

SIU EXPORT CONTROLS MONTHLY

A RESOURCE FOR CURRENT EXPORT CONTROL ISSUES AND EVENTS THAT COULD AFFECT SIU AND ITS FACULTY

EXPORT CONTROL VIOLATION HOTLINE

If you suspect an export control violation, call:
618-650-2476



EXPORT CONTROL ARTICLES



REVISION OF CONTROLS FOR CAMBODIA UNDER THE EXPORT ADMINISTRATION REGULATIONS

The Bureau of Industry and Security's current licensing policy for Cambodia dates from 1992, when the agency amended the EAR in support of the settlement of political conflict in Cambodia and the lifting of a U.S. trade embargo on Cambodia. (57 FR 11576, April 6, 1992.) Recent changes in Cambodian foreign policy, however, undermine regional security as well as U.S. national security and foreign policy interests, and necessitate a revision to export controls for Cambodia under the EAR. In June 2021, during an official visit to Cambodia, Deputy Secretary of State Wendy Sherman expressed serious concerns about the People's Republic of China's (PRC or China) military presence and construction of facilities at Ream Naval Base in Cambodia. Deputy Secretary Sherman emphasized that an exclusive-use PRC military base in Cambodia would undermine Cambodian sovereignty, threaten regional security, and negatively impact U.S.-Cambodia relations. Since then, the Department of State (State) and the Treasury (Treasury), have taken action under their respective authorities to address such concerns. In November 2021, State and Treasury designated two Cambodian military officials due to their involvement in significant corruption, including in connection with the Ream Naval Base. At that time, State, Treasury, and the Department of Commerce also issued an advisory cautioning U.S. businesses regarding the potential exposure to entities in Cambodia, such as the Cambodian military, that engage in human rights abuses, corruption, and other destabilizing conduct.

INTERNATIONAL TRAFFIC IN ARMS REGULATIONS: ADDITION OF CAMBODIA TO LIST OF PROSCRIBED COUNTRIES

The Department of State is amending the International Traffic in Arms Regulations (ITAR) to add Cambodia in the list of countries for which it is the policy of the United States to deny licenses and other approvals for exports and imports of defense articles and defense services.

DRONE GUIDANCE

The Export Controls website was recently updated to include guidance for drones. Many drones are export-controlled under either the Export Administration Regulations (EAR) or the International Traffic in Arms Regulations (ITAR).

As part of the drone registration process on each campus, the Export Controls Office is now being notified of new drones in order to make a determination of the export control classification of the drone. If the drone is export-controlled, the Export Controls Office will contact the user to put the required controls in place.

Certain drone modifications, accessories, or attachments, such as cameras or lasers, may have export controls above the control level of the drone itself. Please contact the Export Controls Office if drones are modified or additional accessories or attachments are used.

"TALENT PROGRAM" FAQs

What is a foreign "TALENTS" program?

Any foreign state sponsored attempt to acquire U.S.-funded scientific research through recruitment programs that target scientists, engineers, academics, researchers, and entrepreneurs of all nationalities working or educated in the United States.

These recruitment programs are often part of broader whole-of-government strategies to reduce costs associated with basic research while focusing investment on military development or dominance in emerging technology sectors. The Department of Energy issued an order on 7 July 2019 with fairly clear explanations of Talents programs [DOE O 486.1](#).

How does this affect SIU and me?

Association with a Talents Program can lead to ineligibility to receive Federal funding for your research. Currently there is no due process to challenge such a determination or limit to the time interval over which it is imposed. Past associations may also be concerning to the US Government.

CHINA DEFENSE UNIVERSITIES TRACKER

The Tracker is a tool created by ASPI's International Cyber Policy Centre to inform universities, governments and scholars as they engage with the entities from the People's Republic of China. It aims to build understanding of the expansion of military-civil fusion—the Chinese government's policy of integrating military and civilian efforts—into the education sector. The Tracker should be used to inform due diligence of Chinese institutions.

EQUIPMENT USED IN RESEARCH

If you use the following equipment/goods in your research or the below is your area of research, please call the Director of Export Controls at 618-650-2476.

- Radiation hardened sensors** 6A002
- Radiation hardened TV cameras or lenses therefor** 6A203.d
- Radiation hardened TV cameras not specified in 6A203** 6A999.b
- Radiation transport calculations/modeling, software for** 0D999.b
- Radiation sensors, optical fibers**.....6A002.d.3
- Radiation shielding windows** 1A227
- Radio frequency monitoring equipment** 5A001.f.4
- Radio frequency transmitting equipment** 5A001.h.1
- Radio equipment** 5A001.b.2, 3 or 4
- Radio equipment** 5A991.b.6 or 7
- Radio relay communications equipment** 5A991.h
- Radio, shortwave technology**5E001.c.4.c
- Radio systems development/production technology** 5E001.b.3
- Radiographic detection equipment** 1A999.b
- Radiographic equipment**A101.b

SIU CLEAN LAPTOP PROGRAM

All SIU travel to the below countries WILL REQUIRE that an Informational Technology Services clean laptop be used during SIU business travel to those countries. Your SIU issued laptop computer SHALL NOT be transported to any of the below countries.

Iran	Russia	Ukraine (Crimea Region)
Sudan	Syria	China
Cuba	North Korea	Venezuela
	Cambodia	

U.S. EXPORT CONTROL REGULATIONS

- EXPORT ADMINISTRATION REGULATIONS (EAR) by the U.S. Department of Commerce Bureau of Industry and Security (BIS)
- INTERNATIONAL TRAFFIC IN ARMS REGULATIONS (ITAR) by the U.S. Department of State Directorate of Defense Trade Controls (DDTC)
- FOREIGN ASSETS CONTROL REGULATIONS (FACR) by the U.S. Department of Treasury Office of Foreign Assets Control (OFAC)

SIU EXPORT CONTROLS WEBSITE

SIU EXPORT CONTROLS CONTACT INFORMATION

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SIU EXPORT CONTROL COMPLIANCE MANUAL

NEWSLETTER CONTENT REQUESTS

If you find any articles, research, or other information relevant to export controls, or have a specific topic you think would be a great addition to this newsletter, please submit your ideas to bjmartin@siu.edu.