

Research Material Shipment & Transport Manual

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Introduction

Harvard is a world-class research institution, committed to serving as a model of quality in our safety practices as in our teaching and research. Integral to research discovery and advancement is collaboration across institutions, both domestically and internationally. Such collaboration often involves the sharing of research materials, including biological samples, chemicals, reagents, research prototypes, and research equipment, including laptops to lasers. The transport and exchange of research materials may be subject to strict regulatory requirements related to the health and safety of shipping carriers and the public, international sanctions, protection of intellectual property, and export controls.

There are as many as ten different agencies imposing public health, safety and security requirements on the transport and exchange of research materials. For transporting or importing hazardous research materials (by hand or common carrier), researchers and research staff need to be aware of proper training, handling, labelling, and packaging requirements as well as the need to secure the appropriate federal safety and transport permits. The requirements and resources, by material and mode of transport, are described in more detail below. Harvard Environmental Health & Safety (EH&S) provides assistance and guidance in these areas.

For transporting or exporting research materials (by hand or common carrier) internationally, researchers and research staff must be aware that the shipment of <u>any</u> research materials, whether hazardous or not, may be controlled for export by U.S. authorities. Further detail on these requirements is detailed in the section on <u>Export Controls</u> below. Your <u>School or Institute Export Control</u> Administrator provides assistance and guidance in this area.

It is important to note that the transport or shipment of chemicals, biologicals, radioactive materials or radiation generating devices internationally may require guidance from **BOTH** EH&S and your <u>School or Institute Export Control Administrator</u>.

Prior to sharing, shipping, or otherwise transporting research materials, ensure that proper controls are in place, including:

- Proper labelling to ensure safe shipping of hazardous materials and the prevention of waste or loss of perishable materials;
- Proper packaging and transport of hazardous materials to avoid accidental exposure of personnel who may handle or be exposed to the material during transport;
- Adequate training to handle, package and ship hazardous materials;
- Authorization to Self-transport hazardous research materials;
- Execution of Material Transfer Agreements to prevent theft of intellectual property when sharing items or information with third parties; and
- Securing applicable permits or export licenses prior to transport or exchange of research materials.

Failure to comply with health and safety and transportation regulations may result in significant delays in transport, confiscation of samples by agencies, loss of perishable research materials, fines, and other civil and criminal penalties, injury, and/or risks to public health and the environment.

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This manual outlines the applicable regulatory requirements and the resources available to Harvard researchers and staff to facilitate the transport and exchange of research materials safely, compliantly, and efficiently.

Material Transfer Agreements (MTAs)

When sharing research materials, MTAs specify the rights, obligations, and restrictions of both the providing and receiving parties with respect to issues such as ownership, publication, intellectual property and permitted use, and liability.

The Harvard Office of Technology Development (OTD) provides high-quality, expedited service while keeping Harvard investigators' interests protected (i.e. the freedom to publish research results, to transfer modifications to other non-profits, etc.).

Visit the OTD <u>MTA webpage</u> for information on securing agreements for incoming and outgoing materials.

Shipment and Transportation of Hazardous Research Materials

Shipments of Hazardous Research Materials

The packaging, handling and transport of hazardous materials is subject to strict local, state, federal and international regulations. This is particularly so if the material is transported through the "public domain," namely, those roadways, airways, and sea lanes accessible to the public. Improper packaging of hazardous research materials can lead to leakage, hazardous material contamination of public areas, or injury to those handling the transported material or individuals and property nearby. The regulations are usually applied based on the method of transport (e.g. domestic ground or air). The U.S. Department of Transportation (DOT) and the International Air Transport Association (IATA) establish requirements for hazardous material transport via ground and air transport respectively. Additionally, the U.S. Departments of Commerce, State and Treasury establish export requirements and impose trade restrictions on the shipment or transport of certain hazardous materials internationally. Failure to comply with hazardous material transport requirements and export regulations (if applicable) can lead to fines, jail time, injury, loss of material, or delays in transport.

Harvard faculty, students, or staff who package, label, ship, prepare shipping documents, or self-transport hazardous research materials must complete appropriate training and comply with all federal, international and local regulations.

Harvard Environmental Health & Safety (EH&S) assists laboratory researchers and staff in managing shipments and transportation of hazardous materials, including chemicals, radioactive materials, and

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biological materials, by ground, air, or sea. For EH&S assistance with hazardous research material transport, please contact EHS ResearchTransport@harvard.edu.

In addition to EH&S, <u>School or Institute Export Control Administrators</u> can advise laboratory researchers and staff on whether export controls apply to the shipment or hand-carry of hazardous research materials internationally.

Shipment of hazardous research materials requires special attention and training, as each type of hazardous material will have specific requirements relating to:

- Training
- Packaging
- Labeling
- Documentation
- Mode of transport

For specific information about the shipment and transport of different types of hazardous research materials, please see below.

Training

Federal regulations and <u>Harvard Policy</u> mandate training for all individuals involved in the shipment of hazardous materials including those who package, label, ship, prepare shipping documents, or otherwise transport hazardous materials. Online training is available for the research community on the <u>Harvard Training Portal</u> (HTP) to enable researchers to ship or transport specific materials themselves. The table below outlines the options to ship or transport research materials. For more details, please review the requirements by specific research material below.

Can I be trained to ship my own research material?

Research Material		Can I be trained to ship this material?
Chemicals	Small volumes of flammables, corrosives,	Yes
	and common fixatives	
	Non-hazardous chemicals	Yes
	All others	No. Contact EH&S
<u>Biologicals</u>	Infectious agents causing serious disease	No. Contact EH&S. See Biologicals
		section below for more information.
	All other infectious agents	Yes
	Nucleic acids and proteins, human and	Yes
	animal tissue samples, non-infectious	
	genetically modified materials	
<u>Dry ice</u>		Yes
Radioactive material	Radioactive materials, lasers, X-ray devices	No
or radiation		
generating devices		

For a complete list of shipping and transport training courses available to you, please see Appendix B.

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Chemical

Trained faculty, staff, or students may ship specific small quantities of certain chemicals that are classified as flammables, corrosives, or common fixatives and are often used in biological research to fix or preserve biological samples (e.g. ethanol or formalin). Completion of the HTP course Shipping is required prior to shipping or transporting such items via ground or air.

Other hazardous chemicals must be shipped by someone specially trained to ship chemical hazardous materials. Contact EH&S to arrange this type of shipment.

For the transport or shipment of chemicals internationally, whether hazardous or not, you must also consult your <u>School or Institute Export Control Administrator</u>.

Biological

There are five basic classifications for biological materials when it comes to transportation and shipping:

- Non-regulated biological material
- Exempt Human or Animal Specimens
- Genetically Modified Microorganism/Organism
- Biological Substance, Category B
- Biological Substance, Category A

Training is required for anyone that will prepare a shipment of biological material or transport material via ground or air. This training is available online through HTP and is called Shipping Biological Materials and Dry Ice. The training will provide you with all instructions for classifying, packaging, labeling, and documenting a shipment of biological material.

Trained faculty, staff, or students may ship all categories of biological material except for Category A materials. To determine what constitutes a Category A shipment, please utilize <u>this flowchart</u>. Contact EH&S to arrange shipments of Category A materials.

For the transport or shipment of biological materials internationally, whether hazardous or not, you must also consult your <u>School or Institute Export Control Administrator</u>.

Radioactive Material or Radiation Generating Devices

No one may use, acquire, or remove from the University any radioactive materials or radiation generating devices (e.g. irradiators, x-rays and lasers) without obtaining written authorization from the <u>Radiation Protection Office</u> (RPO) in EH&S. This includes registration of radioactive materials in

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consumer products that are licensed for sale to the general public and do not require any registration with governmental agencies.

For complete requirements governing the transport and exchange of radioactive materials or radiation generating devices, please reference <u>Harvard's Radiation Safety Manual</u>.

For the transport or shipment of radioactive materials or radiation generating devices internationally, whether hazardous or not, you must also consult your <u>School or Institute Export Control Administrator</u>.

Other Methods of Transport (when shipment via carrier is not feasible)

Self-Transport or Hand Carry

Self-transport or hand carry of research materials via ground or air is strongly discouraged. Self-transport of research materials, especially hazardous research materials, may incur increased scrutiny of material identity and packaging by authorities, and complex documentation requirements. In rare instances where use of a carrier or courier service may be limited (e.g. remote field site), hand carry or self-transport may be considered. Examples of self-transport or hand carry include carrying research materials in airline checked or carry-on luggage or using a personal vehicle to transport research materials. In these cases, you must notify EH&S at EHS ResearchTransport@harvard.edu and meet all requirements outlined below in order to perform self-transport. Additionally, if you are planning to hand-carry research materials internationally, you must notify your School or Institute Export Control Administrator so that they can review the items and determine whether an export license is required.

Note that arranging all required paperwork may take weeks to months depending on the nature of the material and where it will be transported. Be sure to reach out to EH&S and your <u>School or Institute</u> <u>Export Control Administrator</u> (if international) as soon as you suspect that self-transport may be needed to move research materials. Unauthorized self-transport, improperly packaged items, and/or items with inadequate documentation may subject you to detention or other enforcement action by Customs and Boarder Protection (CBP). The following requirements are found in a checklist format in <u>Appendix C</u>.

Requirements for self-transport or hand carry of research materials:

- Obtain and carry documentation that proves you have authority to transport and/or exchange the research materials.
 - An MTA is the recommended mechanism of documentation. If an MTA is not established, a letter signed by the Principal Investigator (PI) must be obtained.
- Obtain and carry all permits relevant to public, agricultural, and environmental health. See the
 sections below pertaining to <u>domestic</u> or <u>international</u> transport of research materials. These
 may include import permits for the destination country or export licenses for materials leaving
 the U.S.

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- For international self-transport or hand carry, have the material reviewed by your <u>Export</u>
 <u>Control Administrator</u> who could review the materials being transported and determine if an
 export license if needed.
- Obtain and carry documentation that accurately identifies the material to be transported and
 ensures it is allowable for self-transport or hand carry via ground or air. The documentation
 must also outline that the packaging and labelling meets regulatory requirements. This
 documentation must include references to the regulation(s) that govern the transport of
 materials via these modes. EH&S can review your hand carry plans and provide this
 documentation.
- Package and label research materials appropriately per regulations cited above.
- Arrange for notification of relevant authorities before you self-transport research materials.
 This may include the Transportation Security Administration (TSA), Customs and Boarder
 Protection (CBP), United States Department of Agriculture (USDA), and others. EH&S can make these notification arrangements for you.
- Declare all research materials to customs and border authorities. Present all paperwork to justify legitimate self-transport of research materials.
- Carry a list of institutional contacts if questions arise during transport. This list should include contact information for the PI, EH&S, <u>School or Institute Export Control Administrator</u>, lab manager, or other pertinent lab contact.

Local Transport of Research Materials

Intracampus

Biological or Chemical

When transporting biohazardous materials or hazardous chemicals by foot on Harvard's campus, take precautions to prevent accidental spills, particularly in public areas of campus buildings and exterior walkways.

The following requirements must be observed during the transportation of biological materials or hazardous chemicals within a campus (e.g., between two laboratories or buildings on the same campus):

- Place the primary container(s) in a secondary transport container that is also sealed. The secondary container must be gasket-sealed, shatterproof, and leak-proof and sturdy enough to remained closed in case the container is dropped.
 - Note: Never place dry ice into a sealed container. Seal primary and secondary containers and then place them into dry ice.
- Add sufficient absorbent to the secondary container to absorb contents of the first container in case of a spill or leakage.
- Decontaminate the outside of the primary container before placing into the secondary container. Decontaminate the secondary container before leaving the laboratory.

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- Clearly label the container, including the identity of the research material, the universal biohazard symbol (if the biological material has been assigned BL2 by the Committee on Microbiological Safety) and the name and phone number of the person carrying the material or the lab the material belongs to.
- Carry a pair of clean disposable exam gloves with you when transporting biohazardous materials. Do not wear gloves while moving materials around campus.
- Avoid transporting materials through eating areas or break rooms. The container should be carried directly to the intended laboratory and not taken to offices, cafeterias, or other public or inappropriate locations.
- Secure IACUC approval prior to transport of any experimentally-infected animals
- Recommended secondary container for test tubes/vials:
 - Nalgene Biotransport Carrier
 - Less expensive options include Plano tackle, field boxes with O-ring seals, available at various sporting goods stores and through Amazon.

Radioactive Material or Radiation Generating Devices

Transportation of radioactive materials is regulated by the Massachusetts Radiation Control Program, U.S. Department of Transportation (DOT), U.S. Postal Service, the License of the destination facility as well as other local regulations. To ensure the transportation of radioactive materials meets these regulatory requirements, all transportation for radioactive materials must first be approved by the Radiation Protection Office. Review Harvard's Radiation Safety Manual for complete instructions on how to transport such materials on campus.

Intercampus and within the Greater Boston Area

Transporting materials considered to be hazardous materials between Harvard campuses (e.g. Longwood, Cambridge, Allston, etc.) and neighboring institutions using public roadways must be done in compliance with US Department of Transportation (DOT) requirements. A guide for transportation of biological materials with the greater Boston area can be found on the EH&S webpage and a table of options for local transport of biological materials can be found in Appendix D.

Domestic Transport or Exchange of Research Materials

Within the United States, the Department of Transportation (DOT) regulates all activities related to the shipment and transport of hazardous materials (e.g. chemicals, gases, etc.). The Hazardous Materials Regulations apply to each person who performs functions related to the transportation of hazardous materials. DOT oversees the Hazardous Materials Regulations (49 CFR Parts 100-185) that regulate all activities involved with the shipment and transport of hazardous materials (e.g. chemicals, gases, etc.). This includes shipping hazardous materials interstate, intrastate, through commerce by rail car, aircraft, motor vehicle and vessel. These comprehensive regulations govern transportation-related activities by

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offerors (e.g., shippers, shipping/receiving departments, brokers, forwarding agents, freight forwarders,); carriers (i.e., common, contract, and private trucking and other transport companies). In most cases Harvard acts as an offeror of hazardous materials.

Interstate Transport of Biologicals

United States Department of Agriculture, Animal and Plant Health Inspection Service

USDA APHIS regulates the interstate movement of agricultural products to prevent pests and agricultural disease agents from spreading within the U.S. Examples of regulated items include livestock disease agents (naturally occurring or engineered), material known or reasonably expected to contain livestock disease agents, vectors of livestock diseases, naturally occurring or engineered organisms that impact plants directly or indirectly, plant pests, noxious weeds, soil, or plants.

More detailed information about USDA APHIS permits can be found in the <u>Biological Importation</u> section. <u>Contact EH&S</u> as soon as possible when you suspect the need for an USDA intrastate transfer permit.

International Transport or Exchange of Research Materials

Import

Chemical Imports: Toxic Substances Control Act

Laboratories engaged in research must consider the applicability of the Toxic Substances Control Act (TSCA) to their operation. The Toxic Substances Control Act (TSCA), administered by the U.S. Environmental Protection Agency (EPA), is intended to ensure that the human health and environmental effects of chemical substances are identified and adequately addressed prior to production or transport. Visit the EH&S webpage on TSCA for more information and import certification form.

Biological Imports: Permits

Harvard EH&S Biosafety can help you determine if you need an import permit for biological materials, assist you in the application process, and support you in preparing for import permit inspections. Permits must be applied for in the name of the faculty member who is the principal investigator overseeing the use of the imported biological material. EH&S does not maintain an umbrella permit.

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You must notify the EH&S Biosafety team at EHS_ResearchTransport@harvard.edu as soon as you identify the need to obtain a permit.

Centers for Disease Control (CDC) Import Permit Program

The <u>CDC Import Permit Program</u>, or IPP, regulates the importation of infectious biological materials that could cause disease in humans in order to prevent their introduction and spread into the U.S. The program ensures that the importation of these agents is monitored and that facilities receiving permits have appropriate biosafety measures in place to work with the imported agents.

Items Requiring CDC Import Permits: Contact EH&S or utilize the <u>CDC Import Permit Program e-Tool</u> for help determining if a permit is needed.

- Any infectious (etiologic) agent known or suspected to cause disease in humans.
- Unsterilized specimens of human and animal tissues (such as blood, body discharges, fluids, excretions, or similar material) containing an infectious or etiologic agent.
- Hosts and Vectors:
 - Animals. Any animal known or suspected of being infected with an organism capable of causing disease in humans may require an import permit. Importation of live turtles of less than 4 inches in shell length and live nonhuman primates is regulated by the <u>CDC</u> <u>Division of Global Migration and Quarantine (DGMQ)</u>
 - Bats. All live bats require an import permit from the CDC and the U.S. Department of Interior, Fish and Wildlife Services.
 - Arthropods. Any living insect or other arthropod that is known or suspected of containing an etiologic agent (human pathogen).
 - o Snails. Snail species capable of transmitting a human pathogen.

To Obtain a CDC Import Permit:

- Notify EH&S at EHS ResearchTransport@harvard.edu.
- Importation permits are issued only to the importer, who must be located in the United States.
- The permittee must be the Principal Investigator of the laboratory. Exceptions must be reviewed by EH&S.
- EH&S will assist you in applying for your permit online through the <u>CDC eIPP System</u>.

United States Department of Agriculture, Animal and Plant Health Inspection Service

<u>USDA APHIS</u> regulates the importation of all agricultural products to ensure U.S. agricultural industries are kept free from pests and diseases. APHIS makes sure that all imported agricultural products shipped to the United States from abroad meet the Agency's entry requirements to exclude pests and diseases of agriculture. APHIS regulates the importation of plants and plant products, organisms/microorganisms, soil, animals and animal products, and vectors.

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Keep in mind that USDA also regulates the interstate movement of agricultural products to prevent pests and agricultural disease agents from spreading within the U.S.

USDA APHIS requirements for import permits is complex. Contact EH&S for help determining if a permit is required.

Items Requiring USDA APHIS Import Permits:

- Animal pathogens and biological materials of animal origin
 - USDA APHIS requires permits for the importation of animal pathogens and biological materials that contain animal material. Materials such as cell culture-grown pathogens containing growth simulants of bovine or other livestock agents require permits due to the potential for the presence of organisms/viruses that may be dangerous to animals.
 - Some animal products may not need a USDA import permit but are still subject to review at the port of entry by USDA inspectors
 - Visit the <u>USDA website</u> or contact EH&S for a list of items that do not require an import permit. While a permit may not be required, there may be documentation requirements to successfully import the materials into the U.S.
- Soil, plant material, plant pests and plant pathogens
 - If you plan to import soil, plant material, plant pests or plant pathogens from a country outside of the U.S., or from certain areas within the U.S., you must be authorized by APHIS through their permitting system. These permits will stipulate storage conditions and disposal requirements, designed to prevent the introduction or spread of pathogens that may be present in the samples.

To Obtain a USDA Import Permit:

- Notify EH&S at EHS ResearchTransport@harvard.edu.
- The permittee must be the Principal Investigator of the laboratory. Exceptions must be reviewed by EH&S.
- EH&S will assist you in applying for your permit on-line using the USDA ePermits system.

Fish & Wildlife Service and National Marine Fisheries Service

Fish and Wildlife Service permits are required for marine mammals, certain fish, and certain live animals, including bats as well as species covered by the Convention on International Trade in Endangered Species (CITES). Contact EH&S and review the <u>USFWS website</u> on import and export to determine if you need a permit.

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Export

Export Control

The U.S. government actively regulates, and in some cases, restricts the export of certain items and information, including technologies that it deems critical to the interests of national security, the economy, and foreign policy. The Departments of State, Commerce, and Treasury administer the primary controls on exports of goods, commodities and information. The Department of State Directorate of Defense Trade Controls (DDTC) administers export controls of **defense items**, Department of Commerce Bureau of Industry and Security (BIS) administers export control of **items that have both commercial and possible military applications**, and the U.S. Department of the Treasury Office of Foreign Assets Control (OFAC) enforces **country-specific embargoes and financial sanctions on individuals, organizations and countries**. For more information on Comprehensively Sanctioned or Targeted Sanctions Countries, see Appendix II of the University's <u>Screening Process and Monitoring Guidance</u>.

Controlled items may include certain pathogens, genetically modified organisms, toxins, chemicals, lasers, software, robotics, and other research items and equipment. The export of controlled items, information or software may require approval from the U.S. government in the form of an export license. An export license permits controlled tangible items or software to be sent outside the U.S. or controlled information or software to be shared with foreign persons in the U.S. or abroad. Before carrying, shipping, sharing, or otherwise sending any materials outside of the United States, consult the International Shipping Guidance.

Additionally, contact your <u>School or Institute Export Control Administrator</u> when:

- Shipping or hand-carrying research samples, models, equipment or other items internationally
- The shipment of research materials involves a <u>Restricted Party</u> on a U.S. Government export or trade sanctions list
- The shipment involves items, information or software on the <u>U.S. Commerce Control List</u> or the U.S. Munitions List.

<u>School or Institute Export Control Administrators</u> can help determine if an export license is required. All license applications must be reviewed and approved by the Office of the Vice Provost for Research prior to submission. Export Licenses must be applied for in the name of the faculty member who is the principal investigator overseeing the research and transport of the material.

In the event of a violation of U.S. export controls, both the individual shipping or transporting the item, as well as the University, may be held liable. The individual shipper may be subject to criminal and civil penalties, as well as denial of export privileges and debarment from contracting with the federal government.

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Chemical Exports: Toxic Substances Control Act

See the reference to the TSCA above under Chemical imports and visit the <u>EH&S webpage on TSCA</u> for more information and export notification form.

Biological Exports

Exportation of biological materials usually does not require a USDA or CDC export permit. Export permits and certification are available through USDA, however, in the case that the destination country requires documentation of the health status or disease risk of agricultural products. Contact EH&S or visit the USDA website for more information.

Off-Campus, Domestic or International Shipment of Animals (including naïve animals)

Shipments of animals to other institutions or another Harvard campus are complicated transactions for the investigator's laboratory, veterinary services, and receiving institutions. Sending laboratories, veterinary staff, and Institutional Animal Care and Use Committees must work together to coordinate animal shipments with the recipient institution and all intermediary authorities (e.g. national veterinary authorities, Customs). Some receiving institutions may need additional assurances regarding health status, required additional diagnostic testing results, or documentation of various aspects of animal care or husbandry. These may require extensive communication and time.

For animals originating at or transported to the Harvard Longwood Campus, contact the <u>Harvard Center</u> <u>for Comparative Medicine</u>.

For animals originating at or transported to the Cambridge campus, Allston Campus, or Concord Field Station, contact the <u>FAS Office of Animal Resources</u>.

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References

Harvard Policies:

- EH&S:
 - Environmental Health & Safety Policy
 - Laboratory Safety Policy
 - Harvard Biosafety Manual
 - Harvard Radiation Safety Manual
- OVPR:
 - OVPR Export Controls Policies and Procedures
 - Export Control Policy Statement
 - Export License Review and Approval Policy
 - International Shipping Guidance
 - Specially Designated National List Screening Process and Monitoring Guidance

Federal Agency Regulations:

- International Traffic in Arms Regulations
- Export Administration Regulations
- OFAC Sanctions Lists
- Department of Transportation Hazardous Materials Regulations (49 CFR Parts 100-185)
- United States Department of Agriculture Animal and Plant Health Inspection Service Imports & Exports
- CDC Import Regulations (42 CFR Part 71.54)

International Regulations:

• International Air Transport Association <u>Dangerous Goods Regulations</u>

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Appendices

Appendix A – Who to Contact for Help by Keyword

	Harvard	Export	OTD
	EH&S	Control	
Chemical (hazardous)	×		
Biological pathogen	×		
Biological GMO/GMMO	×		
Biological human, animal samples	×		
Animal pathogens	×		
Soil, plant material, plant pests, plant pathogens	×		
USDA permits	×		
CDC permits	×		
USFWS permits	×		
Import	×		
Export		×	
Self-transport or hand carry of hazardous research materials	×	×	
International destinations		×	
Restricted party		×	
Trade sanction		×	
US Commerce Control or Munitions list		×	
TSCA	×		
International		×	
Intrastate	×		
Intellectual property (IP)			×
Material Transfer Agreement (MTA)			×
Department of Transportation (DOT)			
International Air Transport Association (IATA)			
Air, ground transport	×		
Radioactive materials, radiation-generating devices (e.g. lasers, x-			
rays)			
Live animals – Contact Local Harvard Animal Facility			

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Appendix B – Research Material Shipping Training Courses

Research Material		HTP Training Available
Chemicals	Small volumes of	Shipping Excepted Quantities: Flammables,
	flammables, corrosives,	Corrosives, and Common Fixatives
	and common fixatives	
	All others	None – shipment must be coordinated by EH&S
Biologicals	Category B,	Shipping Biological Materials and Dry Ice
	GMO/GMMO, exempt	
	specimens	
	Category A	None – shipment must be coordinated by EH&S
Dry ice		Shipping Non-regulated Materials and Dry Ice
Radioactive		None – shipment must be coordinated by EH&S
material or		
radiation		
generating devices		

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Appendix C – Self-transport or Hand Carry Checklist

	Obtain and carry documentation that proves you have authority to transport and/or exchange
	the research materials.
	- An MTA is the recommended mechanism of documentation. If an MTA is not
	established, a letter signed by the Principal Investigator (PI) must be obtained.
	Obtain and carry all permits relevant to public, agricultural, and environmental health. See
	the sections below pertaining to domestic or international transport of research materials.
	For international self-transport or hand carry, have the material reviewed by your Export
	<u>Control Administrator</u> and obtain and license if needed.
	Obtain and carry all import and export authorizations for international self-transport. These
	may include import permits for the destination country or export licenses for materials
	leaving the U.S.
	Obtain and carry documentation that accurately identifies the material to be transported and
	ensures it is allowable for self-transport or hand carry via ground or air. The documentation
	must also outline that the packaging and labelling meets regulatory requirements. This
	documentation must include references to the regulation(s) that govern the transport of
	materials via these modes. EH&S can review your hand carry plans and provide this
	documentation.
	Package and label research materials appropriately per regulations cited above.
	Arrange for prior notification of relevant authorities before you self-transport research
	materials. This may include the Transportation Security Administration (TSA), Customs and
	Border Protection (CBP), United States Department of Agriculture (USDA), and others. EH&S
	can make these notification arrangements for you.
	Declare all research materials to CBP authorities. Present all paperwork to justify legitimate
Ш	self-transport of research materials.
	Carry a list of institutional contacts if questions arise during transport. This list should include
	contact information for the PI, EH&S, <u>School or Institute Export Control Administrator</u> , lab
	manager, or other pertinent lab contact.

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Appendix D – Options for Local Transport of Biological Research Materials

Type of Shipment	Non-hazardous material on wet ice or ice packs	Non-hazardous biological on dry ice Genetically Modified Micro-Organisms Exempt Patient or Animal Specimen Category B Biological Substance
Considered DOT- Hazmat by ground?	No	Yes
Required Training	No IATA / DOT training required	Shipper/transporter must be IATA/DOT trained if a vehicle is used to transport the material.
Packing/Labeling	To and From information	Fully DOT Compliant packing/labeled required if transported via vehicle
University Vehicle	Permissible	Permissible2
Local shuttles: (e.g. MASCO Shuttle, Harvard Shuttles)	No	No
Personal vehicle or bicycle	Yes	Not recommended
Taxi Cab	Yes1	Yes1
Medical Courier	Yes3	Yes3
Mass Transit, i.e. MBTA trains, busses, commuter rail	No	No
Walking	Yes	Yes
Car for hire, i.e. UBER, Lyft	No	No

- 1. Call ahead to ensure company will take biomedical packages/dry ice. Metro Cab is one suggested taxi company. Individual drivers have the right to refuse any package. You may be required to ride with your package.
- 2. Avoid transporting dry ice packages in a poorly ventilated vehicle due to suffocation hazard.

 Transporting biological shipments may null and/or void your auto insurance in case of an accident.
- 3. Examples of couriers = Deliv, Skycom. Your School or Department may already have an agreement with a courier service.

If you are unsure about any aspect of shipping biological materials (hazardous or non-hazardous) contact EH&S at EHS_ResearchTransport@harvard.edu

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