

Russia, Belarus, and Ukraine Guidance

As the situation in Russia and Ukraine continues to evolve, the Texas A&M University (TAMU) Export Controls Office (ECO) is closely monitoring the sanctions and export control restrictions being put forth by various United States (U.S.) government agencies. We will continue to assess the applicable restrictions and will help obtain U.S. government licenses, where appropriate. Any transaction or activity, including but not limited to research, field work, collaboration, or conference travel, with any area of Russia, Belarus, or Ukraine must be elevated to the ECO for approval.

Russia/Belarus

Faculty, researchers, staff and students (collectively, TAMU Personnel) involved in any activities in Russia or Belarus, must contact the ECO to ensure your activities do not violate existing or new federal regulations, as summarized below. Failure to comply with the new requirements related to exports to Russia or Belarus is considered a violation of export control regulations and may result in civil and criminal penalties.

Note that on March 9, 2022, Texas A&M University System Chancellor, John Sharp, issued a memorandum directing all System Members to dissolve all agreements with Russian entities, specifically those relating to academics, research and intellectual property, and to also review any other non-contractual engagements with Russian entities.

Sanctioned Entities

The U.S. Federal Government has recently sanctioned many entities in Russia and Belarus. Most sanctions have been directed at financial institutions. These sanctions have made it difficult for these banks to transact business with U.S. citizens and entities.

Shipping or Hand-Carrying Items

TAMU Personnel who plan to ship, hand-carry, or otherwise transfer any items, software, technology, documents or materials, even temporarily, to Russia or Belarus, must first consult with the ECO.

The U.S. Department of Commerce's Bureau of Industry and Security (BIS) has amended the [Export Administration Regulations](#) (EAR) to generally prohibit the direct and indirect export of a lot of items, as well as related technology and software, to [Russia](#) and [Belarus](#). Determining which items are subject to each specific regulation requires a case-by-case technical analysis conducted by the ECO.

All items on the Commerce Control List (CCL) now require a license from BIS to Russia and Belarus; this includes many items that previously did not require an export license.

Note that BIS announced that applications for the export, reexport, or transfer (in-country) of items that require a license for Russia or Belarus will be reviewed, with limited exceptions, under a policy of denial. This means that the default stance is to deny all license requests unless narrow criteria are met. Due in part to these export restrictions, FedEx, UPS, and DHL have suspended all shipping services to Russia until further notice.

End-User and End-Use Restrictions

Items subject to the EAR, including low-control items classified as EAR99, cannot be exported to a military end-user or for military end-use in Russia or Belarus without a license from the Department of Commerce/BIS. Known Russian Military End-Users have been added to the BIS Entity List. The federal government requires that the exporting entity conduct and appropriately document a military end-use/end-user review for each proposed export. Thus, if you are sending or carrying to Russia or Belarus any item that is subject to the EAR, you must contact the ECO for end-user/end-use verification and review.

Ukraine

TAMU Personnel involved in any activities in Ukraine must contact the ECO to ensure your activities do not violate new federal regulations.

On February 21, 2022, President Biden signed an [Executive Order](#) regarding President Putin's action to recognize the Donetsk and Luhansk People's Republics as independent states. The Executive Order prohibits most transactions and activities with individuals and entities in the Donetsk and Luhansk Regions of Ukraine without a government license. Note there were already existing sanctions on the Crimea Region of Ukraine. The ECO will determine if a general license is applicable or whether a government license is required for any activity in these regions.

Additional information

1. [Executive Order](#)
2. [White House Fact Sheet](#)
3. [Office of the Treasury information on Ukraine Russia sanctions](#)
4. [BIS Russia-Belarus Resources](#)

Texas A&M University Export Controls Office

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