

Belarus Sanctions – University of Cambridge Export Control Guidance

The UK has imposed sanctions on Belarus since August 2021. In July 2022 these were amended and significantly widened. This briefing document summarise the scope of these sanctions as regards the export of equipment, software, technical knowledge or expertise and is aimed at Principal Investigators. It is for general guidance only, does not constitute legal advice, and is not a substitute for the full statutory guidance or for specific advice. Full statutory guidance on the sanctions, including links to the relevant legislation, is available [here](#).

Principal Investigators should consider this guidance whenever considering an export of goods, software or technology (i.e. technical knowledge, research information/data or expertise) involving Belarus or planning to undertake a research project that will involve such as export. Postgraduate teaching may also be affected where it involves provision of unpublished technical information to students in Belarus. This guidance should also be considered for ongoing activities.

It is strongly recommended in such cases that advice is also sought from the Research Office (researchgovernance@admin.cam.ac.uk) and the University's Import-Export hub (importexporthub@admin.cam.ac.uk).

In most cases sanctioned exports will be prohibited, although in some cases it may be possible to seek a licence from the UK Export Control Joint Unit (ECJU) to proceed with the export on the basis of an exemption (see below).

Failure to observe sanctions is a criminal offence; as such the University will require any planned or ongoing activity subject to sanctions to obtain any necessary permissions from the ECJU or, where necessary, to cease with immediate effect.

Note: The sanctions also include controls on import from Belarus (including controls on import of petroleum products, potash, military goods, iron and steel products and mineral products), as well as financial sanctions on specific individuals and companies – this document does not address these aspects of the sanctions. Please consult with importexporthub@admin.cam.ac.uk before importing goods shipped from or originating from Belarus.

The University's Research Office [due diligence team](#) can support financial sanction screening for designated persons and entities. Any researchers undertaking any new engagements with entities based in Russia, non-government controlled areas of Ukraine, or Belarus are advised to contact this team at the earliest opportunity

This document also does not address sanctions on Russia or non-government controlled Ukrainian territory. For University guidance on those sanctions see [here](#).

1. Overview of Prohibited Exports

The sanctions prohibit the export¹ of the following goods and technologies to, or for use in, Belarus. This includes direct exports of exports of goods and technologies from a third country to Belarus and making such goods and technologies² available to a person connected with, or for use in, Belarus

¹ Export includes the sale, supply, transfer or other export of an item, software, or technical knowledge outside the UK.

² Technology' means information necessary for the development, production or use of goods controlled by the regime. This information may take the form of blueprints, plans, diagrams, models, formulae, tables, engineering designs and specifications, or manuals and instructions, either written or recorded on other media or devices such as disks, tapes or read-only memories.

- Military goods
- Dual-use goods
- Interception and monitoring goods
- Critical-industry goods
- Internal repression goods
- Luxury goods
- Oil refining goods
- Quantum computing and advanced materials goods
- Tobacco industry goods

The provision of technical assistance in relation to such goods or technology to a person connected with Belarus or for use in Belarus is also prohibited (with the exception of luxury and tobacco industry goods. Technical assistance is defined as technical support relating to the repair, development, production, assembly, testing, use or maintenance of the goods or technology, or any other technical service relating to the goods or technology.

The sanctions also prohibit the provision of any technical assistance to or for the benefit of person designated by the regulation that relates to an aircraft or ship (including unmanned aircraft and aircraft capable of spaceflight activities) and the provision of technical assistance where this enables or facilitates military activities carried on or proposed to be carried on by the Belarusian military of any other military end-user who is a person connected with Belarus.

2. Military, dual-use and WMD goods

The sanctions against Belarus strengthen existing export controls, which require licences for the export of military and dual-use goods, software and technology (see the Research Office website for general guidance on export controls). Licences will not normally be granted for the exports of any items, software or technology listed on the UK military or dual-use lists³ or listed on Chapter 93 ((Arms and Ammunition; Parts and Accessories thereof) of the UK Goods Classification Table. This means that **military and dual-use exports will normally be prohibited**.

Principal Investigators should seek advice if they know or suspect that their export is to, or for use in, Belarus or that it may be used by a person connected with Belarus.

As for all exports, a licence is required for any item, software, technology or teaching activity which is not listed but where the exporter (usually the Principal Investigator) has been informed, is aware or has grounds to suspect it might be used for or to support WMD programs (chemical, biological or nuclear weapons or other nuclear explosive devices, or the development, production, maintenance or storage of missiles capable of delivery of such weapons).

As Belarus is subject to an **arms embargo**, the Military End-Use controls for non-listed items also apply. If you are aware, or have been informed by the ECJU, that items to be exported to Belarus are intended for a military end-use (for example the incorporation into military equipment or for the development, production or maintenance of such equipment, or for use in a plant for production of such equipment) you must seek advice and export is likely to be prohibited. If you are informed by the ECJU that your export will be used by military, paramilitary, police, security services or

³ <https://www.gov.uk/government/publications/uk-strategic-export-control-lists-the-consolidated-list-of-strategic-military-and-dual-use-items-that-require-export-authorisation>

intelligence services and or an entity involved in procurement, research, development, production or use of items on behalf of such entities you must seek advice and export is likely to be prohibited.

3. Interception and monitoring goods

These sanctions prohibit the export of any goods or software that can perform the following functions (individually or as part of a system) and any software or technology designed for the development, production or use of those goods or software:

- deep packet inspection;
- network interception, including associated systems management and data retention functions;
- radio frequency monitoring, including associated processing or examination;
- network and satellite jamming;
- remote infection;
- speaker recognition, including associated processing functions;
- IMSI, MSISDN, IMEI and TMSI interception and monitoring;
- tactical SMS, GSM, GPS, GPRS, UMTS, CDMA, and PSTN interception and monitoring;
- DHCP, SMTP and GTP information interception and monitoring;
- pattern recognition and pattern profiling;
- remote forensics;
- semantic processing;
- WEP and WPA code breaking;
- interception of VoIP (including proprietary and standard protocols);
- cryptanalysis.

Full details, including explanation of all acronyms used are found in [the legislation](#).

Principal Investigators should seek advice if they intend to export any goods, software or technology relating to the above.

4. Internal repression goods

These sanctions prohibit the export of items that could be used for internal repression and include:

- Firearms, bombs and grenades.
- Simulators for training persons to use firearms and software for the same.
- Specialised vehicles including for riot control, removal or deployment of barricades, prisoner transport, or vehicles electrified to repel boarders and components of the same.
- Explosive substances and related goods (such as for initiating explosives)
- Body armour and riot shields
- Night vision and thermal imaging equipment.
- Image intensifier tubes
- Razor barbed wire.
- Specific types of knives.
- Equipment designed or modified to develop or produce the above.
- Technology designed for the development, production or use of the above.

The technology controls are the most likely to affect academic exports. Principal Investigators should seek advice on any export that they believe may fall under the sanctions above.

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For full details see [the legislation](#).

5. Critical-Industry goods and technologies

The new sanctions also create an additional list of goods, software and technology that are prohibited for export to Belarus. The controls relate to:

- A range of electronic devices and components.
- A range of computers and related equipment.
- A range of telecommunication equipment (including some consumer communication devices).
- The removal of exemptions to the export of controlled information security items, software or technology.
- A range of sensors and lasers.
- A range of navigation and avionics equipment and development equipment.
- A wide range of marine equipment, particularly for underwater use.
- Some land vehicles.
- Aviation, space and propulsion goods, technology and software.
- A range of materials and materials processing equipment and related software and technology.

For the full list of controlled items see schedules [2C and 2D](#) of the sanctions.

Researchers exporting to Belarus or working with Belarusian collaborators in or near any of the above areas must take advice. Exports of controlled equipment will be prohibited unless an exemption applies.

6. Oil Refining Goods, Quantum Computing, Advanced Materials and Luxury Goods

Oil refining goods, software and technology cover a range of items and equipment of use in the oil refining industry, software and technology for their development, production and use, and catalysts for the refining of crude oil.

The **Quantum Computing** controls include quantum computing technologies, cryogenic refrigeration systems, ultra-high vacuum equipment, high quantum efficiency photodetectors and sources, additive manufacturing equipment and metal powders or metal alloy powders designed for such equipment, a range of microscopes, related equipment and detectors and decapsulation equipment for semiconductor devices. The controls also cover software and technology for the development, production or use of such items and for digital twins of additive manufactured products or for the determination of their reliability.

In addition, a new set of sanctions had been placed on a range of **luxury goods**, prohibiting their export to Belarus, to persons connected with Belarus or making them available for use in Belarus. This is an extensive list, including various foods, consumer goods, vehicles and clothing. The extremely wide ranging nature of these controls means that anyone exporting items to Russia should check the sanctions to ensure that they are not listed amongst the controls.

Full lists of the above controls are [available here](#).

7. Exemptions

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There are a number of exemptions to the sanctions controls that allow export of controlled goods by applying for a licence from the Export Control Joint Unit. Not all exemptions apply to all types of export and these will need to be checked before making a licence application.

A full list of exemptions is provided in the [statutory guidance](#). Applications for export under a licence will be considered by government on a case-by-case basis and **no export should take place before a licence is granted**. For advice on the exemptions and applying for a licence please contact the email addresses below.

8. US Sanctions on Belarus

Whilst the UK's sanctions on Belarus apply to exports of goods, technology and software, as described above, researchers should be aware that US sanction controls may apply in regards to re-exports of physical goods of US origin, e.g. scientific equipment that was manufactured in the US or bought from a US supplier. Anyone planning on exporting US-origin items to Belarus should contact the Research Office.

9. Contacts

Advice on the issues covered above may be sought from the University Research Office (researchgovernance@admin.cam.ac.uk) and the University's Import-Export hub (importexporthub@admin.cam.ac.uk).

For more guidance on various related issues see:

University Export Control Website: <https://www.research-operations.admin.cam.ac.uk/policies/export-control>

University International Engagement Principles: <https://international-engagement.cam.ac.uk/>

CPNI Trusted Research Guidance: <https://www.cpni.gov.uk/trusted-research>