HARVARD UNIVERSITY
Export Controls Guidance:
New Russia-related Sanctions and Impacts on University Research

In response to Russia's invasion of Ukraine, the U.S. government imposed severe financial sanctions on Russia and individuals and entities supporting the Russian government in Russia, Belarus, and certain regions of the Ukraine. The government imposed blocking sanctions on most major Russian banks, removed certain banks from the SWIFT system, froze assets of political elites, and imposed a broad set of restrictions on exports of technology to Russia, Luhansk People's Republic (LNR), Donetsk People's Republic (DNR), and the Crimea regions of Ukraine. These restrictions are likely to change and may affect current or future University collaborations, agreements, and research projects.

ECONOMIC SANCTIONS/RESTRICTED PARTIES: Multiple businesses, banks, and individuals are now restricted by the U.S. Government due to their support for the Government of Russia. Conducting business or other activities with restricted parties, their subsidiaries, or family members may be prohibited or require a Commerce or Treasury Department license. The University's Visual Compliance software can assist in identifying barred parties through Restricted Party Screenings. See the University’s Guidance on conducting such screens on the OVPR website.

EXPORT RESTRICTIONS: Items that previously did not require a license to Russia and Belarus now may require government authorization. The export control laws are intended to restrict high-level technologies that would advance Russia’s defense, maritime, and aviation growth. Many items (and technologies) are affected, including, but not limited to, computers, semiconductors, telecommunication, encryption security, lasers, sensors, navigation, avionics, propulsion, aerospace, and maritime technologies. Check with your School or Institute’s Export Control Administrator before shipping or transferring, even by email, any items or technology to Russia or Belarus.

NEXT STEPS: Please contact your School or Institute’s Export Control Administrator or OVPR for guidance if you currently have or anticipate any activities involving individuals, colleagues, businesses, universities, etc. in Russia, Belarus, LNR, DNR, or Crimea including, but not limited to:

- Collaborations on research or other projects
- Exports from/imports to Russia, Belarus, LNR, DNR, or the Crimea Region of Ukraine
- Technology exchanges with these regions
- Travel to these regions
- Financial dealings with individuals or entities in these regions

OVPR is closely monitoring new license requirements with additional sanctions anticipated. Contact OVPR for assistance in determining impacts to your research, collaborations, shipments, payments, travel, and other Harvard-related activities.