

Update on International Shipping and Transactions

May 24, 2013

Summary of Recent Enforcement Action:

On March 15, 2013 UMass Lowell entered into a settlement agreement with the Department of Commerce for multiple violations of federal export control law. The Department of Commerce issued a public order after it found that UMass had shipped items designated as “EAR99” to the Pakistan Space and Upper Atmosphere Research Commission (SUPARCO) without the required license. The items shipped were not listed on the “Commerce Control List.” However, the transaction required a license because SUPARCO has been on the Bureau of Industry and Security Entity List since 1998 when it was “determined to be involved in nuclear missile activities.”

This enforcement action reinforces the importance of performing a restricted party screen before engaging in international transactions or shipping items internationally. Please contact the [Export Control Officer](#) for assistance with international shipments.

Other International Shipping Issues:

1. Shipping items listed on the Commerce Control List or United States Munitions List outside of the United States may require a license. Most items shipped internationally will be designated as “EAR99” and “No License Required.” However, if you are shipping items with a potential military or “dual use” application, then a license from the Department of State or Department of Commerce may be required. Examples of items requiring a license include select agents, satellite components, and advanced GPS. If you are unsure of a shipment’s export classification or need assistance with an export license, please contact the [Export Control Office](#).
2. As demonstrated by the enforcement action above, the federal government administers sanctions against certain individual and entities. The U.S. also maintains comprehensive economic embargoes against Cuba, Iran, Sudan, Syria, and certain partial embargoes, including programs relating to Rwanda and Iraq. Shipping items to these nations is highly regulated and may require a license. If you need assistance with transactions potentially involving restricted individuals, entities, or nations, please contact the [Export Control Office](#).
3. Shippers are required to file an export declaration with the U.S. Census Bureau for all shipments valued over \$2,500. Please contact the [Export Control Office](#) for assistance with an export declaration.