

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 ECB Decision ECB/2020/24¹. In case of any discrepancy between the content of this document and Decision ECB/2020/24, 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/2020/24 defines the general accreditation requirements, the requirements for the ethical conduct of business, 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 item activity** or **euro secure item activity** must have been granted an ECB accreditation. The accreditation is granted for a specific manufacturing site where a manufacturer is allowed to perform the euro item activity or the euro secure item activity indicated in its accreditation.

Euro item activities and **euro secure item activities** are defined in Article 1(3-7) of Decision ECB/2020/24.

For euro secure items, the substantive security requirements apply.

3. Is accreditation a prerequisite for participation in procurement for a euro item activity or a euro secure item activity?

Accreditation is a prerequisite for the performance of a **euro item activity** or **euro secure item activity**. If a euro item activity or a euro secure item activity is tendered, only those manufacturers who have been granted an accreditation may participate in procurements and enter into contracts.

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

¹ Decision (EU) 2020/637 of the European Central Bank of 27 April 2020 on accreditation procedures for manufacturers of euro secure items and euro items (ECB/2020/24), OJ L 149/12, 12.5.2020.

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4. 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 item activity and/or a euro item activity. The requirements comprise security, quality, environmental, and health and safety aspects. Upon receiving your written request for accreditation together with the required documentation, 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 ethical and 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.

5. How do I apply for accreditation if I do not have any type of accreditation?

Requests to initiate the provisional accreditation procedure (initiation request) must be made in writing to the ECB according to Article 5 of Decision ECB/2020/24. The request must include all items listed in paragraph 2 of Article 5. The ECB's Directorate Banknotes can help to guide you through this process. To avail of this, please write to QEHS.accreditation@ecb.europa.eu.

6. What is the actual accreditation process?

The ECB will first assess the initiation request for accreditation against all formal aspects listed in Article 5 of Decision ECB/2020/24. 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/or off-site inspections 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 accreditation.

7. 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. This address can also be used for contacting ECB experts responsible for specific issues.

8. How does the ECB assess compliance with the relevant requirements?

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

Off-site inspections mainly relate to documents submitted by the manufacturer as required by Decision ECB/2020/24 or to the substantive requirements for assessing the manufacturer's compliance.

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Examples of such documents are the relevant ISO certificates, independent auditor's declaration on the compliance with the ethical requirements, 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. Where on-site inspections are not possible, for example in times where travel is restricted due to viral pandemics, the ECB will conduct off-site inspections instead. The off-site inspections are conducted by video conference and exchange of documents via a secure platform.

9. 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 according to a priority list, as defined by the Eurosystem. Typically, manufacturers that are conducting a euro secure item activity will receive a security inspection once per year, and manufacturers producing a euro item will receive a quality inspection every two years.

Inspections can be either announced or unannounced. The inspections following a request for accreditation will of course be announced, for practical reasons. The same is true for regular quality inspections and off-site security inspections. Regular security inspections, which are conducted on-site, are normally unannounced.

Inspections are carried out by joint ECB/Eurosystem 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.

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

For manufacturers with accreditation, 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.

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

At the end of an inspection, 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 preliminary inspection report documenting the non-compliance(s) according to Article 13 of Decision ECB/2020/24. From this point 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 updated with your feedback as well as a conclusion indicating whether the

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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.

12. When does the ECB accreditation become effective?

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

13. When will I receive access rights to the ECB Banknotes Extranet?

Once you have received your 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.

14. 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.

15. 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.

16. 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, ISO 45001) are changed, according to Article 9 of Decision ECB/2020/24. 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. Failure to do so will be treated as non-compliance.

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

Once granted, ECB accreditations do not “expire”, i.e. they remain valid until there is a revocation decision as laid down in Article 18 of Decision ECB/2020/24. There is no need to contact the ECB to ensure that your accreditation remains valid.