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CONTRIBUTION

From:	General Secretariat of the Council
To:	Security Committee
N° prev. doc.:	5307/25
Subject:	Proposal for a Regulation of the European Parliament and of the Council on information security in the institutions, bodies, offices and agencies of the Union – Chapter 5 EUCI, Section 3 Physical Security + Annex III – comments by the Austrian and Polish delegations and by the Commission

Delegations will find in the Annex comments by the Austrian and Polish delegations and by the Commission on Chapter 5 EUCI, Section 3 Physical Security and the related Annex III of the proposal for a Regulation of the European Parliament and of the Council on information security in the institutions, bodies, offices and agencies of the Union, set out in doc. 5307/25.

ANNEX

Proposal for a Regulation of the European Parliament and of the Council on information security in the institutions, bodies, offices and agencies of the Union –
Chapter 5 EUCI, Section 3 Physical Security + Annex III (doc. 5307/25)

– Comments by the Austrian and Polish delegations and by the Commission

1. Comments by the Austrian delegation

SECTION 3
PHYSICAL SECURITY

Article 27
Basic principles

1. Each Union ~~institution and body~~ **entity** shall determine the physical security measures appropriate to its sites **to prevent unauthorised access to EUCI** ~~in accordance with Annex III and the principle of defence in depth~~ on the basis of a risk assessment performed ~~by its Security Authority~~ **in accordance with Article 5**.

1a. Union ~~institutions and bodies~~ **entities** shall put in place physical security measures for all sites where EUCI is discussed, stored or handled, including areas housing communication and information systems as referred to in Section 5 of this Chapter. *[moved from paragraph 2]*

1b. **In line with the principle of defence in depth such** ~~The~~ **physical security** measures shall ensure the following objectives:

(a) to deny ~~**prevent** access to EUCI or~~ **surreptitious or** forced entry by an **unauthorised individual** ~~intruder~~;

(b) to deter, impede and detect unauthorised actions and respond to security incidents as soon as possible;

(c) to allow for ~~segregation~~ **differentiated rights** of personnel ~~in their~~ **to** access ~~to~~ EUCI on **the basis of** ~~a~~ **their** need-to-know ~~basis~~ and**,** where appropriate, ~~on a~~ **their personnel** security clearance ~~basis~~.

~~2. Union institutions and bodies shall put in place physical security measures for all sites where EUCI is discussed, stored or handled, including areas housing communication and information systems as referred to in Section 5 of this Chapter.~~ *[moved to paragraph 1a]*

Commented [redacted]: AT: Please see comment below in 1b.

Commented [redacted]: AT: As mentioned during the last CSC by some delegations, suggestion to keep "prevent". In para 1, the wording is also "prevent".

Please see also the respective comment in Art. 8a (2) – row 5 - in Chapter III of the CSR.

Commented [redacted] AT: Depending on the necessary changes of the wording mentioned by other delegations during the last CSC, we should align the respective provisions here and in Art. 8a (2) – row 5 - in Chapter III of the CSR.

~~32~~. Only ~~security~~ equipment approved by the Security Authority of a Union ~~institution or body~~ **entity** shall be used for physically protecting information classified CONFIDENTIEL UE/EU CONFIDENTIAL or higher.

~~43~~. Union ~~institutions and bodies~~ **entities** may share Secured Areas, as referred to in **Article [29b]** ~~Annex III,~~ for handling, ~~and~~ storing **or discussing** EUCI, upon conclusion of an agreement.

Article 28

Sub-group on physical security

1. The sub-group on physical security as referred to in Article 7(1)~~, point~~ (c), shall have the following roles and responsibilities:

(a) preparing **for the Coordination Group recommendations for** guidance documents relative to physical security matters~~; (b) defining the~~**, in particular** general security criteria for acquiring equipment such as security containers, shredding machines, doors, locks, ~~electronic~~ access control systems **(ACS),** intrusion detection systems **(IDS)** and alarm systems for the physical protection of EUCI;

~~(c)~~**(b)** assisting Union ~~institutions and bodies~~ **entities** in determining the appropriate security measures ~~for their sites; (d) proposing compensatory measures~~ for the protection of EUCI **on their sites and compensatory measures** when EUCI is handled **or stored** outside **such sites** ~~the physically protected areas of a Union institution and body.~~

Commented [redacted]: AT: Is it necessary to use the same wording "above" as it is in the CSR? If this is the case, please adjust in the whole text.

Commented [redacted]: AT: As "discussing" was added in Art. 27 (3), is it necessary to add it here too?

Article 29

Physical protection of EUCI

1. To ensure the physical protection of EUCI, the Union ~~institutions and bodies~~ **entities** shall establish the following physically protected areas:
   (a) ~~A~~**A**dministrative ~~A~~**A**reas, as referred to in **Article [29a]** ~~Annex III~~;
   (b) where appropriate, Secured Areas including Class I, Class II and ~~t~~**T**echnically Secured Areas, as referred to in **Article [29a]** ~~Annex III~~.

2. The Security Authority of the Union ~~institution and body~~ **entity** concerned shall **be responsible for ensuring that only those areas that meet the requirements** ~~conduct an internal inspection to verify whether the conditions for an area to be established as an Administrative Area or a Secured Area,~~ set out in **Article [29a]** **be designated as Administrative Areas or Secured Areas** ~~Annex III, are met. A Secured Area shall be designated as such if it is approved by the Security Authority Where the inspection report indicates that the conditions are met, the Security Authority may issue an accreditation for the Secured Area~~

   A Secured Area may be designated as such only upon approval by the Security Authority of the Union entity concerned that the area can ~~to~~ protect EUCI up to the stated **security classification** level for a period not exceeding 5 years. The Security Authority of the Union ~~institution or body~~ **entity** concerned shall be responsible for ~~carrying out the re-accreditation~~ **renewing the approval** ~~process~~ of its Secured Areas, before the expiry of the ~~accreditation~~ **approval** or whenever changes have been implemented within the ~~accredited~~ **approved** area.

3. Each Union ~~institution and body~~ **entity** shall adopt procedures for managing **security** keys and combination settings for ~~offices, rooms~~ **sites**, strong rooms and security containers for level CONFIDENTIEL UE/EU-CONFIDENTIAL and for higher levels.

4. The Security Authority **of the Union entity concerned** may authorise entry and exit searches to deter and detect the unauthorised introduction of material or the unauthorised removal of EUCI from sites.

~~5. Union institutions and bodies shall establish the measures for the physical protection of the EUCI in accordance with Annex III.~~

Commented [redacted]: AT: Proposal to adjust the wording to Art. 8c (1) – row 18 - of Chapter III of the CSR.

Commented [redacted]: AT: Please see comment above.

Commented [redacted]: AT: Suggestion to adjust the wording to the respective provision in Art. 8e (6) – row 50 - of Chapter III of the CSR.

~~**ANNEX III**~~

~~**Measures for the physical protection of European Union classified information ('EUCI')**~~

Article [29a]

~~***Equipment and organisational measures for the physical protection of EUCI***~~

Physically protected areas

1. An Administrative Area **shall** ~~must~~ meet the following requirements:

   (a) ~~**have**~~ **the area has** a visibly defined perimeter which allows individuals and, where possible, vehicles to be checked;

   (b) ~~**ensure that**~~ windows that ~~**might**~~ **could** allow unauthorised visual access to EUCI within the **physically protected** area are ~~**made**~~ opaque or equipped with blinds, curtains, or other coverings;

   (c) unescorted access **to the area** is ~~to be~~ granted only to individuals who are ~~**duly**~~ authorised by the Security Authority of the Union ~~**institution or body**~~ **entity** concerned to do so;

   (d) all other individuals **who are not authorised by the Security Authority of the Union entity concerned to access the area** are escorted at all times or ~~**be**~~ subject to equivalent **measures** ~~**controls**~~.

2. In addition to the requirements provided in **paragraph** ~~**point**~~ 1, a Secured Area **shall** ~~must~~ meet the following requirements:

   (a) ~~**have**~~ **the area has** a visibly defined and protected perimeter through which entry and exit is controlled at all times;

   ~~(b) be free of unauthorised communication lines, unauthorised telephones or other unauthorised communication devices and electrical or electronic equipment;~~

   ~~(c) be equipped with access control and real time monitoring intrusion detection system ('IDS') combined with response security personnel;~~

   ~~(d) be inspected at the end of normal working hours and at random intervals outside normal working hours where it is not occupied by duty personnel on a 24 hour basis and there is no real time monitoring (IDS) in place;~~

   (b) ~~it shall be~~ the area is equipped with access control carried out~~. Access control may be exercised~~ by electronic or electro-mechanical means, by security personnel or by any other physical means;

   (c) when not occupied by duty personnel on a 24-hour basis, the area is ~~it shall~~:

      (i) ~~be~~ equipped with a real-time surveillance intrusion detection system (IDS) in combination with response security personnel; or

Commented [redacted]: AT: Suggestion to align the wording with Art. 8c (3a) – row 21 – of Chapter III of the CSR.

Commented [redacted]: AT: Please see the addition made in Art. 8c (3b) – row 21 - of Chapter III of the CSR.

Commented [redacted]: AT: In comparison to the respective provision in Art. 8c (4) – row 22 - of Chapter III of the CSR, this para refers directly to para (1) when including "in addition". Please clarify if the requirements of a secured area are made on the basis on these for Administrative Areas. Proposal to adjust the wording between CSR and ISR.

Commented [redacted]: AT: In comparison to the respective provision in Art. 8c (4) – row 22 - of Chapter III of the CSR, the requirement of the approval by the Security Authority of the Union entity concerned is missing in this list.

Commented [redacted]: AT: Suggestion to align the wording with Art. 8c (4b) – row 22 – of Chapter III of the CSR.

(ii) ~~be~~ locked and ~~inspected~~ checked at the end of ~~normal~~ working hours and at random intervals outside ~~normal~~ working hours;

~~(e)~~(d) ~~be managed~~ the area is operated by trained, supervised and appropriately security~~-~~ cleared security personnel;

~~(f)~~(e) ~~have~~ the area has security operating procedures (**SecOPs**) including the following elements:

(i) the level of EUCI which may be handled, **stored or** discussed ~~and stored~~ in the area;

(ii) the surveillance and protective measures to be maintained;

(iii) **a list of** the individuals who are authorised **by the Security Authority of the Union entity concerned** to have unescorted access to the area by virtue of their **need-to-know and** authorisation to access EUCI ~~and need-to-know~~;

(iv) ~~where appropriate,~~ the procedures for escorts ~~or for protecting EUCI when authorising any other individuals to access the area,~~; **and**

(v) any other relevant measures and procedures.

~~3. Where entry into a Secured Area constitutes direct access to the classified information contained in it, the area must be established as a Class I Area and where that is not the case the area must be established as a Class II area.~~

~~For both classes of Secured Area referred to in the first subparagraph and in addition to the requirements provided in point 2, the Security Department/Officer of the Union institution or body concerned must clearly indicate the level of the highest security classification of the information normally held in the area and must clearly define a perimeter which allows individuals and, where possible, vehicles to be checked.~~

~~Union institutions and bodies must ensure that individuals accessing a Secured Area fulfil the following criteria:~~

~~(a) require specific authorisation to enter the area;~~

~~(b) be escorted at all times;~~

~~(c) be appropriately security cleared unless steps are taken to ensure that no access to EUCI is possible.~~

3. A ~~Class I~~ Secured Area ~~is a Secured Area~~ ~~in which~~ the entry to which implies ~~constitutes, for all practical purposes,~~ a direct access to EUCI may be designated as a Class I Secured Area, provided that the following additional requirements are met:~~ ~~Such area requires in addition to the requirements defined in paragraph 2:~~

Commented [redacted]: AT: Proposal to align this wording with the Art. 8c (5) – row 27 - of Chapter III of the CSR.

Commented [redacted]: AT: Please compare to Art. 8c (5) c – row 27 – of Chapter III of the CSR where the PSC is mentioned instead. Please clarify.

Commented [redacted]: AT: Same comment as provided in Art. 8c (6) – row 28 – of Chapter III of the CSR.

(a) **at the entry to the area, there is a clear indication of its class and of the highest classification level ~~and the category~~ of EUCI ~~normally held in the area, i.e. EUCI~~ to which the entry gives access; and**

(b) **the area has an entry control system which admits access only to those individuals who hold an appropriate~~ly~~ personnel security clearance~~ed~~ and who are specifically authorised to enter the area on a permanent or an ad hoc basis.**

3a. **A ~~Class II~~ Secured Area ~~is a Secured Area in which~~ the entry to which does not ~~constitute~~ imply a direct access to EUCI may be designated as a Class II Secured Area, provided that the following additional requirements are met:~~. Such area requires in addition to the requirements defined in paragraph 2:~~**

(a) **the area has an entry control system which admits ~~unescorted~~ access ~~only~~ to those individuals who ~~are~~ have an appropriate~~ly~~ security clearance~~ed~~ and who are specifically authorised to enter the area on a permanent basis; and**

(b) **an escort or equivalent measures for ~~control mechanism to deal with~~ those individuals who do not meet the criteria described in point (a) of this paragraph.**

~~6.~~ **4.** A Secured Area ~~protected against passive and active eavesdropping~~ **that meets the following additional requirements may ~~shall~~ ~~must~~** be designated as a ~~t~~**T**echnically Secured Area~~. The following requirements apply in addition to those for Secured Areas~~:

(a) the area is protected against passive and active eavesdropping;

(b)~~(a)~~ ~~it must be~~ the area is equipped with a~~n~~ **real-time monitoring** IDS **in combination with response security personnel**, **~~be~~ is** locked when not occupied and **~~be~~ is** guarded when occupied. Any **security** keys **and combination settings are ~~must be~~** managed in accordance with Article 29(3);

(c)~~(b)~~ ~~it must be~~ the area is ~~inspected~~ regularly~~,~~ physically or technically~~,~~ inspected, **including ~~t~~T~~e~~chnical ~~S~~surveillance ~~C~~countermeasures ~~(TSCM)~~ inspection**, or both, **as required** by the Security Authority of the Union ~~institution or body~~ **entity** concerned **~~and. Such inspections must also be conducted~~** following any unauthorised entry or ~~suspicion of such~~ **suspected unauthorised** entry **or after any reconstruction or renovation**;

(d)~~(ba)~~ ~~it shall be~~ the area is free of ~~unauthorised~~ communication lines, ~~unauthorised~~ telephones or other ~~unauthorised~~ communication devices ~~and~~ **or electrical or electronic equipment with recording **and/or** transmitting capabilities **that have not been authorised by the competent authority; and**

Commented [redacted]: AT: Please align the wording between this provision and Art. 8c (7) – row 29 - of Chapter III of the CSR.

Commented [redacted]: AT: Please see comment above.

Commented [redacted]: AT: Please see comment above.

Commented [redacted]: AT: Proposal to change the wording in order to be consistent with Art. 8c (9) f – row 35 - of Chapter III of the CSR.

Commented [redacted] AT: Do you mean the "Security Authority of the Union entity concerned" as mentioned always in this Article? Otherwise, please clarify "competent authority".

(e)~~(c)~~ ~~it must have~~ **~~shall be equipped with~~** **the area has** appropriate acoustic ~~and~~ ~~TEMPEST~~ protection.

5. All persons entering ~~i~~**T**echnically Secured Areas ~~must~~ **shall** comply with the requirements set out in [**paragraphs** ~~point~~ **3 or 3a**].

~~6. Secured Areas and technically Secured Areas may be set up temporarily within an Administrative Area for a classified meeting or any other similar purpose.~~

~~7~~6. A **Secured Area may include a** ~~S~~strong room~~s must be constructed within Secured Areas. A strong room is a room with~~, **provided that it has a** reinforced physical construction **comprising** ~~where the Security Authority of the Union institution or body concerned approves the~~ the walls, floors, ceilings, windows and lockable doors **approved by the Security Authority of the Union entity concerned**. Such **strong** rooms **shall** ~~must~~ afford ~~equivalent~~ protection **equivalent** to that of a security container approved for the storage of EUCI of the same classification level.

Article [29b]

Physical ~~protective measures~~ security requirements for handling and storing EUCI

~~8~~1. EUCI which is classified RESTREINT UE/EU RESTRICTED ~~must~~ **shall** be handled ~~and stored~~ in any of the following areas:

(a) in a Secured Area; **or**

(b) in an Administrative Area ~~provided the EUCI is protected from access by unauthorised individuals~~ or **in an area with equivalent physical protection**~~s~~.

~~(c)~~ ~~i~~**In exceptional cases and provided the volume of EUCI is limited, it may** ~~temporarily~~ **be handled** outside a Secured Area or **an** Administrative Area temporarily, provided ~~that the EUCI is limited in volume, the handling of EUCI is limited in time and~~ the holder has undertaken to comply with compensatory measures decided by the Security Authority of each Union ~~institution and body~~ **entity concerned**.

~~9~~2. EUCI which is classified RESTREINT UE/EU RESTRICTED **shall** ~~must~~ be stored **at least** in locked office furniture in an Administrative Area or a Secured Area. **In exceptional cases and provided the volume of EUCI is limited, i**~~I~~t may ~~temporarily~~ be stored outside an Administrative Area or a Secured Area temporarily, provided that the holder has undertaken ~~to store the documents concerned in appropriate locked office furniture when they are not being read or discussed~~ **to comply with compensatory measures decided by the Security Authority of each Union entity concerned**.

Commented [redacted]: AT: In order to be consistent, please adjust the wording to that in the CSR – see comment in Art. 8d (1) – row 39 – of Chapter III of the CSR.

Commented [redacted]: AT: Proposal to align the wording to Art. 8d (1) a – row 39 – of Chapter III of the CSR.

Commented [redacted]: AT: Proposal to align the wording with Art. 8d (1) – row 39 of Chapter III of the CSR.

Commented [redacted]: AT: In comparison to Art. 8d (1) – row 39 – of Chapter III of the CSR, is it necessary to add the part of the sentence "to ensure that EUCI is protected from access by unauthorised persons." in order to be consistent?

From AT perspective, the Coordination Group, where all Security Authorities of the Union institutions and bodies are represented, should develop common minimum requirements for these cases.

Commented [redacted]: AT: As "at least" is mentioned, is this addition necessary? In Art. 8d (2) – row 40 – of Chapter III of the CSR, the secured area is not mentioned. Please align these two provisions.

Commented [redacted]: AT: Please see comment above.

Commented [redacted]: AT: Please see comment above.

~~10. Union institutions and bodies may handle and store RESTREINT UE/EU RESTRICTED information outside their sites provided the relevant information be protected appropriately. For such purpose, Union institutions and bodies must comply with the measures provided in point 8(e).~~

~~113~~. EUCI at level CONFIDENTIEL UE/EU CONFIDENTIAL and SECRET UE/EU SECRET ~~information must~~ **shall** be handled ~~and stored in one of the following areas~~:

(a) in a Secured Area; **or**

(b) in an Administrative Area ~~provided the EUCI is protected from access by unauthorised individuals;~~.

~~(c)~~ ~~i~~**In exceptional cases and provided the volume of EUCI is limited, it may** ~~temporarily~~ **be handled** outside a Secured Area or an Administrative Area temporarily, ~~where limited in volume and time and~~ provided **that** ~~the EUCI is limited in volume, the handling of EUCI is limited in time and~~ the holder has undertaken to comply with compensatory measures decided by the Security Authority of the Union ~~institution or body~~ **entity** concerned. In addition, the holder of EUCI ~~must~~ **shall** take the following steps:

(i) notifies~~y~~ the relevant registry ~~of the fact~~ that ~~classified documents are~~ **EUCI is** being handled ~~outside a physically protected area;~~ **in accordance with this subparagraph;**

(ii) keeps the ~~document~~ **EUCI** under ~~their~~ **his or her personal** control at all times.

~~124~~. **EUCI classified** CONFIDENTIEL UE/EU CONFIDENTIAL and SECRET UE/EU SECRET ~~information must~~ **shall** be stored in a Secured Area ~~accredited to that level by the competent Security Accreditation Authority of the Union institution or body concerned~~, ~~either~~:

(a) in~~side~~ a security container**;** or

(b) in~~side~~ a strong room as referred to in Article 29a (6)**.**

[13. ~~Documents~~ **EUCI** classified CONFIDENTIEL UE/EU CONFIDENTIAL or higher ~~can~~ **may** only be copied by the relevant Registry.] *[to be moved to EUCI management chapter]*

~~145~~. **EUCI classified** TR~~E~~ÈS SECRET UE/EU TOP SECRET ~~information must~~ **shall** be handled ~~and stored~~ in a Secured Area**. EUCI classified TRÈS SECRET UE/EU TOP SECRET shall be stored in a Secured Area** ~~accredited to that level. To that end, Union institutions and bodies may conclude the necessary arrangements to use a Secured Area hosted and accredited to the appropriate level by the Security Accreditation Authority of another Union institution and body.~~

Commented [redacted]: AT: Please see comment above.

Commented [redacted]: AT: Please see comment above.

Commented [redacted]: AT: Proposal to use the structure of Art. 8e (1) – row 44 – of Chapter III of the CSR and put this under (i) as it is also an obligation of the holder.

Commented [redacted]: AT: Or "has notified" as in Art 8e (1) – row 44 - of Chapter III of the CSR.

~~15. TRES SECRET UE/EU TOP SECRET information must be stored in a Secured Area accredited to that level by the Security Accreditation Authority of the competent Union institution or body concerned under one of the following conditions:~~

(a) in a security container ~~approved by the Security Authority of each Union institution and body~~ with **at least** one of the following supplementary controls:

(i) continuous protection or verification by **security**-cleared security ~~staff~~ **personnel** or **security-cleared** duty personnel;

(ii) ~~an approved~~ **real-time monitoring** IDS in combination with ~~security~~ response **security** personnel~~.~~**; or**

(b) in ~~**an real-time monitoring IDS equipped**~~ **a** strong room, as referred to in Article 29a (6), **equipped with a real-time monitoring IDS** in combination with ~~security~~ response **security** personnel.

Commented [redacted]: AT: Proposal to delete in order to be consistent with Art. 8f (2) – row 54 – of Chapter III of the CSR.

Commented [redacted]: AT: See comment in Art. 8f (2) a (ii) – row 55 – of Chapter III of the CSR.

2. Comments by the Polish delegation

With reference to documents no.:

- 5916/25 and 5307/25 we propose to replace: “to allow for segregation/ differentiated rights of personnel to access EUCI” with “to allow for appointing the right personnel to access EUCI”

3. Comments by the Commission

Article 28

Sub-group on physical security

1. The sub-group on physical security as referred to in Article 7(1)~~, point~~ (c), shall have the following roles and responsibilities:

   (a) preparing ~~for~~ **the Coordination Group recommendations for** guidance documents relative to physical security matters~~; (b) defining the~~**, in particular** general security criteria for acquiring equipment such as security containers, shredding machines, door**s,** locks, ~~electronic~~ access control systems **(ACS),** intrusion detection systems **(IDS)** and alarm systems for the physical protection of EUCI;

   ~~(c)~~**(b)** assisting Union ~~institutions and bodies~~ **entities** in determining the appropriate security measures ~~for their sites; (d) proposing compensatory measures~~ for the protection of EUCI **on their sites and compensatory measures** when EUCI is handled **or stored** outside **such sites** ~~the physically protected areas of a Union institution and body.~~

Article 29

Physical protection of EUCI

[…]

3. Each Union ~~institution and body~~ **entity** shall adopt procedures for managing **security** keys and combination settings for ~~offices, rooms~~ **sites**, strong rooms and security containers for level CONFIDENTIEL UE/EU ~~-~~CONFIDENTIAL and for higher levels.

4. The Security Authority **of the Union entity concerned** may authorise entry and exit searches to deter and detect the unauthorised introduction of material or the unauthorised removal of EUCI from sites.

~~5. Union institutions and bodies shall establish the measures for the physical protection of the EUCI in accordance with Annex III.~~

~~**ANNEX III**~~

~~**Measures for the physical protection of European Union classified information ('EUCI')**~~

Article [29a]

~~***Equipment and organisational measures for the physical protection of EUCI***~~

Physically protected areas

1. An Administrative Area **shall** ~~must~~ meet the following requirements:

(a) ~~**have**~~ **the area has** a visibly defined perimeter which allows individuals and, where possible, vehicles to be checked;

(b) ~~**ensure that**~~ windows that ~~**might**~~ **could** allow unauthorised visual access to EUCI within the **physically protected** area are ~~**made**~~ opaque or equipped with blinds, curtains, or other coverings;

(c) unescorted access **to the area** is to be granted only to individuals who are ~~**duly**~~ authorised by the Security Authority of the Union ~~**institution or body**~~ **entity** to access it on a permanent basis~~concerned~~;

(d) ~~all other~~visiting individuals **who are ~~not~~ authorised by the Security Authority of the Union entity concerned to access the area** on an ad hoc basis are escorted at all times or ~~**be**~~ subject to equivalent **measures** ~~**controls**~~.

Commented [redacted]: Individuals who are not authorised by the security authority to access the area simply cannot access the area. Hence, the re-wording of (c) and (d).

[…]

3a. **A ~~Class II~~ Secured Area ~~is a Secured Area~~ ~~in which~~ the entry to which does not ~~constitute~~ imply direct access to EUCI may be designated as a Class II Secured Area, provided that the following additional requirements are met:~~. Such area requires in addition to the requirements defined in paragraph 2:~~**

(c) **the area has an entry control system which admits ~~unescorted~~ access ~~only~~ to those individuals who ~~are~~ have an appropriate~~ly~~ security clearance~~ed~~ and who are specifically authorised to enter the area on a permanent or an ad hoc basis; and**

(d) **an escort or equivalent measures for ~~control mechanism to deal with~~ those individuals who do not have an appropriate security clearance~~meet the criteria described in point (a) of this paragraph~~.**

Commented [redacted]: All other individuals that are referred to in point (b) and for whom an escort is intended fall into two categories:
(1) those who are neither specifically authorised to enter the area on a permanent basis nor have an appropriate security clearance; and
(2) those who are not specifically authorised to enter the area on a permanent basis but have an appropriate security clearance.

As written here, individuals of the second group must be escorted in Class II area. At the same time, they are not escorted in Class I area (Article 29a, para 3(b)). Such approach is inconsistent and weird, given that Class I area is a more sensitive area in terms of access to EUCI.

Hence, the proposal for an adaptation in (a) and (b).

[…]

Article [29b]

Physical ~~protective measures~~ security requirements for handling and storing EUCI

~~8~~**1**. EUCI which is classified RESTREINT UE/EU RESTRICTED ~~must~~ **shall** be handled ~~and stored~~ in any of the following areas:

(a) in a Secured Area; **or**

(b) in an Administrative Area ~~provided the EUCI is protected from access by unauthorised individuals~~ or **in an area with equivalent physical protection**~~:~~**.**

~~(c)~~ ~~**:**~~**In exceptional cases and provided the volume of EUCI is limited, it may temporarily be handled** outside a Secured Area, ~~or~~ **an** Administrative Area **or an area with equivalent physical protection** provided ~~**that the EUCI is limited in volume, the handling of EUCI is limited in time and**~~ the holder has undertaken to comply with compensatory measures decided by the Security Authority of each Union ~~institution and body~~ **entity concerned**.