

Shipping or Hand-Carrying Research Items Internationally?

[Flow chart](#) for determining EEI filing requirement

With the goal of developing export statistics and to help prevent illegal exports, the Foreign Trade Division of the Census Bureau tracks items shipped from the US. This is done by the filing of Electronic Export Information (EEI) by exporters. An exporter must submit the EEI when:

- The value of any individual commodity, technology, or software (or multiples of the same item) in the shipment are more than \$2,500.
- An export license or license exemption is required, regardless of the value of the contents of the shipment.
- The destination is a country experiencing strained relations with the U.S. These are Cuba, Iran, , North Korea, and Sudan.¹

Luckily, the FTD allows for exemptions to the EEI requirement. The two that most commonly apply to campus are the Canada Exemption and the Tools of the Trade (ToT) Exemption.

Canada Exemptions (§30.36)

Shipments to Canada are exempt from filing unless they require a license or even if they qualify for a license exemption, are subject to the ITAR.

Tools of Trade (§30.37 (b))

Tools of trade are exempt from filing requirements if the item:

- is owned by the individual or the university;
- is intended for personal, business, or research purposes
- is not for sale;
- will be returned to the U.S. within **one year** from the date of export;
- must remain under "effective control" of the traveler at all times (for example, physical custody or keeping the item secured in a place such as a hotel safe, a bonded warehouse, or a locked or guarded exhibition facility); AND
- is not shipped under a bill of lading or air waybill (hand carried by student or employee)

When using the ToT exemption and you intend to hand-carry the items internationally it is recommended that you have documentation to support the exemption. Contact [EHS](#) for help with preparation of such documentation.

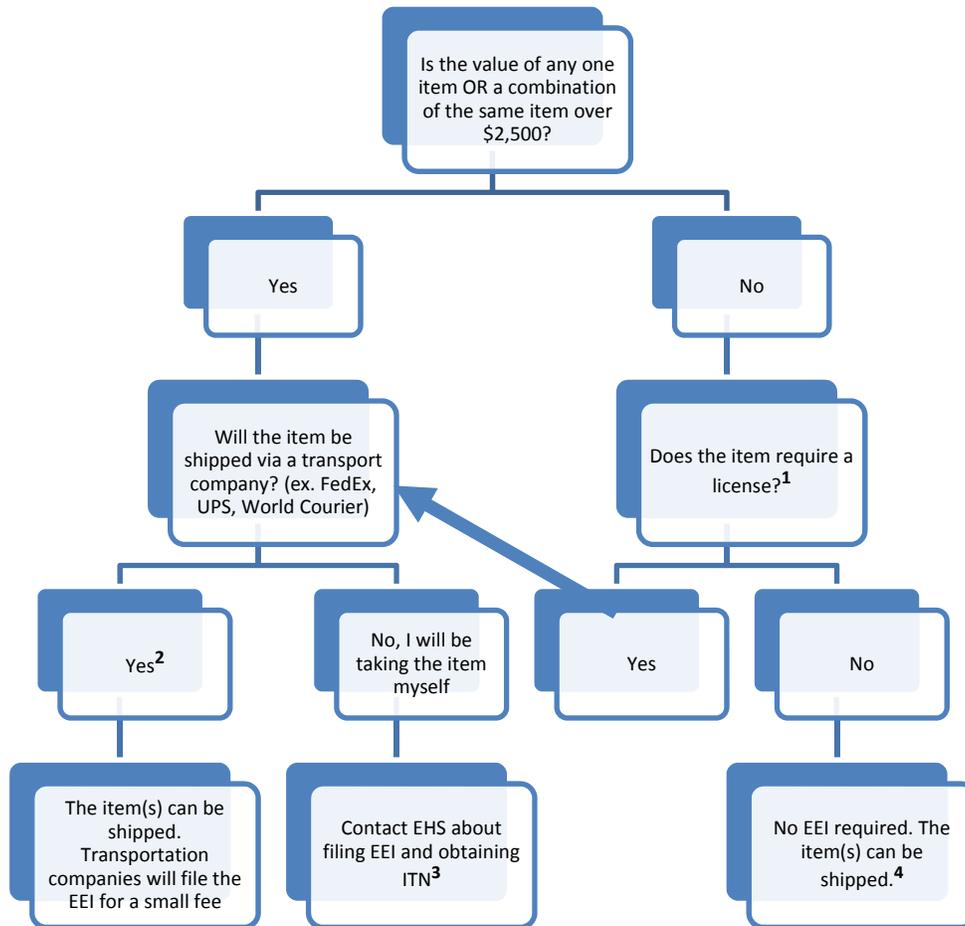
It is recommended to your ship research items via a transport company (ex. FedEx, UPS, World Courier)². The transport company will file your EEI information and obtain your Internal Transaction Number (ITN) for a small fee. If you are hand carrying research materials that meet the requirements for filling and the above exemptions do not apply, please contact [EHS](#) so that EHS can perform the requisite filing and obtain the ITN. You must contact EHS in advance of your departure. FTD requires filing **before** items are exported from the US.

Failing to file the EEI and non compliance with FTD can result in fines up to \$10,000.

¹ Countries listed in Country Group E:1 as set forth in Supplement 1 to 15 CFR 740.

² Packages sent to international locations to which FedEx can deliver and all domestic packages must be shipped through the University's e-commerce platform with FedEx

My research team is shipping or hand-carrying supplies and equipment internationally for a study. Do we need to file EEI on behalf of the University?



¹Contact EHS for items that may require a license before exporting.

^{2,3}Exemptions may apply.

⁴Shipment must comp with all other university guideline and federal regulations. See EHS Shipping for details.