CLEARED
For Open Publication
Oct 07, 2026
Department of War
OFFICE OF PREPUBLICATION AND SECURITY REVIEW

OFFICE OF THE UNDER SECRETARY OF WAR
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WASHINGTON, DC 20301-5000

INTELLIGENCE
AND SECURITY

SEP 2 9 2026

MEMORANDUM FOR ASSOCIATE DIRECTOR, INDUSTRIAL SECURITY
DEFENSE COUNTERINTELLIGENCE & SECURITY AGENCY
DOW COMPONENT SPECIAL SECURITY OFFICERS AND
SECURITY DIRECTORS

SUBJECT: Continued Usage of "Black Label" Safes in Certain Circumstances

In 2018, the General Services Administration (GSA) directed the replacement of "black label" security containers (known colloquially as "safes") by 2028. Although the DoW recognizes the significant age of these safes (which were last manufactured in the late 1980s), replacing the thousands of "black label" safes still in use across the DoW with newer "red label" safes will be expensive and, in certain circumstances, unwarranted.

On September 28, 2026, the GSA granted an exception to allow the continued use of "black label" safes by DoW and DoW cleared industry partners in 1) collateral open storage areas constructed in accordance with Section 2001.53 of Title 32, Code of Federal Regulations (CFR); and 2) in sensitive compartmented information facilities and special access program facilities accredited for open storage in accordance with Intelligence Community Directive 705. In these open storage situations the safe serves simply as an administrative control for need-to-know or access separation, not as physical protection for the classified materials they contain.

Each "black label" safe intended for continued use must be inspected by local personnel for safety concerns (e.g., functioning drawer stops) and proper operation. No "black label" safe that remains in use under this exception may be repaired. Any such safe that needs to be neutralized ("drilled") or otherwise requires repair must be replaced with a "red label" safe or other appropriate security equipment, as defined in Part 32, CFR. A routine change in combination is not considered repair.

Entities intending to continue using "black label" safes must implement procedures to ensure such safes used in open storage areas under this exception are not relocated to closed storage areas. This exception does not apply to "black label" safes protecting classified information in closed storage circumstances, which must be replaced as GSA directed in 2018. Nothing in this memorandum restricts a DoW Component or cleared industry partner from replacing a "black label" safe with a "red label" safe.

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cc:
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