



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MOBILITY AND TRANSPORT

SRD - Shared Resource Directorate
Acting Director

**NOTE FOR THE ATTENTION OF
MS ILZE JUHANSONE, SECRETARY-GENERAL**

RE: REPLY FROM DG MOVE TO THE INTERSERVICE CONSULTATION LAUNCHED BY SG

Note signed by: Anne Montagnon

Deadline for reply: 05/03/2020

Dated: 05/03/2020

Reference: ISC/2020/00857

Ref DG MOVE: move.srd.2.002(2020)1578458

**Title: Reply from DG MOVE - Interservice consultation on the draft Decision
and Implementing Rules on Records Management and Archives**

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- ☐ Positive opinion
- ☒ Positive opinion with comments
- ☐ Negative opinion (see attached comments)

Contact: [REDACTED]

Comments:

Thank you for consulting DG MOVE. We welcome this draft Decision as we agree with the need to reflect the evolution in the document and archives management landscape and the increasing digitalisation of the Commission as a public administration.

Please find hereafter our comments, which we kindly ask you to take into account:

1. The management of Commission's records and archives shall respect the provisions of the Internal Data Protection Regulation 2018/1725 [I-10 ; II-14.3].

We understand the European Data Protection Supervisor will be formally consulted both on the draft Decision and its implementing rules.

2. Page 1 of the draft Commission Decision: the Article of the Treaty establishing the European Atomic Energy Community mentioned is Article 131 but this Article is repealed. A new reference needs eventually to be added.
3. As drafting remarks, the title for two sub-sections are missing in the implementation rules [I-3.1 – Management of electronic records signed by means of electronic signature]:

- a. The first section starting with the text “These are in particular most records relating to administrative procedures, whether purely internal...” should be listed under the title : 3.1.1 - Types of documents drawn up by the Commission not requiring a signed original
 - b. The second section starting with the text “These are in particular most of the records relating to administrative procedures coming from institutions...” should be listed under the title : 3.1.2 - Types of documents received by the Commission not requiring a signed original
4. Point 2.5 of the draft Implementing Rules: “All documentation relating to digitisation operations must be kept **permanently**.”

Does the term “permanently” means that this type of documentation has no limitation in time?

5. Point 16.2 d) page 40 of the draft Implementing Rules:

Consider replacing “local IT Security Officer” by “Local **Information** Security Officer”.

6. Point 16.3 of the draft Implementing Rules: “Directorates-General and Services will **consult** the Secretariat-General when they appoint a Document Management Officer.”

The aim and the consequences of the “consultation” should be further developed in this document.

Anne Montagnon
Acting Director