



UC Davis Environmental Health and Safety

Guidelines for Export Compliance SafetyNet #126

The United States export laws and regulations operate to restrict the use of and access to controlled information, goods, and technology for reasons of national security or protection of trade. In general, the export control regulations cover four main types of University activities:

- **The transfer of controlled information**, including technical data, to persons and entities outside the United States.
- **The shipment of controlled physical items**, such as scientific equipment, from the United States to a foreign country.
- **The transfer of controlled scientific and technical information** related to export controlled items to foreign nationals in the United States unless the disclosure is made during the course of fundamental research or some other regulatory exclusion applies.
- **The travel to certain sanctioned or embargoed countries for purposes of teaching or performing research.**

Federal Regulations:

The Export Administration Regulations (EAR) *regulate the export of “dual use” goods and services (goods and services having both military and civilian uses)* that are identified on the Commerce Control List (CCL). The CCL includes nuclear materials, chemicals, microorganisms, toxins, electronics, computers, sensors, lasers, etc. Examples of some items that are controlled by the EAR are certain viruses, bacteria, and toxins and their corresponding vaccines, some metal alloys, some encrypted software, and some lab equipment, such as fermenters and biological safety cabinets. If an item or technology is controlled on the CCL, export to certain countries may be prohibited or require a license. **Regulatory Enforcement:** [Department of Commerce - BIS](#)

The International Traffic in Arms Regulations (ITAR) *regulate items with military applications*. Items and technology controlled under the ITAR regulations are listed on the U.S. Munitions List (USML). Some articles and technologies that are not readily identifiable as inherently military in nature—for example, research satellites or small, research submersibles—are included on the USML. If an item or technology is listed on the USML, export to certain countries is either prohibited or a license is required. However, licenses are rarely granted.

Regulatory Enforcement: [Department of State - ITAR](#)

The Treasury Department’s Office of Foreign Assets Control (OFAC) implements the economic and trade sanctions and, based on U.S. foreign policy and national security goals, targets foreign countries, terrorists, international narcotics traffickers, and those engaged in activities related to the proliferation of weapons of mass destruction. The OFAC regulations prohibit providing *anything of value* to an embargoed country or specially designated national.

Individuals should **not** travel to conduct research or educational activities to embargoed countries without first checking with the Office of Research to determine whether a license from the Department of Treasury, Office of Foreign Assets Control, is required.

Regulatory Enforcement: [Office of Foreign Assets Control - OFAC](#)

Laptop Computers, PDA's, cell phones, and other data storage devices:

When you travel outside of the United States (except Canada), you may require an export license to take your laptop computer, PDA, cell phone, data storage devices and encrypted software. The personal computer you take abroad may contain encrypted software that requires a license for export to many countries. For example, the new Microsoft Windows VISTA Business suite contains encrypted software, subject to some export restrictions. Please consult the software manufacturer or your local information technology staff to determine if you have encrypted software on your computer. If you determine you have encrypted software on the computer you plan to take abroad, please contact [Research Compliance & Integrity](#) to discuss a possible license exception. If a license is required, the process can take several weeks.

Campus Resources

- [UC Davis Export Control Information](#)
- [UC Office of the President Export Control Website](#)
- [Mail Services](#)
Contact Mail Services regarding items that you are shipping internationally.
- [Research Compliance & Integrity](#)
Contact Research Compliance & Integrity regarding items that you plan to carry with you overseas, or regarding research collaborations abroad.

For additional information, contact your EH&S [Safety Advisor](#), EH&S at 752-1493.

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