

Memorandum

To: Research Community
From: Thomas Blair, JD
WCM Chief Research Compliance Officer, Research Integrity Officer
Weill Cornell Medicine
Date: March 3, 2022
RE: Russia Export Controls Update

To the WCM Community:

Cornell University's Office of Export Controls has put out the below information regarding the situation in Ukraine and Russia:

Any CU/WCM transaction with any area of Russia, Belarus or Ukraine must be elevated to the Export Control Office for approval.

As the situation in Russia and Ukraine continues to evolve, the Export Controls Office is closely watching the sanctions and export control restrictions being put forth by various government agencies. To summarize some of the current restrictions:

- The Department of the Treasury has announced comprehensive financial sanctions against many banks in Russia.
- Numerous companies and individuals in Russia, Ukraine, and Belarus have been added to the Specially Designated National (SDN) list – meaning most interactions with these named entities and individuals are strictly prohibited without a license.
- The Bureau of Industry and Security (BIS) has increased the license requirements and restrictions on items going to Ukraine and Russia.
- BIS significantly increased restrictions on foreign produced goods going to Russia by implementing two new Foreign Direct Product Rules and expanding the scope of foreign produced items that will be subject to U.S. controls.
- Certain regions of Ukraine (the Donetsk People's Republic (DNR), Luhansk People's Republic (LNR), and Crimea regions) are comprehensively sanctioned – meaning most activities are strictly prohibited without a license.

If you have any questions, please feel free to reach out to Thomas Blair, WCM's CRCO, thb2002@med.cornell.edu or Sarah Schlagter, the University's Export Control and Compliance Officer, sms655@cornell.edu.