

National Aeronautics and Space Administration

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Washington, DC 20546-0001



September 26, 2025

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the Events
Related to the 76th International Astronautical Congress (IAC) in Sydney,
Australia, September 29 – October 3, 2025

Representatives from NASA have been invited to attend a series of events in conjunction with the International Astronautical Congress (IAC) in Sydney, Australia. The IAC is intended to enable representatives from the space industry, space users, space policy makers, students, young professionals, researchers, and academicians to meet and exchange experiences and knowledge on space-related topics, and to develop world-wide cooperation programs. The IAC is the largest annual event organized by the International Astronautical Federation (IAF), a non-governmental, non-profit membership organization, based in Paris, France. The Congress is hosted by one of the IAF's member countries, which forms a local organizing committee. Events organized by other organizations adjacent to the IAC include:

1. AIAA Networking Reception, September 28, 2025, 5:30 pm – 7 pm. The American Institute of Aeronautics and Astronautics (AIAA), a Section 501(c)(3) non-profit will host a reception at the Hyatt Regency Sydney. Approximately 400 people have been invited to attend the dinner. Expected attendees include representatives of foreign government agencies, industry, academia, students, and members of the public. The dinner will include food and beverages valued at approximately \$50 per person. The event is by invitation only for a recipient and guest. (NASA employees may accept the gift lapel pin.)
1. SpaceX Reception, September 30, 2025, Space Exploration Technologies Corp. (SpaceX) will host a reception at Smoke Rooftop. Approximately 200 people are expected to attend the dinner. Expected attendees include representatives of foreign government agencies, industry, and academia. The dinner will include food and beverages valued at approximately \$65 per person. The event is by invitation only. (This event also includes a small food take away gift worth \$10 which may be accepted under the exception

allowing gifts not exceeding \$20 if the employee will not have accepted gifts from SpaceX exceeding \$50 in 2025.)

2. Voyager Reception, September 30, 2025, Voyager will host a reception at Pier One Sydney Harbour Hotel. Approximately 150 people are expected to attend the dinner. Expected attendees include representatives of foreign government agencies, academia, students and young professionals, and members of the public. The dinner will include food and beverages valued at approximately \$95 per person. The event is by invitation only, which includes a guest. (This event includes a gift bag valued at \$22.95. NASA attendees are advised to decline an item within the gift bag so that it will be removed by the hosts, reducing its value to \$12.95 so that it may be accepted under the exception allowing gifts not to exceed \$20 if the employee will not have accepted gifts from Voyager exceeding \$50 in 2025.)
3. Space Generation Advisory Council (SGAC) and Planet Happy Hour, September 30, 2025, 7 pm – 9 pm. The Space Generation Advisory Council (SGAC), a Section 501(c)(3) non-profit and Planet Labs PBC, will host a reception at The Sporting Globe x 4 Pines in Sydney, Australia. Approximately 250-300 people are expected to attend. Expected attendees include representatives from foreign government agencies, industry, academia, students and young professionals. The reception will include food and beverages valued at approximately \$30 per person. The event is by invitation only. (NASA attendees may accept the gift stickers and keychain.)
4. Space Industry Association of Australia (SIAA) and Aerospace Industries Association (AIA) reception. SIAA and AIA, a Section 501(c)(6) non-profit, will host a reception at Norton Rose Fulbright in Sydney, Australia. Approximately 200 people have been invited to attend. Expected attendees include representatives of foreign government agencies and industry. The reception will include food and beverages valued at approximately \$50 per person. The event is by invitation only.

In accordance with 5 C.F.R. § 2635.204(g), and 14 C.F.R. § 1207.103, I find that the events listed above each meet the definition of a “widely attended gathering.” I further find that there is an agency interest in having NASA employees attend the events, as they will have the opportunity to further agency programs and operations through the exchange of views and information with other attendees. Accordingly, NASA employees who have been invited to attend may accept free attendance for themselves, and if invited a single guest, for these events.¹

¹ In addition, invited employees may accept free attendance at the following IAC program events which are covered by the IAC registration fees (or based on the exception for gifts and refreshments, and entertainment in foreign areas in 5 CFR § 2635.204(i)): the IAC Opening Ceremony, Welcome Reception, IAC program breakfasts/lunches, IAC VIP events (including those co-sponsored by foreign governments for which

NASA employees who have a significant role in any pending matter affecting the host of an event in this determination, such as procurement duties, program management, or negotiating or administering a Space Act Agreement, should seek a separate determination from their local ethics counselor as to whether they may accept an invitation of free attendance.

Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year). NASA invitees should not accept gift items exceeding the \$20 cap.

In addition, NASA employees may accept invitations to attend the following events under the Foreign Gifts and Decorations Act²:

September 27

Bahrain Space Agency Young Professionals Dinner, 7:30 pm, Cruise Bar and Restaurant

September 29

Australia VIP reception, Olia Restaurant, September 29, 2025, 7:30 pm

UAE reception, Pier One Sydney Harbour, 7:45 pm

September 30

Singapore Space Summit Preview, Living Room Bar, 5 pm

New South Wales Governor VVIP event, Government Sydney House, 6 pm

Germany reception, BrewDog South Eveleigh, 7 pm

ESA dinner, Museum of Contemporary Art, 7:30 pm

October 1

New Zealand Reception, Australia National Maritime Museum, 5:30 pm

United Kingdom reception, UK Deputy High Commissioner to Australia, 6 pm

Uzbekistan reception, Dockside Venue, 7 pm

Turkey reception, Maydanaz, 7 pm

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acceptance is authorized by the Foreign Gifts and Decorations Act), IAC young professionals events, and IAC 2026 Launch Reception. Attendance at the IAC closing gala dinner, for which tickets are 240 euros, is not covered in the IAC registration fee, and the IAF has not offered any free gala invitations to NASA employees. While a gift of a single ticket to the closing dinner gala may be accepted under the gifts in foreign areas exception noted above, NASA employees receiving an invitation to attend the gala should exercise caution to ensure it is not accepted under circumstances where their integrity or impartiality may be questioned.

² The Foreign Gifts and Decorations Act authorizes acceptance of gifts from a foreign government not exceeding \$480.