrive at estimated CIF values. Since it uses trade partner-commodity-time specific CIF-FOB values, this study is an improvement over previous studies that use fixed values for all partners and commodities (Ndikumana and Boyce, 2010; Ndikumana, et al., 2015).

Their estimation generates CIF-FOB margin of a specific commodity c, imported by a country, E, from a trading partner, P, at a given year t.

Once the CIF-FOB values are computed, the remaining question other is whether to use CIF-FOB values estimated from trade flow data reported by a country or its trading partners. Figures 1 and 2 below present plots of estimated CIF-FOB values from Ethiopia and its trading partners for 2008-2016 and 2014, respectively. As is clear from the plots, there are variations in the average values of the computed CIF-FOB ratios. The data estimated from partner countries concentrate around 0.09 whereas those estimated from Ethiopia vary widely. Figure 1 plots average CIF-FOB ratio for the period between 2008 and 2016; whereas Figure 2 plots estimates for 2014¹ (the latest year data on CIF-FOB ratio is available). In this study, I use CIF-FOB ratio (CIF-FOB_repo) obtained from Ethiopia's trade flow data to compute values of Ethiopia's imports from partners exports. Similarly, I used CIF-FOB ratio (CIF-FOB_part) obtained from partners' trade flow data to compute values of partners' imports from Ethiopia's exports. This approach is justifiable since estimates of CIF-FOB values are computed based on each country's actual trade flow, and it is reasonable to use the same estimates to compute import values for each country.

Figure 1. Kernel density of average cost insurance and freight estimates from data reported by Ethiopia and its partners 2008-2016

¹For the years 2015 and 2016, I use the numbers from 2014 to extrapolate to the two recent years for each country and commodity group.

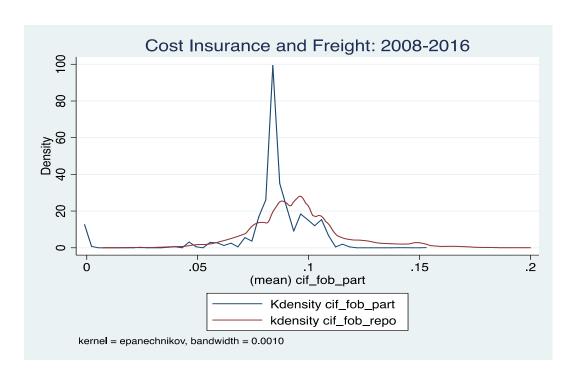
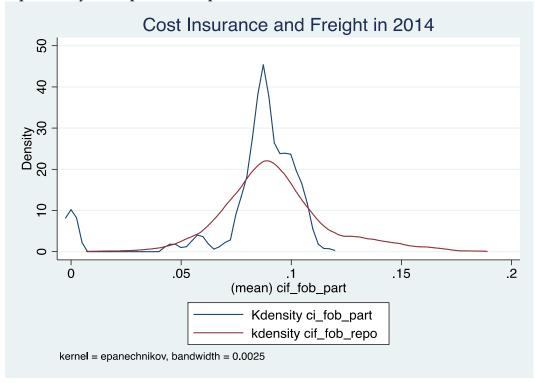


Figure 2. Kernel density of average cost insurance and freight estimates from data reported by Ethiopia and its partners 2014



Methodology

There is no as much debate or controversy on how to compute trade mis-invoicing numbers as much as what CIF-FOB ratios and which countries to include in the

computation. Most previous studies have adopted the standard estimation technique that compares exports of a country to its trading partners' imports and vise versa. Some studies estimate trade mis-invoicing numbers to adjust gross capital flight estimates (Chang, et. al, 1997; Ndikumana and Boyce, 2010; Geda and Yimer, 2016; Global Financial Integrity, 2017; Kwaramba, et. al, 2016) while others just estimate trade mis-invoicing to highlight its importance at a commodity level (UNCTAD, 2016; Beja, 2006; Buehn and Eichler, 2011).

The estimation formula adopted in this study is not different from previous studies. The variables used in the computations, however, are a bit different. To have a focused discussion on this, consider two countries: Ethiopia (E) and its partner (P). Ethiopia both imports from and exports to its partner country, P. As described above in the data, I have gathered data on Ethiopia's exports to and imports from P as reported by Ethiopia. I have also gathered data on P's imports from and exports to Ethiopia. Ideally, imports of P from E should be the same as exports of E to P (plus costs of insurance and transportation, CIF). Similarly, imports of E from P should be the same as exports of P to E (plus CIF). In practice, however, there is no such perfect equality in trade flows for various reasons as discussed above. I follow a simple formula to calculate the discrepancies between these values both for exports and imports to see if there are any systematic discrepancies between the numbers reported by Ethiopia (E) and its trading partner (P) by commodity (c), and over time (t). I have reported CIF-FOB values as a fraction of exports at CIF values. In the formula below, I added the CIF-FOB fraction of exports to export values to generate equivalence import values.

For export mis-invoicing by exporters from E, I compute the following:

 $DX_{EP,t}^c = M_{PE,t}^c - (1 + CIF) * X_{EP,t}^c$, labelled as differences in exports (exportdiff) in the data.

Positive values of the difference are evidence for export under-invoicing (evidence for capital flight); whereas negative values of the difference are evidence for export over-invoicing (evidence for capital inflow).

For import mis-invoicing by exporters from E, I compute the following:

 $\mathsf{DM}^c_{\mathsf{EP},t} = \mathsf{M}^c_{\mathsf{EP},t} - (1+\mathsf{CIF})^* \mathsf{X}^c_{\mathsf{PE},t} \text{ , labelled as differences in imports (importdiff) in the data.}$

Similarly, positive values of the difference are evidence for import over-invoicing (evidence for capital flight), whereas negative values of the difference are evidence for import under-invoicing (evidence for capital inflow).

Export over-invoicing and import under-invoicing result in capital inflow (although illegally), as such some studies (Global Financial Integrity, 2016) exclude these values from capital flight estimation, not just becasues it brings capital back to a country but also

assuming it as insignificant. As we will discuss below though, these values are not negligible.

I compute total trade mis-invoicing as the sum of export mis-invoicing and import mis-invoicing. Positive values of trade mis-invoicing give us net capital flight estimates due to trade mis-invoicing, which means more export under-invoicing (compared to export over-invoicing) and more import over-invoicing (compared to import under-invoicing). I compute these differences by partner and commodity groups, then I regroup the values to highlight the commodities and partners by the sign and magnitude of the difference.

IV. Results and Discussion

Before getting into detailed estimates of trade mis-invoicing and its components, lets first compare trade flows that Ethiopia and its trading partners have reported (Figure 3). Differences in total trade flows are in the range of hundreds of millions of dollars, especially since 2012. In 2012, 2014 and 2015, Ethiopia's trading partners reported more trade than what Ethiopia has reported; whereas, in 2016, Ethiopia reported more trade flow than that of its trading partners. The last five years has driven much of the differences in trade flows between Ethiopia and its trading partners.

Tables 4-7 in the appendix provide details on alternative ways of measuring trade misinvoicing (and its components) over time (Table 4) and trade mis-invoicing (and its components) by major commodity groups and trading partners (Tables 5-7).

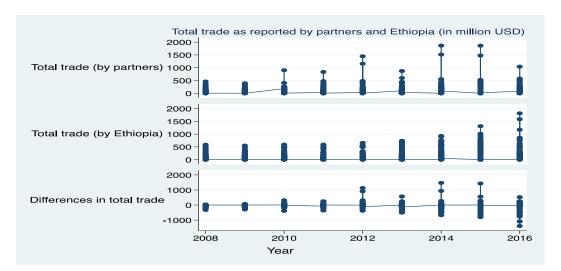


Figure 3. Differences in total trade flows as reported by Ethiopia and its partners

Table 3 presents estimates of export, import, and trade mis-invoicing using three alternative approximation of CIF-FOB ratios for advanced countries as well as for emerging trading partners of Ethiopia. Table 4 in the appendix provides similar estimates for all countries and major trading partners over time. To compare results with previous studies, I computed estimates of trade mis-invoicing not just with estimated values of

CIF-FOB ratio but also using fixed ratios (10% and 5%) of exports at FOB values to generate corresponding import values. It is important to note from the outset that there is no difference in the direction (sign) of mis-invoicing using all three estimates of CIF-FOB ratios, but there is a significant difference in magnitude². In all the three cases, estimates that use 10% and 5% CIF-FOB ratios overestimate values of trade mis-invoicing; the same result is obtained for all countries and major trading partners (see Table 4).

The results in Table 3 confirm that exports are over-invoiced and imports are under-invoiced. The results that use 10% and 5% for CIF-FOB ratio overestimate over-invoicing of exports and under-invoicing of imports since both overstate estimated values of partners countries' imports (for export mis-invoicing) and Ethiopia's imports from partner countries (for import under-invoicing).

Table 3. Trade mis-invoicing computed using three different estimates of CIF-FOB ratios (estimated, 10% and 5%) for advanced countries and emerging economics (in mill. USD)

Year	Exports (estimated)	Exports (10%)	Exports (5%)	Imports (estimated)	Imports (10%)	Imports (5%)	Trade (estimated)	Trade (10%)	Trade (5%)
2008	-172.64	-700.23	-515.84	818.25	3299.67	3604.07	404.95	2700.48	3160.18
2009	-54.83	-162.15	-16.66	529.06	3026.86	3297.19	210.61	2601.91	3000.22
2010	-170.92	-746.40	-539.57	131.91	1849.07	2209.08	3.40	760.38	1275.70
2011	-82.15	-419.42	-163.90	-50.50	963.89	1361.99	-11.67	637.01	1238.69
2012	-79.78	-314.97	-48.26	582.38	37.55	551.46	36.88	-688.49	64.29
2013	-458.82	-1881.02	-1545.62	1129.07	3496.80	3945.35	56.51	1365.94	2114.37
2014	-491.46	-1980.65	-1601.66	1628.92	3502.83	4091.31	139.91	1351.29	2270.28
2015	-325.63	-1159.41	-779.33	2760.28	8484.39	9095.59	2196.69	7086.46	8036.50
2016	636.73	2553.41	2710.85	3156.29	11345.42	11940.40	3600.40	13688.84	14417.18
Total	-1199.49	-4810.85	-2499.98	10685.65	36006.47	40096.45	6637.67	29503.81	35577.41
For em	erging trading	partners (Br	azil, China, I	Egypt, India, N	Iexico, Polar	ıd, Russia, Soı	ath Africa, Tha	ailand, and T	'urkey)
2008	-4.39	-39.02	-9.10	490.27	1927.82	2261.46	328.60	1711.06	2047.38
2009	-52.53	-225.05	-161.18	1043.75	4141.30	4552.27	748.59	3709.75	4155.13
2010	-85.25	-412.36	-325.48	1346.07	5370.02	5750.56	952.34	4536.71	4981.99
2011	-45.86	-219.78	-132.48	1414.30	5712.43	6089.34	1035.33	5264.52	5718.45
2012	-77.55	-317.24	-219.28	1495.81	5993.18	6583.26	1173.34	5461.52	6098.27
2013	-142.03	-636.33	-520.86	1897.08	7289.19	7987.60	1621.81	6538.44	7305.66
2014	-151.98	-672.78	-515.35	3267.21	13465.69	14333.56	2875.11	12467.43	13471.42
2015	-76.58	-355.30	-240.39	4292.37	17932.85	18918.32	3811.87	17195.43	18277.21
2016	428.72	1694.32	1720.39	3750.56	14957.85	15931.65	3275.14	15945.13	16904.68
Total	-207.46	-1183.54	-403.73	18997.42	76790.33	82408.01	15822.12	72830.00	78960.18

Results in Table 3 above show that, Ethiopia has lost \$6-36 billion to trade mis-invoicing between 2008 and 2016. Import over-invoicing contributed to this mis-invoicing in its entirety, that is, \$10-40 billion of the capital flight during the study period was due to import over-invoicing. The lower panel of the table reports results for emerging trading partners of Ethiopia, that are often not included in the estimation of capital flight or trade

² Similar estimates for all countries and for major trading partners (including India and China) confirm the same finding. Tables for these estimates are not reported here but are available upon request.

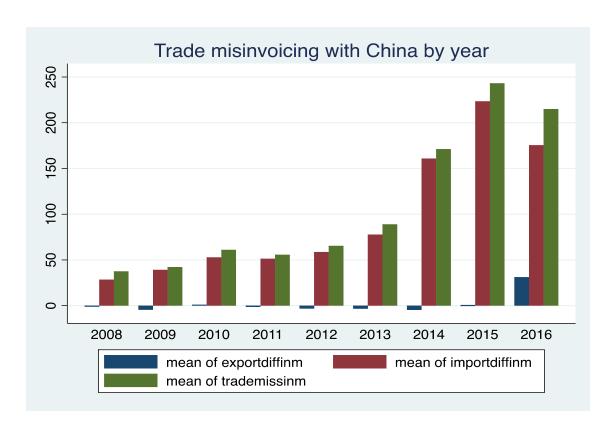
mis-invoicing. Just these latter countries alone add \$15-78 billion to trade mis-invoicing number, which is more than double the estimate for advanced countries. For these countries, import over-invoicing contributed \$18-82 billion during the same period between 2008 and 2016. I argue that ignoring these estimates from emerging economies underestimate trade mis-invoicing and overall capital flight number for Ethiopia.

Fortunately, or unfortunately, export mis-invoicing resulted in capital inflow, in that export over-invoicing brought in about \$1-4.8 billion from advanced countries and \$0.2 – 1 billion from emerging trading partners. As noted in the literature review, estimates from the Global Financial Integrity (2017) exclude export over-invoicing since it results in capital inflow. But I believe that since this capital inflow comes through illegal means, it may end up financing illegal activities, that may not help development process in the country.

Trade mis-invoicing estimates for transactions with US and China

Are there differences in trade mis-invoicing across countries? Two figures below show estimates for the two top trading partners of Ethiopia, China (Figure 4), and the U.S (Figure 5). The major component of trade mis-invoicing between China and Ethiopia was under-invoicing of imports; it accounted for over \$200 million of the total trade mis-invoicing between the two countries in 2015, it declined to around \$180 million in 2016.

Figure 4: Trade mis-invoicing estimates for Ethiopia-China trade flow: 2008-2016



Comparable number for the U.S is not as high, in fact, trade mis-invoicing of Ethiopia with the U.S is about one-fourth of what it was in China in 2015. In 2016, trade mis-invoicing with the U.S jumped to \$100 million, which is about half of what it was in China. In recent years, there may be trade diversion from China to the U.S as the country expand factories to target the U.S market to take advantage of the Africa Growth Opportunity Act signed between selected African countries and the U.S government.

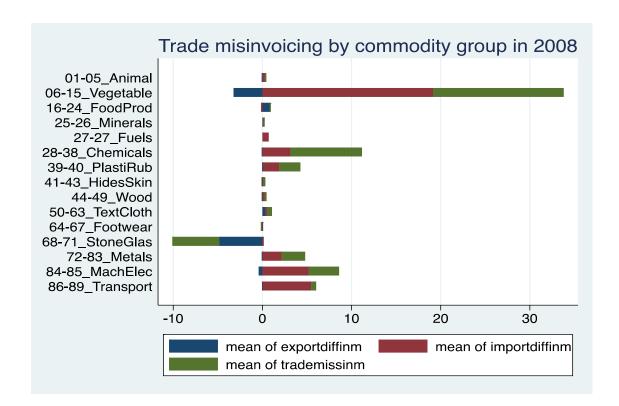
Figure 5. Trade mis-invoicing estimates for Ethiopia-U.S trade flow: 2008-2016



Trade mis-invoicing by commodity groups

In 2008, a handful of commodities contributed to trade mis-invoicing for both export and import mis-invoicing. Trade in vegetables, chemicals, machines, and transport requirements were the top commodities that contributed to import under-invoicing. Trade in stones and glass (to some extent vegetables) was one of the significant drivers of export over-invoicing (see Figure 6).

Figure 6. Trade mis-invoicing by commodity groups in 2008.



In 2016, export over-invoicing almost disappeared (Figure 7), the majority of the commodity groups contributed to capital flight through both import over-invoicing and export under-invoicing, with trade in machinery and transport equipment being the major contributors to both import over-invoicing and export under-invoicing. As the country engages in a major infrastructure expansion, import in different types of machinery and transport equipment expanded in recent years and ended up being one of the significant contributors to trade mis-invoicing.

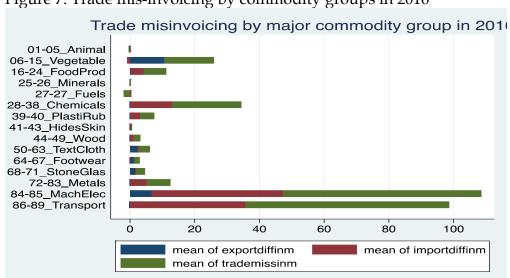


Figure 7. Trade mis-invoicing by commodity groups in 2016

Figures 8-13 report trade mis-invoicing over time and by commodity groups, for trade with advanced countries (Figures 8 and 9) and for separately for China (Figures 10 and 11) and the U.S (Figures 12 and 13). In almost all these figures, the commodities that contribute to the significant surge in trade mis-invoicing in recent past are the same commodity groups discussed above, that is, trade in vegetables, chemicals, machinery, and transport equipment. There is, however, slight variations across commodity groups as we zoom in the details by year, country, and direction of trade (exports or imports).

Figure 8 reveals that for advanced countries, Ethiopia's exports of hides and skins, and vegetables have contributed to the largest share of the mis-invoicing. Both products were responsible for export over-invoicing, but during different time periods, exports of hides and skins were responsible for over-invoicing between 2008 and 2012, whereas exports of vegetables (this includes cut flowers and chat- a stimulant leaf mostly sold to middle eastern countries) were over-invoiced between 2012 and 2015.

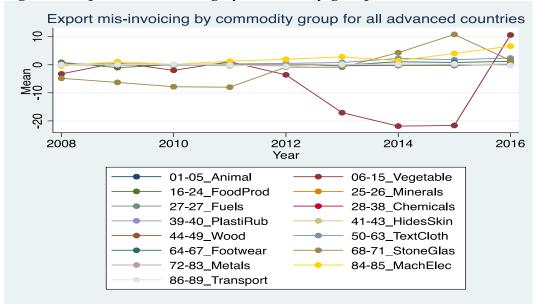


Figure 8. Export mis-invoicing by commodity groups for Advanced countries: 2008-16

For imports, trade in machinery, transport equipment, and chemicals are significant contributors to import mis-invoicing. Except for a couple of years between 2010 and 2012, imports of all three products were over-invoiced (Figure 9). The last three years were particularly important as the country expanded imports of these goods as it expands infrastructure development.

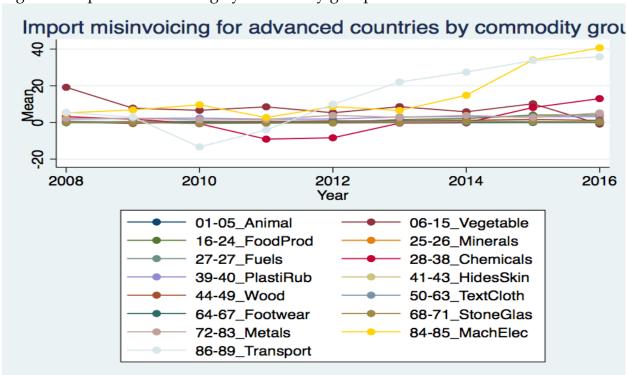


Figure 9. Import mis-invoicing by commodity groups for Advanced countries: 2008-16

Figure 10 depicts similar phenomenon for trade with China; that is, exports of vegetables, footwear, and textile products are responsible for export mis-invoicing. Until 2013, exports of vegetables were under-invoiced, however, for the following two years (2014 and 2015), exports of vegetables were over-invoiced. Textile and clothing products were consistently under-invoiced from 2008 to 2016. One suspicion is that most Chinese firms that have relocated their production units to Ethiopia are the ones exporting textile and clothing products to back to China and they tend to underestimate exports out of Ethiopia to evade income tax and divert profits of their local operation.

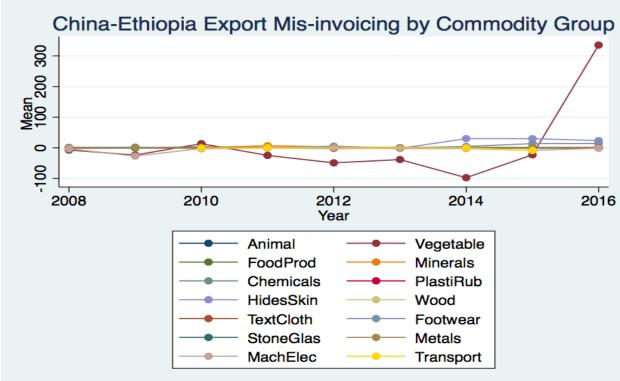


Figure 10. Export mis-invoicing of China-Ethiopia trade flow by commodity groups

Except for textile products, imports of all other products from China were over-invoiced (Figure 11). Imports of machinery, transport equipment, and plastic and rubber products contributed significantly to import over-invoicing. As noted above, when Ethiopia intensifies expansion of infrastructure development it looked east for the supply of construction materials sourcing most inputs from China. These import over-invoicing followed the trend this trend and took advantage of this trade expansion to hid their ill-obtained foreign currency in China through this mechanism.

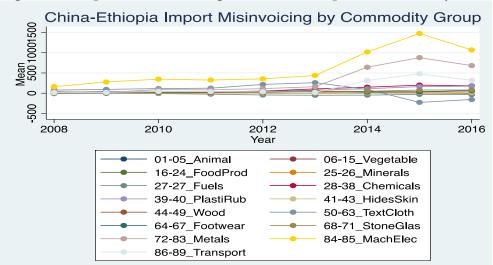


Figure 11. Import mis-invoicing of China-Ethiopia trade flow by commodity groups

For exports, the case of the U.S is similar to that of China, in that three products were responsible for export mis-invoicing: Vegetables, footwear, and textile products with more or less similar trends (Figure 12). Similarly, imports of machinery and transport equipment drove most of the import mis-invoicing between Ethiopia and the U.S.

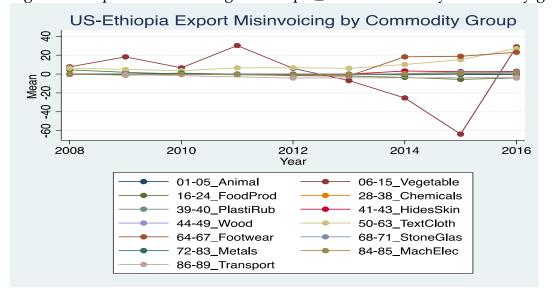


Figure 12. Export mis-invoicing of Ethiopia_U.S trade flow by commodity groups

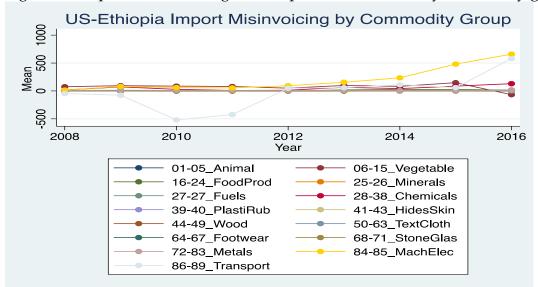


Figure 13. Import mis-invoicing of Ethiopia-U.S trade flow by commodity groups

Figures 14-17 depict scatter plot of export, import, and trade mis-invoicing for major trading partners of Ethiopia. These figures highlight the countries with which Ethiopia had recorded under-invoicing or over-invoicing of exports and imports. For instance, Figure 14 (with a 45-degree line) shows that countries to the right of the 45-degree line reported exports that are lower than the import amount reported by Ethiopia, which implies import over-invoicing in 2008. These countries include the U.S, Italy, Japan, Germany, and France. In 2016, not much had changed except that France moved to the other side of the 45-degree line suggesting import under-invoicing, and Germany moved closer to the 45-degree line (Figure 15).

For Ethiopia's exports, there have been movements by trading partners between 2008 and 2016. In 2008, Ethiopia's exports to Switzerland, Japan, and the U.S were over-invoiced (to the left of the 45-degree line), whereas, in 2016, all these three countries changed sides to the right side of the 45-degree line suggesting export under-invoicing. It is not clear why there has been such significant shift from export over-invoicing to export under-invoicing between 2008 and 2016 for these countries.

In connection with partner countries that have contributed to trade mis-invoicing, Tables 5-7 provide percentage share of export, import, and trade mis-invoicing to exports, imports, and total trade, respectively, for major commodity groups. Six commodity groups are selected based on results from previous graphs that show the importance of these commodities in affecting trade mis-invoicing. The percentage share of export mis-invoicing was the highest for exports to Austria, Czech Republic, Estonia, Ireland, Luxembourg, Slovak Republic, and Switzerland. These are small European economies

with which Ethiopia has a small market share, and for these countries even smaller (in absolute magnitude) mis-invoicing shows up as a large percentage change. China has the highest percentage share of mis-invoicing for exports in vegetables and transport equipment. Germany, the third major trading partner of Ethiopia, recorded the highest export mis-invoicing for food and machinery.

Overall, significnat trade mis-invoicing in vegetables had been recorded with Singapore (over-invoicing) and Brazil (under-invoicing). For food products, trade with India, United Arab Emirates, and Czech Republic had the highest percentage share and recorded the highest export under-invoicing. For trade in chemical products, Finland, Czech Republic, and New Zealand had the highest percentage share. For trade in machinery, China (Hong Kong), Ireland, and Australia were the top three countries with the highest share of trade mis-invoicing. The U.S comes second on the list of countries responsible for trade mis-invoicing as a result of trade in transport equipment. The other countries on the top of the list are Australia, Czech Republic, and Japan. Czech Republic comes up a lot on this list for almost all products. One needs to study further the trade relationship with the country further to get to the root of the problem.

V. Conclusions and Implications

This study aimed to present estimates of Ethiopia's trade mis-invoicing disaggregated by commodity groups, trading partners, and over time. Unlike previous studies that have used fixed CIF-FOB rations, the present study used estimated values of CIF- FOB to convert a country's exports to its equivalent imports values from partner countries. Estimates reported in this study also include countries often excluded in similar previous studies, despite being major trading partners of Ethiopia (like China and India), especially in recent years.

The results of this study show that, if we consider only advanced countries, trade misinvoicing costs Ethiopia \$6-36 billion between 2008 and 2016. If we include trade with emerging trading partners of Ethiopia (often excluded from such estimation), this alone adds \$15-78 billion to trade mis-invoicing estimates between 2008 and 2016. A handful of commodity groups contributed to trade mis-invoicing in a significant way. For exports, vegetables, hides and skins, and machinery were major contributors; for imports, transport equipment, machinery, and, to some extent, chemicals were major contributors.

Trading partners, which have significant percentage share of trade mis-invoicing compared to overall trade, include: India, United Arab Emirates (UAE), Finland, New Zealand, China (Hong Kong), Ireland, Australia, the U.S, Australia, Japan, and Czech Republic. Some of these countries are not on the list of advanced economies (India, UAE, and China); however, these countries contributed to mis-invoicing and hence to capital flight in a significant way.

Authorities in Ethiopia should look into these countries and commodity groups that have contributed to trade mis-invoicing in a major way to close the loopholes that these traders have used to mis-invoice trade.

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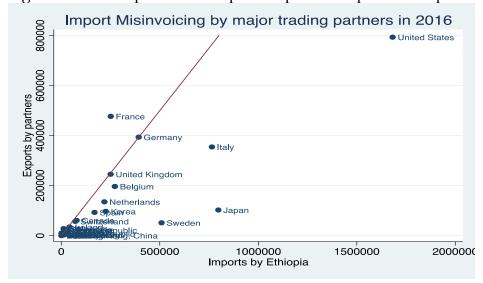
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Figure 14: Scatter plots of Ethiopia's imports and partners exports: 2008



Figure 15: Scatter plots of Ethiopia's imports and partners exports: 2016



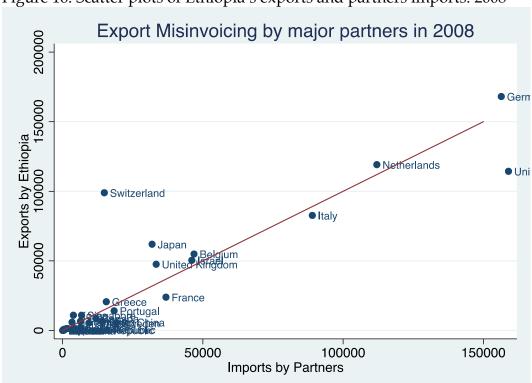


Figure 16: Scatter plots of Ethiopia's exports and partners imports: 2008

Figure 17: Scatter plots of Ethiopia's exports and partners imports: 2016

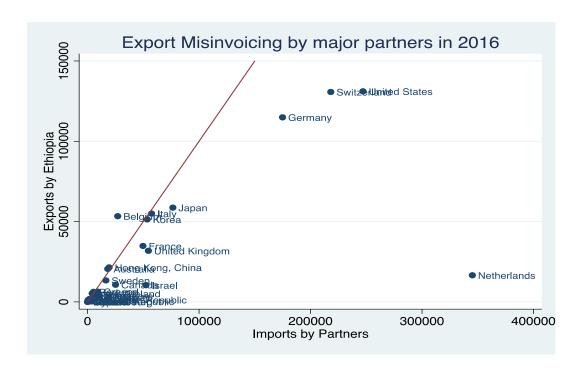


Table 4. Export, Import, and total trade mis-invoicing at three different CIF-FOB ratios (estimated, 10% and 5% CIF values)

All Countries	Exports		,	Imports			Trade		
year	Diff. Exports	Diff. Export (10%)	Diff. Export (5%)	Diff. Imports	Diff. Imports (10%)	Diff. Imports (5%)	Diff. Trade	Diff. Trade (10%)	Diff. Trade (5%)
2008	-77.37	-437.4	-159.3	2017.05	13437.83	14126.3	856.08	11712.49	12610.43
2009	-49.99	-706.72	-430.89	2111.77	12043.27	12801.33	1188.31	10133.66	11085.49
2010	-324.19	-1991.14	-1613.1	2137.55	12077.27	12943.35	1079.25	8476.97	9602.09
2011	-142.3	-1548.24	-1108.55	2209.62	11689.18	12650.01	1253.68	10085.79	11348.94
2012	-213.01	-1620.48	-1133.05	3039.54	14526.12	15760.8	1502.3	11674.1	13268.52
2013	-785.96	-4223.35	-3618.8	3945.22	19423.49	20716.69	2220.92	14506.94	16277.33
2014	-888.84	-3790.34	-3108.31	5856.12	31419.79	33031.44	3571.15	26945.56	29114.63
2015	-703.92	-2758.28	-2113.93	8296.98	37676.82	39455.13	6459.6	33609.74	35930.21
2016	1017.21	4461.63	4722.92	7982.62	35857.99	37563.93	7529.8	38866.36	40750.82
Total	-2168.37	-12614.32	-8563.01	37596.46	188151.76	199048.98	25661.09	166011.61	179988.46
Major Partners	Trading								
2008	-186.89	-786.32	-561.34	1309.86	5709.16	6320.27	738.81	4970.15	5749.89
2009	-104.33	-683.98	-463.2	1527.1	7039.51	7721.38	948.07	5982.78	6831.12
2010	-229.39	-1700.16	-1386.71	1428.8	6659.25	7424.9	963.67	4550.33	5536.42
2011	-103.18	-1224.23	-861.67	1345.42	5582.46	6407.23	1038.15	4948.72	6035.85
2012	-144.15	-579.48	-225.38	2013.88	5729.53	6821.63	1194.39	4579.22	5949.28

2013	-546.95	-2262.56	-1831.04	2988.41	10606.07	11731.93	1711.75	8003.76	9482.58
2014	-597.97	-2470.19	-1954.17	4825.13	16626.84	18057.4	2965.61	13655.65	15539.61
2015	-382.2	-1431.71	-953.01	6961.08	26019.69	27589.56	5989.87	24046.56	26038.63
2016	1044.3	4162.27	4343.58	6826.33	25973.39	27508.83	6810.35	29276.35	30934.9
Total	-1250.77	-6976.35	-3892.93	29226	109945.91	119583.14	22360.66	100013.5	112098.28

Table 5. Average export misinvoicng as a percent of total exports by major commodity groups for major trading partners between 2008 and 2016

Country	Vegetable	FoodProd	Chemicals	Metals	MachElec	Transport
Australia	-3.20	-30.07	93.42	57.65	1559.15	92.89
Austria	216293.73	5.47e+06	1197.80	2849.02	6951.53	501.46
Belgium	73.06	34997.10	743.94	109.83	226.02	172.84
Brazil	125.98			-45.33	-53.98	
Canada	71.64	381.81	122.71	9118.94	383.35	29.09
China	409.59	54.66	42.79	60.67	-101.27	2275.90
Cyprus	2664.20					
Czech Republic	3430.45	801.25	3314.01	1168.78	18.93	-87.87
Denmark	43.66	29.54			730.97	2995.51
Egypt	0.55	-22.21	213.55	648.48	387.30	-35.05
Estonia	2711.76					
Finland	72.54	47.94	3791.68	204.91	114.23	451.93
France	33.22	838.66	32185.88	-24.45	32.35	1762.03
Germany	-23.83	437.99	-36.56	-39.16	1827.66	203.12
Greece	16.08	20.11			-73.18	-108.38
Hong Kong, China	-83.40	18339.03	519.59	198.08	135.73	
Iceland	13.67	-108.18			-107.35	
India	-6.08	3131.15	10.86	-10.76	179.98	38.77
Ireland	15940.41		981.39	-64.78	844.87	55436.50
Israel	22.01	124.41	-12.58	73.39	-72.96	
Italy	-12.45	984.95	3251.07	395.32	499.73	22.39
Japan	-12.25	20215.59		-93.42	29.56	3661.40
Korea	1.19	2406.33	-0.12	-85.38	184.36	
Latvia	-29.83					
Lithuania	113.77					
Luxembourg	19301.99				-80.18	
Malta	-46.95	3276.61		-77.77		
Netherlands	61.61	-74.47	1144.82	450.93	31985.48	699.38

New Zealand	9.20	1325.43	-32.85	-96.12	268.56	2250.16
Norway	181.65	15912.93	-13.24	-90.08	-89.81	-18.31
Portugal	-12.08					
Russia	42.42				-54.57	
Singapore	-89.47		442.67	5938.03	69296.95	292204.03
Slovak Republic	66506.21			2776.90	982.18	
Slovenia	70.04					
South Africa	-18.05	946.75	36.61	-84.80	0.64	-58.28
Spain	-2.85	151.48	-75.51	-32.30	1932.07	-65.05
Sweden	34.38	56.71	-4.28	-107.15	12606.05	8989.62
Switzerland	1524.37	5136.81	528.93	84.52	27639.55	115957.53
Thailand	-52.26		916.24	1926.76	684.83	
Turkey	19.24	-72.50	-50.13	7619.01	-44.55	2006.93
United Arab Emirates	-40.94	-57.76	62.10	-93.50	-100.75	-94.20
United Kingdom	-29.54	169.73	898.98	-64.35	2940.06	1563.07
United States	5.92	83.72	31.54	37.13	76.78	-101.33

Table 6. Average import misinvoicng as a percent of total imports by major commodity groups for major trading partners between 2008 and 2016

Country	Vegetable	FoodProd	Chemicals	Metals	MachElec	Transport
Australia	-1219.45	67.34	85.02	94.77	70.65	-89.10
Austria		18.39	-117.08	-19.09	-102.41	-1345.30
Belgium	-106.86	-106.25	-494.41	9.33	15.58	-485.02
Brazil	84.69	61.99	-50.80	28.51	57.09	52.12
Canada	-25.13	71.52	54.12	-7.86	25.20	-3278.51
China	35.04	50.85	45.60	38.25	37.31	29.81
Cyprus		72.32	24.24	-62.88	30.71	
Czech Republic	-9646.80	-145.72	71.99	-319.76	28.28	-332.77
Denmark	32.98	28.29	77.15	41.29	-14.25	-727.27
Egypt	44.32	34.68	-20.19	53.59	-23.31	6.41
Estonia			-5.61	66.70	-58.16	-1594.75
Finland			95.69	85.43	23.65	-1162.56
France	63.33	-39.27	-252.50	63.38	26.93	-78.01
Germany	11.02	-19.41	28.60	28.27	20.35	31.97
Greece	33.53	14.48	14.46	10.98	-45.55	78.70
Hong Kong, China		81.70	100.00	32.68	77.40	100.00
Iceland					98.94	
India	69.35	81.42	7.50	32.15	39.10	36.68
Ireland	79.09	-2265.17	0.91	-131.70	74.58	-656.19
Israel	13.27	-1.37	52.99	20.22	6.54	-90.27
Italy	92.86	42.10	67.37	26.69	7.10	45.23
Japan			48.50	45.93	75.41	82.64
Korea	2.54	20.09	-27.56	63.63	50.19	47.53
Latvia	45.96	-53.32	96.31		-697.84	
Lithuania			-160.47	65.50	-818.50	-15057.01
Luxembourg				38.82	-4508.21	-176.54
Malta		99.34		-640.13	-537.45	
Netherlands	15.56	7.54	53.78	23.00	-68.52	-396.83

New Zealand	16.09		43.92	72.28	65.55	100.00
Norway		-1998.80	91.51	-17.68	-37.88	-1128.40
Portugal	17.67	10.94	-219.14	43.19	-0.89	-513.83
Russia	-508.32	67.83	-665.88	41.88	-918.43	-466.76
Singapore	-450.56	-4891.20	57.35	27.01	16.38	-1580.43
Slovak Republic			-1733.14	-214.64	-24.33	-392.90
Slovenia			-372.13	-701.64	36.94	81.04
South Africa	-32.00	38.36	18.42	47.38	-0.58	40.09
Spain	-15.73	27.38	31.43	23.66	13.12	16.01
Sweden	5.56	80.08	39.85	51.44	55.33	47.37
Switzerland	99.46	17.96	-10.75	-27.06	38.12	-73.93
Thailand	37.94	62.83	39.29	18.96	55.46	83.76
Turkey	42.06	38.60	11.56	17.85	19.07	14.87
United Arab Emirates	81.42	61.32	50.88	45.29	76.93	29.30
United Kingdom	45.67	25.97	10.57	24.80	-66.40	-106.12
United States	32.01	47.29	82.14	70.47	68.40	-306.10

Table 7. Average trade misinvoicng as a percent of total trade by major commodity groups for major trading partners between 2008 and 2016

Country	Vegetable	FoodProd	Chemicals	Metals	MachElec	Transport
Australia	-27.83	17.14	1499.68	16408.79	505.66	6154.15
Austria		89.03	-33.60	1644.49	8.28	-293.89
Belgium	6.56	-4.13	-43.81	143.21	113.40	-50.42
Brazil	236.73			75.81	378.88	
Canada	19.44	19.50	305.75	22.57	115.04	80.92
China	1.75	116.62	103.18	78.63	67.36	82.61
Cyprus						
Czech Republic	79.41	529.65	4627.12	-39.21	147.36	1007.79
Denmark	100.49	35.43			-2.93	13.86
Egypt	34.94	198.06	-15.43	315.59	49.20	191.64
Estonia						
Finland			17650.41	2019.16	118.84	333.29
France	34.49	-15.90	-56.10	263.83	51.31	-20.99
Germany	-32.59	-5.36	62.66	48.61	35.65	53.38
Greece	-20.19	40.00	27.57		6.40	
Hong Kong, China			221.76	-35.56	11632.35	
Iceland						
India	152.65	2896.42	22.60	66.74	84.46	-36.21
Ireland	42.09		15.53	16121.80	598.44	0.30
Israel	-32.79	95.47	326.85	294.26	25.28	
Italy	180.09	154.00	589.63	44.89	10.68	162.27
Japan			128.92	172.63	329.18	975.87
Korea	0.72	131.96	85.52	684.75	121.56	
Latvia						
Lithuania						
Luxembourg					-64.80	
Malta						

Netherlands	-206.15	54.75	382.51	51.85	15.51	-73.68
New Zealand	10.59		1552.18	3286.10	282.82	
Norway		69.18		1184.15	65.55	-110.94
Portugal	-23.06					
Russia	81.32				97.36	
Singapore	-622.02		19.82	-64.76	73.06	29.75
Slovak Republic				-39.28	-13.58	
Slovenia					145.22	
South Africa	-19.94	141.38	42.87	131.15	4.47	82.52
Spain	-27.03	153.60	53.23	80.80	31.23	144.52
Sweden	-15.98	93.00	94.65	570.47	269.85	234.94
Switzerland	40.53	5.96	-1.09	1838.50	102.83	54.63
Thailand	95.50		69.96	434.12	139.23	
Turkey	-0.80	312.84	41.15	31.63	42.72	21.56
United Arab Emirates	4.27	552.74	511.34	304.11	284.68	510.28
United Kingdom	-48.66	12.47	21.92	75.31	-24.59	-16.82
United States	35.13	193.47	1080.66	301.97	413.17	1904.79