

**Since the International Committee on Taxonomy of Viruses (ICTV) officially named the virus causing the current outbreak of coronavirus disease "severe acute respiratory syndrome coronavirus 2" (SARS-CoV-2) and a member of the severe acute respiratory syndrome-related coronavirus species, does BIS consider this pathogen now controlled under Export Control Classification Number (ECCN) 1C351.a.46?**

The ICTV is the international body responsible for official classification and taxonomy of viruses. In a report published on February 7, 2020, the organization classified the causative agent of COVID-19 respiratory disease as SARS-CoV-2 virus. It further noted that the virus is a variant belonging to the species *severe acute respiratory syndrome-related coronavirus*. The Commerce Control List (CCL) currently controls the export of SARS-CoV under the ECCN 1C351.a.46, "severe acute respiratory syndrome-related coronavirus (SARS-related coronavirus)."

While the official nomenclature of the species exactly matches the entry for SARS-CoV on the CCL, SARS-CoV-2 is a genetically distinct virus and causes a clinically distinct disease, COVID-19. The existing SARS entry was intended to capture only the virus causing severe acute respiratory syndrome, after the etiology, pathogenicity, and epidemiology were well established in the public health community. The SARS-CoV-2 virus has already undergone numerous nomenclature changes within the last three months, and the specifics of the disease transmission, progression, and lethality are still being investigated.

Therefore, BIS currently considers SARS-CoV-2 to be distinct from the SARS-CoV virus and as such will continue to classify the SARS-CoV-2 and its specific genetic elements as EAR99. An export license is generally not required for export of this virus or its genetic elements to most destinations. However, exporters are reminded that certain end-users, end-uses, and destination countries may require a license for the export of EAR99 items. Exporters should continue to screen all requests in accordance with Supplement No. 3 to Part 732 of the Export Administration Regulations (EAR), the General Prohibitions in Part 736 of the EAR, the Consolidated Screening List, and the end-user and end-use-based controls in Part 744 of the EAR.