

DG	Ver.	Transmitted answer	Responsible officer	Comments	Last action
				<p>autonomous entity, is administratively attached to the Commission in the sense that its staff members are Commission officials and the Commission provides it with the same corporate and administrative services as any Commission department (i.e. HR, logistics, security, corporate IT solutions, etc). For these and only these purposes, ESA is emulated as a directorate in DG ENER.</p> <p>With a view to having this complex reality reflected, we wish that, in Article 7 §1 of the draft Commission Decision, the Euratom Supply Agency be explicitly mentioned. Hence, this paragraph should read “Each Directorate-General or equivalent department, and the Euratom Supply Agency shall regularly analyse the typology of records....their life cycle”.</p> <p>Likewise, ESA should be explicitly mentioned in Chapter I, 1., point 1.2, lit. a) of the Annex to the aforementioned Commission Decision. The relevant paragraph should read: “a) circle 1: internal circle made up exclusively of the Commission and its Directorates-General and equivalent departments, as well as the Euratom Supply Agency, which exchange documents electronically among themselves;”</p>	
AAE		1 Positive opinion	(ENER.AAE.1)		05/03/2020 14:56:11
AGRI		1 Positive opinion with comments	(AGRI.R.5)		04/03/2020 17:53:38
BUDG		1 Positive opinion	(BUDG.R.2)		27/02/2020 14:53:11
CLIMA		1 Positive opinion	(CLIMA.A.4)		17/02/2020 16:24:39
				<p>DG CONNECT provides a Positive opinion with comments subject to overall linguistic and specific terminological improvements in the text of both the draft Decision and implementing rules (annexe).</p> <p>see attached reply and Changes are suggested in track changes directly in the draft of the Decision and the Annex - implementing rules.</p> <p>Apologies for the delay. Thanks for your understanding</p> <p>We apologise but we will upload our comments tomorrow. Thanks for your understanding.</p>	
CNECT		1 Positive opinion with comments	(CNECT.R.3)		05/03/2020 19:10:57
COMM		2 Positive opinion with comments	(COMM.D.2.002)		02/04/2020 17:44:16
COMM		1 Positive opinion with comments	(COMM.D.2.002)		05/03/2020 18:23:33
COMP		1 Positive opinion with comments	(COMP.R.1)		02/03/2020 07:48:38
DEFIS		1 Positive opinion	(DEFIS.01)		02/03/2020 16:00:57
DEVCO		1 Positive opinion	(DEVCO.R.4)		21/02/2020 15:24:10
DGT		1 Positive opinion	(DGT.01)		04/03/2020 17:17:00

DGT-EDIT	1 Positive opinion with comments	[REDACTED] (DGT.S.3)	<p>Please see our editing corrections in the attached document. We would like to remind you to follow the Interinstitutional style guide (see <a href="http://publications.europa.eu/code/en/en-000500.htm">http://publications.europa.eu/code/en/en-000500.htm</a> )</p> <p>If you reject any of the changes, please inform us of your reasons for doing so. This will help us improve our service. Note that you are not obliged to accept all our changes. If your document undergoes major changes and you wish to have it edited again, or if you have any questions, please get in touch with the DGT-EDIT team (by e-mail or call 56164/56512).</p> <p>For tips on how to handle our edited documents, please see <a href="https://myintracomm.ec.europa.eu/serv/en/dgt/making_request/edit/Pages/tips.aspx">https://myintracomm.ec.europa.eu/serv/en/dgt/making_request/edit/Pages/tips.aspx</a> (copy and paste into your browser).</p> <p>Please send all future correspondence to DGT-EDIT (FMB).</p> <p>Le(s) document(s) révisé(s) sont joints à la réponse.</p> <p>Les changements proposés ne sont pas obligatoires. Merci toutefois de nous faire connaître les raisons d’un rejet éventuel de tout ou partie de nos suggestions, cela nous permettra d’améliorer notre service à l’avenir.</p> <p>Si vous avez des questions, ou si votre texte subit des changements importants, n’hésitez pas à contacter l’équipe DGT-EDIT.</p> <p>Pour des conseils sur le traitement des documents révisés, voyez <a href="https://myintracomm.ec.europa.eu/serv/fr/dgt/making_request/edit/Pages/tips.aspx">https://myintracomm.ec.europa.eu/serv/fr/dgt/making_request/edit/Pages/tips.aspx</a></p> <p>Merci d'adresser toute correspondance à DGT-EDIT.</p> <p>DG DIGIT welcomes the communication on “Records management and archives”. DG DIGIT is overall aligned with the content of this document.</p> <p>In that context, DG DIGIT gives positive opinion provided that the comments attached in this enclosed document are taken into account.</p> <p>Dear colleagues,</p> <p>Many thanks for consulting us. We added some clarifying questions to both the Decision and implementing rules. Our concerns are mainly linked to the compliance with the data protection rules.</p> <p>Hope this helps.</p> <p>Kind regards,</p> <p>[REDACTED]</p> <p>Thanks for the opportunity to comment, even if we're not part of the Commission. We salute the alignment of e-Domec rules with professional standards (ISO-15489/2016) and international usage (records management instead of document management). We recognize the ambition of the new decision and we are currently reviewing the proposal in order to present alternatives to the senior management of EEAS. We will clearly strive for rules as close as possible to those of the Commission, but a simple transliteration of the rules replacing Commission with EEAS is not feasible and the question requires a serious discussion about governance, resources and political support.</p> <p>We have a single request: the tool chosen for the qualified signature should become a “corporate tool” (the same for all HAN users)</p>	28/02/2020 10:13:47
DIGIT	1 Positive opinion with comments	[REDACTED] (DIGIT.B.2)		05/03/2020 18:03:58
EAC	1 Positive opinion with comments	[REDACTED] (EAC.R.1)		05/03/2020 12:30:48
ECFIN	1 Positive opinion with comments	[REDACTED] (ECFIN.R.1.002)		04/03/2020 17:56:33
ECHO	1 Positive opinion	[REDACTED] (ECHO.E.5.002)		03/03/2020 08:48:12
EEAS	1 Positive opinion	[REDACTED] (EEAS.BA.BS.IDM)		05/03/2020 17:40:44

DG EMPL gives a positive opinion subject to the following comments:

Draft Implementing Rules:

- Chapter I, point 3.1 “Management of electronic records signed by means of electronic signatures”: The structure would benefit from being aligned to the implementing rules in force. This would help clarify (1) the requirements of electronic signature creation devices for documents that are drawn up or received by the Institution; (2) the types of documents “drawn up” by the Institution that do not require the use of a signed original; (3) the types of documents “received” by the Institution that do not require the use of a signed original.
- Chapter III, point 16.2 “Document Management Officer”: Please clarify the meaning of “horizontal coordination between the records management team(s) within the meaning of Article 18 of Decision XXX”. In fact, Article 18 of Decision XXX does not mention the “records management team(s)” referred to in Chapter III, point 16.2 of the Draft Implementing Rules.

EMPL	1 Positive opinion with comments	(EMPL.G.5)	05/03/2020 14:33:54
ENER	1 Positive opinion with comments	(ENER.SRD.2)	05/03/2020 15:39:16
ENV	1 Positive opinion	(ENV.A.4)	18/02/2020 14:02:35
EPSO	1 Positive opinion	(EPSO.03)	18/02/2020 10:47:08
ESTAT	1 Positive opinion	(ESTAT.A.2)	19/02/2020 15:29:48
FISMA	2 Positive opinion with comments	(FISMA.A.3.001)	06/03/2020 11:38:29
FISMA	1 Positive opinion		05/03/2020 23:59:59
FPI	1 Positive opinion	(FPI.1.001)	25/02/2020 15:32:33
GROW	1 Positive opinion	(GROW.R.2)	04/03/2020 11:30:01
HOME	1 Positive opinion	(JUST.DDG.B.3)	03/03/2020 11:02:17
Reply coordinated HOME-JUST coordinator. Same reply as DG JUST			

Dear Colleagues, please find enclosed the comments from the Historical Archives Service of OIB and the HR [REDACTED]. The general comments are summarised in a separate document and the more detailed comments can be found in track changes in the draft Decision and in the implementing rules.

Many aspects are to be clarified or even replaced to remain in line with the Council Regulation 1700/2003 on the historical archives. The comments of the Historical Archives Service result from its mission statement as foreseen in the Council Regulation 1700/2003. Indeed, the experience the Historical Archives Service gained during the last years should be taken into account as the text offers an opportunity to correct certain articles which were never implemented, were vague or even erroneous in the previous decision.

Regarding the application of the restrictions on the rights of data subjects foreseen in Article 25(3) and (4) of the Regulation 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, the EDPS has not yet published its specific guidelines on Article 25(3) and (4) as announced in the general guidance on Article 25 of the Regulation 2018/1725. We draw your attention to the principles set out in Article 25(5) of the Regulation 2018/1725 and recommend - if this has not already been done - to inform the [REDACTED] of the Commission and to consult the EDPS on the basis of Article 42 of Regulation 2018/1725.

We thank you for taking those comments into account.

Contact person in DG HR.E: [REDACTED]

You will also find 2 documents with comments from HR.DS - the contact persons can be found in the track changes.

Please note: The IAS response to this INTERSERVICES Consultation is without prejudice to positions the IAS may take as a result of future work.

Please note that JUST B3 is responsible for replying to this ISC on behalf of both JUST and HOME.

See annexed documents (only difference from version1: annexed documents in pdf format with the Ares reference).  
See annexed documents.

Please find enclosed comments on the decision by [REDACTED]

HR	1 Positive opinion with comments	[REDACTED] (HR.01.001)
IAS	1 Positive opinion	[REDACTED] (IAS.B.4)
IDEA	1 Positive opinion	
JRC	2 Positive opinion with comments	[REDACTED] (JRC.R.I.3)
JRC	1 Positive opinion	
JUST	2 Positive opinion	[REDACTED] (JUST.DDG.B.3)
JUST	1 Positive opinion	[REDACTED] (JUST.DDG.B.3)
MARE	2 Positive opinion with comments	[REDACTED] (MARE.E.3.003)
MARE	1 Positive opinion with comments	[REDACTED] (MARE.E.3.003)
MOVE	1 Positive opinion with comments	[REDACTED] (MOVE.SRD.2)
NEAR	1 Positive opinion	[REDACTED] (NEAR.R.1)
OLAF	1 Positive opinion	[REDACTED] (OLAF.C.1.002)
OP	1 Positive opinion with comments	[REDACTED] (OP.01)
REFORM	1 Positive opinion	[REDACTED] (REFORM.A.2)
REGIO	2 Positive opinion with comments	[REDACTED] (REGIO.01)
REGIO	1 Positive opinion	[REDACTED] (REGIO.01)
RTD	1 Positive opinion	[REDACTED] (RTD.I.1)

05/03/2020 17:48:40

03/03/2020 09:44:37

05/03/2020 23:59:59

06/03/2020 10:02:22

05/03/2020 23:59:59

03/03/2020 10:51:25

03/03/2020 10:27:56

04/03/2020 15:23:42

04/03/2020 15:09:12

05/03/2020 15:42:02

03/03/2020 09:47:58

02/03/2020 10:16:41

05/03/2020 15:01:19

04/03/2020 13:59:37

04/03/2020 15:11:33

28/02/2020 12:10:16

03/03/2020 13:53:30

SANTE	1 Positive opinion with comments	[REDACTED] (SANTE.A.1.002)
SCIC	1 Positive opinion	[REDACTED] (SCIC.C.3)
SJ	2 Positive opinion with comments	[REDACTED] (SJ.F)
SJ	1 Positive opinion with comments	[REDACTED] (SJ.F)
TAXUD	1 Positive opinion	[REDACTED] (TAXUD.E.2.003)
TRADE	1 Positive opinion	[REDACTED] (TRADE.A.1)
UKTF	1 Positive opinion	[REDACTED] (UKTF.DDG.A.1)

We would like to thank you for consulting us on this initiative. DG SANTE welcomes the initiative to merge the previous Decision on document management (2002/47/EC, ECSC, Euratom) and the Decision on electronic and digitalised documents (2004/563/EC, Euratom) and to update it taking into account the new landscape and the increasing digitalisation of the Commission as a public administration.

We are convinced of the importance to establish a clear framework, which is sufficiently flexible to take into account upcoming digital challenges and exploit new opportunities related to the development of artificial intelligence-based tools. To this end, we provide some suggestions in track changes and some comments in the attached draft decision.

Accord du SJ sous la prise en compte des observations dans la note ci-jointe.

Veillez noter que ce document est la bonne version. Merci

Accord du SJ sous la prise en compte des observations dans la note ci-jointe.

04/03/2020 16:52:16

26/02/2020 14:49:00

06/03/2020 09:48:00

05/03/2020 15:44:44

04/03/2020 10:36:17

20/02/2020 11:25:21

02/03/2020 10:02:01