

## Government of Ontario

# Guidance on Completing the Mitigating Economic and Geopolitical Risk (MEGR) Checklist and Attestation Forms

The Government of Ontario is taking active steps to ensure that the outputs of research carried out by Ontario institutions funded by the Ministry of Colleges, Universities, Research Excellence and Security are safeguarded to protect the province's long-term economic security and interests.

**Note:** This tool is intended for your use only. Do not submit this as part of your grant application package.

## The Mitigating Economic and Geopolitical Risk (MEGR) Checklist

The [Mitigating Economic and Geopolitical Risk \(MEGR\) Checklist](#) assists applicants in conducting a risk assessment of their project to identify and address potential economic and geopolitical risks. One checklist is required per application, regardless of the number of participants and your answer selections in the Application Attestation form.

For each checklist question if you select “no” or “not applicable” please address the reasoning in the text-based “Potential Risk Identified and Risk Mitigation Proposal” section. The questions involve a series of actions that need to be undertaken prior to the start of the proposed project.

Each MEGR Checklist needs to be signed off by the Vice-President, Research and Innovation (VPRI) as the Authorized Signing Officer.

## PI and/or Co-Investigator Involvement with Foreign Entities Section

There are two mandatory disclosure questions in the MEGR Checklist.

## **Question 1**

Does the principal investigator (PI) and/or any Named Researcher currently hold any position or role, whether paid or voluntary, at any foreign government, foreign academic or research institution, Canadian military/defense-entity, foreign military/defense entity, private enterprise and/or community organizations?

For Question 1, the PI must select Yes or No. If answering Yes, you must use the drop-down to provide the name of the entity, position held, country and any other relevant details. All relevant positions outside of Canada must be declared, including those based in countries considered allies or like-minded partners.

## **Question 2**

Are the PI and/or any Named Researchers in the application currently in receipt of funding or in-kind support from any foreign government, foreign institutions, foreign military/defense entity, any foreign corporations, including their Canadian subsidiaries and/or foreign community organizations?

In addition to the PI, all Named Researchers' answers to Questions 1 and 2, including relevant details, must be entered using the drop-down. Positions and funding or in-kind support that need to be declared should include, but not be limited to: adjunct appointment, talent program participation, graduate student co-supervision, visiting scholarship, journal editor, alumni association membership, chief scientist advisor, board of directors position, scientific or academic committee membership, registered legal representative and/or any role affiliated with a commercial entity.

The truthfulness and transparency of disclosures will be assessed during the security review process. Applicants should be mindful of any discrepancies between their submitted CV, general online footprint and the disclosures. Any omission could be potentially interpreted as intentional deceit and may impact the overall risk assessment of the application.

## **Potential Risk Identified and Risk Mitigation Proposal Section**

This text-based section allows the PI to contextualize any identified risks and establish mitigation strategies.

## Considerations for Potential Risk Identified

If any Named Researchers, including the PI, have indicated they maintain a collaboration or are in receipt of funding or in-kind support from a foreign entity, the PI must address the related risks and set out mitigation measures.

Particularly focus on providing information about collaborations (including co- publications/co-authorships) with entities that could pose an elevated security risk. This includes but is not limited to:

- Institutions on the Government of Canada's [Named Research Organizations list](#)
- Entities on the United States Department of Defense's [List of Foreign Institutions Engaging in Problematic Activities to Counter Unauthorized Technology Transfer](#)
- Entities rated as "High Risk" or "Very High Risk" on the [Australian Strategic Policy Institute \(ASPI\) Defense Tracker](#)
- Corporations that have been sanctioned by NATO countries. (e.g., the [Consolidated Canadian Sanctions List](#), the [EU sanctions tracker](#), the [US Office of Foreign Assets Control List](#) and the [US Bureau of Industry and Security Entity List](#))
- Foreign government research institutions or labs

Report an international research collaboration or industrial partnership if you are in doubt as to whether it could be considered an elevated risk. In addition, vendors or in-kind support (equipment, personnel, services) entities may also be assessed during the security review.

The Ministry of Colleges, Universities, Research Excellence and Security's review process prioritizes risks to research via collaborations. Applicants must disclose collaborations with entities that could be considered to pose an elevated security risk.

Collaborations include:

- Currently holding any position or role, whether paid or voluntary
- Receiving funding or in-kind support
- Co-publishing
- Industry partnerships and collaborations
- Graduate student supervision
- Participation as or research with a visiting scholar

## Developing a Risk Mitigation Proposal

The Ministry of Colleges, Universities, Research Excellence and Security expects the risk mitigation proposal to contain an explanation of all identified collaborations as well as mitigation strategies to ensure the safety of the proposed research.

Discuss the following in your response, as applicable:

- Explanations of the collaboration should address if it was:
  - Via a former student/post doc who is no longer with TMU
  - Via a third-party researcher
  - A public lecture or conference
  - A deep partnership, and if so, the nature of the partnership
- When the collaboration began
- Whether foreign funding was involved
- If there are yet-to-be published papers from the collaboration
- Whether patents or intellectual properties were created and under which jurisdictions they were filed and registered
- If the collaboration is ongoing or finished
- What steps are taken to terminate any identified high-risk collaborations

Examples of risk mitigation categories under which the PI may consider proposing specific tactics include:

- Training (i.e., research security, cybersecurity and intellectual property training)
- Guidance and best practices: [Government of Ontario's Research Security Guidelines for Ontario Research Funding Programs](#), [Government of Canada's Guidelines and Tools to Implement Research Security](#)
- Partnership agreements that include intellectual property and technology transfer clauses that address national security risks: [Office of the Vice-President, Research & Innovation \(OVPRI\) Technology Transfer and Commercialization / Intellectual Property](#)
- Data management and information security: [TMU Research Data Management \(TMU Libraries\)](#)
- Establishing access restrictions for partners and personnel to an “as needed” basis
- Reporting mechanisms to your institution on the implementation and effectiveness of the proposed risk mitigation measures

## **Attestation Forms**

An [application attestation](#) is required for each Named Researcher in the application and is signed by the researchers. The PI is responsible for gathering the required information from all Named Researchers and ensuring that each form is complete.

Each attestation form requires a selection of Option A or Option B declaring whether or not the Named Researcher will be in collaboration with a problematic (elevated risk) entity. Please read the definitions provided carefully before selecting your option. When making the selection, please note what the Ministry considers a problematic entity beyond the federal government's Named Research Organizations (NRO) list. Please consult the lists of entities provided in the section for Considerations for Potential Risks Identified.

When selecting Option B, the Named Researcher should ensure that they provide the detailed contexts for all the collaborations captured in the relevant period. This information is required to assist the PI in completing the Risk Mitigation plan in the MEGR form.

Please note that selecting Option B does not impact the eligibility of the application, but intentional misrepresentation by selecting option A instead of B may negatively impact the funding timeline and decision.

## **Definitions**

### **Collaboration**

Scientific collaboration includes but is not limited to collaborations involving co-authorship, co-publication, co-hosting of international conferences, joint research or joint funding recipients. This may also include more formal relationships such as a memorandum of understanding or a partnership, joint venture, joint funding, joint degree/exchange program, graduate student supervision, visiting scholar or participation in a foreign-funded talent program.

### **In-Kind Support**

Non-cash contributions in the form of a good or a service donation received by any of the researchers in an application, including the PI and co-investigator(s). Examples may include, but are not limited to, lab equipment, consultation, travel tickets and hotel accommodations.

## **Named Researchers**

Researchers who participate in a research project and whose names and roles are stated in the Ministry research funding program application. They include a PI and co-investigators in the project. They do not include project members that may participate in the project but are not named in the application (e.g., technicians, post-docs, etc.).

## **Relevant Period**

For the purposes of research security evaluation, including the Application Attestation Form, the relevant period encompasses two years prior to the date a Named Researcher signs the Application Attestation Form through to the anticipated completion date of the proposed project.

## **Contact for Assistance**

For assistance completing the forms referenced in this document, please [contact the OVPRI's Research Services](#).

Assistance on Research Security is also available. For tailored risk advice and consultation, please contact [researchsecurity@torontomu.ca](mailto:researchsecurity@torontomu.ca).

For general assistance in navigating research security requirements, please visit [TMU's Research Security webpage](#).