

12 November 2008

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DOCUMENT
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Silence Procedure ends:
20 Nov 2008 18:00

PUBLIC DISCLOSURE OF NATO INFORMATION

Note by the Secretary General

1. The passing of time and the developments in the areas of Access to Information Legislation and of Information Management have required a review of the Policy on the Public Disclosure of NATO Documents of Historical Significance for Research Purposes (PO(90)32-REV).
2. A working group made up of IS, IMS and SHAPE staffs, and including representation of the NATO Office of Security, has revised the policy in the light of concerns expressed by the nations and in order to bring it into line with the new NATO Information Management Policy (NIMP).
3. The revised policy is supported by a directive that identifies specific responsibilities and procedures and includes provisions for processing ad hoc public disclosure requests and for the public disclosure of NATO subject files. This supporting directive will be updated and maintained as appropriate by the NATO Archivist.
4. Following endorsement of both documents by the Archives Committee on 24 October 2008 (AC/324-D(2008)0002), the Council is requested to approve the Policy on the Public Disclosure of NATO Information at Enclosure 1 and to note the Directive on the Public Disclosure of NATO Information at Enclosure 2.
5. Unless I hear to the contrary by **20 November 2008 c.o.b.** I will take it that Council has approved the Policy on the Public Disclosure of NATO Information and noted the Directive on the Public Disclosure of NATO Information.

(Signed) Jaap de Hoop Scheffer

2 Enclosures

Original: English

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POLICY ON THE PUBLIC DISCLOSURE OF NATO INFORMATION

Introduction

1. This document establishes the policy on the public disclosure of NATO information in support of the NATO Information Management Policy (NIMP)¹.
2. This Policy is published by the North Atlantic Council (NAC) and is authorised for public disclosure.
3. The Policy is supported by a Directive on the Public Disclosure of NATO Information.

Scope and Implementation

4. This Policy applies to information falling within the scope of the NIMP and shall be implemented by the NATO Archivist.

Principle and Objectives

5. In keeping with the democratic principle that there is a clear duty to inform the public, and as an expression of the importance of the common historical and cultural values that tie members of the Alliance indivisibly together, the North Atlantic Treaty Organization (NATO) will disclose to the public NATO information when such information is no longer classified or sensitive.
6. The objectives of the public disclosure of NATO information are:
 - a) to 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) to stimulate discussion about NATO through the examination of information that documents NATO's evolution, missions, policies, consultation and decision making; and
 - c) to promote and facilitate research about NATO.

¹ Currently C-M(2007)0118.

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Policy

7. It is the policy of NATO to disclose and make available to the public NATO information that:

- a) has permanent value and is at least thirty years old;
- b) has been declassified, if appropriate, by competent authorities in accordance with the NATO Security Policy² and its supporting Directives; and
- c) has been examined by competent authorities in the member nations where required, and approved for public disclosure.

8. NATO information shall be examined by competent authorities for declassification and public disclosure against the NATO Exemptions listed in Annex 1 as well as specific national concerns.

9. A decision not to disclose specific NATO information to the public shall be by reference to its contents.

10. When NATO information cannot be disclosed in its entirety, it may be further screened for partial disclosure.

11. NATO information of permanent value that is not classified and is thirty years old shall be automatically disclosed to the public consistent with the applicable policy on unclassified information.³ This applies both to information marked unclassified at the time of its creation and to information that has been declassified in an authorised manner.

12. Independently of the systematic disclosure of NATO information outlined above, NATO information may be declassified and publicly disclosed as the result of an ad hoc request by a competent authority of NATO, or by a nation or international organisation having formal relations with NATO. Such ad hoc requests shall be approved by competent authorities in the member nations.

13. Classified information that has been introduced into NATO by a nation or international organisation, and that has not been circulated under a NATO marking, shall be disclosed subject to the agreement of that nation or international organisation.

² Currently C-M(2002)49

³ Currently C-M(2002)60 (under review)

Responsibilities

14. Originators, successor organisations or higher authorities are responsible for the declassification of NATO classified information in accordance with the NATO Security Policy and its supporting Directives. They are also responsible for the approval of ad hoc requests for public disclosure, where required.

15. The NATO Archives Committee, on behalf of the NAC, is responsible for the continuation and expansion of this Policy, for publishing and maintaining specific supporting directives and guidelines, and for coordinating the examination of the NATO information proposed for public disclosure by competent authorities in the member nations.

16. The NATO Archivist, on behalf of the Archives Committee and within the scope of this Policy, is responsible for initiating, coordinating and reporting on the declassification and public disclosure of NATO information, and proposing amendments to this Policy and the related directives and guidelines.

17. The NATO Archivist is also responsible for ensuring the public availability of, and access to, publicly disclosed information in the NATO Archives.

Definitions

Access is the right, opportunity and means of finding, using or retrieving information. (Source: NIMP) Within the context of this Policy, access relates to NATO information that has been publicly disclosed.

Availability is the property of information and material being accessible and usable upon demand by an authorised individual or entity. (Source: NIMP) Within the context of this Policy, availability relates to NATO information that has been publicly disclosed.

Competent Authority is the originating member nation, office, successor organisation or higher authority, NATO commands or agencies and, as appropriate, other interested member nations, non-NATO nations or international organisations.

Information is any communications or presentation of knowledge such as facts, data or opinions in any medium or form, including textual, numerical, graphic, cartographic, narrative or audiovisual forms. (Source: NIMP)

Information of Permanent Value is all information that is required to document NATO's evolution and missions, consultation and decision making processes. (Source: NATO Primary Directive on Information Management (PDIM))

NATO denotes the North Atlantic Treaty Organization and the bodies governed either by the Agreement on the status of the North Atlantic Treaty Organization, National

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Representatives and International Staff, signed in Ottawa on 20th September, 1951 or by the Protocol on the status of the International Military Headquarters set up pursuant to the North Atlantic Treaty, signed in Paris on 28th August, 1952. (Source: NIMP)

NATO Information Management Policy establishes a framework to ensure that information is handled effectively, efficiently and securely in order to serve the interests of NATO. This includes managing all aspects of information throughout its life-cycle

Originator is the nation or international organisation under whose authority the information has been produced or introduced into NATO. (Source: NIMP)

Partial Disclosure is the public disclosure of portions of information as the result of screening and redacting.

Screening is the examination of information to determine whether portions of it can be declassified and publicly disclosed.

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DIRECTIVE ON THE PUBLIC DISCLOSURE OF NATO INFORMATION

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1. 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)XXXX, Policy on the Public Disclosure of NATO Information, dated XX XXXXXXXX 2008; and
- d) C-M(2002)60, The Management of Non-Classified NATO Information, dated 11 July 2002 (under review).

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2. INTRODUCTION

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;

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- 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 thirty 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; and
- b) information that is marked classified shall be proposed for declassification and public disclosure taking into account the NATO Exemptions listed in Annex 1.

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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 two ways:
 - a) Competent authorities may request the declassification and public disclosure of NATO information; and
 - 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.
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.

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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.

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.

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.

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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.

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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 thirty 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) apply international standards to list, copy and describe the information in coordination with NATO civil and military bodies;
 - 4) distribute to competent authorities in member nations lists, copies and descriptions of the information, 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;
 - 5) 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;
- 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) maintain an inventory of information that has been:
 - 1) entirely disclosed;
 - 2) withheld; and
 - 3) partially disclosed; and
- e) ensure the availability of, and access to, publicly disclosed information and associated metadata in the NATO Archives.

NATO Civil and Military Bodies

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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 thirty 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; and
- c) 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
- 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.

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

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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.

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ANNEX 1

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.

3. Competent authorities in member 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 7 - 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.

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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.

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ANNEX 2

**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) unclassified information that shall be publicly disclosed automatically; and
 - 2) classified information that shall be proposed for declassification and public disclosure examination;
 - c) examine the classified 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; and
 - g) circulate copies, metadata, lists and descriptions of classified information to competent authorities in member nations via the Archives Committee, for examination under a twelve month silence procedure;
 - h) circulate a list of the unclassified information to the Archives Committee, indicating that it shall be automatically publicly disclosed on 1 January of the following year.
3. On an annual basis, competent authorities in member nations shall examine the contents of the classified information items and make one of three decisions for each item:
 - a) entirely declassify and disclose;
 - b) automatically declassify and disclose after a specified date that cannot exceed ten years; or
 - c) withhold.

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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 member 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 nations 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.

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ANNEX 3

**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.

Response

4. 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 member nations or originators who shall take into account the NATO Exemptions listed in Annex 1 as well as specific national concerns.

5. Competent authorities in member 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.

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

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

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8. The NATO Archivist shall inform the requesting authority about the status of the request within ninety calendar days.
9. When action on a request has been completed, the NATO Archivist shall inform NATO member nations 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."
10. 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.
11. 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.
12. 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.
13. 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.

Retention and Disposition

14. An ad hoc request has no impact on the value of an information item.
15. 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.

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16. 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.
17. Redacted copies of information or PDNs produced during the ad hoc process shall be disposed of according to the applicable retention and disposition directive.

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Appendix to ANNEX 3

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 member 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 member 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 can not 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.

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11. All metadata related to withheld portions, or that might indicate the specific content of those withheld portions, shall also be obliterated.

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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.

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ANNEX 4

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 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 classified information shall only be declassified and publicly disclosed in coordination with competent authorities in member 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.

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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:

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- 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.

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