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Strategy of the European archives (2025-2030)

1. Introduction

The European Archives Group (EAG) is the European Commission's expert body ensuring cooperation and coordination on general matters related to archives. Its mandate is to stimulate the exchange of knowledge and experience through collaboration between Member States and to provide strategic advice to the Commission on archives-related matters.

Archives, information and records management are not EU competencies but are primarily the responsibility of each member state, without overarching EU regulation. However, numerous adjacent EU regulations affect national archives, information and records management, like those referring to the digital single market, copyright, data protection, digital signatures or artificial intelligence¹.

In its last strategic document of 2012² the EAG already discussed the changing role of archives in the digital era, addressing issues such as digitisation, re-use of public information or on-site/online access. Twelve years later, in an ever-changing digital landscape, new challenges must be tackled: artificial intelligence, a data-driven economy, electronic identity and signatures and the continuing digital transition of public services.

The EAG faces the challenge of advising the Commission within the new landscape more effectively and, consequently, increasing the influence of National Archives in the European institutions decision making process. Members should increase cooperation at national administrations' level and liaise with their national delegates to the Council Working Groups discussing draft legislation with a potential impact for archives, which will be mutually beneficial. It will help the Commission to develop its policies and programmes and support the digital transition and development of the digital single market. At the same time, it will help archives to be more effective in fulfilling their mission in crucial domains as set out below.

These challenges may be addressed by focusing on cooperation on regulatory matters and sustainability aspects in the archives' domain, and in the larger area of information and records management.

¹ See the annex.

² [European Archives Group. Archives in Europe facing the challenges of the digital era. 2nd progress report to the Council, 2012.](#)

The main working method of the group remains its biannual meetings, prepared by the Commission with the help of members' contributions, where they share knowledge and experience and discuss common positions, challenges and approaches, which are then followed up closely³.

2. Strategic orientation for EAG: Two Main Goals for Archives Today

Some of the Commission strategies and legal acts have a direct impact on challenges and developments for archives and information and records management and the EAG will cooperate to address them. Based on the EAG's discussions and meetings over the last years, two central goals were identified for archives today: 1) archives supporting democracy; and 2) maintaining citizens' trust in archives in the Digital Era.

Archives supporting democracy

History and recent geopolitical developments show that democracy cannot be taken for granted but must be actively managed and supported. The strength of the EU lies in the consensus on common democratic values and commitment to fundamental human and civil rights, freedom of speech, the rule of law, gender equality and equal opportunities.

The *Universal declaration on archives*⁴ recognises 'the vital necessity of archives for protecting citizens' rights' while the relationship between archives and civil rights cannot be dissociated from the more encompassing relationship between archives and democracy. A fundamental condition for an open and democratic society and the core mission of the archives is to preserve authentic and reliable information that is accessible to the public. Well organised and accessible archives provide transparency for citizens, which allows for a better understanding of societal developments and is a prerequisite for informed citizens.

In the current era of increasing disinformation and the emergence and advancement of high-tech enterprises which handle substantial amounts of data, it is imperative to enhance the recognition and the role of archival institutions. Their image should be built as professional institutions responsible not only for the appraisal and collection of records but also as actively supporting and being involved in their creation. Archives must continue to be a source of valuable and reliable information.

The three pillars that support the EU's digital strategy mention the following actions that archives should consider as guiding principles in their activities:

- foster an open and democratic society.
- increase access to high-quality data while ensuring that personal and sensitive data is safeguarded.
- fight disinformation online and foster diverse and reliable media content.

³ Currently, the EAG has a sub-group on Archiving by Design while another sub-group on Data Protection and Privacy for Personal Data (GDPR) has concluded its work. The EAG also follows ongoing collaborations and projects in the archives domain that have a European dimension.

⁴ [Universal Declaration on Archives, UNESCO, 10th November 2011.](#)

More specifically, the role of National Archives in this context will be to contribute to:

- Helping to protect democracy through access by citizens and media outlets to reliable and authentic documentation that counters disinformation.
- Promoting the independence of archival institutions within state or local government structures and their work towards transparency and protection of civil rights and democracy.
- Making a successful contribution to the European vision of a data-driven economy. Archives must strike the fine balance between opening up their data and preserving privacy, security and ethical standards and the EAG can guide this process through recommendations.
- Taking an active role in the ongoing changes and participating in developing civil society, including supporting institutions and citizens to secure civil and human rights by establishing a common approach to ensure compliance with the ‘once-only’ principle for cross-border users in matters such as birth, residence, studies, work, move, retirement and start/run/close a business. Aim at including this approach in *technical systems for the cross-border automated exchange of evidence and application of the ‘once-only’ principle*⁵.
- Documenting key decisions taken and the key decision-makers involved in times of crisis such as armed conflicts, pandemics and other emergencies. This documentation is vital for ensuring governmental accountability not only during the crisis but also in its aftermath. By helping to ensure that decision-making processes are documented by governments and administrations, the National Archives contribute to transparency and accountability.

Maintaining citizen’s trust in archives in the Digital Era

The Green Deal involves the EU transitioning to a modern, resource-efficient and competitive economy⁶. A sustainability perspective in the information provision is essential for the archives sector to be able to contribute to the green transformation of society. The digital and the green transition are closely interconnected and improving the management of the lifecycle of records in digital work processes and systems must be done in a way that is resource-efficient and sustainable over time. Ultimately, the digital information management of archival data can contribute to new technologies, solutions and working methods that lead in a carbon neutral direction.

While some European archives are struggling to cope with preserving born digitals in a trustworthy way, the emergence of sophisticated artificial intelligence technologies and the exponential proliferation of digital information pose new and even more profound challenges for numerous areas of archival work, for their role in society and for the services that they deliver. How can archives retain their traditional role as guardians and providers of trustworthy and authentic information while facing the increasing challenges of the digital transformation, the emergence of the data economy and the rapidly increasing use of artificial intelligence technologies?

⁵ As per the *Single Digital Gateway* regulation: <https://eur-lex.europa.eu/eli/reg/2018/1724/oj>

⁶ https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en.

The European archival sector faces common challenges regarding assessments, adaptation and application of EU regulations affecting Member States' records and archives management stemming from the EU's overarching strategies on the digital transition. Cooperation on these matters will be greatly beneficial for Member States, for the European archival sector as a whole and for citizens.

EU's digital strategy aims to ensure that the digital transition benefits all people and businesses while contributing to a climate-neutral EU by 2050. The EU must strengthen its digital independence with a clear focus on data, technology and infrastructure. The area is linked to numerous EU regulations that need to be implemented effectively in the Member States.

There are two overarching paths, *Shaping Europe's digital future* and *Europe's digital decade*, which govern and guide the digital transition of the Member States. Relevant in the context is also *The European Declaration on Digital Rights and Principles*⁷, which includes sustainability perspectives within digital transition, by ensuring that digital infrastructure relates to a green transition.

There are certain actions that National Archives will take in relation to this area. More specifically, the role of National Archives in this context will be:

- Contributing to an up-to-date and fit for purpose EU legislative framework that allows Member States to manage their digital records and archives. As part of the digital decade, the digital transition of public services that should be readily available online is one of the main goals and archives must continue their efforts towards achieving it. EAG can propose a framework of best practices in digital services offered to users, that may be used as support at national level by National Archives.
- Defining the ways archives must influence records creation for better information and records management. Reinforcing the involvement of archives in relation to the organisation of electronic records and archives management or to the access to this information. The activity of the Archiving by Design sub-group will help to put in place a new methodology and a better understanding on how to ensure data as records with sustainable authenticity and availability over time. Interoperability should be considered in the assessment of user needs.
- Contributing to the common specifications as well as certification and accreditation processes for electronic archiving will also ensure that data stored in these repositories meets specific standards of authenticity, reliability, and trustworthiness.
- Supporting EU open data initiatives by making historical and archival data as readily accessible as possible to the public by including content from common archival repositories in cross-border platforms, promoting transparency and accountability. The use of AI offers many opportunities and the EAG can assess them and if feasible, then propose guidelines on their application (for example on how to use open data from archives, establish auditing processes and certification standards, handle AI generated results).
- Defining a records and archives management competence framework that could guide European private or public organisations for recruitment and career development purposes of experts in this field by developing a curriculum for training programmes for archivists

⁷ [European Digital Rights and Principles | Shaping Europe's digital future \(europa.eu\)](https://european-council.europa.eu/media/en/press-communications/infographic/infographic-digital-rights-principles-2020-11-19-1000x500.pdf)

and records managers that combines archival skills, data management, data integrity, privacy and security legislations and standards.

Conclusions

The strategic contribution of the EAG depends upon linking these two main goals to the EU Commission's overarching strategies and EU regulations affecting the Member States' archives and information and records management. A more detailed correspondence can be consulted in the annex, which is structured based on legislative acts. This annex aims to be a living document that will be updated as soon as new legal acts impacting the archives domain are published as well as once new actions and initiatives are progressively planned at EAG level.

Annex. EU legal acts and recommendations that affect the archives, information and records management domains

This annex contains a presentation of the EU's two main strategies in the area of digitisation and an overview of the legal acts that regulate different aspects of data handling within the EU and in the Member States. The tables indicate which legal acts and recommendations EAG chooses to cooperate on or monitor.

Shaping Europe's digital future and Europe's digital decade

Initiative	Time frame	Description	Links	Impact on Member States archives and EAG involvement
Shaping Europe's digital future	2024	The EU's digital strategy was communicated in February 2020 and includes measures to manage the digital transformation within the EU. It states that the European approach will be based on three main pillars: Technology that works for people, A fair and competitive economy and An open, democratic and sustainable society. The strategy includes several legislative proposals, the EU's data strategy and the digital Europe funding programme (DIGITAL).	https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-digital-future_en	<p>The three pillars that support the strategy mention the following actions that archives should take into account as guiding principles in their activities:</p> <ul style="list-style-type: none"> • foster an open and democratic society • increase access to high-quality data while ensuring that personal and sensitive data is safeguarded • fight disinformation online and foster diverse and reliable media content.

Europe's digital decade	2030	The Digital Decade framework includes the Digital Decade policy programme, the Digital Decade targets, the Digital Decade objectives, the multi-country projects and the Digital Decade rights and principles. Each Member State shall, every two years from October 2023 to the year 2030, submit a report to the European Commission on how far the country has come in the work to achieve the targets.	https://digital-strategy.ec.europa.eu/en/policies/europes-digital-decade	As part of the digital decade, the digital transition of public services that should be readily available online is one of the main goals and archives must continue their efforts towards achieving it. National Archives should consider that Member States are encouraged to apply the once-only principle within their public administration, fostering the re-use of data, in accordance with the data protection rules, so that no additional burden falls on citizens or businesses. EAG proposing a framework of best practices in digital services offered to users, that may be used as support at national level by National Archives.
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Recently adopted and upcoming legal acts

Legal act	Date of adoption or Status	Description	Link to Eurlex	Impact on Member States archives and EAG involvement
AI Act	EP plenary final vote on 11 April 2024	<p><i>Purpose:</i> Harmonising rules for Artificial Intelligence within the EU.</p> <p><i>Subject matter:</i> Prohibition of certain artificial intelligence practices, specific requirements for high-risk AI systems and obligations for operators of such systems, harmonised transparency rules for AI systems intended to interact with natural persons, emotion recognition systems</p>	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=cele_x%3A52021PC0206	<p>Archival information can serve as a fundamental input for external AI development by providing valuable training data. Open data can be used to accelerate better AI models and contribute to building the European data economy.</p> <p>One of the greatest challenges to the application of AI to recordkeeping and archiving processes, is the inability to see how deep learning systems make their decisions. Archives will have to decide what degree of uncertainty they can 'allow' in the lifecycle of</p>

		<p>and biometric categorisation systems, and AI systems used to generate or manipulate image, audio or video content and rules on market monitoring and surveillance.</p>		<p>public records in order to be able to reconstruct actions and decisions with the help of AI models.</p> <p>The use of AI offers many opportunities and the EAG can assess them and if feasible, then propose guidelines on their application (for example on how to use open data from archives, establish auditing processes and certification standards, handle AI generated results).</p>
<p>Data Act</p>	<p>11 January 2024</p>	<p><i>Purpose:</i> Fairly distribute benefits from the type of data that comes from connected products and promote access to and use of data</p> <p><i>Subject matter:</i> The making available of product data and related service data to the user of the connected product or related service. The making available of data by data holders to data recipients; The making available of data by data holders to public sector bodies, the Commission, the European Central Bank and Union bodies, where there is an exceptional need for those data for the performance of a specific task carried out in the public interest. Facilitating switching between data processing services. Introducing safeguards against unlawful third-party access to non-personal data. The development of interoperability standards for data to be accessed, transferred and used.</p>	<p>https://eur-lex.europa.eu/eli/reg/2023/2854</p>	<p>Archives have the potential to make a successful contribution to the European vision of a data-driven economy. To realise this potential, archives must strike a balance between opening up their data and preserving privacy, security and ethical standards.</p> <p>The Regulation mentions that in exceptional circumstances, data from the private sector can be requested by public sector bodies, the Commission, the European Central Bank or another Union body. EAG could issue recommendations on how this information should be handled and how this data is to be preserved.</p>

<p>Data Act</p> <p>Governance</p>	<p>23 June 2022</p>	<p><i>Purpose:</i> Increase trust in data sharing, strengthen mechanisms to increase access to data and overcome technical barriers to data reuse</p> <p><i>Subject matter:</i> Conditions for the re-use, within the Union, of certain categories of data held by public sector bodies. A notification and supervisory framework for the provision of data intermediation services. A framework for voluntary registration of entities which collect and process data made available for altruistic purposes. A framework for the establishment of a European Data Innovation Board.</p>	<p>https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=cele_x%3A3A32022R0868</p>	<p>With the help of EU regulatory frameworks, archives must establish sustainable business models to gain access to advanced technology, software, and AI models, as potential important data contributors.</p> <p>EAG should list the preservation issues stemming from public sector data sharing and propose one or more possible solutions or mitigating actions per issue.</p>
<p>Implementing regulation on high-value datasets (HVD)</p>	<p>21 December 2022</p>	<p><i>Purpose:</i> Ensure that public data with the greatest socio-economic potential are available for re-use with minimal legal and technical restrictions and free of charge.</p> <p><i>Subject matter:</i> Establishes the list of high-value datasets belonging to the thematic categories set out in Annex I to Directive (EU) 2019/1024 and held by public sector bodies among the existing documents to which that Directive applies. The regulation also lays down the arrangements for publishing and reusing high-value datasets, in particular the applicable conditions for re-use and the minimum</p>	<p>https://eur-lex.europa.eu/eli/reg_impl/2023/138/oj</p>	<p>Establish a common approach and cooperate in making HVDs available according to the technical requirements.</p>

<p>Interoperable Europe Act</p>	<p>Proposal of 18 November 2022</p>	<p>requirements for disseminating data via application programming interfaces ('APIs').</p>	<p>https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52022PC0720</p>	<p>The activity of the <i>Archiving by Design sub-group</i> will help to put in place a new methodology and a better understanding on how to ensure data as records with sustainable authenticity and availability over time. Interoperability should be taken into account in the assessment of user needs.</p>
<p>Single digital gateway</p>	<p>2 October 2018</p>	<p><i>Purpose:</i> Provide information via a common digital gateway (Your Europe), make it possible to carry out matters online across national borders, reduce administration for individuals and companies.</p> <p><i>Subject matter:</i> The establishment and operation of a single digital gateway to provide citizens and businesses with easy access to high quality information, to</p>	<p>https://eur-lex.europa.eu/eli/reg/2018/1724/oj</p>	<p>Establish a common approach to ensure compliance with the 'once-only' principle of the regulation for cross-border users in matters such as birth, residence, studies, work, move, retirement and start/run/close a business. Aim at including this approach in the <i>Technical system for the cross-border automated exchange of evidence and application of the 'once-only' principle</i>.</p>

		<p>efficient procedures and to effective assistance and problem-solving services with regard to Union and national rules applicable to citizens and businesses exercising or intending to exercise their rights derived from Union law in the field of the internal market, within the meaning of Article 26(2) TFEU.</p>		
<p>eIDAS (revision)</p>	<p>Proposed to be finalised in Q2 2024</p>	<p><i>Purpose:</i> Aims to ensure that individuals and businesses can use public and private online services within the EU, while preserving their privacy. With the increasing digitization of cross-border public and private services, there is a need for access to high-security digital identification solutions that are accepted throughout the EU.</p> <p><i>Subject matter:</i> The regulation lays down the conditions under which Member States shall provide and recognise electronic identification means of natural and legal persons, falling under a notified electronic identification scheme of another Member State. It lays down rules for trust services, in particular for electronic transactions. The regulation establishes a legal framework for electronic signatures, electronic seals, electronic time stamps, electronic documents, electronic registered</p>	<p>https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021PC0281</p>	<p>Contribute to common specifications as well as the certification and accreditation processes for electronic archiving. This ensures that data stored in these repositories meets specific standards of authenticity, reliability, and trustworthiness.</p> <p>Address preservation issues in the implementing regulation to eIDAS (E.g. What should be preserved regarding electronic signatures?)</p>

<p>Directive on measures for a high common level of cybersecurity across the Union</p>	<p>14 December 2022</p>	<p>delivery services, certificate services for website authentication, electronic archiving and electronic attestation of attributes, the management of remote electronic signature and seal creation devices, and electronic ledgers. It lays down the conditions for the issuing of European Digital Identity Wallets by Member States.’</p>	<p>https://eur-lex.europa.eu/eli/dir/2022/2555</p>	<p>Through EAG, National Archives should establish a common approach to evaluating and managing information from essential and important entities as defined by the Directive.</p>
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