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eIDAS2 AND ELECTRONIC ARCHIVING; ONE STAGE, MANY SCRIPTS

Abstract

Purpose*: This paper examines, from an archival science perspective, the eIDAS2 provisions on qualified electronic archiving, which constitute the first pan-European regulation of a specific recordkeeping process.*

Methods*: The study employs a conceptual and comparative analysis of the terminology and requirements introduced by eIDAS2, considering them in relation to established recordkeeping principles and practices. Particular attention is paid to how the term "archiving" is understood across different countries and languages and to the essential properties of records that qualified electronic archiving service providers should preserve. The paper also examines the roles and responsibilities of the main stakeholders involved in electronic archiving, including qualified service providers, record-creating organisations, and national archives.*

Results*: The analysis reveals differences between the understanding of "archiving" within recordkeeping traditions and its use in the eIDAS2 regulatory framework. It also identifies uncertainties concerning the allocation of responsibilities for safeguarding the authenticity, reliability, integrity, and usability of electronic records among the various stakeholders.*

Discussion*: The findings suggest that eIDAS2 incorporates certain elements of a recordkeeping perspective on electronic archiving but approaches the process from a predominantly technical and IT-oriented perspective. A clearer alignment between qualified electronic archiving services and established recordkeeping principles could contribute to a more comprehensive understanding of the long-term preservation and evidential value of electronic records.*

Keywords: *qualified electronic archiving services; electronic archiving; records management*

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In 2011, at a DLM conference in Budapest, Eric Ketelaar advised participants seeking EU support for the implementation of good electronic records management practices to manage the matter within their own countries, as EU institutions were not interested in such regulations. Thirteen years later, *Regulation (EU) 2024/1183 of the European Parliament and of the Council of 11 April 2024 amending Regulation (EU) No 910/2014 as regards establishing the European Digital Identity Framework* (eIDAS2) was issued. Among other trust services, it introduced qualified electronic archiving.

This is a welcome development, reflecting the evolution of perspectives and the needs of European societies. To my knowledge, it is the first pan-European regulation in the field of recordkeeping. I therefore considered it appropriate to examine the relevant provisions of both the Regulation and the principal standard supporting it. The first part of this paper summarises their provisions. The second discusses key aspects, including the activity defined as archiving, the properties of records that eIDAS2 is intended to preserve, and the Regulation's relationship with the principal actors engaged in "archiving". The conclusions assess the results of the analysis against the expectations surrounding these regulatory instruments.

1. eIDAS2 AND SUPPORTING STANDARD FOR QUALIFIED ARCHIVING

The preamble of the Regulation explains that "*Many Member States have introduced national requirements for services providing secure and trustworthy electronic archiving in order to allow for the long-term preservation of electronic data and electronic documents*" (eIDAS2, Recital 66). As such, to ensure legal consistency the regulation introduces the trust service of electronic archiving. A trust service, according to the text is "*an electronic service normally provided for remuneration*" (eIDAS2, art. 3, 16), performed under several conditions. The provisions are applied to both born and digitized electronic documents[2] (eIDAS2, recital 66). A special attention is dedicated to those documents containing more qualified electronic signatures or qualified electronic seals (eIDAS2, recital 66). As exception, eISAD provisions may not apply for internal records centres (eIDAS2, recital 66) and memory institutions, like National Archives. (eIDAS2, recital 67)

[2] In spite the fact the text is written in English, the EU office used the term *document* and not *record*, following the term largely used in EU languages. As such, in the present article, the two terms are used interchangeable.

The dispositive part of the Regulation clarifies the legal status of the electronic archiving services. Hence, based on the model of other trust services, "*A qualified electronic archiving service provided in one Member State shall be recognised as a qualified electronic archiving service in all other Member States*" (eIDAS2, art. 24a, 10). Further, electronic documents or data preserved using an electronic archiving service "*shall not be denied legal effect or admissibility as evidence in legal proceedings* (eIDAS2, art 45i, 1) on the sole ground that they are electronic or "*not preserved using a qualified electronic archiving service*" (eIDAS2, art 45i, 2). The four requirements for a qualified electronic archiving services are listed in the article 45j, para 1: they are performed by qualified trust service providers; they provide longterm durability, readability, and integrity of documents; they offer protection against loss or alteration; it generates an automated integrity report for authorized parties.

It is to be highlighted that despite regulating the archiving process, the regulation does not deny the evidential value for those documents that are not preserved in the conditions stipulated by the Regulation (eIDAS2, art 45i, 1).

In 17.12.2025, the Commission issued the *Implementing Regulation (EU) 2025/2532*, which indicated the reference standards and specifications for qualified electronic archiving services. The text is somehow ambiguous, since the article one refers only to "*Electronic archiving of documents bearing a qualified electronic signature or a qualified electronic seal"*. This seems misaligned from the text of the regulation, that did not reference in any way only the digital signed documents, but only electronic documents or electronic data. The list of standards and regulation have the bias: while starting the list with CEN/TS 18170:2025, several adaptations of the standard are indicated, referring mostly to Information security, cryptographic algorithms, time stamps etc.

The core standard for the service is CEN/TS 18170:2025 - *Functional requirements for the electronic archiving services*[3]. It is a European standard adaptation of OAIS reference model. In the section 5, the standard specifies that it does not address "the preservation of electronic signatures, seals, timestamps, or certificates", but only "the requirements for the trust service for electronic archiving".

[3] For a larger analysis of relations between eIDAS and other implementing standards see Frederik Rosseel, *From Regulation to Reality: How eIDAS 2, the Implementing Act and CEN/TS 18170:2025 Fit Together* at https://www.linkedin.com/pulse/from-regulation-reality-how-eidas-2-implementing-act-cents-rosseel-vol4e/.

The structure of the standard follows the main lines of the reference model and creatively elaborates on some specific aspects. A first section is devoted to the policies and practices of the trust provider (policy and practice statement, terms and conditions, information security policy, agreements - service agreement, submission agreement). A second one describe trust service provider management and operation (internal organization, human resources, asset management, access control, cryptographic controls and monitoring, physical and environmental, operation, network, vulnerabilities and incident management, collection of evidence, business continuity management, termination and termination plan, compliance, supply chain). A consistent practice is devoted to the Information Packages:

- Submission Information Package (Format, Components, Other metadata in the SIP, Content Data Object Formats, Transfer submission, Receive submission, Audit submission)
- Archival Information Package
  - AIP Generation (Format, Components, Transformation of SIPs into AIPs, Transformation of Content Data Objects into other formats, Map and list of archiving formats for Content Data Objects)
  - Storage infrastructure, localization and security
  - Media migration and format conversion during preservation period
  - Deletion
- Dissemination Information Package

The returning of digital objects is addressed in a separate section (Identification of transfer Requirements, Design of the transfer Interface, Documentation of transfer process, Responsibilities).

The standard also details the traceability of operations (criticality of events-typology, time, initiator, integrity protection of critical events and digital objects-by digital signature or integrity chains) and the requirements for reporting.

2. ARCHIVING…

According to the eIDAS Regulation, art. 3, 48, electronic archiving means „*a service ensuring the receipt, storage, retrieval and deletion of electronic data*

and electronic documents in order to ensure their durability and legibility as well as to preserve their integrity, confidentiality and proof of origin throughout the preservation period". The same definition is included in para 3.1.1 from CEN/TS 18170:2025.

A first remark is that the term "archiving" has not a generally accepted definition, mainly in multilanguage environment (Popovici, 2023). Secondly, considering the flow of re management and preservation of records, the definition does not clarify in what moment this electronic archiving intervenes: at the registration/ capture of records? At their transfer to organisational records centre? Or transfer to Historical Archives for permanent preservation? The activities indicated may apply to any phase in the life cycle of records, which does not help differentiate between records or archives management and archiving process[4].

In ENGLISH, the SAA Glossary indicates the first meanings of the term archiving as „*all actions relating to the selection and care*" or „*the storage and preservation" of records of enduring value* (SAA Glossary, sub voce). The definitions are somehow expected, since *archives* means in English, originally, historical records. The glossary specifies, however, that „*some archivists avoid the use of the term archiving, possibly in the belief that the word is one that was used first by computer scientists and that is currently used in an archives sense only by an uninformed public"*[5]. Nevertheless, the SAA glossary added a third definition, labelled as *used in computing*: „*the offline storage of data from an information system when that data is no longer required for active use*". The authors identify a possible connexion between the second and three definitions: „*the term is used in archivy in two different senses: one encompassing all of the work of an archives that is focused on records, and the other focused merely on the storage and preservation of those records, that latter use again likely influenced by the computing use of the term*".

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4 CEN/TS 18170 indicates specifically in 6.1, a: "*a) The challenges related to document archiving, regardless of the media, and throughout it(s) life cycle*". The records lifecycle is therefore the underling model and the meaning of archiving is somehow related to the whole life of the document.

5 It may be eloquent in this regard that InterPARES (who developed several ontologies regarding records and processes associated with their management and preservation), does not include this term in their terminological resources (see Interpares trust terminology database). A quite similar reluctance is in some countries, like Romania, where the term archiving was not included nor in the formal dictionary of history special sciences, neither in archival legislation; it can be speculated that the term is rather imprecise, conflating more actions that are better defined and described individually.

FRANCE is a very eloquent example for the polysemy of the term *archiving* (i.e. *archivage*). On the one hand, there is a definition from Archives de France, in their *Dictionnaire de terminologie archivistique*. *Archivage* is defined as "*Transfert de documents qui ont cessé d'être d'utilité courante dans un local de stockage ou dans un service d'archives compétent pour les recevoir.*"(AdF, 2002) That means, the concept is associated with the transfer from current to intermediate phase of the lifecycle. However, in the *Petit glossaire de termes archivistiques* of the Association des archivistes français it is defined the concept of *préarchivage* (that is, *before archiving*) like « *gestion des archives intermédiaires jusqu'à l'expiration de leur délai d'utilité administrative, induisant à terme leur tri, leur élimination ou leur conservation définitive* ».(AAF, 2026). By opposition, it means *archivage* would be rather connected with historical archives. But, in the French translation of MoReq2, edited by the same Archives de France, records management (that is, the management of record by the creators) is translated as… *archivage*! (AdF 2008) According to this translation, the term would encompass the management of both current and intermediate records. Stepping aside of pure recordkeeping, one can notice the French Commission Nationale de l'Informatique et des Libertés uses the term archiving as synonim with archives and use the terms *archivage intermediare* and *archivage definitive* (for historical purposes) (CNIL, s.d.).
Commenting on this varied understandings, Marie Anne Chabin concluded that "*c'est le monde industriel, avec les prestataires en externalisation de documents et de données (« tiers-archiveurs » papier ou électroniques), qui a imposé « archivage » comme terme professionnel, terme que les archivistes ont fini par reprendre à leur compte(...) Cette cartographie des sens affirmés ou constatés des mots archives et archivage (...) met en évidence une diversification des usages telle que les mots semblent être parfois le seul lien entre les choses différentes qu'ils représentent.*" (Chabin, 2021).

In ITALY there is a more structured position. Even from classical Eugenio Casanova, archiving is the process of transfer from *archivio corente* to *archivio di deposito* (Casanova, 1928, 148-150). Rafaele De Felice defines archiving (archivazione) as „*Operazione con la quale documenti, fascicoli, registri, scritture in genere, vengono ordinatamente conservati nei locali dell'archivio utilizzando scanalature, armadi, classificatori, schedari ecc. destinati a tale uso.*" (De Fe-

lice, 1992, 80) For digital records, however, *archiviazione* is used to describe the process for the management of current records (ACS 2021, 41), but also for those preserved on medium and long term. The term is rather used in the context of management, while another term, *conservazione,* is focusing on the idea or preserving the qualities of records (see AGiD 2021) What in other countries is named *archiving systems*, in Italy they are called *sistemi di conservazione*. It is to be remarked that in a document titled *Manuale della conservazione*, the two terms exist, and their definitions are quite identical, with reference to storing files (Csp 2015).

In GERMANY, the Bundesarchiv glossary of archival terminology indicates that *archivierung* means „*The storage and preservation of documents for an indefinite period*" (Bundesarchiv, 2026), thus connecting the term with historical archives. More than 30 years ago, a guides for archiving stated that "*The term 'archiving' within the meaning of archival law refers to the complex task of public archives to record and evaluate documents from public bodies and to accept them as archival material, as well as to permanently store, preserve, catalogue and make the archival material available for use(...) Archiving within the meaning of archiving law therefore involves a very different temporal dimension to that of archiving within the meaning of information technology*." (Schäfer 1997, 2-3). In a book about electronic archiving, Ulrich Kampfmeyer admitted that, in Germany, "*the term 'electronic archiving' encompasses various components which, in Anglo-American usage, are referred to separately as 'records management', 'storage' and 'preservation'. Furthermore, the academic concept of an archive and archiving is not, in terms of content, identical to the term used by the document management sector or in the context of data backup*". (Kampfmeyer, 2012, 2). Moreover, "*to distinguish it from the general term 'archiving', the term 'long-term archiving' is therefore increasingly used in academic circles, in state archives, and in museums and collections. The term 'long-term archiving' is, in principle, a pleonasm, as archiving already implies the long-term aspect and is understood to extend well beyond a human lifetime"*. (Kampfmeyer 2012, 5) The same line of understanding is presented on German Wikipedia, (archivierung, *sub voce*). Eventually, a German speaking Swiss provider of competence for Records Management (KRM 2026) indicate that *archivierung* means **"***Proper*

transfer of data/information to an archive repository regardless of the medium; the term is compromised and ambiguous in operational practice, depending on the point of view (business, IT, specialist offices) from which the topic is treated; from an archival point of view, archiving – in contrast to temporary storage – only refers to permanent or permanent storage (secondary purpose of documents and files)" (KRM 2026)

The other countries in European Union have the term *archiving* covering one of these models. Majority of states, as far as I could retrieve from online documentation, considers archiving as a process associated with the transfer of records from current to intermediate phase. As exceptions, one can quote Finland (Glossary, 2026) or Hungary, where the archiving is rather associated with historical records. Nevertheless, in the IT context, the meaning always covers the move of data/records from active (current) stage (read, primary production systems) to other environment, for medium- or long-term preservation (often cheaper or more secure storage), while keeping it retrievable and controlled.

Apart from the definitions illustrating the IT concepts, it is worth reminding that even in IT industry the understanding of the term archiving may vary. In one sense, „archivers" (like Zip or WinRAR), making the „archives", are software that compress the files, reducing their size; therefore, the archiving is, basically, a space saving (which often it is called *files archiving*). In another meaning, as seen above, by archiving is understood the move of inactive data to a separate „place", to free up active space and secure records (sometime called *data archiving*). It is also a „space" savers, but I would be reluctant to consider that it implies mandatory a move to different storage. For instance, archiving in web Gmail is a move to a different storage, but in the interface the emails are still „there". On the other hand, in MS Outlook for desktop, "archiving" emails move them into a different folder, but they are still on the same storage. But the essential of the process is to save space in production environment, not by deleting the files, but by putting them *aside*, in an ordered and secured way, in order to be retrievable.

As a conclusion, the term "archiving" has several meanings, depending on languages and cultural traditions. It is somehow surprising that in several cases, the term was not produced by recordkeeping profession, but rather it was associated with recordkeeping activities; the explanation may be that the term seems more

imprecise that the regular terminology, reuniting several different activities. On the other hand, the IT industry seems more consolidated in understanding the term, across various jurisdictions.

Under these conditions, the usage of the term archiving in eIDAS2 seems less like a recordkeeping (ad)option and more like an IT one. The definition, in my opinion, does not describe clearly enough the position in the lifecycle of records and processes associated with it. It also does not clearly establish the relations between archiving and records management and digital preservation. The reference to preservation period[6] (see eIDAS2, art. 3, 48) may indicate it is referring to semiactive or inactive records; however, permanent retention may be, in some jurisdictions, be considered as a preservation period itself. In this regard, probably the use of classical recordkeeping names for activities and milestones, like disposition, would have clarified both the meaning and the responsibilities. Also, I find rather challenging to consider that "retrieval" or "deletion" help preserving integrity, confidentiality and proof of origin. The use of new terms while recordkeeping discipline already has clear and standardized terms for various activities (like *disposition* instead of *deletion*-a rather technical term) is not a decision to favour the fully understanding and alignment to the records management standards and practices.

3. RELEVANT PROPERTIES OF RECORDS

As presented above, eIDAS stated in the definition for archiving the purpose of the process as to preserve what was considered as essential or significant properties for electronic documents and data: durability, legibility, integrity, confidentiality and proof of origin. CEN/TS 18170 mentions evidential value that consists of proof of origin, integrity, legibility, durability (6.4.2, y). Also, for electronic archiving as a process, the standard mentioned the digital objects (read, electronic data or electronic documents) need to be available, readable, interpretable and reliable (3.3.1.).

These characteristics for records can also be met in other national jurisdictions. For instance, in France, AFNOR, the issuer of NF Z42-013 on *archivage electronique,* specifies the service has as a goal to secure availability, integrity, confidentiality and traceability (https://www.afnor.org/decryptages/cybersecurite/faq-archiva-

[6] The professional standards in English language call it rather *retention period*.

ge-electronique/). It resonates a lot with "confidentiality, availability and integrity", which are the triad of the information security framework. In other industries, there are also other properties presented, for instance ALCOA++[7] or FAIR[8]

Apart from the fact there is no definitions for these terms in eIDAS2 or CEN/TS 18170, the question that arises whether these characteristics of records overlap with those described in the recordkeeping literature, even under the lack of a shared and agreed list of records properties (see Popovici 2017). InterPARES, attempting to define ontologically the trustworthiness of records, finds that it is based on 3 main properties: reliability (based on its turn on completeness and creation procedure fidelity), authenticity (based on integrity and identity) and accuracy (defined by a record being precise, correct, truthful and pertinent) (InterPARES, s.d.). As one can see, these are properties focusing on creation and preservation. ISO 15489 on the other hand, claims that an authoritative record needs to possess authenticity, reliability, integrity and usability (ISO 15489:2016). Its focus is on creation, preservation and access.

The record's properties as outline in recordkeeping field emphasize those characteristics that a record needs to fulfil its role: how a record is created as to be the carrier of relevant content and to produce the intended effects. The preservation process must keep those properties as to maintain the records relevant. On the other hand, the activities covered by archiving in eIDAS2 seems concentrated on management (confidentiality, integrity, proof of origin) and preservation (durability and legibility). However, in the lack of a definition, we can only speculate for instance, whether the proof of origin[9] includes provenance and traceability or only the reference to the authorship of a document. Also, the lack to references to usability may open the possibility as a document to be „lost/misplaced in the archives" while all the other properties are preserved.

The conclusion of this part is that the properties (or characteristics) of documents that need to be archived are focused more on the IT technical aspects and less on the broad recordkeeping properties of records. While it makes sense for implemen-

7 Attributable, Legible, Contemporaneous, Original, Accurate, Complete, Consistent, Enduring, Available, Traceable.

8 Findable, Accessible, Interoperable, Reusable.

9 The property of „proof of origin" is a quite an exotic term for recordkeeping The term seems to be borrowed rather from the ETSI standard on electronic signature, meaning „the signer recognizes to have created, approved and send the message") (ETSI 101733, p. 43). Also, see Commission Implementing Regulation (EU) 2025/2532, recital 6, connecting proof of origin to the electronic signature or Vigil et al (2015).

tation technical level, this tends to simplify the whole process. As Mariella Guercio wrote, "*...l'archiviazione nel medio e lungo periodo non può, per esempio, limitarsi a replicare in un contesto allargato di archiviazione elettronica le indicazioni, pur fondamentali, degli standard ETSI che si concentrano quasi esclusivamente sul prolungamento del certificato delle firme elettroniche qualificate e dei sigilli. Né può essere sufficiente appoggiare il processo conservativo alla mera applicazione di catene infinite di marcature temporali, considerata la quantità e la rilevanza di informazioni di contesto che devono essere mantenute nel tempo perché i contenuti informativi prodotti siano non solo mantenuti integri, ma resi accessibili e soprattutto intelligibili e riusabili nel tempo*"(Guercio 2023).

4. THE SUBJECTS

The recital 66 of the eIDAS2 indicates that the purpose of the regulation is "*To ensure legal certainty, trust and harmonisation across Member States*" in the field of qualified electronic archiving services. Further, "*To the extent that electronic archiving services are not harmonised by this Regulation, it should be possible for Member States to maintain or introduce national provisions, in accordance with Union law, relating to those services, such as specific provisions for services integrated in an organisation and only used for the internal archives of that organisation.*" Eventually, in the next recital, *"The activities of national archives and memory institutions, in their capacity as organisations dedicated to preserving the documentary heritage in the public interest, are usually regulated in national law and they do not necessarily provide trust services within the meaning of this Regulation. In so far, such institutions do not provide such trust services, this Regulation is without prejudice to their operation".*

These texts reveal several aspects. Firstly, that there are requirements for *services*. Corroborating with the provision about the "remuneration", it may be considered that the qualified electronic archiving service is a *commercial service*. By contrast, the text above indicates that it may exist an exception from applying provision of the regulation for the internal archives[10] of the organization, provided it is not performed as a commercial service.

[10] It is about current or intermediate archives, since in English the term *archives* is reserved for historical ones.

The defined goal of eIDAS2 is to regulate the commercial providers of qualified archiving. It is built a framework for a sort of *loca credibilia* from medieval times[11], an independent place where records should be kept and everybody trusted the archives they kept. In contrast with the creator, the commercial provider, whose sole activity is archiving, should act as impartial preserver, and it must prove its neutrality or lack of interest in interfering with the content of records; essentially, to show that it is trustworthy. And this is shown not by some sort of entrusted authoritativeness, like notaries, or by the contextualised chain of custody, but by mere technical procedures, proving the *integrity, confidentiality and proof of origin*.

Since the beginning of times, the role of the archives/records centre of the creator was to preserve the records considered relevant for the creator; not keeping documents for the sake of preserving, but for a purpose. That includes, very often, the records for legal value, which when needed, may be referred or presented in courts. The power of these self-held records was always considered the certainty of the chain of custody and the context of production-the association with the working processes. But, under the new regulative framework, do the records from the creator lose their evidential value in front of a third party? Definitely not, and as shown in the first part, the article 45i, 1 is very clear that "shall not be denied legal effect or admissibility as evidence in legal proceedings". Therefore, the provision of eIDAS, conditioning the different status for records only whether they are *used for the internal archives of that organisation"* is a bit unrealistic[12].

A second aspect is that the architecture of archiving services seems to facilitate and encourage dispersion of records. In regular creator's archives not only, the final records are preserved, but also intermediate drafts or documents that prepared the final, legal document, like a contract. The commercial provider, with its purpose of prove the evidentiality, will be entrusted very likely only with the preservation of the final record-the contract; when it is *commercial*, any extra byte of data stored will cost more. All the rest will be preserved in creator's records centre. And here comes two aspects: on the one hand-the dispersion of ar-

[11] Of course, the fact *loca credibilia* historically disappeared from societies is a topic in itself and may undermine the logic of such providers…

[12] For a tentative case comparing risks in self-archiving vs. commercial archiving see Qualified Electronic Archiving and eArchiving at https://www.docbyte.com/qualified-archiving/.

chives: some parts preserved in trust archiver repository, others (or all) preserved at the creator's; documentary context may be lost. Provider will rather hold a collection of legal pieces rather than the archives (read fonds) of the creator. On the other hand, it is also questionable whether a disposition action, for instance, will be synchronized both for the intermediate (and final) copies of the contract at the creator and the legal version at the provider.

Somehow, the same applies for national archives or memory institutions. The heritage archiving, performed by these institutions are not the same as legal archiving. There are multiple layers of analysis.

The legal archiving is concerned of preserving the legibility of records for the duration of preservation period; it is a finite time span. A National archives would have to preserve the electronic records on an open-ended period of time. National Archives are not notaries. They are not looking to preserve legal validity in the first place, but the documentary memory of the creators (implicitly, by and for society) whose permanent archives it is mandated to keep.

The concerns of legal archiving are to control the access and preserve the confidentiality; except for some initial periods in some cases, the purpose of a memory institution is to grant free access to the records preserved.

The Truth means, for legal archives, the non-repudiation and preservation of digital signatures; for a historical archives, the truth means the content in contexts of its creation.

A risk analysis is also relevant: what happens if the digital archival repository fails? In case of legal archiver, the risk is quite measurable but also limited to the organisations that are contracted: loss of evidentiality of records, legal non-conformity, potential litigations. For a national archives, a failure of the system would destroy irreversibly the cultural memory of the society, and it will erase the possibilities for further research.

Despite idealism, the economics of processes matters. The business model is different in case of national archives and providers. A trust provider for archives needs to have the best tools to solve current needs of their clients. They need to be updated with the technological change. All its investments return by the service fees. National Archives are not a business for the state; they should not spend money for things that are not relevant on the longest term. A national archive

needs to preserve the evidential value of the records, but this is a matter for the next 30-60-90 years, but no more. In this case, a trust service implementation may be an unjustified expense, and legal validity needs may be compensated by procedural and other legal requirements.

The differences are big, but eIDAS2 avoid the clear delineation. The only purpose is that national archives not to deliver services described by the regulation. But, similar to creators' case, remain questionable whether the validity of records held by national archives would have a diminished value only because the legal, procedural and technical requirements of eIDAS2 would not be implemented.

5. CONCLUSIONS

eIDAS 2 Regulation brings a pan-European certified service of electronic archiving. This should be a step forward in creating a consolidated European perspective over recordkeeping. The analysis of terminology and view on records showed the electronic archiving service is more *electronic* than *archiving*, in the way that it seems more inspired by the IT understanding of the term than from recordkeeping practices and concepts. The regulation is not about records, it is about legal sustainability of electronic records, originally-the electronic signed ones. This approach is not always aligned with the recordkeeping theory and practice, and the efforts of many archivists involved in the process of elaboration of the regulation and accompanying standards seemed not always successful. The future will need to determine whether there will be common specifications and understanding for both administrative/legal archiving and heritage archiving or separate requirements for the two. In any case, it is somehow ironic that, when recordkeeping professionals tend to all phases of records life in a unified continuum, Europe seems to highlight the differences between the management of records in active/semiactive phase, versus historical one. But, after all, records are produced for the needs of their creators in the first place, and records managers or archivists are called to manage those needs, not of the recordkeeping standards. It remains to be seen in the future if good recordkeeping practices will prevail in front of technical consideration and understandings, or the recordkeeping practices will be updated to match the technology.

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POVZETEK

Prispevek obravnava ureditev kvalificiranega elektronskega arhiviranja v okviru uredbe eIDAS2 z vidika upravljanja dokumentov in arhivske teorije ter prakse. Avtor analizira določbe Uredbe (EU) 2024/1183, povezane izvedbene uredbe in tehnične specifikacije CEN/TS 18170:2025, ki temelji na referenčnem modelu OAIS. Osredotoča se na pomen izraza »arhiviranje«, lastnosti dokumentov, ki jih morajo storitve ohranjati, ter razmerja med ponudniki storitev, ustvarjalci gradiva in arhivskimi ustanovami.

Uvedba kvalificiranega elektronskega arhiviranja pomeni pomemben korak k skupnemu evropskemu okviru za zaupanja vredno hrambo elektronskih dokumentov in podatkov. Ureditev določa zahteve glede njihove trajnosti, berljivosti, celovitosti, zaupnosti in dokazovanja izvora ter predvideva priznavanje kvalificiranih storitev med državami članicami. Avtor hkrati poudarja, da dokumentom ni mogoče odreči pravnega učinka ali dopustnosti kot dokaznega sredstva zgolj zato, ker niso shranjeni s kvalificirano storitvijo.

Primerjava angleške, francoske, italijanske in nemške terminologije razkriva različna razumevanja arhiviranja. Izraz lahko označuje upravljanje tekočih dokumentov, njihov prenos v vmesno hrambo ali trajno ohranjanje arhivskega gradiva. V informacijski tehnologiji praviloma pomeni umik neaktivnih podatkov iz produkcijskega okolja ob zagotavljanju njihove nadaljnje dostopnosti.

Po avtorjevi presoji opredelitev v eIDAS2 sledi predvsem temu tehničnemu razumevanju, saj ne določa jasno mesta arhiviranja v življenjskem ciklu dokumentov in ga ne razmejuje dovolj od upravljanja ter ohranjanja.

Podobna vprašanja se pojavljajo pri zahtevanih lastnostih dokumentov. Avtor jih primerja s koncepti projekta InterPARES in standarda ISO 15489-1:2016, ki poudarjajo avtentičnost, zanesljivost, celovitost in uporabnost. Ugotavlja, da ureditev daje prednost tehničnim in varnostnim vidikom, manj jasno pa obravnava kontekst nastanka, dokumentarna razmerja ter dolgoročno razumljivost in uporabnost gradiva. Ohranjanje tehnične celovitosti zato samo po sebi še ne zagotavlja ohranitve vseh lastnosti dokumenta.

Prispevek opozarja tudi na razlike med komercialnimi ponudniki kvalificiranega arhiviranja, notranjimi arhivi ustvarjalcev in ustanovami, ki ohranjajo dokumentarno dediščino. Zunanja hramba zgolj končnih, pravno pomembnih dokumentov lahko povzroči razpršitev gradiva, izgubo konteksta in neusklajeno izvajanje odločitev o nadaljnji hrambi ali izločitvi. Arhivske ustanove pa poleg dokazne vrednosti zagotavljajo trajno ohranjanje družbenega spomina, raziskovalno uporabo in dostopnost gradiva, zato imajo drugačne cilje, časovne horizonte in modele financiranja.

Avtor zaključuje, da eIDAS2 le delno odraža celovit strokovni pogled na upravljanje in ohranjanje dokumentov. Odprto ostaja vprašanje, ali bodo prihodnje zahteve povezale pravne, upravne in dediščinske namene arhiviranja ali jih dodatno ločile. Za nadaljnji razvoj bo bistveno usklajevanje tehničnih rešitev z arhivskimi načeli ter ohranjanje vsebine, konteksta in uporabnosti dokumentov skozi čas.