**Academic/Research Organization Activities Potentially Subject to STC**

The examples listed below illustrate some of the activities often undertaken by academic and research organizations that could potentially be subject to strategic trade controls in your country. **To determine the full extent to which STC impact your organization’s activities and research, the following questions must first be answered:**

1. Does your country restrict exports/transfers of strategic goods or technology, either through tangible and/or intangible means? This includes intangible technology controls and other strategic trade controls.
2. Does your country regulate the transfer of technology to a foreign national, even when the transfer takes place within your country? In other words, does your country have a “deemed” export control provision?

Note: *If your country maintains a “deemed” export control, the information in* ***blue text*** *(below) is applicable to your institution.*

**Research Activities Potentially Subject to Control**

* Collaborative research or work with foreign nationals, [whether in your country or] abroad;
* Undertaking international travel for a conference, meeting, or to conduct field work abroad;
* Research instructions or skill training conducted for a foreign national, [whether in your country or] abroad;
* Providing technical data via phone, email, fax, or other electronic/data storage device to a foreign national, [whether in your country or] abroad;
* Sharing experimental equipment or technology with a foreign national, [whether in your country or] abroad;
* Providing technical assistance during lectures, conferences, meetings or other engagements where foreign nationals are present, [whether in your country or] abroad;
* Providing consulting services or other technical assistance internationally, [or domestically when a foreign national is present]
* Conducting tours or visits of research facilities for foreign students, trainees, or visitors [Note: *This only applies to countries that maintain deemed export controls*.]

**Before initiating a research project or conducting any of the activities listed above, the following questions should be answered:**

1. **Does the activity involve providing information, technology, software, services, or equipment to foreign nationals?**

* Are the foreign nationals outside of your country? Which country?
* Are the foreign nationals inside of your country? Nationality?
* Are the foreign nationals both inside and outside of your country? Which country? Nationality?

1. **Will the activity involve the intangible transfer of technology and/or physical exports?**

* Is the item to be transferred publicly available or regarded as fundamental or basic scientific research?
* Is the item found on the national control list(s) in your country?
* Will the item be used for a civil/commercial end-use or commercial application?
* Is the research defense application oriented or funded by the Ministry Of Defense or other government institution/body?

1. **Is the country, individual, or entity with whom the activity is intended, under national or international sanctions/embargoes or found on any restricted party lists?**
   * Does the destination country have an active WMD program, a history of proliferation activities, or is it involved in an ongoing conflict?
   * Does the destination country maintain a strategic trade control system?
2. **Are there any contractual restrictions on dissemination of information and research results?**

* Is there a stated intent to develop products based on the technology or findings of the research?
* If the activity involves foreign nationals working in your country, will the individual eventually return to his/her home nation?
* What is the probability or risk that the technology transferred over the course of the activity could be re-exported or re-transferred (either inadvertently or intentionally)?

1. **Does the activity require your institution to seek a license or authorization from the national authorities?**[[1]](#endnote-1)

Note: *The answer to Question # 5 will be contingent on the answers provided to Questions # 1 through 4 as well as the unique requirements set forth in your country’s STC legislation.*

1. Guidance for the Control of Sensitive Technologies for Academic Institutions (Revised version),” Japanese Ministry of Economy, Trade, and Industry, February 2010; Internal Compliance Programme Guidelines, Pakistan Ministry of Foreign Affairs, Strategic Export Control Division (SECDIV), 3 October 2014, <http://www.mofa.gov.pk/secdiv/documents/ICP-Guidelines.pdf>. [↑](#endnote-ref-1)