

Contribution by the Federal Archives of Germany to the EDPB Public Consultation 1/2026 ‘Guidelines 1/2026 on processing of personal data for scientific research purposes’

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The Federal Archives welcome the public consultation version of the Guidelines 1/2026 as they add some much needed clarity on how to apply the General Data Protection Regulation (GDPR) in a research context. To foster such clarity further, the Federal Archives concurs with the statement issued by the State Archives of Belgium (ARA), which has outlined four important aspects regarding the responsibilities and practical realities of public archives.

The Federal Archives therefore requests clarification on the four aspects raised by the ARA.

Of particular importance is the question of whether the guidelines are relevant to “archiving in the public interest.”

The Federal Archives would therefore also appreciate clarification on the following questions:

- a) Are the guidelines relevant at all to the processing of personal data for the purpose of “archiving in the public interest”?
- b) Will there be additional guidelines specifically for “archiving in the public interest”?