



MEMORANDUM

1 MAY 2025

Subject: Updated UCPH overview of sanctions against countries, institutions and certain types of funding

**RESEARCH AND INFORMATION
SECURITY**

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Background

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MOB 51 29 84 66

The work to increase safety in international research collaboration is evolving continuously. Export control rules and international sanctions prohibit certain collaborations. In addition, sanctions/cessation of collaboration have been adopted at both national and UCPH level, targeting the not like-minded countries that PET specifically warns against (China, Russia and Iran) regarding the risk of unwanted knowledge transfer.

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The various sanctions/cessation of collaboration are reviewed below.

Sanctions not previously notified at UCPH are marked with *

At the end of this memo, a general overview of the sanctions/cessation of collaboration is provided.

* Sanctions on three Iranian universities

EU sanctions imposed on three Iranian universities mean that UCPH is not allowed to contribute to capacity building at these universities because of their close ties to the Iranian military. The universities are:

- Malek Ashtar University,
- Sharif University of Technology
- Shahid Beheshti University

These universities are so closely linked to the Iranian military that any supply of knowledge or funds is considered military support to Iran.

The Danish Business Authority has also clarified that visits by guest researchers from the sanctioned universities will also be contrary to the sanctions. The knowledge acquired by the persons during their stay will be regarded as indirect provision of financial resources to the sanctioned institution.

It is assumed that this also applies to guest students who will subsequently return to Iran with the acquired knowledge, as they will also be able to contribute to capacity building.

Persons from a sanctioned university who currently and according to the agreement must stay at UCPH will be able to terminate their stay at UCPH.

Sanctions against China

* Sanctioning collaboration with Seven Sons Universities

UCPH will stop all future research collaborations with Chinese universities that have significant ties to the Chinese military. This is in line with practice at a wide range of other Western international universities. This is especially true of Chinese universities, which fall under the “Seven Sons of National Defence” listed in the table at the end of the note.

Stop means specifically:

- Stop for the reception of guests and delegations from the aforementioned institutions.
- Stop employment of persons who come directly from the aforementioned institutions.
- Stop exchange and research stays at and from the aforementioned institutions.

Closure of collaboration with BGI

UCPH approved in 2024 the cessation of use of services and machinery from BGI Group. According to PET intelligence, BGI has transferred biodata collected in Denmark to China, and BGI owns genetic data from the Danish population. Danish biodata can potentially be used for military purposes.

Termination means:

- Stop for mail order sequencing
- Phase out of collaboration with BGI over a number of years until the fall of 2026, for BGI machines located at UCPH and until the end of 2027, for initiated PhDs and postdocs and initiated research projects.

Stop to receive individuals with CSC funding – Chinese Scholarship Council

- In spring 2023, the Danish universities decided that researchers/PhD students with funding from CSC should not have the opportunity to come here. This applies not only for PhD students who are enrolled, but also non-enrolled visiting PhD students, visiting researchers as well as Bachelor and Master's degree students.

The reason for the suspension is a concern that the terms and conditions of the contracts that the CSC scholarship holders must sign are compromising their working and living conditions and are in conflict with academic freedom, as it is understood at Danish universities.

Sanctions against Russia and Belarus

UCPH follows the March 2022 call from the Ministry of Education and Research to suspend all education, research and innovation collaboration with institutions in Russia and Belarus as a result of Russia's invasion of Ukraine and the associated international sanctions.

*** Stop to receive self-paying PhD students**

UCPH wants transparency in the funding of all research at UCPH.

Each year there are some self-paying PhD students who want to be enrolled at KU and have KU as a workplace. However, there is a high risk that they are not actually self-paying but use this status to camouflage the actual source of financing, which is suspected among some PhD students.

- UCPH therefore introduces a stop for enrollment of self-paying PhD students who must have KU as a workplace.

UCPH overview of sanctioned partners		
(Version April 2025)		
COUNTRY	Sanctioned	Reason
China	Beihang University in Haidian, Beijing	Engaged at very high level in national defence research as one of the 'Seven Sons of National Defence'
	Beijing Institute of Technology in Haidian, Beijing	Engaged at very high level in national defence research as one of the 'Seven Sons of National Defence'
	BGI Group: • Stop for mail order sequencing • Phase out of collaboration with BGI over a number of years (unfolded in memo text).	Risk that the collection and analysis of genetic data can be misused by the Chinese authorities for surveillance and suppression of ethnical minorities in China and for development of Chinese military programs.
	CSC – China Scholarship Council	In spring 2023, the Danish universities decided that researchers/PhD students with funding from CSC should not have the opportunity to come here. The reason is a concern that the terms and conditions of the contracts that the CSC scholarship holders must sign are compromising their working and living conditions and are in conflict with academic freedom, as it is understood at Danish universities.
	Harbin Engineering University in Harbin, Heilongjiang	Engaged at very high level in national defence research as one of the 'Seven Sons of National Defence'
	Harbin Institute of Technology in Harbin Heilongjiang	Engaged at very high level in national defence research as one of the 'Seven Sons of National Defence'
	Nanjing University of Aeronautics and Astronautics i Nanjing, Jiangsu	Engaged at very high level in national defence research as one of the 'Seven Sons of National Defence'
	Nanjing University of Science and Technology i Nanjing, Jiangsu	Engaged at very high level in national defence research as one of the 'Seven Sons of National Defence'
	Northwestern Polytechnical University i Xi'an, Shaanxi	Engaged at very high level in national defence research as one of the 'Seven Sons of National Defence'
Russia	All organisations in Russia and Belarus	The Russian invasion of Ukraine and international Ruslands invasion af Ukraine and included international sanctions.
Iran	Malek Ashtar University	Internationally sanctioned Iranian university.
	Shahid Beheshti University	Internationally sanctioned Iranian university.
	Sharif University of Technology	Internationally sanctioned Iranian university.
All countries	Self-paying PhD-students working at UCPH	UCPH wants transparency in the funding of all research at UCPH. There is a severe risk that "self-paying" PhD students use this status to camouflage the actual source of financing