

# Rules on Export Controls

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Approved by	The President
Responsible administrator	Nellie Grenius

**Description:**

These rules are intended to raise awareness of the importance of export control compliance among Stockholm University's staff and students, thus ensuring that export controls and sanction regulations to which the organisation is subject are not breached.

## Introduction

Efficient controls on the export of dual-use goods (i.e. having civilian and military applications) are essential in order to ensure that weapons of mass destruction and destabilising accumulations of conventional weapons do not find their way into the wrong hands<sup>1</sup>. For this purpose, the term export controls refers to measures adopted by Sweden, the European Union, the United States and other governments around the world to prevent the dissemination of weapons of mass destruction and the misuse of conventional weapons and armaments.

All exporters of dual-use goods must comply with strategic trade control requirements imposed under EU and Member State laws, regulations and other provisions. All stakeholders must refrain from any transactions that raise concerns regarding the possible future use of products for military purposes. These rules are legally binding and any breach is subject to civil and criminal sanctions. As research may have both civilian and military applications, it is incumbent on Stockholm University to ensure that matters related to the export of controlled products are dealt with in accordance with applicable legislation and regulation. Stockholm University must therefore ensure that no products, information, technical assistance or other services subject to export controls are exported without first clarifying whether a permit is required. In the event that a product is subject to export controls, a permit application must be submitted in accordance with applicable regulations.

## Purpose

The purpose is to raise awareness of the importance of export control compliance among Stockholm University's staff, thus ensuring that export controls and sanction regulations to which the organisation is subject are not breached.

## Responsibility

Ultimate responsibility for operations related to export controls rests with the President. The President has delegated principal responsibility for export control management to the University Director.

The Head of Security is responsible for monitoring developments within this field, for coordinating, following up and reporting to the supervisory authority and for declarations pursuant to the applicable regulatory framework.

At the departments that handle products subject to export controls, the head of department/equivalent is responsible for ensuring that a contact person with specific responsibility is appointed.

The head of department/equivalent is also responsible for ensuring that regulations related to export controls are implemented at their own department and that a central export control administrator is informed that a classified product is about to be transferred to another EU Member State or exported to a third country.

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<sup>1</sup> [COMMISSION RECOMMENDATION \(EU\) 2019/1318 on internal compliance programmes for dual-use trade controls under Council Regulation \(EC\) No 428/2009.](#)

Before any dual-use products are transferred or exported, the appointed contact person at the department/equivalent handling the product, supported by an export control administrator, shall classify the product in accordance with Regulation (EC) No 428/2009<sup>2</sup>. The export control administrator shall then apply for the necessary permit for transfer/export from the supervisory authority.

Researchers, doctoral students, technical and administrative staff, research group leaders and consultants whose activities may involve physical exports, electronic transmissions of data or other transfers of information, software or technology classified as dual-use according to Regulation (EC) No 428/2009 have an obligation to take account of and comply with these rules.

## Principles of export control

To ensure that Stockholm University complies with the rules stipulated in export control regulations, the following applies:

1. All employees and doctoral students who conduct research in relevant disciplines shall be made aware of how export control rules are to be applied in their operations. This shall be accomplished by providing up-to-date information, guidance, support, advice and ongoing training.
2. When acquiring products subject to US export controls, particular consideration shall be given to the rules for reexport.
3. Compliance with regulations concerning dual-use products, armaments and chemicals shall be ensured by requiring all affected researchers and other staff to ascertain whether their operations, equipment and/or materials are subject to export controls or trade sanctions before any transfer or export takes place.
4. All operations and research affected by trade sanctions and embargoes shall be identified and given due consideration.
5. The transfer or export of products subject to export controls is prohibited until such time as a permit has been obtained from the responsible authority and all necessary measures have been taken to ensure that the terms and conditions of the permit have been fully implemented.
6. Should any infringement be discovered, the relevant supervisory authorities shall be informed and the necessary measures taken.
7. Case management shall be documented and followed up through regular inspections and annual audits in order to ensure compliance with these principles.

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<sup>2</sup> [COUNCIL REGULATION \(EC\) No 428/2009 setting up a Community regime for the control of exports, transfer, brokering and transit of dual-use items.](#)