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## **Guidance Document on Export Control Law**

### **dated 09.12.2025**

Export control law is concerned with preventing the proliferation of weapons and military equipment, as well as the associated know-how (knowledge), to crisis regions and to countries that may use such items for repression or terrorism. Export control law is governed by numerous national and European laws and regulations. In Germany, responsibility lies with the Federal Office for Economic Affairs and Export Control (BAFA):

<https://www.bafa.de/DE/Aussenwirtschaft/Ausfuhrkontrolle/Academia/academia.html>.

Universities are also affected. Introductory information on this topic can be found, by way of example, on the following university of applied sciences websites:

<https://www.h-brs.de/de/d3/exportkontrolle-forschung-und-wissenschaft-0>

<https://www.fh-aachen.de/fh-aachen/hochschulstruktur/zv/dez-3/themen/anlagen-und-inventar/exportkontrolle-und-zoll>

An overview of affected countries and categories can be obtained at

<https://www.sanctionsmap.eu/#/main>.

As a preliminary measure pending the establishment of a formal compliance regulation, this Guidance Document is intended to provide orientation.

Universities at which research is conducted are responsible for compliance with export control law; however, the Doctoral School NRW is also obliged to comply with these regulations. This applies, without being exhaustive, to the following activities:

- Cooperation with foreign universities (e.g., cotutelle arrangements);
- Involvement of foreign professors residing in Germany or abroad in supervision and evaluation;
- Admission of doctoral candidates from abroad residing in Germany or abroad;
- Participation in conferences abroad;
- Collaboration with experts from abroad, for example in colloquia or academic conferences;
- Publications in foreign journals or other foreign media.

Export control law is definitely relevant when weapons or nuclear facilities are involved. As a rule, this will not be the case for our doctoral projects. However, the scope also includes, for example, missiles or other means of transport that could be used for weapons, as well as digital surveillance technologies if they can be used for human rights violations. Basic research is generally not affected.

The following guiding questions must be addressed when assessing relevance under export control law:

1. Does the matter involve weapons, weapons of mass destruction, technology for human rights violations, or technologies that can be used for such purposes?
2. Are persons, organizations, or states outside the European Union involved, or persons who do not hold EU citizenship?

In cases of doubt, project leaders, supervisors, or the doctoral candidates themselves should be consulted in order to answer these questions.

If both questions are not answered in the affirmative, the result must be documented in the records, and no further action under export control law is required.

If both questions are answered in the affirmative, an individual assessment is required, and the Export Control Officer must be informed. At present, this is Martin Sternberg.

The individual assessment must be conducted in coordination with the export control office of the responsible university and must relate to the specific (knowledge-based) item (dual-use), the persons concerned (where applicable, sanctions regulations), and the countries concerned (where applicable, embargo regulations).

Informational Version