Compliance with German Export Control Regulations

Foreign trade is subject to a number of restrictions stemming from EU legislation as well as the provisions of the Foreign Trade and Payments Act (Außenwirtschaftsgesetz) and its implementation, the Foreign Trade and Payments Regulation (Außenwirtschaftsverordnung). These export-control regulations apply also to the use of the Leibniz-Rechenzentrum (LRZ) high-performance computer (HPC) systems. The LRZ is obligated to implement these export-control regulations whenever access is granted to a HPC system. As a Master User of an LRZ project with access to our HPC systems you share these obligations.

More specifically, this means that you have to keep in mind and will be held accountable that access to LRZ HPC systems (currently Linux Cluster and SuperMUC) is granted only in accordance with these regulations. This is implemented in the following way:

To protect both the LRZ as the operator of these systems and you as a Master User, all research-project managers asking for access to LRZ HPC resources have to submit written compliance declarations. This is accomplished by following these steps:

1. Research-project managers requesting or currently enjoying access to LRZ HPC resources have to sign the printed form Declaration of Compliance with German Export Control Regulations to affirm that they assume responsibility for compliance with all applicable export-control regulations.
2. If you are a research-project manager yourself, you too have to sign this form.
3. As a Master User you affirm towards the LRZ that you will only issue user permissions for LRZ HPC systems if the respective research-project manager has already signed the compliance form requested in step 1.

You are not required to evaluate the content of research projects unless you yourself are the project manager. Rather your role is limited to the formal layer and consists solely of requesting the compliance form from the project managers and filing it. This is necessary also for existing projects. Unfortunately, there appears to be no other practical way for a whole-scale roll-out of this topic in the university.

As Master User of a project using LRZ HPC systems, you are or will be requested to confirm the following statement:

- I affirm that I will contact the respective research-project managers for all accounts with access to LRZ HPC systems in any of my projects and request him/her to sign the form Declaration of Compliance with German Export Control Regulations. Should a project manager refuse to sign the form, I will report all affected user accounts to the LRZ.
- I affirm that I will only request a new access authentication for an LRZ HPC system if I have a form Declaration of Compliance with German Export Control Regulations signed by the respective research-project manager.

I affirm that I will retain the signed forms at an appropriate location in my organization and that I will make them available to the LRZ on request.