

## International Travel and Export Control Compliance

University personnel (including faculty, staff, visiting scholars and students) planning to travel abroad need to be mindful of export control laws and regulations. The purpose of the federal government's export control laws and regulations is (a) to restrict exports of goods and technology that could contribute to the military potential of adversaries, and (b) to comply with U.S. trade sanctions. To avoid running afoul of these laws and regulations, University personnel should review the information below before traveling abroad and should seek assistance from the University contacts listed below if you have any questions.

- Many items that are not hazardous, valuable or uncommon are nevertheless subject to export control laws. For a list of items that may be subject to export control laws, click the following link: <http://www.access.gpo.gov/bis/ear/pdf/indexcel.pdf>. Contact the University's Department of Environment, Health and Safety for assistance determining whether export control restrictions apply to the research material or other items you wish to transport outside the United States ([dmhoward@email.unc.edu](mailto:dmhoward@email.unc.edu); ph: 962-5722).
- **Question:** Does an exclusion from U.S. export control regulations apply to my laptop and its software?  
**Answer:** Your laptop and its software (and other "tools of the trade" such as PDA's and electronic storing devices) are excluded from U.S. export control regulations under the "Temporary Export Exclusion" so long as:
  - The item will be returned to the U.S. within one year of its export date; and
  - The item is a usual and reasonable type of tool of the trade for use in lawful research or education; and
  - You retain effective control at all times over the laptop while abroad by retaining physical possession of the item or securing the item in an environment such as a hotel safe; and
  - You accompany the laptop abroad, or the laptop is shipped within one month before your departure, or at any time after your departure; and
  - The laptop does not contain encryption software employing a key length greater than 80 bits for the symmetric algorithm; and
  - The equipment, software and technology are not of an inherently military nature and will not be put to a military use or be used in outer space.
- The U.S. government's Office of Foreign Assets Control ("OFAC") enforces economic and trade sanctions relating to the following countries: Balkans, Belarus, Burma, Cuba, Democratic Republic of the Congo, Iran, Iraq, Ivory Coast, North Korea, Sudan, Syria, and Zimbabwe (list current as of 4/09). The specific regulations on economic transactions conducted with these foreign governments and/or with citizens of these foreign countries differ for each country. If you are traveling to one of these countries, to avoid potential penalties you should carefully review the details of the relevant OFAC sanctions program (<http://www.treas.gov/offices/enforcement/ofac/>) and contact the Office of University Counsel with any questions ([will\\_tricomi@unc.edu](mailto:will_tricomi@unc.edu); ph: 843-5329).
- If you will be carrying a large amount of cash into or out of the United States, be advised that you are required to declare any amount over \$10,000 to U.S. Customs and Border Protection.
- Be sure to review the University's [Office of International Affairs website](#) for guidance on other issues relating to international travel, including links to current U.S. State Department travel warnings, and the [Office of the Provost's Policy](#) Concerning Study, Travel, and Research in Countries under U.S. State Department Travel Warnings and U.S. Centers for Disease Control Travel Notices.