



International Shipping: Export Controls/Other Requirements

Harvard University is fully committed to comply with applicable U.S. laws and regulations pertaining to exports of items, services and technology.



The information contained in this pamphlet is intended to provide a high-level overview of situations in which export control laws may apply to international shipments and resources to assist with international shipping matters.

In the event of a violation of U.S. export control law, both the university and the individuals involved in the violation may be liable.

The [Office of the Vice Provost for Research](#) and Harvard [Global Support Services](#) (GSS) websites have additional information on export control laws and regulations, as well as links to University resources and a list of School Contacts.

Export Control Council/ School Export Control Administrators

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SHIPPING TIPS

- Be aware of trade sanctions that exist for certain countries (e.g. Iran, Cuba, North Korea, Syria and the Crimean Region of the Ukraine) regarding restrictions on research collaborations or shipping items, materials or equipment.
- Retain hard or soft copies of shipping documentation for **5 years**.
- Double-check that the recipient address is a valid business address, rather than a residential address.
- **Shipped v. Carried:** Export-control laws do not distinguish between an item that is shipped and an item that is hand-carried. Thus, ***if it is unlawful to ship an item to a certain country without a license, it is also unlawful to carry it with you.***

Exports

- Any item that is sent from the United States to a foreign destination is an export. “Items” include commodities, software, biological materials, chemicals, technology, and information.
- 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. Controlled items may include biological materials, chemicals, sensors and lasers, robotics, imaging equipment, nuclear technology, navigation, avionics and flight control technology, marine technology, and computer/microelectronic technology.
- Before carrying, shipping, or otherwise sending materials outside of the United States, you should consult your School or Institute’s Export Control Administrator to determine whether an export license is required.
- Export Control requirements apply regardless of the source of funding, both external and internal.

Know Before You Ship

- **Item:** Certain items are considered “controlled” and require an export license. It is important to describe the item, biological material, chemical, equipment or component you want to ship, including any information provided by the vendor, such as an export control classification number (ECCN). Your School’s Export Control Administrator can help you determine if a license is required.
- **Destination:** *Your destination determines what export controls or regulations apply.* Contact your School or Institute’s Export Control Administrator to determine whether your destination (or shipping route) is subject to any sanctions program. Additionally, your arrival country may have import controls. Consult the [Global Support Services Exports and Imports](#) website for more info.
- **Recipient:** Foreign individuals and entities may be subject, individually, to sanctions. Before collaborating with a foreign national/entity, or sending an item abroad, contact your School’s or Institute’s Export Control Administrator to ensure that the recipient of the item is not included on a sanctions list.
- **End Use:** It is important to describe the proposed end use of the item you are shipping, if it is known, as that may affect whether or not the item is subject to export controls.

Other Considerations

- **Shipping Items Back:** US Customs enforces import controls. Consult the [Global Support Services Exports and Imports](#) website for more info. Also, foreign countries restrict certain exports or may impose custom duties or import restrictions on items brought into the country. This may include data and specimens as well as laptops, encryption software and other electronic devices.
- **Shipments or Transport of Dangerous Goods:** In addition to export control requirements, other regulatory requirements apply to shipments and transport of dangerous goods, including chemicals, radioactive materials and biological materials. For more information, see Environmental Health and Safety (EH&S)’ guidance on [Shipping and Transporting Research Materials](#) or contact: lab_safety@harvard.edu
- **Protecting Your IP:** You may need a Material Transfer Agreement when sharing or receiving materials to specify the rights, obligations, and restrictions of both the providing and receiving parties. Consult hms_materialtransfer@harvard.edu or materialtransfer@harvard.edu for more information.