

Sensitive Technologies and Research Areas of Concern (STRAC) – U15 Canada Issue Note

Today, the Government of Canada announced the [publication of additional details](#) concerning the enhanced research security measures first indicated in the [Ministerial Statement on Protecting Canada’s Research](#) issued on February 14, 2023. The federal government has instructed the Natural Sciences and Engineering Research Council (NSERC), the Social Sciences and Humanities Research Council (SSHRC), the Canadian Institutes of Health Research (CIHR), and the Canada Foundation for Innovation (CFI) not to approve any new federal research funding for projects through a university or an affiliated research institution that advance a [Sensitive Technology Research Area \(STRA\)](#) if those projects include any individual researcher affiliated with or receiving financial or on-kind support from a [Named Research Organization \(NRO\)](#) deemed to pose a risk to Canada’s national security.

To inform the application of this new policy, the federal government has also published a list of STRAs deemed vulnerable or of potential dual-use application to hostile foreign actors and a list of NROs that Canada’s security and intelligence agencies have deemed connected to the military, national defence or state security entities of foreign state actors that pose a potential threat to Canada’s national security. Following the implementation of this policy, federal granting agencies will require applicants for research grants that advance an STRA to attest that they are not affiliated with an NRO. This new measure will come into force in Spring 2024.

As co-chairs of the Government of Canada-Universities Working Group, U15 Canada has been engaged with federal departments for a number of years to provide insight and feedback on the development of research security policies. Previously, this has included supporting the creation of the *National Security Guidelines for Research Partnerships* in 2021 and responding to the pilot application to NSERC Alliance Grants. Following the February 14 Ministerial statement, U15 Canada continued to communicate with senior government officials on the development of this new policy initiative, including advocating for an appropriate implementation timeline for researchers to enter into compliance, however we provided no final review or approval of the entities listed as NROs. Our understanding is that this list was generated internally through Public Safety Canada with input from Canada’s security and intelligence agencies, reflecting similar exercises to identify high risk entities by Canada’s peers.

At all times, we have continually underscored the importance of mitigating any unintended consequences that stifle the research enterprise, including by providing additional resources to research security offices, enhancing funding for sensitive technologies to maintain Canadian competitiveness in key fields of research and developing robust non-discriminatory policies to preserve the rights of Canadian researchers regardless of their background.

The Government of Canada has released extensive guidance on this new policy, including a [Frequently Asked Questions page](#). We understand that further details will be communicated in advance of the implementation of this new policy.

In summary, the new policy features the following of note:

- This policy applies to all federal funding opportunities administered by Canada’s federal granting agencies — the Canadian Institutes of Health Research (CIHR), the Natural Sciences and Engineering Research Council of Canada (NSERC) and the Social Sciences and Humanities Research Council of Canada (SSHRC) —and the Canada Foundation for Innovation (CFI).
- The requirements under this policy only apply if research funded by a federal granting agency or CFI may advance a listed Sensitive Technology Research Area (STRA). The application of a sensitive technology to a research project without advancing the technology itself would not normally be considered in scope.
- If a project supported by the grant does advance a listed STRA, applicants will be required to complete an attestation as part of the standard grant application process, attesting that they are not affiliated with or in receipt of funding or in-kind support from a Named Research Organization (NRO).
- Only researchers with a named role on a grant application will be required to provide an attestation that they are not affiliated with or in receipt of funding or in-kind support from an NRO. The policy will also apply to all other individuals involved in a project, such as graduate students, but such individuals will not typically be required to provide an attestation.
- Compliance with this policy will be required for the duration of the grant and no researcher affiliated with an NRO can be involved in any research activity. Recipients will be required to inform the granting agency if there are substantial changes to the sensitivity of the research area or composition of the research team over time.
- Affiliation to an NRO could include employment, appointment, or the conduct of research. The receipt of financial or in-kind support from an NRO will also be considered an affiliation.
- The policy will not be applied retroactively to grants received prior to the implementation of the new measures and funding for any such project can continue. However, applicants would need to comply with the new policy when they apply for renewal of funds or for additional funding streams for the same project. If a researcher is affiliated with an NRO, they must terminate this affiliation to be eligible for a federal grant application.
- Validation of compliance with this new policy will include validation of an accurate identification of whether research advances a listed STRA, typically as part of a project assessment by granting agencies, as well as validation of a researcher’s attestation concerning their affiliations. Validation of attestations will occur in parrel with *National Security Guidelines* assessments for grants included in this process. For all other cases, validation will be conducted on small, randomly selected set of grant applications, with no personal information used to in the selection process. This validation will be led by Public Safety Canada in collaboration with the granting agencies and could include

further assessment as required by security and intelligence agencies.

- Validations will not typically occur prior to grant funding, with some exemptions, and so an application selected for random screening should not experience a delay in the disbursement of funding.

As this new measure is publicly released, we understand there will be many questions from the research community across U15 institutions. U15 Canada will be reviewing the full details of the policy and its implications for the research system in Canada. We will continue to engage with the Government of Canada as implementation moves forward. Questions on this new policy can be sent to James Hammond (james.hammond@u15.ca)

As your institution responds to this announcement and particularly given the likelihood of requests for public comment, the below key messages have been drafted to assist your institution in public communications.

Key Messages:

- Canadian universities take the importance of securing research from foreign threats extremely seriously.
- Universities are acting proactively to respond to emerging threats, including establishing extensive internal policies for the secure conduct of research. This work has been supported by the expansion of research security offices on campuses to monitor risks and guide researchers on evolving threats, building on important new resources from the federal government announced in Budget 2022.
- International research partnerships provide significant benefits to all Canadians and remain vital to ensuring Canada remains globally competitive. Through the flow of knowledge and talent, engaging in international research has helped Canada become a world-leader in innovative new technologies from Artificial Intelligence to biomanufacturing. U15 universities remain committed to being internationally engaged research partners and fostering campuses there are welcoming and inclusive for people of all backgrounds. Promoting a secure and open research environment will be vital to this goal.
- U15 Canada welcomes the publication of lists of Sensitive Research Areas and Named Research Organizations of concern. The identification of high-risk research partners, informed by information from Canada's national security agencies, provides an additional resource to inform the actions already being taken by research universities and will help ensure that researchers are aware of risks when engaged in international research. This is another step towards hardening Canadian research from malign threats.
- Universities will be closely examining these lists and conducting a thorough analysis of any risks to their institution. U15 members will continue to comply with all federal government and granting council regulations and will respond with any additional steps

that may be required prior to the new regulations entering into force. Institutions will also be providing guidance and building awareness of the new rules amongst their own community of researchers.

- Today's announcement is a further step which builds on the longstanding work between universities and the federal government to safeguard research. As a shared responsibility, universities have been working closely with government and security officials for several years to strengthen research security measures, including leading the creation of the Government of Canada - Universities Working Group in 2018, and spearheading the development of the National Security Guidelines for Research Partnerships in 2021.
- U15 Canada last summer issued detailed guidance on leading practices to safeguard research, informed by the work of our members and intended to support secure research across the community. As a guide on the principles and practices being implemented by universities across Canada, it demonstrates how universities are responding to evolving security threats and leading the way on robust action to ensure research remains secure. By acting diligently and proactively to respond to evolving threats, this work can ensure that Canada can seize the opportunities offered by research while ensuring the rewards of this work benefit Canada.
- Together, the collective efforts of universities and public officials are helping to develop a robust set of federal government policies, informed by guidance from security officials and the academic community, and underlined by the principle that we support a research system which is as secure as necessary and as open as possible. This announcement continues to work towards that goal.