

University of South Alabama Research Compliance and Assurance Export-Controlled and Restricted Chemicals



What is Export Control?

Export Control Laws are U.S. federal laws that regulate the transfer or “exports” considered to be strategically important to the U.S. in the interest of national security, economic and/or foreign policy concerns. An export is defined very broadly to include an oral or written disclosure of information, visual inspection, or actual shipment outside the U.S. of technology, software/code or equipment to a foreign national or entity. Transfer of any of the above to foreign nationals or entities within the United States is defined as a deemed export.

In general, the export control regulations cover four main types of University activities:

1. transfers of controlled information, including technical data, to persons and entities outside the United States;
2. shipment of controlled physical items, such as scientific equipment, that require export licenses from the United States to a foreign country;
3. verbal, written, electronic, or visual disclosures of controlled scientific and technical information related to export controlled items to foreign nationals (“deemed exports”), even when it occurs within the United States; and
4. travel to certain sanctioned or embargoed countries for purposes of teaching or performing research.

Non-compliance with export controls can result in severe monetary and criminal penalties against both an individual as well as the university, and can result in the loss of research contracts, governmental funding, and the ability to export items.

What chemicals are restricted?

The Links below list certain chemicals restricted for export by the U.S. Government.

1. The Export Administration Regulations (EAR), Commerce Control List, Supplement No. 1 to Part 774

<https://www.bis.doc.gov/index.php/documents/regulations-docs/2332-category-1-materials-chemicals-microorganisms-and-toxins-4/file>

- **1C350** - Chemicals that may be used as precursors for toxic chemical agents, **Page 61**
- **1C355** - Chemical Weapons Convention (CWC) Schedule 2 and 3 chemicals and families of chemicals not controlled by ECCN 1C350 or “subject to the ITAR”, **Page 73**
- **1C395** - Mixtures & medical, analytical, diagnostic and food testing kits not controlled by ECCN 1C350, **Page 75**

2. Export Administration Regulations, Chemical Weapons Convention (CWC) Provisions.

See additional information listed under Part 774, Supplement 1, Category 1

https://www.cwc.gov/regulations_ear_provisions.html

It is important that all faculty and staff be aware of export control requirements and how they may affect their work. If you work with any of the following (or similar) agents and/or you intend to send samples or data abroad, or plan to collaborate with foreign colleagues either here or in foreign countries, contact the Office of Research Compliance and Assurance. aswilliams@southalabama.edu or (251) 460-6509