



**EUROPEAN COMMISSION**  
SECRETARIAT-GENERAL

Directorate C - Transparency, Efficiency & Resources  
SG.C.1 - Transparency, Document Management & Access to Documents

Brussels  
SG.C.1/CS/APG

**EUROPEAN ARCHIVES GROUP**  
**BRUSSELS, 30 MAY 2024**

**MEETING MINUTES**

**1. OPENING SPEECHES**

On behalf of Arnaud Vajda, Chairman of the Board of Directors of the Belgian Science Policy Office, and the Belgian Presidency of the Council, Bruno Verbergt, Director General of Publics & Collection of Belgian Federal Science Policy welcomed members of the European Archives Group (EAG). Mr. Verbergt highlighted the participation of Belgium in the Group since its creation in 2005 to promote cooperation in archival matters, discuss items such as the archives' role in the EU digital agenda and the challenges ahead such as those linked to the adoption of AI. He recalled specific projects based on AI at the State Archives of Belgium like the implementation of handwritten text recognition in some research projects and the extraction of metadata from digitised bulk archives.

María Oliván Avilés, Chair of the EAG, also welcomed the members and thanked the State Archives of Belgium for hosting the event in the historic building of the Palace des Academies. She highlighted the importance of cooperation in the archives field that happened also in other events during the week such as the meetings of the Archiving by design subgroup, the DLM Forum, EBNA and the Archives Portal Europe Foundation. She underlined the challenges ahead for archives, such as those linked to democracy and civil rights, and congratulated the Belgium National Archives research project in their colonial archives as an illustration of good practice.

**2. WELCOME AND ADOPTION OF THE AGENDA**

The Chair welcomed Amalia Papa, from the Greek National Archives, on the occasion of her first participation at the EAG.

A point in AOB was added following the request of Afelonne Doek, Director of the National Archives of the Netherlands, on the Joint controllership under Commission Implementing Regulation (EU) 2023/1070, which has an influence on archives and data management.

### 3. THE WORK OF STANDARDISATION OF ELECTRONIC ARCHIVING AT EUROPEAN LEVEL – DISCUSSION

The Chair introduced the first point, on the work of standardisation on electronic archiving. The eIDAS revised regulation entered into force on 20 May. As a novelty, the new section 10 allows for the provision of qualified electronic archiving services at the EU level. Some EAG members are part of a working group of the European Technical Committee for Standardisation CEN TC 468 (*Management of digital preservation*). The Commission welcomed the early involvement of national archives in defining the technical specifications necessary for the implementation of the regulation.

The first presentation on ‘Standardisation of digital archiving at European level’, came from Violette Levy, co-chair of the working group, and head of the Office of digital expertise and sustainable preservation at the Sub-directorate of collection, preservation and electronic archiving, SIAF, Ministry of Culture of France.

The key issues in France on digital archiving are about the design of acquisition policies and an increasing the number of digital records, collecting archives with a heritage or legal value, developing standards in line with user needs, controlling the ecosystem of third-party archiving of digital records, developing format policies at institutional level, or integrating the environmental impact of digital technology into archiving policies.

The starting point for France was to bring French standards at European level. The revision of the eIDAS Regulation gave an opportunity to meet the specific requirements of the European market. It was also necessary to provide a response to the needs of European standardisation stakeholders to take account of territorial characteristics not taken into account at ISO level. The aim was to define digital archiving and electronic archiving systems from a functional and technical point of view for the first time at European level.

Michel Cottin, digital curator at the National Archives of Luxembourg, also contributed to the presentation on the work of the new technical specification. Luxembourg works as part of the Benelux team. The technical specifications’ final version is expected for September 2024 and aims to provide with a single, consensual reference framework for the application of the new eIDAS trust service.

Technical specifications, in the specifications’ hierarchy, are the closest to a standard. They cannot conflict with a European standard and can replace a national standard. Following the first version of eIDAS, many countries tried to create national regulations on electronic archiving such as France, Belgium and Luxembourg.

There is the assumption that National Archives keep inactive archives for historical reasons, but the reality is that they hold collections also with administrative and legal value. The CEN/TC468 offers a platform for involvement in digital preservation strategies where national archives can influence new standards.

During the discussion that followed, Silvestre Lacerda (PT) pointed out that at national level, national archives have made legislative proposals to their government, and they are interested in the discussion on eIDAS2.

A representative of the State Archives of Belgium added that in the last two months, progress was done in the specifications and soon they will be ready before

implementing act of the updated eIDAS regulation. A balance needs to be found between needs of the Archives and the industry.

#### 4. EAG STRATEGY 2025-2030 – ADOPTION

The Chair briefly presented the draft strategy document of the EAG. The strategy had been discussed over the last meetings and fine-tuned by a dedicated working group. She thanked the Nordic countries group that came up with the draft.

The strategy covers the period 2025-2030 and addresses the most current issues archives face today. Our democracy is under threat from many directions, and we have to make sure archives do their best in protecting it. This comes at the same time as great technological changes that are challenging for the archives. Its goal is to adapt, modernise and maintain citizen's trust in archives in this Digital Era.

The annex of the strategy 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.

Given the already concluded written consultation, **the Chair proposed to adopt the strategy and all members agreed.** She also proposed to start working on an action plan, for which the active involvement of members is needed and expected.

During the discussion that followed LU intervened expressing that the next step is to identify actions for each goal and which countries/members could work on them, including indicating ongoing actions in each country to support the goals of the strategy, as mentioned by NL; this action could be linked to the second issue of the first goal (Promoting the independence of archival institutions and their work towards transparency). ES reminded that, for the first goal, on archives supporting democracy, archives have holdings related to fights on repressive regimes that could be shared or made accessible e.g. on the Archives Portal Europe. This action could be linked to the first issue of the first goal. Also, a call from the European Commission on remembrance to making holdings visible could be a concrete action.

The Chair reminded that while Commission has no competences on archives policy it would need EAG's meaningful input to share among its services in charge of management of programmes. In this context IE suggested that it is necessary to find ways (such as expert presentations) to bring expertise from the national level to the Commission to pass the right messages so that archives are represented in the Commission.

SE highlighted the importance of more actions and pointed to the need to use the Archives Portal Europe and the possibilities opened by the AI. HU plans to organise another workshop on specific expert topics such as AI and ES proposed to organise an observatory group on the rights on AI.

ES added that the ICA had reported that not all decisions were documented in emergency situations such as in the case of pandemics or wars, and by helping to ensure that decision-making processes are documented by governments and administrations, the National Archives contribute to transparency and accountability. PT, with regard to topics such as immigration, suggested to show aspects of immigration in the past to help citizens better understand it in the present. Also,

administratively, archives can help in specific procedures such as asking for the double nationality.

The coordinators for each of the topics identified in the strategy are as follows:

### **Goal 1: Archives supporting democracy**

- Helping to protect democracy through access by citizens and media outlets to reliable and authentic documentation: Belgium;
- Promoting the independence of archival institutions and their work towards transparency: the Netherlands;
- Making a successful contribution to the European vision of a data-driven economy: Latvia;
- Taking an active role in the ongoing changes and participating in developing civil society: Spain;
- Documenting key decisions taken and the key decision-makers involved in times of crisis: Sweden.

### **Goal 2: Maintaining citizen's trust in archives in the Digital Era**

- Contributing to an up-to-date and fit for purpose EU legislative framework that allows Member States to manage their digital records and archives: Hungary, together with the European Commission;
- Defining the ways archives must influence records creation for better information and records management: Luxembourg;
- Contributing to the common specifications as well as certification and accreditation processes for electronic archiving: Denmark;
- Supporting EU open data initiatives by making historical and archival data as readily accessible as possible to the public: Ireland;
- Defining a records and archives management competence framework: Poland.

**The Chair invited every coordinating member to send their written proposals of actions for their topics to the Commission before the meeting of the Programme and Coordination subgroup, which will take place on 5 July to prepare the meeting in Budapest. All other members are also invited to send proposals for the different topics.**

## **5. THE ARTIFICIAL INTELLIGENCE REGULATION AND ITS IMPACT ON THE ARCHIVES DOMAIN – PRESENTATION BY THE COMMISSION AND DISCUSSION**

The Chair introduced the session on AI. The AI Act received the final green light of the Council on 21 May and its publication is foreseen for June.

To continue the discussion in Madrid's meeting on how the AI models operate and how this will reverberate in tomorrow's archives, Elinor Wahal (COM), legal and policy officer in the Artificial Intelligence Policy Development and Coordination service in the Commission's Directorate-General for Communications, Networks, Content and Technology guided members through the regulation's main aspects.

The need for this regulation lays in the opportunities AI brings for society and economy but also its risks on safety and fundamental rights.

In addition, the [AI Pact](#) is a framework to prepare AI Act's implementation during the transitional period, with two pillars: gathering and exchanging with AI Pact network and facilitating and communicating company pledges. The AI Pact will be a good platform for national archives to be included as part of the database so that they are considered and informed about seminars and other initiatives, and they are encouraged to [register their interest](#).

Following the intervention of CH, the presenter described how the AI Act had been drafted based on product safety and a risk approach to take advantage of the legislative framework on existing bodies on products and to leverage the resources that are there. One of the features of taking this approach is that, when an AI product is on the market and is classified as high risk by other legislation, the same conformities can be taken, and this avoids duplication.

Regarding the general-purpose AI models, it was clarified that they have been included as a special category in the AI Act as examples of systems using them have become popular and under scrutiny during the drafting of the act.

International cooperation was further explained. Some cooperation is in the form of bilateral relations with countries (US, India, South American and Caribbean countries, etc.) since they are starting to regulate or assessing the way to take in regulatory terms. There are also multilateral fora, such as the OECD.

During the discussion that followed, and replying to the questions of members, the Commission further mentioned that the business sector has been cooperative, and the feedback received seems to be positive (DK). With regard to the differentiation of what is true or false in the age of AI (DK), this could be possible by different means, e.g. by pointing a label in text, but also a watermark on images; specific guidelines will be issued by the AI Office.

Regarding the types of systems that will be mostly impacted by the regulation, the Commission indicated that the impact assessment performed before the AI regulation showed that 85% of AI systems were expected to be classified as no-risk systems.

Making reference to the issues raised in the last meeting in Madrid, and in particular on the inability to see how deep learning systems make their decisions, the Commission considers that there are provisions for AI high-risk systems, such as human oversight for every decision AI does on every system. Regarding the possibility for applying AI for appraisal purposes, this should be checked more carefully, but perhaps this process could fall under high-risk systems.

The Commission agreed that key concepts such as integrity and authenticity, and therefore the need for transparency, was the reason why transparency requirements have been introduced in the legal text. (ES). The Commission also clarified that the

context in which a system that uses AI has been created is important. If the context changes, the system will have to also be compliant with the requirements in the new context.

## **6. AOB AND CLOSING**

Afelonne Doek (NL) proposed to discuss the joint controllership of data following the introduction of the Commission implementing regulation (EU) 2023/1070, which mandates shared data responsibility between member states and the European Commission and presents challenges to national archives with regard to the responsibility of data and retention periods. Dutch Archival Law puts the responsibility of government information with the department in charge, while data is in systems of the EU not under Dutch Archival Law.

Afelonne proposed measures to help align joint responsibilities with existing national laws and improve data management: ensure that the data management and archival policy enforces that the data concerned is findable, available, readable, interpretable, reliable, and future proof; allow members states to ensure that they can enforce these archival values concerning the accessibility of data. Afelonne proposed whether members of EAG could share any possible concerns on this and their opinions on the suggestions.

## **7. NEXT EAG MEETING**

Zsuzsanna Miko and Zoltan Szatucsek (HU) showed a [video](#) presenting the National Archives of Hungary and welcoming members to the next meeting of EAG and EBNA taking place on 13-16 October 2024 in Budapest.

Zoltan Szatucsek reminded the request of the Hungarian National Archives about personalities promoting the EU idea and values from each country, with their biographies and legacies in the respective archives, which will make part of a publication that is in preparation on the occasion of the Hungarian Presidency of the Council.