

Export Restricted Biological Items



**SECURE AND
GLOBAL RESEARCH**
COLORADO STATE UNIVERSITY

Secure and Global Research
Office of the Vice President for Research
Colorado State University
Phone: (970) 491-7194

E-mail: vpr_export_control@mail.colostate.edu

General Overview

There are two sets of regulations for export restricted biological items:

- International Traffic in Arms Regulations (ITAR) from Department of State and,
- Export Administration Regulations (EAR) from Department of Commerce.

Restricted items require export licenses to all countries. Licensing takes at least 8 weeks. Fines are \$284,000 to \$1,094,010 per violation.

These listed items (and any vaccines against these items) are controlled for export regardless of quantity or attenuation, genetic elements or genetically modified organisms for such agents or “toxins”, including small quantities or attenuated strains of select biological agents or “toxins” that are excluded from the lists of select biological agents or “toxins” by APHIS, CDC, or DHHS.

All biological agents listed in this document, and their biologically derived substances meeting the specific technical parameters that are controlled by the ITAR are listed in CATEGORY XIV—TOXICOLOGICAL AGENTS, INCLUDING CHEMICAL AGENTS, BIOLOGICAL AGENTS, AND ASSOCIATED EQUIPMENT.

(See Category XIV in [ITAR Part 121.1](#))

Certain precursor chemicals, Biosafety gear, and lab equipment are also export restricted by the EAR.

(See [Categories 1 & 2 of the Commerce Control List](#))

Additionally, there are economic and trade sanctions for all transactions under:

- Office of Foreign Assets Control (OFAC) from the Department of the Treasury.

(See [OFAC Sanctions Lists](#))

Want more information? Here are a few helpful links:

[CITI Program Training](#) – This program includes self-paced, online trainings about export control. There is a specific section dedicated to export control and biologicals.

[CSU Secure and Global Research](#) – Check out our website for more details!

Alphabetical Listing of Export Restricted Biological Items

Abrin ^{1, 2, 3}	Clostridium argentinense (formerly known as Clostridium botulinum Type G) botulinum neurotoxin producing strains	Guanarito virus
Aflatoxins ^{1, 2, 3}	Clostridium baratii, botulinum neurotoxin producing strains	Hantaan virus
African horse sickness virus	Clostridium botulinum ⁴	Hendra virus (Equine morbillivirus)
African Swine fever virus	Clostridium butyricum, botulinum neurotoxin producing strains ⁴	Herpes virus (Aujeszky's disease)
Andean potato latent virus (Potato Andean latent tymovirus)	Clostridium perfringens, epsilon toxin producing types	Hog cholera virus (Swine fever virus)
Andes virus	Clostridium perfringens alpha, beta 1, beta 2, epsilon and iota toxins ^{1, 2, 3}	HT-2 toxin ^{1, 2, 3}
Avian influenza (AI) viruses with high pathogenicity (HP):	Coccidioides immitis	Influenza virus, Reconstructed 1918
• AI viruses that have an intravenous pathogenicity index (IVPI) in 6-week old chickens greater than 1.2; or	Coccidioides posadasii	<u>Note:</u> This includes reconstructed replication competent forms of the 1918 pandemic influenza virus containing any portion of the coding regions of all eight gene segments.
• AI viruses that cause at least 75% mortality in 4- to 8-week old chickens infected intravenously.	Cochliobolus miyabeanus (Helminthosporium oryzae)	Japanese encephalitis virus
<u>Note:</u> Avian influenza (AI) viruses of the H5 or H7 subtype that do not have either of the characteristics described in above should be sequenced to determine whether multiple basic amino acids are present at the cleavage site of the haemagglutinin molecule (HA0). If the amino acid motif is similar to that observed for other HPAI isolates, then the isolate being tested should be considered as HPAI and the virus is export restricted	Colletotrichum kahawae (Colletotrichum coffeanum var. virulans)	Junin virus
Bacillus anthracis ⁴	Conotoxins ^{1, 2, 3}	Kyasanur Forest disease virus
Bluetongue virus	Coronavirus, SARS-associated (SARS-CoV)	Laguna Negra virus
Botulinum toxins ^{1, 2, 3, 4}	Coxiella burnetii	Lassa virus
Brucella abortus	Crimean-Congo hemorrhagic fever virus	Louping ill virus
Brucella melitensis	Diacetoxyscirpenol toxin ^{1, 2, 3}	Lujo virus
Brucella suis	Dobrava-Belgrade virus	Lumpy skin disease virus
Burkholderia mallei (Pseudomonas mallei) ⁴	Eastern Equine Encephalitis virus	Lymphocytic Choriomeningitis virus (LCV)
Burkholderia pseudomallei (Pseudomonas pseudomallei) ⁴	Ebolavirus (includes all members of the Ebolavirus genus) ⁴	Lyssa virus (aka Rabies)
Chapare virus	Encephalitis: Eastern equine, Japanese, Murray Valley, St. Louis, Tick-borne, Venezuelan equine, Western equine	Machupo virus
Chikungunya virus	Enterohaemorrhagic Escherichia coli (E Coli), Shiga toxin producing Escherichia coli (STEC) of serogroups O26, O45, O103, O104, O111, O121, O145, O157, and other shiga toxin producing serogroups	Magnaporthe oryzae (Pyricularia oryzae)
Chlamydia psittaci (formerly Chlamydia psittaci)	<u>Note:</u> Shiga toxin producing Escherichia coli (STEC) is also known as enterohaemorrhagic E. coli (EHEC) or verocytotoxin producing E. coli (VTEC).	Marburgvirus (includes all members of the Marburgvirus genus) ⁴
Choclo virus	Equine Morbillivirus (Hendra Virus)	Microcyclus ulei (syn. Dothidella ulei)
Cholera toxin ^{1, 2, 3}	Foot-and-mouth disease virus ⁴	Microcystins (Cyanginosins) ^{1, 2, 3}
Classical swine fever virus (Hog cholera virus).	Francisella tularensis ⁴	Modeccin toxin ^{1, 2, 3}
Clavibacter michiganensis subspecies sepedonicus (syn. Corynebacterium michiganensis subspecies sepedonicum or Corynebacterium sepedonicum);	Goatpox virus	Monkeypox virus

Peste-des-petits ruminants virus
Phoma glycinicola (formerly Pyrenochaeta glycines)
Porcine herpes virus (Aujeszky's disease)
Porcine Teschovirus
Potato Andean latent tymovirus (Andean potato latent virus)
Potato spindle tuber viroid.
Powassan virus
Puccinia graminis ssp. graminis var. graminis/Puccinia graminis ssp. graminis var. stakmanii (Puccinia graminis [syn. Puccinia graminis f. sp. tritici])
Puccinia striiformis (syn. Puccinia glumarum)
Rabies virus and all other members of the Lyssavirus genus
Ralstonia solanacearum, race 3, biovar 2
Rathayibacter toxicus;
Reconstructed 1918 influenza virus <u>Note:</u> This includes reconstructed replication competent forms of the 1918 pandemic influenza virus containing any portion of the coding regions of all eight gene segments.
Ricin ³ (including Ricin D and Ricin E)
Rickettsia prowazekii
Rift Valley fever virus
Rinderpest virus ⁴
Rocio virus
Sabia virus
Salmonella enterica subspecies enterica serovar Typhi (Salmonella typhi)
Severe acute respiratory syndrome-related coronavirus (SARS-related coronavirus)
Saxitoxin ³
Sclerophthora rayssiae var. zaeae;
Seoul virus
Sheeppox virus

Shiga toxin producing Escherichia coli (STEC) of serogroups O26, O45, O103, O104, O111, O121, O145, O157, and other shiga toxin producing serogroups; <u>Note:</u> Shiga toxin producing Escherichia coli (STEC) includes, inter alia, enterohaemorrhagic E. coli (EHEC), verotoxin producing E. coli (VTEC) or verocytotoxin producing E. coli (VTEC) ^{1, 2, 3}
Shigella dysenteriae
Sin Nombre virus
St. Louis encephalitis virus
Staphylococcus aureus enterotoxins, hemolysin alpha toxin, and toxic shock syndrome toxin (formerly known as Staphylococcus enterotoxin F) ^{1, 2, 3}
Suid herpesvirus 1 (Pseudorabies virus; Aujeszky's disease)
Swine fever virus (Hog cholera virus)
Swine vesicular disease virus
Synchytrium endobioticum;
T-2 toxin ^{1, 2, 3}
Tetrodotoxin (TTX) ^{1, 2, 3}
Tick-borne encephalitis complex viruses (Russian Spring-Summer encephalitis virus aka Far Eastern subtype) and (Siberian subtype, formerly West Siberian virus)
Thecaphora solani
Tilletia indica
Vaccines against items in this alphabetical list (ECCNs 1C351, 1C353, or 1C354)
Variola virus (major - Smallpox virus; minor - Alastrim) ⁴
Venezuelan Equine Encephalitis virus
Verotoxin & Verocytotoxins: other Shiga like ribosome inactivating proteins ^{1, 2, 3}
Vesicular stomatitis virus

Vibrio cholerae
Viscum Album Lectin 1 (Viscumin) ^{1, 2, 3}
Volkensin toxin ^{1, 2, 3}
Western equine encephalitis virus
Xanthomonas albilineans
Xanthomonas axonopodis pv. citri (Xanthomonas campestris pv. citri A) (Xanthomonas campestris pv. citri)
Xanthomonas oryzae pv. oryzae (syn. Pseudomonas campestris pv. oryzae); proteobacteria
Yellow fever virus
Yersinia pestis ⁴
Genetic elements, as follows:
<ul style="list-style-type: none"> • Genetic elements that contain nucleic acid sequences associated with the pathogenicity of microorganisms on this list, • Genetic elements that contain nucleic acid sequences coding for any of the “toxins” on this list or “sub-units of toxins” thereof.
Genetically modified organisms, as follows:
<ul style="list-style-type: none"> • Genetically modified organisms that contain nucleic acid sequences associated with the pathogenicity of microorganisms on this list; • Genetically modified organisms that contain nucleic acid sequences coding for any of the “toxins” on this list or “sub-units of toxins” thereof.
“Genetic elements” include, inter alia, chromosomes, genomes, plasmids, transposons, and vectors, whether genetically modified or unmodified, or chemically synthesized in whole or in part.

¹Any diagnostic & food testing kits containing these agents are controlled under the Commerce Control List
²Any immunotoxins containing these agents are controlled under the Commerce Control List
³Any medical products containing these agents are controlled under the Commerce Control List
⁴These biological agents, and any biologically derived substances and genetic elements thereof meeting the specifications of ITAR category XIV are controlled by the ITAR-Part 121. Category XIV also includes certain listed antibodies, recombinant protective antigens, polynucleotides, biopolymers, or biocatalysts (including their expression vectors, viruses, plasmids, or cultures of specific cells modified to produce them), and equipment for the dissemination, dispersion, or testing of these controlled agents.

Biological International Shipments or Hand Carry Guidance

(Items 1-3) Prepare information and submit via the [International Shipping Checklist](#).

1. To which country is it shipping? Does it fall under a comprehensive or targeted sanction?
Review at [Export Controlled or Embargoed Countries](#).
 - a. If yes, this may be a prohibited export or an export license or general license may be required.

2. Who is the intended recipient? Enter the intended recipient's name, address and institution in the Receiving Party portion of the checklist to screen whether they are a listed as a restricted or denied party. Is there a match on the name or address?
 - a. If yes, this may be a prohibited export or an export license or general license may be required. Results of the screening will be emailed to you after the automatic screen completes. If the response is red, you will need to work with Export Control for further review.
Note: For your reference, consolidated screening lists are also available via [US Government Consolidated Export Control Lists](#) (be sure to include all available sources from the dropdown)

3. (i) Are you sending any items, software, or technical data outside the U.S. that is restricted for export?
 - a. If yes, this may require an export license. If you know the export classification of the item/technology, please include it in the shipping checklist.
 - b. If unsure, just describe the item as clearly as possible, and include the intended end-use and/or take a look here:
Review Category XIV in [ITAR Part 121.1](#); Review [Categories 1 & 2 of the Commerce Control List](#)
Note: Products and services restricted by ITAR are designed for and/or directly applied to military purposes. Items on the CCL are considered dual-use, meaning "items that have both commercial and military or proliferation applications" as well as some purely commercial items.

3. (ii) Will this item be for a prohibited end-use like creation of weapons of mass destruction or use by a foreign military?
 - a. If yes, the transaction must stop. Alert Export Control.

What happens if the resulting review determines that your item will require an export license?

Export Control will follow up to verify details about the anticipated shipment. Export Control will then file licenses and advise you on any available exceptions. Licensing takes a minimum of 8 weeks to obtain from the US government and must be in place prior to the export.

*Note: Any of the listed items in this document or on the ITAR USML will require an export license to **all** countries.*

Reach out to ypr_export_control@mail.colostate.edu with questions!

Questions?



**SECURE AND
GLOBAL RESEARCH**
COLORADO STATE UNIVERSITY

Secure and Global Research
Colorado State University | 309 Johnson Hall
2001 Campus Delivery | Fort Collins, CO 80523-2001
Office (970) 491-7194

Scot T. Allen, Ph.D.
scot.allen@colostate.edu
(970) 491-1563

Claire Chance
claire.chance@colostate.edu
(970) 491-3025