



EUROPEAN COMMISSION

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs  
Single Market Enforcement  
Notification of Regulatory Barriers

Message 103

Communication from the Commission - TRIS/(2026) 0204

Directive (EU) 2015/1535

Notification: 2025/0622/NL

Forwarding of the observations of a Member State (Italy) (article 5, paragraph 2, of Directive (EU) 2015/1535). These observations do not have the effect of extending the standstill period.

MSG: 20260204.EN

1. MSG 103 IND 2025 0622 NL EN 19-01-2026 20-01-2026 IT COMMS 5.2 19-01-2026

2. Italy

3A. Ministero delle Imprese e del Made in Italy

Dipartimento Mercato e Tutela

Direzione Generale Consumatori e Mercato

Divisione II - Normativa tecnica - Sicurezza e conformità dei prodotti, qualità prodotti e servizi

00187 Roma - Via Molise, 2

3B. Ministero della Cultura

Ufficio Legislativo

4. 2025/0622/NL - B00 - CONSTRUCTION

5. article 5, paragraph 2, of Directive (EU) 2015/1535

6. Following a systematic comparison with Italian and international legislation, in the context of the Strategy of the European archives (2025-2030), we would like to make the following observations:

Chapter 2 - Sustainable accessibility

- Provide for appropriate technical and organisational measures to ensure a level of security appropriate to the risk in relation to the protection of personal data, in accordance with Regulation (EU) No 679/2016 (GDPR).
- Plan for greater structural alignment with eIDAS 2.0 (Regulation (EU) 2024/1183) and e-Storage (Commission Implementing Regulation (EU) 2025/2532 of 16 December 2025 laying down rules for the application of Regulation (EU) No 910/2014 of the European Parliament and of the Council as regards reference standards and specifications for qualified electronic archiving services) in order to ensure full interoperability with European standards and strengthen the legal validity of digital documents: systematic use of qualified electronic seals for public documents; recognition of qualified electronic copies.
- Refer to ISO 14721 - OAIS (Open Archival Information System) reference model and standards:
  - ☐ ISO 15836 - Information and documentation - The Dublin Core metadata element set;
  - ☐ ISO/TR 18492 - Long-term preservation of electronic document-based information.
  - ☐ ISO 20652 - Space data and information transfer systems - Producer-archive interface - Methodology abstract standard;
  - ☐ ISO/CD TR 26102 - Requirements for long-term preservation of electronic records. SIARD Software Independent Archiving of Relational Databases 2.0.
- Specify technical standards in order to ensure uniformity, quality and technological sustainability: establish mandatory formats for long-term preservation; adopt a more prescriptive and uniform metadata model (E-ARK, ETSI, ISO); provide for periodic audits of preservation systems.
- Specify the chain of responsibility in the digital document preservation process by appointing figures other than the



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Document Management Manager, such as the Preservation Manager or Preservation Service Manager.

#### Chapter 4 – Destruction

- Define a certified procedure for digitisation with legal value: introduce preventive controls or random checks by the archival authority; provide a more structured description of the process, taking care to define:

- a digitalisation plan;
- quality controls;
- full traceability;
- formal responsibilities of the parties involved.

#### Chapter 5 – Building requirements and storage conditions for physical documents

- Refer to the relevant standards and technical specifications:

- ISO 11799: 2024, Information and documentation – Document storage requirements for archive and library materials;
- ISO 16245: 2023, Information and documentation – Boxes, file covers and other enclosures, made from cellulosic materials, for storage of paper and parchment documents
- ISO 18934: photographic materials;
- ICCROM/IFLA: general guidelines.

#### Chapter 7 – Obligation to report incidents

- Regarding the management of digital incidents: fully integrate the obligations set out in the GDPR and NIS2: define standard procedures for managing data breaches, data loss, inaccessibility, file corruption and cyber attacks; establish a national reporting and monitoring system.

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European Commission

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