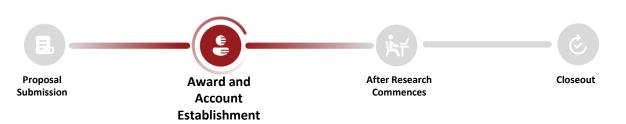
### International Travel – Export Control "Safe Harbors"

#### USC Office of Culture, Ethics and Compliance Research Compliance Program



#### Why might I need to think about export controls for my international travel?

 Although export control considerations most commonly arise in the research context, other activities by USC personnel, including international travel on university-related business by any USC employee in connection with their job responsibilities, can raise export control issues. In addition, international travel can raise data security and safety issues depending on who is traveling, where you are going, what you are taking with you, and who you will be working with.

# Are there different export control restrictions based on the country/countries to which I am traveling?

Yes. Travel to embargoed and sanctioned countries may be prohibited or highly restricted. <u>OFAC's</u>
<u>Sanctions Program and Country Information Page</u> has the most current list of countries and restrictions.
Please consult with OCEC prior to arranging travel to the following countries: Cuba, Iran, North Korea,
Syria, Russia, Belarus, and the Crimea, Donetsk People's Republic "DNR" and Luhansk People's Republic
"LNR" regions of Ukraine.

#### Can I bring my laptop on my international trip without worrying about export controls?

Possibly. Taking a data storage device (e.g., a laptop, tablet, smart phone, USB flash drive, or smart watch) outside of the United States typically does not require an export license, as long as the device does not also contain "special purpose" encryption software or other software or data that is "controlled" under U.S. laws and regulations.

Traveling abroad with a storage device containing research-related information (e.g., publications, presentations, underlying research results) would typically not require an export license, as long as the research is available in the public domain or is research that is ordinarily published and shared. However, certain destinations are subject to stricter export control restrictions and/or data security consideration that should be assessed prior to travel. Please reach out to OCEC for an export control review if you will be traveling internationally with non-publicly available or restricted research data.

#### What about my personal baggage?

EAR License Exception BAGGAGE (BAG) authorizes individuals leaving the United States temporarily (i.e., traveling) to export as personal baggage certain classes of commodities, software, and technology. This includes personal effects, household effects, and "tools of the trade" (usual kinds and quantities of tools, instruments or equipment and their containers and technology for use in the trade, occupation, or employment of the traveler).

## What are examples of physical items that if exported would NOT fall within the "safe harbor" and instead might require government authorization?

- Devices with non-commercial, "special purpose" encryption software
- Devices that contain proprietary or export-controlled data
- Sophisticated research equipment or tools (e.g., Inertial Measurement Units, infrared cameras)
- Defense articles controlled under the

ITAR (e.g., certain kinds of thermal imaging cameras, toxicological agents, or spacecraft systems and associated equipment)

 Pathogens and/or toxins, or genetic materials/GMOs that contain or code for them that could be used to conduct research

### I'd like to learn more about international travel and export controls. Where can I find additional information?

The Office of Culture, Ethics and Compliance (OCEC) provides <u>International Travel guidance</u> that applies regardless of destination. You can also view USC's <u>International Collaborations and Export Controls policy</u>. For questions, please contact Emily Pender, Manager of Export Controls, at <u>epender@usc.edu</u>.



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