

# Memorandum 21:39

**Date:** July 15, 2021

**To:** Presidents and Administrative Officers  
Local, Federated, and Provincial Associations

**From:** David Robinson, Executive Director

**Re:** **NSERC National Security Guidelines for Research Partnerships**

On July 12, the Government of Canada introduced the **National Security Guidelines for Research Partnerships** that will, effective immediately, require applicants and their institutions to complete a **risk assessment form** for all NSERC Alliance grant applications involving one or more private sector partners. Applications that NSERC determines may pose a risk will undergo a further review by security agencies. Proposals assessed as a high national security risk will not be funded.

According to the Government, the risk assessment of research partnerships is necessary to guard against foreign interference, espionage, and "unwanted knowledge transfer" that threaten Canada's national security interests. The risks are defined broadly as research that may lead to **"advancements in military, security, and intelligence capabilities of states or groups that pose a threat to Canada; or disruption of the Canadian economy, society, and critical infrastructure."** While not explicitly stated, it is understood that research collaborations with Chinese partners will be under specific scrutiny.

CAUT was not invited to participate in the working group that developed the guidelines but did have an opportunity to speak with officials as earlier drafts were being developed. Some of the issues raised are addressed in the final document, including an explicit commitment to academic freedom and open inquiry. However, several other concerns remain:

- Any national security restrictions on research, to the extent they are required, must be precise, narrowly defined, and applied only in exceptional circumstances. General concerns about national security and espionage in the guidelines can exaggerate the extent of the actual threats while leading to increased limitations on the global exchange of scientific research and the academic freedom of researchers to interact with international colleagues.
- The guidelines target not just research that may have a direct or indirect military application, but also that which may threaten intellectual property rights and undermine Canada's

economic interests. In this way, the guidelines conflate what has been traditionally understood as national security concerns with commercial interests.

- The guidelines and requirements reflect an increased targeting of Chinese academics and students. Last year, the Canadian Security Intelligence Service officially warned universities that China is allegedly using students, academic exchange programs, and partnerships to obtain access to science and technology for economic advantage. In the United States, the Federal Bureau of Investigation has urged universities and colleges to monitor students and visiting scholars from China. Such calls to be alert to or track individuals based solely on their country of origin violate basic norms of due process and amount to racial profiling.
- The guidelines and requirements put additional burdens on NSERC Alliance grant applicants and will lengthen the application process. Applicants will be required to assess whether their proposal has potential for either military or civilian applications that could be considered “dual-use” or “sensitive”. The “non-exhaustive” list of sensitive or dual use research includes not just the obvious categories of advanced weapons design and surveillance systems, but also “advanced materials and manufacturing”, “quantum science”, and “energy generation, storage and transmission”. This broad category of dual use and sensitive research will likely make it difficult for many applicants to determine with any certainty whether their proposed research poses any potential risks.

While currently the requirements apply only to NSERC Alliance grants involving a private sector partner, there is a possibility that they will be extended to other programs in the future. CAUT will be monitoring developments and discussing further with government officials. If any of your members experience issues with respect to the new requirements, please encourage them to share with CAUT so that we can develop a clear and comprehensive picture of any impact.