



**IF YOU HAVE ANY QUESTIONS:**

Contact:  
Natascha Finnerty  
Export Compliance Officer (ECO)  
[export@cfa.harvard.edu](mailto:export@cfa.harvard.edu)  
(617) 496-7557

Visit the Export Control website:  
<http://www.cfa.harvard.edu/spp/ec/>



Smithsonian Institution  
Export Control Compliance

Smithsonian Astrophysical Observatory  
60 Garden Street  
Cambridge, MA 02138  
617.496.7557 ph  
617.496.7692 fax

What do I need to know  
about **Export Controls?**

Smithsonian Institution



# Smithsonian Institution Export Controls

If you are involved in:

- travelling overseas;
- collaborating with colleagues in sensitive areas of the world (e.g., embargoed, areas with high cyber theft, or areas of conflict);
- hosting colleagues coming to the U.S. from overseas;
- giving scientific presentations at non-public meetings anywhere, domestic or abroad; or
- shipping technical, chemical, laboratory or biological items overseas or to U.S. possessions,

under certain conditions, your activity may be considered “export controlled” under Federal regulations.

Here is a brief introduction to export-controlled activities; how to contact the Export Compliance Officer (ECO) and where to go for information on how you can comply with Federal requirements (all websites referenced are linked from the ECO site on the back cover).

## EMBARGOED COUNTRIES:

Cuba, Iran, North Korea, and Syria are under **comprehensive** embargo. Travel to, as well as shipping items, information, or funds to, and collaboration with, individuals from these countries is restricted. Specific sanctions vary by country.

Countries with **partial** embargoes are Afghanistan, Balkans, Belarus, Burundi, Central African Republic, China, Colombia, Congo, Democratic Republic of Congo, Iraq, Lebanon, Libya, Mexico, Nicaragua, Russia-Crimea, Somalia, South Sudan, Ukraine, Venezuela, Yemen and Zimbabwe.

Embargoes are subject to change, so check the Office for Foreign Assets Control/Treasury Dept. site.

## EXPORTING /SHIPPING CONTROLLED ITEMS OR INFORMATION:

The export of items, information (if not encrypted) or software may require an export license from the U.S. government, depending on to whom it is being exported or disclosed, where it is going, and what is being shipped. To illustrate, a license is required to export to foreign countries certain historic military or space items that qualify as strategic dual use or defense hardware, materials, technology or software.

Contact the ECO before you export OR before making equipment available to non-U.S. persons.

**WHO?** Recipients should be screened against the DENIED PERSONS LISTS (see Commerce Dept. website.)

**WHAT?** Many different goods or information are restricted. See the U.S. Munitions list (State Dept.) and Commerce Controlled list (Commerce Dept.) for detailed lists of restricted technology. The ECO maintains a current combined list for SI.

--ITEMS: Biologicals, chemicals, lab equipment, infrared instruments, underwater marine, GPS, or space/satellite items, hazardous items (e.g. magnetic, x-ray, batteries, chemicals)

--INFORMATION: Presenting restricted information at conferences with international persons present, carrying sensitive info on laptops

## TAKING ITEMS OVERSEAS:

Tools of the trade (e.g., computers, tools, unrestricted equipment that is coming back) are exempted from reporting. However, if you wish to leave behind anything at the overseas location, we are required to file the export with the Bureau of Census - for anything valued more than \$2500 – ask the ECO how, if you are not using a freight forwarder (hand carry, courier).

## BOYCOTT PROVISION (ISRAEL):

Some Middle Eastern countries may attempt to require SI to participate in their boycott of Israel by including boycott language in written agreements. U.S law prohibits SI from accepting such clauses. Ask your sponsored projects contact or the ECO for more information.

## COLLABORATION WITH NON-U.S. PERSONS:

If you are hiring (including fellow, research associate or intern appointments) or collaborating with non-US persons for scientific research, there may be special requirements to complete. **U.S. persons** include U.S. citizens, permanent residents and individuals approved under asylum or refugee status. All others are **non-U.S. persons**.

Foreign visitors should be screened against the SPECIALLY DESIGNATED NATIONALS’ (SDN) lists of people or companies in foreign countries identified and blocked by U.S. Law. U.S. persons are generally prohibited from dealing with them.

Instructions on how to use our screening tools, mkdenial.com, can be found under the policies and procedures tab of our export compliance website. Your unit or the Office of International Relations, who assists in the preparation of visa applications for your visitors, may screen the SDN list.

## INTERNATIONAL PROCUREMENT QUICK TIPS!

If your answers to the questions below are yes, contact the ECO for further guidance. If the procurement international THEN:

Is the item an instrument, chemical or biological item on the Commerce Control List or U.S.

Munitions List? If so:

- Do you need to send drawings or technical data?
- Is the vendor in an embargoed country?
- Is the Vendor on the Denied Persons List?

## SHIPPING RECORDS:

Records of all exports (procurement, shipping, hosting non-U.S. persons, etc.) must be kept for 5 years. Updated 11/27/19

