

NATO UNCLASSIFIED

16 January 2018

DOCUMENT
AC/324-D(2014)0010-REV2

ARCHIVES COMMITTEE

Directive on the Public Disclosure of NATO Information

Reference: (a) AC/324-WP(2016)0004-REV2-AS1
(b) AC/324-D(2018)0001

1. On 28 February 2017, under the silence procedure, the Archives Committee approved the Procedures for Systematic Declassification and Public Disclosure of Allied Command Operations (ACO) Information. The Committee agreed to include these procedures as Annex 5 to the Directive on the Public Disclosure of NATO Information (ref a).

(Signed)
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5 Annexes
1 Appendix

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DIRECTIVE ON THE PUBLIC DISCLOSURE OF NATO INFORMATION

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REFERENCES

- a) C-M(2007)0118, NATO Information Management Policy, dated 11 December 2007; and its supporting directives
- b) C-M(2002)49, NATO Security Policy, dated 17 June 2002, and its supporting Directives
- c) C-M(2008)0116, Policy on the Public Disclosure of NATO Information, dated 12 November 2008
- d) C-M(2002)60, The Management of Non-Classified NATO Information, dated 11 July 2002
- e) AC/324-D(2013)0004, Streamlining the Public Disclosure Programme: Request to Submit Items of On-going National Sensitivities, dated 18 April 2013
- f) AC/324-N(2013)0017, Streamlining the Public Disclosure Programme: Refinement of the Process for Nuclear and Intelligence related Information, dated 25 June 2013
- g) AC/324-D(2014)0003, Guidelines for Inclusion of Non-NATO Nations in the Public Disclosure Process, dated 04 March 2014

Background

1. NATO recognises that transparency is key to creating a public climate of support and understanding for the Alliance's missions and accomplishments.
2. The Policy on the Public Disclosure of NATO Information (PPD) establishes a framework for the orderly and efficient declassification and public disclosure of NATO Information.

Purpose

3. This Directive establishes the procedures and assigns roles and responsibilities for implementing the PPD.

Scope & Applicability

4. This Directive applies to all NATO information falling within the scope of the NATO Information Management Policy (NIMP), and is mandatory for all NATO civil and military bodies, originators and owners of NATO information.

Intended Audience

5. This Directive is intended for:
 - all staff engaged in archives and information management;
 - originators; and
 - competent authorities in member nations.

3. OBJECTIVES AND PRINCIPLES

6. The key objectives of public disclosure as set out in the PPD are to:
 - a) inform public opinion and broaden the understanding of the purposes, principles and results of the common endeavour of NATO in all its fields of activity;
 - b) stimulate public discussion about NATO through the examination of information that documents NATO's evolution and missions, policies, consultation and decision making; and
 - c) promote and facilitate research about NATO.

7. The key principles of public disclosure are that:
- a) NATO information of permanent value shall be examined for potential declassification and public disclosure when it is at least thirty¹ years of age;
 - b) NATO information shall be examined systematically in coordination with competent authorities in member nations and originators;
 - c) NATO information shall also be examined on an ad hoc basis, in coordination with competent authorities in member nations and originators;
 - d) decisions about whether or not to declassify and publicly disclose information shall be based on an examination of its contents, taking into account the NATO Exemptions listed in Annex 1 as well as specific national concerns, and not on arbitrary criteria;
 - e) publicly disclosed information shall be made publicly accessible and available in the NATO Archives; and
 - f) nations may give access to copies of publicly disclosed NATO information without further reference to NATO.

4. IMPLEMENTATION

8. NATO information shall be examined for declassification and public disclosure through both systematic and ad hoc processes.

Systematic Process

9. On an annual basis, the NATO Archivist, in coordination with NATO civil and military bodies, shall identify NATO Information held in numerical NATO series that has permanent value and is at least thirty years old.
10. The NATO Archivist shall sort the information into two subsets, based on classification markings:
- a) information that was marked UNCLASSIFIED at the time of its creation or subsequently declassified in an authorised manner shall be disclosed automatically;
 - b) Information that was marked RESTRICTED² at the time of its creation or has been downgraded to RESTRICTED during its life cycle, and has not yet been declassified when reaching the 30 years threshold shall be declassified in an authorised manner as set out in appendix 2 and then be disclosed automatically after a further year; and

¹ Information related to the nuclear planning process and intelligence will be processed after 50 years

² Any information with special category designators, administrative markings or dissemination limitations is excluded. Files related to the nuclear planning process and intelligence are also excluded.

- c) Information that is marked CONFIDENTIAL, SECRET or TOP SECRET shall be proposed for declassification and public disclosure taking into account the NATO Exemptions listed in Annex 1.
- 11. Information that is proposed for declassification and public disclosure shall be circulated to competent authorities in member nations through the NATO Archives Committee, with a request for examination.
- 12. Competent authorities in member nations shall examine the contents of information items to determine whether they may be publicly disclosed, taking into account the NATO Exemptions listed in Annex 1 as well as specific national concerns.
- 13. When competent authorities confirm that information falls under a NATO Exemption, or a specific national concern, it shall be withheld.
- 14. NATO information that has been withheld shall be examined again no later than ten years after it was last proposed for public disclosure.
- 15. NATO member nations and civil and military bodies shall be informed about decisions made by competent authorities in the examination.
- 16. Information disclosed in the systematic process shall be disclosed throughout NATO. It shall be publicly accessible and available in the NATO Archives and may be made publicly accessible and available in the nations without further reference to NATO.
- 17. Procedures for the systematic declassification and public disclosure process are detailed in Annex 2.

Ad Hoc Process

- 18. Public disclosure under the ad hoc process may be achieved in three ways:
 - a) Competent authorities may request the declassification and public disclosure of NATO information;
 - b) the NATO Archivist may propose the declassification and public disclosure of subject files on behalf of the NATO Archives, or on behalf of NATO civil and military bodies; and
 - c) Originators may screen current NATO information that supports agreed Alliance transparency goals and propose it for public disclosure.
- 19. Competent authorities may at any time make ad hoc requests for the declassification and public disclosure of information that is less than thirty years old, or has no permanent value or has been withheld in the systematic process.
- 20. Ad hoc requests shall conform to the requestor's Freedom of Information or Access to Information legislation or policy.

21. Ad hoc requests shall be directed to the NATO Archivist, who shall coordinate the response with the appropriate NATO body, competent authority or originator.
22. Information disclosed as the result of an ad hoc request shall be disclosed throughout NATO. It shall be publicly accessible and available in the NATO Archives and may be made publicly accessible and available in the nations without further reference to NATO.
23. Procedures for ad hoc requests for declassification and public disclosure are detailed in Annex 3.
24. The NATO Archivist may at any time propose the declassification and public disclosure of NATO subject files.
25. Procedures for the ad hoc declassification and public disclosure of NATO subject files are detailed in Annex 4.

Types of Disclosure

26. NATO Information may be publicly disclosed through two processes:
 - a) the systematic process shall only declassify and publicly disclose entire information items held in numerical NATO series; and
 - b) the ad hoc process shall declassify and publicly disclose either entire information items, or portions thereof.

Entire Disclosure of an Information Item

27. An entirely disclosed information item shall include corrigenda, action sheets, enclosures, annexes and appendices. It shall not include subsequent revised versions, editions or addenda, even if they carry the same identifying metadata.³

Partial Disclosure of an Information Item

28. If an information item included in an ad hoc request cannot be entirely disclosed, the NATO Archivist shall screen the item.
29. If necessary, the NATO Archivist shall coordinate further detailed screening by competent authorities in member nations or originators.

³ Originators and competent authorities may also decide that the disclosure decision should apply to all subsequent revisions on a case-by-case basis.

30. If necessary, redacting shall be done on the basis of this screening. If redaction results in the publicly disclosable portion of an information item being so small or disjointed that it is incoherent and nonsensical, the entire information item shall be withheld.
31. Information that has been partially disclosed and that has permanent value shall be examined for entire disclosure in the systematic process when it is at least thirty years old.
32. Information that has been partially disclosed and that has only temporary value shall be disposed of according to applicable retention and disposition directives.
33. Procedures for partial disclosure are detailed in the Appendix to Annex 3.

5. ROLES AND RESPONSIBILITIES

NATO Archivist

34. The NATO Archivist shall initiate, coordinate and report on the declassification and public disclosure of NATO information and ensure the public availability of, and access to, disclosed information in the NATO Archives.
35. In order to fulfil this role, the NATO Archivist shall:
 - a) on an annual basis;
 - 1) identify, in coordination with NATO civil and military bodies, NATO information of permanent value that is at least thirty⁴ years old;
 - 2) examine that information against the list of NATO Exemptions at Annex 1, and clearly identify those information items that, in the NATO Archivist's view, fall under one of the exemptions;
 - 3) examine that information against the list of on-going national sensitivities and consult with nations about those information items that, in the NATO Archivist's view, fall under the topics identified;
 - 4) apply international standards to list, copy and describe the information in coordination with NATO civil and military bodies;
 - 5) distribute to competent authorities in member nations lists, copies and descriptions of information that is marked CONFIDENTIAL, SECRET or TOP SECRET, along with a recommendation for declassification and public disclosure that clearly indicates information items that, in the NATO Archivist's view, fall under a NATO Exemption;
 - 6) distribute to competent authorities in nations lists of the information that is marked RESTRICTED or UNCLASSIFIED, and that is to be declassified or disclosed, as appropriate,

⁴ Fifty years old in the case of information related to the nuclear planning process or intelligence.

- 7) complete the process by informing NATO member nations and civil and military bodies about what information has been declassified and publicly disclosed and what has been withheld, including those items that have been withheld in accordance with the list of on-going national sensitivities;
- b) coordinate the response to ad hoc requests for declassification and public disclosure of NATO Information;
- c) propose the declassification and public disclosure of NATO subject files and oversee the related examination and approval process;
- d) support the declassification and public disclosure of NATO information less than thirty years old in accordance with Annex 3;
- e) maintain an inventory of information that has been:
 - 1) entirely disclosed;
 - 2) withheld; and
 - 3) partially disclosed; and
- f) ensure the availability of, and access to, publicly disclosed information and associated metadata in the NATO Archives.

NATO Civil and Military Bodies

36. Information managers and archivists in NATO civil and military bodies shall support the NATO Archivist in the tasks outlined above by:

- a) identifying information that has permanent value, that is at least thirty⁵⁵ years old, or that is the subject of an ad hoc request;
- b) listing, describing and providing copies of that information for the systematic and ad hoc processes;
- c) listing, describing and providing copies of information less than thirty years old that has been disclosed in accordance with Annex 3; and
- d) responding to ad hoc requests within established time frames.

Competent Authorities in Member Nations

37. Competent authorities in member nations shall support the NATO Archivist in the tasks outlined above by:

- a) examining NATO information proposed in the systematic process for possible declassification and public disclosure, taking into account the NATO Exemptions listed in Annex 1 as well as specific national concerns;
- b) informing the NATO Archivist about specific information that is withheld, by providing, as a minimum, the same justification as is required under their national Freedom of Information or Access to Information legislation or policy; and

⁵ Fifty years old in the case of information related to the nuclear planning process or intelligence.

- c) responding to ad hoc requests within established time frames.

6. DEFINITIONS

Confidential Commercial Information is any financial, business, scientific or technical information, including trade secrets and intellectual property that is entrusted to NATO and whose public disclosure could reasonably be expected to negatively affect the competitive position of a natural or legal person.

Current Information for the purposes of Public Disclosure, current information is information less than thirty years of age.

Information Item is a distinct piece of information which includes corrigenda, action sheets, enclosures, annexes and appendices. An information item does not include revised versions, subsequent editions or addenda.

Portion is any distinct, coherent part of an information item that is identified for declassification and public disclosure through screening. At its smallest, a portion is a paragraph or an item within a decision sheet, but can be as large as an entire annex.

Redaction is the removal of non-disclosable information by blocking out individual portions and related metadata.

Sensitive Personal Information is any fact or opinion about an individual's workplace performance, discipline, physical or mental health, financial affairs, or private life, the release of which could reasonably be expected to put the person in physical danger, or harm their career or reputation.

Subject files Within NATO, subject files consist of individual information items that are managed under a single physical or virtual identifier, because they pertain to a common subject, office, or administrative process. Subject files may contain both NATO-originated and externally originated information items.

NATO EXEMPTIONS

1. This annex identifies the categories of information that shall be withheld from declassification and public disclosure of NATO information. These categories have been identified as NATO Exemptions.

2. When undertaking initial screening, the NATO Archivist shall identify information items, or portions of information items that, in the NATO Archivist's view, fall under any of the ten exemptions listed below. Nations may also submit lists of on-going sensitivities under exemption NATO 1 to the NATO Archivist to improve the pre-review of information (reference e).

3. Competent authorities in nations shall screen information by taking into account the NATO Exemptions listed in this annex, as well as specific national concerns.

4. The ten NATO Exemptions are:

NATO 1 - Information, the public disclosure of which would be likely to endanger NATO internal cohesion, members, missions, infrastructure or personnel;

NATO 2 - sensitive personal information about individuals who were born less than one hundred years before the date on which the information is screened;

NATO 3 - confidential commercial information, unless the parties concerned consent to its public disclosure;

NATO 4 - details about methods or sources of intelligence;

NATO 5 - details about weapons of mass destruction;

NATO 6 - details about current cryptographic systems;

NATO 8 - details about current weapons systems;

NATO 8 - details about current political or military plans, policies and operations;

NATO 9 - details about current internal or external NATO political discussions and sensitivities; and

NATO 10 - details about current physical and information security.

5. Lists of NATO information items, or the margin beside portions of information that are redacted in the ad hoc processes, shall be annotated "NATO 1," "NATO 2," etc., to identify the applicable Exemption.

PROCEDURES FOR SYSTEMATIC DECLASSIFICATION AND PUBLIC DISCLOSURE OF NATO INFORMATION

1. This annex describes detailed procedures for accomplishing the systematic declassification and public disclosure of NATO Information, as called for in this directive.
2. On an annual basis the NATO Archivist shall:
 - a) identify, in coordination with NATO civil and military bodies, information and all related metadata that has permanent value and is at least thirty years old;
 - b) identify within that information
 - 1) information marked UNCLASSIFIED that shall be publicly disclosed automatically, on 1 January of the coming year;
 - 2) information marked RESTRICTED that shall be declassified after 12 months⁶ and consequently be publicly disclosed automatically on 1 January of the following year; and
 - 3) information marked CONFIDENTIAL, SECRET and TOP SECRET that shall be proposed for declassification and public disclosure examination
 - c) examine the CONFIDENTIAL, SECRET and TOP SECRET information against the list of NATO Exemptions at Annex 1 and clearly identify those information items that, in the NATO Archivist's view, fall under one of the NATO Exemptions:
 - d) coordinate with NATO civil and military bodies to list and describe the information according to international standards;
 - e) coordinate the digitisation of the information and capture of related metadata that is not already in electronic format;
 - f) store all information and related metadata in an electronic system that conforms to international standards;
 - g) circulate copies, metadata, lists and descriptions of information marked CONFIDENTIAL, SECRET and TOP SECRET to competent authorities in nations via the Archives Committee, for examination under a twelve month silence procedure;
 - h) circulate a list of the information marked UNCLASSIFIED to the Archives Committee, indicating that it shall be automatically publicly disclosed on 1 January of the following year; and

⁶ This one year period will allow Nations to review the lists and contents if they choose and consult with the NATO Archivist about specific items as appropriate.

- i) Circulate a list of the information marked RESTRICTED to the Archives Committee, indicating that it shall be declassified after 12 months and publicly disclosed on 1 January of the year after.⁷
3. Upon receipt of the lists, competent authorities in nations shall examine the contents of the information items marked CONFIDENTIAL, SECRET and TOP SECRET and make one of two decisions for each item:
 - a) entirely declassify and disclose; or
 - b) withhold.
4. Decisions about whether to disclose or withhold information items shall be based on an examination of their contents, taking into account the NATO Exemptions listed in Annex 1 as well as specific national concerns, and not on arbitrary criteria.
5. When withholding information, the competent authority in the nation shall, as a minimum, provide the NATO Archives with the same justifications as required under the nation's Freedom of Information or Access to Information legislation or policy.
6. The NATO Archivist shall inform NATO member nations⁸ and civil and military bodies about decisions, and where required indicate the time frame within which withheld information shall be proposed for examination again. The NATO Archivist shall also issue a Public Disclosure Notice (PDN) identifying the disclosed information.
7. The archival copies of information items that have been declassified and publicly disclosed, and related metadata, shall be marked with a reference to the PDN and stored electronically.
8. Information that is declassified and publicly disclosed in the systematic process shall be declassified and disclosed throughout NATO. It shall be publicly accessible and available in the NATO Archives and may be made publicly accessible and available in the nations without further reference to NATO.

⁷ This one year period will allow Nations to review the lists and contents if they choose and consult with the NATO Archivist about specific items as appropriate.

⁸ Non-NATO-Nations and Non-NATO-entities shall also be informed in accordance with reference g.

PROCEDURES FOR AD HOC REQUESTS FOR DECLASSIFICATION AND PUBLIC DISCLOSURE OF NATO INFORMATION

1. This annex describes detailed procedures for responding to requests for the ad hoc declassification and public disclosure of NATO Information as called for in this directive.

Submission

2. Ad hoc requests shall be submitted to the NATO Archivist.

3. Only ad hoc requests submitted by competent authorities of NATO, nations or international organisations having formal relations with NATO shall be considered. Ad hoc requests shall conform to the requestor's Freedom of Information or Access to Information legislation or policy and provide sufficient detail to make information easily identifiable.

4. In addition NATO information less than thirty years of age may be declassified and publicly disclosed as the result of a review and recommendation by the originator or the Head of a NATO Body.

Response

5. On receipt of an ad hoc request, the NATO Archivist shall:

- a) send an acknowledgement to the requesting authority;
- b) coordinate the identification of information that falls within the request;
- c) make an initial screening of the identified information, based on the NATO Exemptions listed in Annex 1; and
- d) where necessary, coordinate further screening by competent authorities in nations or originators who shall take into account the NATO Exemptions listed in Annex 1 as well as specific national concerns.

6. Competent authorities in nations or originators shall examine, and screen where necessary, individual information items to determine whether they shall be:

- e) entirely declassified and disclosed;
- f) withheld; or
- g) partially declassified and disclosed.

7. Competent authorities in nations or originators shall inform the NATO Archivist of their decisions, identifying, where necessary, portions to be redacted.

8. Redaction shall be carried out in accordance with the procedure for partial disclosure detailed in the Appendix to this Annex.

9. The NATO Archivist shall inform the requesting authority about the status of the request within ninety calendar days.

10. When action on a request has been completed, the NATO Archivist shall inform NATO member nations⁹ and civil and military bodies in one of the following ways:

- a) Information that is entirely disclosed shall be listed in a Public Disclosure Notice (PDN) stating "As the result of an ad hoc request, the information identified in this notice has been approved for entire declassification and public disclosure in accordance with the Policy on the Public Disclosure of NATO Information."
- b) The redacted copy of information that is partially disclosed shall be appended to a PDN stating "As the result of an ad hoc request, the attached information has been approved for partial declassification and public disclosure in accordance with the Policy on the Public Disclosure of NATO Information. At least one portion has been withheld."; or
- c) When information is entirely withheld, a PDN shall be prepared stating "No information has been declassified and publicly disclosed as a result of this ad hoc request, in accordance with the Policy on the Public Disclosure of NATO Information."

11. The NATO Archivist, in transmitting NATO's reply to the ad hoc request, shall provide the requesting authority with a copy of the PDN, and with a copy of any disclosed information.

12. The NATO Archivist shall also include a summary of ad hoc requests completed during the reporting period in the annual activity report to the Archives Committee.

13. Information that is either entirely or partially disclosed as the result of an ad hoc request shall have a similar status throughout NATO. The disclosed portions shall be publicly accessible and available in the NATO Archives and may be made publicly accessible and available in the nations without further reference to NATO.

14. Information that is withheld in the ad hoc process shall be withheld throughout NATO, pending a subsequent examination in either the systematic or ad hoc processes.

15. For ad hoc procedures in accordance with paragraph 4 of this annex, the originator or NATO body shall circulate to the competent authorities (normally the originating committee or body) a proposal to initiate processing of this information with a view to public disclosure under an appropriate silence procedure.

⁹ Non-NATO-Nations and Non-NATO-entities shall also be informed in accordance with reference g

Retention and Disposition

16. An ad hoc request has no impact on the value of an information item.
17. Information with permanent value that was subject to an ad hoc request shall be proposed for entire declassification and public disclosure in the systematic process, if required, when it is at least thirty years old.
18. Information with temporary value that was subject to an ad hoc request, whether it was withheld or disclosed, shall be disposed of according to the applicable retention and disposition directive.
19. Redacted copies of information or PDNs produced during the ad hoc process shall be disposed of according to the applicable retention and disposition directive.

PROCEDURES FOR PARTIAL DISCLOSURE OF NATO INFORMATION

1. This appendix describes detailed procedures for accomplishing partial disclosure of NATO Information as called for in this directive.
2. Partial declassification and public disclosure results from successfully completing the related processes of screening and redacting.

Screening

3. An information item shall be copied before being screened. An original information item shall never be marked or altered during screening.
4. Competent authorities in nations or originators shall screen the copied information against the NATO Exemptions listed in Annex 1 as well as specific national concerns.
5. Portions of information items that meet one or more of these categories shall be withheld and annotated with the appropriate reference to national legislation or policy, and/or the NATO Exemptions listed in Annex 1.
6. The NATO Archivist shall assemble the screening results from all competent authorities in nations or originators on a single copy of the information item and determine whether the publicly disclosable portions are coherent and make sense.
7. When the publicly disclosable portions are coherent and make sense, the information item shall be redacted.

Redacting

8. An original information item shall never be marked or altered during redacting.
9. A copy of the information item shall be redacted by obliterating the portions identified in screening in such a way as to ensure that they cannot be read or recovered.
10. It shall be evident on screened information items where portions have been withheld. Therefore, the partially disclosed information shall have the same length and structure as the original.
11. All metadata related to withheld portions, or that might indicate the specific content of those withheld portions, shall also be obliterated.

12. In order to accomplish this:

a) Withheld portions of information in paper shall be:

- 1) obliterated with an indelible black marker, ensuring that the content is entirely concealed and unreadable;
- 2) photocopied once again to ensure that the obliterated information cannot be recovered by being held up to the light, or other means; and
- 3) annotated in the margin beside each redacted portion, with the appropriate NATO Exemption listed in Annex 1, or the appropriate reference to national legislation or policy, to indicate the reason for which the portion was withheld.

b) Withheld portions of electronic information shall be:

- 1) obliterated with an indelible black mark-up tool, ensuring that the content is entirely unreadable, (i.e. never use track changes, comments or any visible mark-ups);
- 2) deleted in a way that ensures that all code and metadata and residual formatting relating to the withheld information is removed; and
- 3) annotated in the margin beside each redacted portion, with the appropriate NATO Exemption listed in Annex 1, or the appropriate reference to national legislation or policy, to indicate the reason for which the portion was withheld.

13. If redacting changes the format and structure of an electronic document in an unacceptable way, then the withheld portions shall be replaced with meaningless content, either an unbroken string of letter Xs, or a black mark-up tool that maintains the original format.

14. Redacted information shall be circulated to competent authorities or originators for endorsement under a six week silence procedure.

15. If the redacted information is endorsed, the NATO Archivist shall proceed with disclosure.

16. If the redacted information is not endorsed, the original information item(s) shall be considered withheld and the request shall be closed.

PROCEDURES FOR THE PUBLIC DISCLOSURE OF NATO SUBJECT FILES

1. This annex describes detailed procedures for accomplishing the declassification and public disclosure of subject files as called for in this directive.
2. Subject files are excluded from the systematic process.
3. NATO information contained in subject files may be declassified and publicly disclosed as the result of an ad hoc proposal by the NATO Archivist.
4. Subject files containing only NATO Unclassified and Restricted information that is at least thirty years old and has permanent value may be publicly disclosed by the NATO Archivist without a formal examination and approval process.
5. Subject files containing Confidential, Secret and Top Secret information shall only be declassified and publicly disclosed in coordination with competent authorities in nations and originators.

Identification of Subject Files

6. At any time, the NATO Archivist may identify NATO subject files for possible public disclosure based on:
 - a) particular themes that have minimal sensitivity and/or strong research interest;
 - b) similar or related information that has been publicly disclosed by NATO, member nations, or non-member nations; and
 - c) the age of the information held within the files.
7. The NATO Archivist shall circulate to the Archives Committee a proposal to initiate processing of these files with a view to public disclosure under a three month silence procedure.
8. The Archives Committee shall agree to or reject the proposal based on any national sensitivities that could prevent declassification and public disclosure.

Examination and Approval Process

9. If the proposal is agreed, the NATO Archivist shall consult the NATO office currently responsible for the subject area about any current sensitivity.
10. After agreement by the Archives Committee and the responsible NATO office, the NATO Archivist shall identify and list information in the subject files that:
 - d) has already been publicly disclosed;

- e) was created by NATO civil and military bodies; or
- f) was created by nations or international organisations.

11. The list shall include the following details for information items that require examination by originators:

- a) date;
- b) identifier;
- c) title, or subject;
- d) current classification level;
- e) originator (i.e. nation, NATO civil or military body, or international organisation); and
- f) addressee(s).

12. The NATO Archivist shall make the list available to the originating:

- a) NATO civil and military bodies or their successors in order for them to determine the information's current sensitivity, based on the NATO Exemptions listed in Annex 1.
- b) nations or international organisations in order for them to determine the information's current sensitivity, based on national or organisational criteria.

13. Subject files proposed for declassification and public disclosure shall be available for consultation in the NATO Archives.

14. The NATO Archivist shall compile all responses in a comprehensive proposal, and recommend the public disclosure of those subject files that are coherent and make sense after removal of withheld information items.

15. The comprehensive proposal shall be submitted to the Archives Committee for approval under a three month silence procedure.

16. When the comprehensive proposal has been approved by the Archives Committee, the NATO Archivist shall:

- c) issue a PDN listing the subject files that have been disclosed and identifying files where some information has been withheld;
- d) withdraw from the files individual information items that have been withheld;
- e) place a withdrawal notice, referring to the appropriate PDN in place of each withdrawn information item;
- f) maintain the withdrawn information in the Archives' secure storage area; and
- g) make the entirely or partially publicly disclosed NATO subject files publicly accessible and available in the NATO Archives.

17. The NATO Archivist shall propose information from subject files that has been withheld for further examination on a ten year basis.
18. NATO subject files that have been declassified and publicly disclosed shall be publicly accessible and available in the NATO Archives.

**PROCEDURES FOR SYSTEMATIC DECLASSIFICATION AND PUBLIC DISCLOSURE
OF ALLIED COMMAND OPERATIONS (ACO) INFORMATION****Reference: (a) AC/324-D(2014)0010-REV1**

1. This annex describes detailed procedures for accomplishing the systematic declassification and public disclosure of ACO Information¹⁰.
2. On an annual basis the NATO Archivist and SHAPE Historian¹¹ shall:
 - a) identify¹², in coordination with ACO Command Archivists, Historians and Information and Records Managers, information from strategic and operational headquarters and all related metadata that has permanent value and is at least thirty years old¹³;
 - b) identify within that information:
 - 4) information marked UNCLASSIFIED that shall be publicly disclosed automatically, on 1 January of the coming year;
 - 5) information marked RESTRICTED that shall be declassified after 12 months¹⁴ and consequently be publicly disclosed automatically on 1 January of the following year; and
 - 6) information marked CONFIDENTIAL, SECRET and TOP SECRET.
3. The SHAPE Historian shall, in coordination with ACO Command Archivists, Historians and Information and Records Managers and the NATO Archivist, examine the identified information against the list of NATO exemptions at Annex 1 of the Directive (ref a) and declassify¹⁵ those information items that, in the competent ACO declassification authorities¹⁶ view do not fall under one of the NATO exemptions;
 - a) coordinate with ACO headquarters and sub-ordinate commands and operational commands to list and describe the declassified information according to international (archival) standards¹⁷;
 - b) coordinate the digitisation of the information and capture of related metadata that is not already in electronic format;

¹⁰ ACO also includes legacy command structures such as Supreme Allied Commander Atlantic (SACLANT) and Commander-in-Chief Channel (CINCHAN).

¹¹ The term SHAPE Historian is used throughout the document to reflect the current term of the post title at the time of issuing this document.

¹² ATOMAL marked information will be handled separately outside of the terms defined in this policy.

¹³ A fifty year period shall apply to nuclear and intelligence related information.

¹⁴ This one year period will allow Nations to review the lists and contents if they choose and consult with the NATO Archivist about specific items as appropriate (AC/324-D(2014)0010-REV1, annex 2).

¹⁵ Declassify refers to items identified under paragraph 2.b.3 of this annex.

¹⁶ Competent declassification authorities refers to ACO staff that have delegated downgrading authority on behalf of the originator, these are the Chief of Staff (COS) of the Command concerned and the SHAPE Historian with input from Command Archivists, originating or successor ACO divisions and subject matter experts.

¹⁷ Such as International Standard on Archival Description (ISAD(G), NATO Core Metadata Schema (NCMS).

- c) coordinate the declassification marking of each item with the downgrading authority document reference (downgrading notice); and
 - d) store all information and related metadata in an electronic system that conforms to NATO standards.
4. The NATO Archivist shall, in close coordination with the SHAPE Historian, circulate on an annual basis the following information to the Archives Committee:
- a) a list of the UNCLASSIFIED information of permanent value and that is at least thirty years old, indicating that it shall be automatically publicly disclosed on 1 January of the following year;
 - b) a list of the information marked RESTRICTED of permanent value and that is at least thirty years old, indicating that it shall be declassified after 12 months and publicly disclosed on 1 January of the year after¹⁸; and
 - c) a list of the declassified information (the previously CONFIDENTIAL, SECRET and TOP SECRET information declassified by the competent declassification authorities) that is of permanent value and at least thirty years old, indicating that it shall be automatically publicly disclosed on 1 January of the following year.
5. Upon receipt of the lists, competent authorities in nations shall examine the contents of the lists. Competent authorities may indicate their concerns about the disclosure of the previously classified items¹⁹ and request that the public disclosure is postponed²⁰ for another 10 years.
6. Decisions about whether to postpone the disclosure of information items shall be based on an examination of their contents, taking into account the NATO Exemptions listed in Annex 1 of the Directive on the Public Disclosure of NATO Information (ref a) as well as specific national concerns, and not on arbitrary criteria.
7. When postponing the disclosure of information, the competent authority in the nation shall, as a minimum, provide the NATO Archives with clear justifications as required under the Directive on the Public Disclosure of NATO Information (ref a, annex 1).
8. The NATO Archivist shall inform NATO member nations and civil and military bodies about decisions, and where required indicate the time frame within which postponed information shall be reviewed. The NATO Archivist shall also issue a Public Disclosure Notice (PDN) identifying the disclosed information and specify postponed information with an action sheet.
9. The archival copies of information items that have been declassified and publicly disclosed, and related metadata, shall be marked with a reference to the PDN and stored electronically in the NATO Archives.

¹⁸ This one year period will allow Nations to review the lists and contents if they choose and consult with the NATO Archivist about specific items as appropriate.

¹⁹ This includes Restricted, Confidential, Secret and Top Secret

²⁰ The information on the lists (paragraph 4) distributed to the nations has already been declassified by ACO. As this information is 30 years or older, it would normally be publicly disclosed according to the Policy (C-M(2008)0116). However nations have the possibility to request that the information remains NATO UNCLASSIFIED for another 10 years.

10. Information that is declassified and publicly disclosed in the systematic process shall be declassified and disclosed throughout NATO. It shall be publicly accessible and available in the NATO Archives and may be made publicly accessible and available in the nations without further reference to NATO²¹.

²¹ The original classification and any markings shall be left visibly on the document.