**Travel and Transferring Biological Materials**

**GUIDANCE**

**Purpose**: This document serves as a reminder for how to properly transfer biological materials outside of BMC for research. It also provides guidance for researchers who have travel plans outside of the country and were considering travelling with any biological materials.

**Background:** As has been reported by the media, several researchers, including at Boston-area institutions, have been stopped at the airport where government officials searched and seized biological materials on their person. This can cause delays, missing flights, seizure, and in the worst cases arrest and/or federal charges. Follow the guidance here in an effort to properly streamline travel plans and any material transfers BMC authorizes.

**Scope:** This guidance applies for all transfers of BMC biological materials to any non-BMC entity. Those subject to this guidance include, but are not limited to, BMC employees, researchers, principal investigators, trainees, visiting scientist/researchers, post-docs, collaborators, or other staff (“BMC Staff”), if they intend to transfer or otherwise share access to biological materials. This guidance also provides instruction to those travelling outside of the United States who also need to transfer any biological materials to a non-BMC institution. Other researchers or post-docs who have completed their tenure at BMC and are returning home outside of the United States must also comply. If unsure whether or not this guidance applies to you, or for questions, contact the Senior Research Compliance Manager at michelle.irick@bmc.org.

**General Rule:** As a general rule, *you may not travel with any biological materials on your person or in your possession* (e.g. in a suitcase, pocket, bag). You must use a shipping service to transport biological materials in compliance with the various United States regulations governing this area, in addition to the IRB. The United States has several complex regulations governing the shipping, labelling, packaging of biological materials; and complying with export control regulations.

**Steps:** To transfer any biological materials out of BMC, you must complete the following steps:

1. **Recipient Institution**. Biological materials may only be transferred outside BMC to a recipient institution. Researchers leaving BMC must have a formal affiliation with an institution in order to transfer biological materials. BMC will not permit transfer of data to unaffiliated individuals.
2. **Authorization from the Principal Investigator or Department Chief.** Develop the packaging / shipping approach that will be followed to transfer the materials in accordance with applicable laws and regulations (“Shipping Plan,” see further information on shipping in Section 8 below), and discuss both the (a) nature of the materials and (b) Shipping Plan with the Principal Investigator or Department Chief supervising you about your need to take biological materials. Such transfer must be in conjunction with a BMC-related research project and in furtherance of those research goals. The Principal Investigator or Department Chief must give you express permission in writing to transfer any BMC biological materials.
3. **Institutional Review Board (IRB).** Contact the IRB at [medirb@bu.edu](mailto:medirb@bu.edu) to inform them of your plans to transfer biological materials, and confirm whether these plans are covered by your existing IRB protocol, or whether a modification is needed. Please consider ahead of time how the samples relate to BMC research, whether the subjects have provided permission/authorization for transfer of the samples, how the samples will be stored, and how they will be protected.
4. **Institutional Biosafety Committee (IBC).** Contact the [IBC](http://www.bu.edu/researchsupport/compliance/ibc/) to discuss your plans to transfer biological materials. The IBC has overall oversight and responsibility for the Biosafety program at BMC and BU.
5. **Export Control Officer.** Contact Heather Skinner at [hskinner@bu.edu](mailto:hskinner@bu.edu). the export control officer, to ensure transfer will comply with United States export control regulations.
6. **Research Counsel—Legal Instrument(s)**. Before transfer of any biological materials, you must contact BMC Research Counsel to execute a Materials Transfer Agreement (“MTA”) or another type of agreement between BMC and the recipient institution abroad.
   1. Contact [DUA.MTARequest@bmc.org](mailto:DUA.MTARequest@bmc.org) to determine what agreement you may need.
7. **Data**. Will you need to share/transfer any data tied to the biological materials? This is a related but separate matter. Please follow the guidance in the Instructions for Authorization Letter for Travel and Transfer of Data.
   1. Data transfer/sharing also requires legal agreements, so broach the data issue together with the biological materials issue with Legal and Compliance as it may speed up and facilitate agreement execution. Contact [DUA.MTARequest@bmc.org](mailto:DUA.MTARequest@bmc.org) for agreements.
   2. If you have questions on data sharing/transfers, contact [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org).
8. **Shipping**. You may not carry and travel with biological materials on your person through airports and customs. In order to avoid being stopped in the airport and having materials seized from you, you must use an authorized shipping service and appropriate packaging, labeling, etc. to package, ship, and deliver the biological materials.
   1. Be aware that shipping biological materials is subject to several international regulations including IATA, ITAR, and ICAO, and packaging and labelling requirements can differ depending on what type of material is being shipped.
      1. Detailed information from the IBC about preparing for transporting biological materials may be found [here](https://www.bu.edu/researchsupport/compliance/ibc/resources/biosafety-manual/chapter-11-transportation-of-biological-materials/).
   2. Consult the Export Control Officer and BMC Research Compliance with your Shipping Plan in compliance with the guidance in this document.