

## Export Controls, Trade Sanctions and Country Key

UPDATED 1/11/11—Check urls for updates (changes occur often)

<b>NATO Countries</b> <a href="http://www.nato.int/structur/countries.htm">http://www.nato.int/structur/countries.htm</a> (Relevant for fundamental research involving <u>space technology</u> and ITAR.)	Albania, Belgium, Bulgaria, Canada, Croatia, Czech Republic, Denmark, Estonia, France, Germany, Greece, Hungary, Iceland, Italy, Latvia, Lithuania, Luxembourg, The Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Turkey, UK, USA
<b>Major Non-NATO Allies (§§517, 664(q) of Foreign Assistance Act of 1961)</b> (Relevant for fundamental research involving space technology and ITAR.)	Argentina, Australia, Bahrain, Egypt, Israel, Japan, Jordan, New Zealand, Philippines, Republic of Korea (S. Korea), Taiwan, Thailand, Kuwait, Morocco, Pakistan
<b>European Space Agency Countries</b> <a href="http://www.esa.int/SPECIALS/About_ESA/SEMW16ARR1F_0.html">http://www.esa.int/SPECIALS/About_ESA/SEMW16ARR1F_0.html</a> (Relevant for fundamental research involving <u>space technology</u> and ITAR.)	Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, the Netherlands, Norway, Portugal, Spain, Sweden, Switzerland, the United Kingdom
<b>European Union</b> <a href="http://europa.eu/abc/european_countries/eu_members/index_en.htm">http://europa.eu/abc/european_countries/eu_members/index_en.htm</a>  (Relevant for fundamental research involving <u>space technology</u> and ITAR.)	Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, the United Kingdom

<b>Countries with Entities on the EAR Entity List<sup>i</sup></b> (15 CFR 744, Supp. 4) Contact DSR before any involvement with entities (or persons associated with entities) on this list if technical information, <u>any equipment</u> (even standard laptops, PDAs, cell phones), biological materials, chemicals are involved. Check List before involvement with entities or persons associated with entities in these countries.	Armenia, Belarus, Canada, China, Egypt, Germany, Hong Kong, India, Iran, Ireland, Israel, Korea (North), Kuwait, Lebanon, Malaysia, New Zealand, Norway, Pakistan, Russia, Singapore, Syria, Taiwan, United Arab Emirates, United Kingdom (countries with restricted entities on the EAR “entity chart” at 15 CFR 744, Supp.4) <a href="http://www.access.gpo.gov/bis/ear/pdf/744spir.pdf">http://www.access.gpo.gov/bis/ear/pdf/744spir.pdf</a>
<b>OFAC Sanctioned Countries<sup>ii, iii</sup></b> <a href="http://www.treas.gov/offices/enforcement/ofac/">http://www.treas.gov/offices/enforcement/ofac/</a>  Contact DSR before any involvement, even planning, with Governments, entities or nationals of or from these countries. <u>Sanctions apply to ALL DISCIPLINES</u> but restrictions vary by country.	Balkans Sanctions, Belarus Sanctions, Burma Sanctions, Cote d’Ivoire (Ivory Coast) Sanctions, Cuba Sanctions, Democratic Republic of the Congo Sanctions, Iran Sanctions, Iraq Sanctions, Former Liberian Regime of Charles Taylor Sanctions, N. Korea Sanctions, Sudan Sanctions, Syria Sanctions, Zimbabwe Sanctions
<b>EAR Denied Persons List, Unverified Persons List, General Order No. 3 List<sup>iv</sup></b> Contact DSR before any involvement with persons on this list if technical information, <u>any equipment</u> (even standard laptops, PDAs, cell phones), biological materials, or chemicals are involved.	<a href="http://www.bis.doc.gov/DPL/Default.shtm">http://www.bis.doc.gov/DPL/Default.shtm</a> <a href="http://www.bis.doc.gov/enforcement/unverifiedlist/unverified_parties.html">http://www.bis.doc.gov/enforcement/unverifiedlist/unverified_parties.html</a> <a href="http://www.access.gpo.gov/bis/ear/txt/736.txt">http://www.access.gpo.gov/bis/ear/txt/736.txt</a>
<b>ITAR Prohibited Countries<sup>v</sup></b> (22 CFR 126.1 and other State Department-embargoed countries <a href="http://www.pmddtc.state.gov/embargoed_countries/index.html">http://www.pmddtc.state.gov/embargoed_countries/index.html</a> )  Contact DSR before any involvement with these countries, their nationals or governments, if <u>technical information, research or technical equipment, biological materials, or chemicals are involved</u> —or if standard laptops, PDAs, cell phones are involved <u>and they contain encrypted software or nonpublic research data or nonpublic technical information</u> . (What is “public” is defined in regulations. See Fundamentals of Export Controls Slides on DSR or General Counsel’s web site.)	Belarus, Cuba, Iran, Iraq <sup>vi</sup> , Libya <sup>vii</sup> , N. Korea, Syria, Cote d’Ivoire, Vietnam, Burma (Myanmar), China, Haiti, Lebanon, Liberia, Rwanda, Sierra Leone, Somalia, Sri Lanka, Sudan, or Zaire (Democratic Republic of Congo), Venezuela, Afghanistan <sup>viii</sup> , Cyprus (if destined for the armed forces of Cyprus), Eritrea <sup>ix</sup> , Yemen (presumption of denial for lethal articles and supporting items or services), Zimbabwe, any UN Security Council arms embargoed country

**Chemical Weapons Convention Countries**

(15 CFR 745, Supp.2)

(Relevant for export controls of biological and chemical materials.)

Afghanistan, Albania, Algeria, Andorra, Antigua and Barbuda, Argentina, Armenia, Australia, Austria, Azerbaijan, Bahrain, Bangladesh, Barbados, Belarus, Belize, Belgium, Benin, Bhutan, Bolivia, Bosnia-Herzegovina, Botswana, Brazil, Brunei Darussalam, Bulgaria, Burkina Faso, Burundi, Cambodia, Cameroon, Canada, Cape Verde, Central African Republic, Chad, Chile, China (and Hong Kong and Macau), Colombia, Congo (Democratic Republic of the), Cook Islands, Costa Rica, Cote d'Ivoire (Ivory Coast), Croatia, Cuba, Cyprus, Czech Republic, Denmark, Djibouti, Dominica, Ecuador, El Salvador, Equatorial Guinea, Eritrea, Estonia, Ethiopia, Fiji, Finland, France, Gabon, Gambia, Georgia, Germany, Ghana, Greece, Grenada, Guatemala, Guinea, Guyana, Haiti, Holy See, Honduras, Hungary, Iceland, India, Indonesia, Iran, Ireland, Italy, Jamaica, Japan, Jordan, Kazakhstan, Kenya, Kiribati, Korea (Republic of), Kuwait, Kyrgyzstan, Laos (P.D.R.), Latvia, Lesotho, Liberia, Libya, Liechtenstein, Lithuania, Luxembourg, Macedonia, Madagascar, Malawi, Malaysia, Maldives, Mali, Malta, Marshall Islands, Mauritius, Mauritania, Mexico, Micronesia, Moldova (Republic of), Monaco, Mongolia, Montenegro, Morocco, Mozambique, Namibia, Nauru, Nepal, Netherlands, New Zealand, Nicaragua, Niger, Nigeria, Niue, Norway, Oman, Pakistan, Palau, Panama, Papua New Guinea, Paraguay, Peru, Philippines, Poland, Portugal, Qatar, Romania, Russian Federation, Rwanda, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Samoa, San Marino, Sao Tome and Principe, Saudi Arabia, Serbia, Senegal, Seychelles, Sierra Leone, Singapore, Slovak Republic, Slovenia, Solomon Islands, South Africa, Spain, Sri Lanka, Sudan, Suriname, Swaziland, Sweden, Switzerland, Tajikistan, Tanzania, Thailand, Timor Leste (East Timor), Togo, Tonga, Trinidad and Tobago, Tunisia, Turkey, Turkmenistan, Tuvalu, Uganda, United Arab Emirates, United Kingdom, Ukraine, United States, Uruguay, Uzbekistan, Vanuatu, Venezuela, Vietnam, Yemen, Zambia, Zimbabwe

**Entities Subject to State Department Non-Proliferation****Sanctions** (US government may not issue licenses to these entities nor procure items from these entities)

Entities listed at:

<http://www.state.gov/t/isn/c15234.htm>**Persons and Entities on OFAC Prohibited List or State****Department Terrorist Exclusion List** (includes U.S. and foreign citizens)No involvement with these persons or entities is permitted, regardless of discipline. Applies to ALL DISCIPLINES.<http://www.ustreas.gov/offices/eotffc/ofac/sdn/index.html><http://www.state.gov/s/ct/rls/fs/2004/32678.htm>**State Department Designated State Sponsors of Terrorism**

(FL law prohibits use of funding available to state universities for travel and travel-related or involved activities to these countries.

Confer with Office of General Counsel about applicability for any travel or travel-related activities involving these countries.

Cuba, Iran, Syria, Sudan, North Korea

<sup>i</sup> EAR license required, potentially even for standard laptops if exporting (sending, hand-carrying) to these entities or persons associated with these persons.

<sup>ii</sup> OFAC license potentially required for any interaction with these countries or their nationals including, without limitation, travel, services, collaboration, planning conferences, payments and hand-carrying or sending standard office laptop computers or tourist cameras.

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iii Some of these sanctions apply to the entire listed country (e.g., Cuba, Iran). In other cases, the sanctions apply only to Specially Designated Nationals or other specified persons or entities (e.g., Western Balkans, Ivory Coast

iv EAR license required for exports of EAR-controlled items, materials and technical information.

<sup>v</sup> ITAR license required and will not be granted for exports of ITAR-controlled items, materials, technical information and services. (ITAR license required for exports of ITAR-controlled items, materials, technical information and services to *any* country in the world. Decided case by case if not an ITAR prohibited country.)

<sup>vi</sup> For Iraq, non-lethal military equipment, lethal military equipment going to the reconstituted Iraqi army and police force, and small arms for private security purposes are excepted.

<sup>vii</sup> Note that certain sanctions on Libya imposed due to its support of terrorism were lifted on August 31, 2006, but Libya remains a prohibited destination for items appearing on the U.S. Munitions List, and certain items appearing on the Commerce Control List require a license for export to Libya.

<sup>viii</sup> For Afghanistan, shipments to the Government of Afghanistan and the International Security Assistance Force are excepted

<sup>ix</sup> For Eritrea, items supporting U.S. anti-terrorism, counter-terrorism, and de-mining programs; U.N. or other peacekeeping operations; or U.S. commitments under international conventions are excepted.