

## Questions and answers on the accreditation procedures for manufacturers of euro items and euro secure items

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### INTRODUCTION

This document explains the accreditation procedures for manufacturers of euro secure items and euro items. Its questions and answers are related to practical aspects of the public ECB Decision ECB/2013/54<sup>1</sup>. In case of any discrepancy between the content of this document and Decision ECB/2013/54, the legal act will prevail.

This document is updated regularly and posted on the ECB's website and, for all accredited manufacturers, on the ECB Banknotes Extranet.

### 1. What are the legal instruments on accreditation in place?

Decision ECB/2013/54 defines the general accreditation requirements, the accreditation procedure and the ongoing obligations that manufacturers need to comply with once accredited. There are further non-public decisions which define the substantive requirements. Substantive requirements entail detailed, technical requirements related to security, quality, environmental as well as health and safety aspects. These requirements are shared with manufacturers who have requested accreditation, after they have signed a binding declaration to keep the content confidential and, if applicable, after an initial security inspection has been successfully carried out.

### 2. Which manufacturers require an ECB accreditation?

Manufacturers who wish to perform a **euro items activity** or **euro secure activity** must have been granted an accreditation or provisional accreditation. The accreditation or provisional accreditation is granted in respect of a specific manufacturing site where a manufacturer is allowed to perform the euro items activity or the euro secure activity indicated in its accreditation.

**Euro items activity** and **euro secure activity** are defined in Article 1, paragraphs 1-4, of Decision ECB/2013/54:

- “**euro items activity**” means the production of euro items;
- “**euro items**” means euro banknotes, partly printed euro banknotes and paper, ink, foil and thread used to produce euro banknotes or partly printed euro banknotes;
- “**euro secure activity**” means the origination, production, processing, destruction, storage, internal movement within a manufacturing site or transport of euro secure items;

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<sup>1</sup> Decision ECB/2013/54 of the European Central Bank of 20 December 2013 on the accreditation procedures for manufacturers of euro secure items and euro items and amending Decision ECB/2008/3, OJ L 57, 27.2.2014, p. 29.

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- “euro secure items” include euro banknotes (in circulation, being developed or withdrawn) and other items required in the course of euro banknote production, as enumerated in a confidential list kept by the ECB.

For euro secure items as well as for euro items, except standard inks, the substantive security requirements apply.

### **3. Is the accreditation a prerequisite to participate in procurement for a euro items activity or a euro secure activity?**

The accreditation is a prerequisite to perform a **euro items activity** or **euro secure activity**. If a euro items activity or a euro secure activity is tendered, only those manufacturers who have been granted a provisional accreditation or an accreditation may participate in procurements and enter into contracts.

However, the accreditation does not imply the award of any contract.

### **4. What is the difference between ink manufacturing and ink adjustment?**

Ink is a euro item. Its manufacturing is thus a euro items activity, for which an accreditation is required.

An ECB inspection team would however not consider the following ink adjustment processes as manufacturing and they would therefore not require an accreditation: the addition of components to an ink solely in order to enable its curing according to a pre-defined formulation, to adapt its rheology or its shade or to improve its drying in a proportion below 12% in weight of the original ink produced during the ink manufacturing process.

### **5. Which substantive requirements apply to me as an accredited manufacturer?**

If you produce euro items or euro secure items, you must comply with all relevant substantive requirements to be allowed to perform a euro secure activity and/or euro items activity. The requirements comprise security, quality, environmental, and health and safety aspects. Upon receiving your written request for provisional accreditation together with the required documentation (see sections 1, 7 and 8), the ECB will be in a position to inform you of all applicable substantive requirements in your case. While all manufacturers of euro items are required to adhere to certain quality, environmental and health and safety as well as general security requirements, the manufacturers of euro secure items included on the list maintained by the ECB are required to comply with specific security requirements.

### **6. What is the difference between provisional accreditation and accreditation?**

This terminology is used to differentiate between active manufacturers, non-active manufacturers and new manufacturers. All these manufacturers are accredited and are listed in the ECB accreditation register. These manufacturers are bound by the continuing obligations specified in the relevant Decisions and can participate in tenders for a relevant euro items activity or euro secure activity.

New manufacturers applying for accreditation will always first receive a provisional accreditation, which may be subsequently converted to an accreditation after passing relevant inspections during the actual production

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of euro items or euro secure items according to Article 6 and 7 of Decision ECB/2013/54, as amended. The accreditation of manufacturers who have not produced for 36 months may be converted to a provisional accreditation. To enable the ECB to convert an accreditation into a provisional accreditation, accredited manufacturers are obliged to inform the ECB of any period of non-production lasting 34 months.

If you have a provisional accreditation and receive an official order to produce euro items, please inform the ECB so that the relevant onsite inspections can be planned.

### **7. How do I apply for accreditation if I do not have any type of accreditation?**

Requests to initiate the provisional accreditation procedure (initiation request) have to be made in writing to the ECB according to Article 4 of Decision ECB/2013/54. The request must include: (i) the euro secure activity and the euro secure item(s) and/or euro items activity and the euro items for which accreditation is sought, and (ii) the exact name and address of the manufacturing site where the relevant activity will be carried out, since accreditations are granted with regard to a specific manufacturing site and a specific euro items activity or euro secure activity.

The application must also include a declaration that you will comply with all applicable provisions of Decision ECB/2013/54, as amended, and will keep the substantive requirements (relating to security, quality, environmental and health and safety aspects) confidential. For manufacturers of euro items, i.e. euro banknotes, partly printed euro banknotes and paper, ink, foil and thread, copies of valid ISO 9001, ISO 14001 and OHSAS 18001/ISO 45001 certificates must be enclosed with the application. ISO 45001 will be available in due course, while OHSAS 18001 will be valid for a final period of three years (status: October 2016). By the end of this period, manufacturers with certificate OHSAS 18001 will need to switch to ISO 45001.

The ECB's Directorate Banknotes can help to guide you through this process. If you need help in this respect, please write to [QEHS.accreditation@ecb.europa.eu](mailto:QEHS.accreditation@ecb.europa.eu).

### **8. What is the actual accreditation process?**

The ECB will first assess the initiation request for accreditation against all formal aspects listed in section 7 above and indicated in Article 4 of Decision ECB/2013/54, as amended. Once all formal aspects have been met, the ECB will provide the requesting manufacturer with documentation for the relevant substantive requirements (relating to security, quality, environmental, and health and safety aspects) as part of the accreditation requirements as well as documentation in which the requesting manufacturer shall indicate to the ECB how its arrangements would comply with the substantive requirements.

The ECB will carry out on-site and off-site inspections (see Section 10) to assess the manufacturer's compliance with the relevant substantive requirements. Health and safety and environmental compliance will be assessed off-site, based on the documentation provided by the manufacturer. This will allow the ECB to assess whether the procedures and infrastructure at the manufacturing site meet the relevant requirements. On-site inspections are carried out to assess compliance with the security and quality requirements at the manufacturing site.

If the overall assessment is positive, the manufacturer will be granted a provisional accreditation which can be converted into an accreditation, as explained in section 6.

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### **9. Is there a centralised contact point for accreditation matters?**

Yes, any queries or documents relating to accreditation can be sent to [QEHS.accreditation@ecb.europa.eu](mailto:QEHS.accreditation@ecb.europa.eu). This address can also be used for contacting ECB experts responsible for specific issues.

### **10. How does the ECB assess compliance with the relevant requirements?**

It assesses compliance by conducting on-site and off-site inspections.

Off-site inspections mainly relate to documents submitted by the manufacturer as required by Decision ECB/2013/54, as amended, or to the substantive requirements for assessing the manufacturer's compliance.

Examples of such documents are, in particular, the relevant ISO or OHSAS certificates, pre-inspection questionnaires, individual quality plans, annual reports in English on the performance of the environment and health and safety management systems, and the ECB environmental questionnaire.

On-site inspections are carried out to assess compliance with the security and quality requirements at the manufacturing site. As these disciplines are managed by different teams within the Eurosystem, two separate types of inspection are carried out, one for security and one for quality.

### **11. How are the on-site inspections planned and organised, and how often will I be subject to such an inspection?**

Each accredited manufacturer is inspected at least once every three years (the minimum requirement). For most manufacturers inspections are carried out every year or every second year, as defined by the Eurosystem.

Inspections can be either announced or unannounced. The inspections following an initiation request for a provisional accreditation will of course be announced, for practical reasons. The same is true for regular quality inspections. Security inspections, in particular, are in general unannounced.

Inspections are carried out by joint ECB/national central bank inspection teams, typically consisting of between two and four inspectors. To prepare for the inspection you will need to complete questionnaires defined by the ECB. These questionnaires should be completed with as much detail as possible.

### **12. Do I need to be in production at the time of the on-site quality inspection?**

For manufacturers with accreditation, or manufacturers who have provisional accreditation and receive an official order, the on-site quality inspection should be carried out during actual production of euro items or euro secure items. Please liaise directly with the inspection team and provide as much information as possible on which production steps will be running each week, in order to optimise the timing of the quality inspection. Ideally, as many production steps as possible should be running during the inspection.

For on-site security inspections, which may be conducted without prior announcement, manufacturers are regularly requested to submit euro production schedules to the ECB.

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### **13. What happens if the inspection team identifies a (potential) non-compliance with the ECB requirements?**

Before leaving the site the inspection team will provide an oral summary of the inspection, including the identification of potential instances of non-compliance. You will then receive a Findings Letter documenting the non-compliance(s) according to Article 10 of Decision ECB/2013/54, as amended. You will then have 15 working days to provide a written reply (if any) to the identified non-compliance(s). You should provide as much information as possible in the reply, including specific details and timeframes for remedying the non-compliance(s), including any relevant evidence, such as updated procedures. The inspection report will then be drafted and will include the feedback you provided as well as a conclusion indicating whether the proposed remedial action is to the satisfaction of the inspection team. The remedial action may be verified through the submission of documented evidence, or during the next scheduled inspection or an additional on-site inspection.

### **14. When does the ECB provisional accreditation become effective?**

After completion of the assessment process, you will receive a letter from the ECB granting you a provisional accreditation. This letter will also indicate the scope and date of applicability of the accreditation.

### **15. When will I receive access rights to the ECB Banknotes Extranet?**

Once you have received your provisional accreditation, you have to request access rights to the ECB Banknotes Extranet for up to three persons per section (environment, health and safety, and quality). The ECB will assess the requests before granting the access rights. Security-related documents are not available on the ECB Banknotes Extranet and will be securely provided to the designated persons at the accredited site.

### **16. How do I withdraw my accreditation?**

If you want to withdraw your accreditation, the ECB needs to formally revoke it. As long as you are still accredited, you are required to comply with the continuing obligations for accredited manufacturers. A manufacturer holding an ECB accreditation who no longer wishes to be subject to these obligations should send a letter to the ECB, indicating the specific manufacturing site concerned. The ECB will assess the request and contact you to explain any further steps required.

### **17. When does the withdrawal of my accreditation become effective?**

The process to revoke accreditation may take some time, as some activities related to euro items and euro secure items held on the accredited site may have to be clarified. In most cases you should provide a list of euro secure items in your possession to the ECB and the ECB will instruct you to destroy the items or transfer them to another accredited site or a national central bank. Destruction certificates, transfer documentation and/or on-site verification visits will be required. When the process has been completed you will receive a letter indicating the date of applicability of the accreditation withdrawal.

### **18. What should I do if there is a change to my certificates, e.g. expiry or renewal?**

You are obliged to inform the ECB if certificates (ISO 9001, ISO 14001, OHSAS 18001/ISO 45001) are changed, according to Article 12 of Decision ECB/2013/54, as amended. ISO 45001 will be available in due course, while OHSAS 18001 will be valid for a final period of three years (status: October 2016). By the end

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of this period, manufacturers with certificate OHSAS 18001 will need to switch to ISO 45001. If the certificate has expired and the certification authority sends you a new certificate, please send an electronic copy, preferably a pdf version, to [QEHS.accreditation@ecb.europa.eu](mailto:QEHS.accreditation@ecb.europa.eu). Failure to do so will be treated as non-compliance.

### **19. Does my accreditation expire? Do I need to contact the ECB to ensure that my accreditation remains valid?**

Granted ECB accreditations do not “expire”, i.e. they remain valid until there is a need to take a suspension or revocation decision. There is no need to contact the ECB to ensure that your accreditation remains valid.