

Recommendations on Archival Access, Monitoring Access to Holocaust Collections – Zagreb 2023

19 October 2023

Taking all necessary steps to facilitate the opening of archives is one of the important commitments Member Countries have made under the Stockholm Declaration.

Access to Holocaust-related materials¹ has been at the center of the IHRA's work for more than a decade and is an IHRA priority. Under the 2020 Ministerial Declaration, Member Countries have underlined the importance of identifying, preserving and making available archival material for educational purposes, commemoration and research. Soon, survivors will no longer be with us, and access to Holocaust archives looms in importance for keeping the memory of the Holocaust alive. It is becoming a matter of priority for Governments, Parliaments and archival collections. This increased interest for the identification, preservation, access and use of archives should contribute to humanist and democratic values at the service of global peace.

The IHRA's "Archival Access" (2014-2017) project sought to map the status of accessibility to Holocaust period documentation and the [challenges faced by researchers](#). The project also contributed to ensuring that a specific exception for documents bearing on the Holocaust was included in the [European Union's General Data Protection Regulation](#) (GDPR).

The "Monitoring Access to Holocaust Collections" (2020-2023) project is a follow-up project aimed to help the IHRA map the legal and practical status of access to Holocaust collections and monitor difficulties with access. During the project, the IHRA team has been in touch with various stakeholders and examined and analyzed five test cases.² The following recommendations reflect the general work and reflections of the project team, conclusions of the test cases reports and the input received during various exchanges with stakeholders.

In order to support IHRA Member Countries in following through on their commitments to make available archival material, IHRA experts advise to address the following categories of challenges:

¹ For a more detailed review of how to define Holocaust-related materials, please refer to the IHRA Guidelines for Identifying Relevant Documentation for Holocaust Research, Education and Remembrance (www.holocaustremembrance.com/findyouranswer).

² The five test cases concern Holocaust and World War II-related collections in the Red Cross Archives in Poland and in The Netherlands, archives in Austria, archives in Sweden and Declassification and reclassification of Holocaust related collections.

1. Archives at Risk

Hundreds of millions of documents, films, recordings, and other material evidence of the Holocaust are stored in archives, museums, and other repositories around the world. Yet numerous factors can threaten the existence of and access to these important [materials](#). In some cases, this evidence is in imminent danger. At-risk materials can include print, photographic, film, audio, ephemeral, material, and born-digital objects. There are a number of factors that may contribute to archival materials being at risk.

What causes archival holding to be at risk? IHRA experts have identified the following main risks:

- **Environmental conditions:** Environmental factors, such as moisture, high temperatures, flooding, or rodents and insects, place original materials in imminent danger of destruction. These conditions may occur because of inadequate storage, rodent and insect infestation, or because of changes in the broader environment. For example, all materials in some geographic areas could be considered at-risk due to the likelihood of flooding, hurricanes, or other extreme weather.
- **Political decisions and uncertainty:** Political issues, government policy, and war can lead to critically important historical materials becoming inaccessible and/or untraceable. Governments hold responsibility over safeguarding records and public interest. They are often the decision-makers on who can access historical archives, especially on those under their authority. Yet, the policies and priorities of leaders favoring a certain interpretation of the historical record can and has come at the expense of access to records and evidence. In some cases, military or civil conflict may have resulted in the destruction of original archival materials.
- **Socio-economic aspects:** Community priorities to collect and document their own history can wane, often because of a lack of resources to preserve important historical materials or insufficient knowledge regarding archival good practices. Provincial archives and community organizations struggling to sustain staff and programs may be unable to maintain the conditions required to conserve materials. While they might desperately want to maintain their holdings, some repositories are simply unable to do so. Archives, museums and other institutions that are unable to safeguard their own holdings, or institutions in danger of closing and discarding materials could result in the loss of important and unduplicated historical materials.
- **Inherently unsustainable media:** Materials stored on magnetic tape, optical discs (CDs and DVDs), or nitrate film, or that include acidic paper, degrade rapidly and can easily be lost forever. These media, which were never made to last forever, are inherently unstable and become unreadable relatively quickly.

Access to archives is a shared challenge, and solutions to archives at risk should be on a trans-national level. **The following recommendations are made:**

- IHRA delegations to urge and support archives to develop **proactive procedures** and measures in case of emergency, including prioritization of collections.
- IHRA Member Countries to prioritize **funding for digitization** as a form of preservation and access, paying attention to the risk outlined above concerning the usage of inherently unsustainable media.
- IHRA Member Country governments to **create awareness to archival good practices and to ensure better conditions** for access to and preservation of archival materials by providing adequate funding and support. This support is encouraged to also minimize costs for use of these collections by Holocaust researchers, museums and memorials.

2. Implementation of Good Practices

There has to be an understanding that archives differ from each other in many ways.

We recommend introducing the following good practices to state archives and other archival entities in regard to Holocaust-related documentation:

- We recommend that **digitization** be made a priority due to the vital role it plays in promoting access and preservation.
- We recommend **standardization of metadata** should follow the FAIR principles (Findable, Accessible, Interoperable and Reusable)
- We recommend **joining** professional networks and using existing tools such as those offered by [EHRI](#), Arolsen Archives, and others.
- We recommend that archives **adopt and actively apply** the [IHRA Guidelines for Identifying Relevant Documentation for Holocaust Research, Education and Remembrance](#) and mark Holocaust-related collections.
- We recommend that archives **translate the general information** regarding access to materials on their website into more languages, with English as a priority.
- We recommend that archives **translate the finding aids** for collections into other languages, with English as a priority.

3. Working to Remove Legal Obstacles

The legal obstacles to disclosure vary from country to country in the specific wording of the legislation. Nonetheless, most countries have the same exemptions in substance from disclosure, such as information obtained in confidence, breach of privacy, breach of copyrights, injury to national security and others.

As a means of navigating these legal obstacles, **we recommend the following:**

- In order to deal with privacy regulations and GDPR obstacles, the implementation of Recital 158 in national law should be promoted. Recital 158 has been introduced following [IHRA's collective effort at EU level](#) to secure access to Holocaust-related material.
- As we notice that obstacles to access to Holocaust records stem from legislation which is general in nature, general legislation should be amended to provide an exception specific to Holocaust records to these general requirements, concerning both perpetrators and victims, in a similar function to that which Recital 158 has in the GDPR for EU countries.
- Insofar as there is discretion in current legislation to allow for exceptions to prohibitions to access, that discretion should be exercised in favor of access to Holocaust-related records, as defined in the [IHRA Guidelines for Identifying Relevant Documentation for Holocaust Research, Education and Remembrance](#).
- In some Parliamentary systems, Parliaments can obtain documents from Governments which the public cannot obtain, as they are exempt from disclosure obstacles, for example, documents pertaining to war criminals' trials. Where that is the case, Parliaments should exercise that power to obtain Holocaust-related records.

4. Post-Project Sustainable Attention and Action to Ensure Access to Archives within the IHRA

With archives as the basis of and the future for Holocaust research, education and remembrance, and in order to ensure sustainable attention to the issue within the IHRA, **we recommend:**

- Creating an Archival Access Forum within the IHRA in order to facilitate cross-cutting online discussions among working groups.

- Establishing a standing item of archival access on the AWG agenda to follow up on the implementation of these recommendations in subsequent plenary meetings, and other outstanding issues related to archival access.
- For the IHRA to consider incorporating a question on archival access in the Country Reporting Mechanism during the next revision of the questionnaire, in order to allow for countries to report back on the status of access.
- Including archivists or archival experts in national delegations.
- Including representatives of state archives in preparation and debriefing meetings for IHRA Plenaries.