EECARO
European Export Control Association for Research Organisations

## Comments to the 2nd joint EU-US Stakeholder's Outreach Event for TTC WG 7 Export Controls – 19th July 2022

We appreciate the opportunity to further participate in the TTC WG 7 Export Controls. After having read the 'Factual Summary Report regarding the Public feedback consultation on EU-U.S. TTC WG 7 Export Controls' - EECARO would like to take this opportunity to once again emphasize the importance of the following topics to the international research community.

### 1. „published information" and „information intended to be published"

Allow for an unrestricted publishing in publicly available scientific journals – print or online - including sharing information with co-authors and reviewers abroad, to enable a smooth and timely peer review process. Further, the EU and the US should align the licensing requirements for software and technology to be released "in the public domain".

Export controls on published information and information intended to be published do not only create additional compliance requirements and burdens for scientists and researchers but also hinders international research projects. Different interpretations on the terminology "published information" weakens the effectiveness of trade controls.

### 2. Public scientific conferences and export controls

Participating in public scientific conferences is key to research and academia, while conference contributions and presentations are generally of low technical applicability. The approach undertaken by the EAR regarding open conferences should serve as a starting point.

EECARO is supporting the TTC and appreciates the opportunity to address research and science export control topics by actively participating in the TTC's WG 7 Export Controls. EECARO remains open for further outreach.

On behalf of EECARO,

**Sabine van Gastel**, Export Controls TNO, sabine.vangastel@eecaro.eu

**Paul Gerharz**, Export Controls Fraunhofer-Gesellschaft, paul.gerharz@eecaro.eu



**About EECARO**
The European Export Control Association for Research Organisations (EECARO) is a network that aims to unite European Union research institutes, universities, and their export control compliance officers with a view to address the specific character of export controls in a research context.