

CRA DEEP DIVE: REQUIREMENTS AND DOMAINS

Cyber Resilience Act (EU) 2024/2847 · Application: 11 June 2026 notified bodies · 11 September 2026 reporting obligations · 11 December 2027 all other obligations · As of September 2026

Requirements: condensed interpretations in actionable form, not original legal text, not legal advice · Role: who the requirement applies to · (optional): option

Manage Regulatory Compliance			Develop and Manage Products and Services			Manage Supply Chain			Manage IT and Resilience			Manage External Relationships																																																																																																																																																																																																																																																																																																								
Domain 01 Product Compliance <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td colspan="3">Scope & Classification</td></tr><tr><td>01-01</td><td>Determine for each product whether it falls within the scope of the CRA (Art. 2)</td><td>All economic operators</td></tr><tr><td>01-02</td><td>Determine the role as economic operator per product (Art. 3)</td><td>All economic operators</td></tr><tr><td>01-03</td><td>Classify products as default, important or critical and review the classification when the Commission amends the lists of important and critical products (Art. 7 & 8, Impl. Reg. 2025/2392)</td><td>Manufacturers</td></tr><tr><td>01-04</td><td>Assess changes to products for substantiality; anyone who substantially modifies a product or sells it under their own brand assumes the manufacturer's obligations (Art. 21 & 22)</td><td>All economic operators</td></tr><tr><td>01-05</td><td>Observe the dates of application and the rules for legacy products (Art. 69 & 71)</td><td>All economic operators</td></tr><tr><td colspan="3">Conformity Assessment & CE Marking</td></tr><tr><td>01-06</td><td>Select the conformity assessment procedure according to the product class and carry it out before placing on the market (Art. 13 & 32, Annex VIII Part I)</td><td>Manufacturers</td></tr><tr><td>01-07</td><td>Where a designated conformity assessment body (notified body) is involved: apply for its assessment, report changes and enable its surveillance (Art. 31, Annex VIII Part II & IV)</td><td>Manufacturers</td></tr><tr><td>01-08</td><td>After a positive assessment, draw up the EU declaration of conformity and affix the CE marking (Art. 13 & 28–30, Annex V & VI)</td><td>Manufacturers</td></tr><tr><td>01-09</td><td>Label products unambiguously and indicate contact details (Art. 13 & 19)</td><td>Manufacturers Importers</td></tr><tr><td>01-10</td><td>Be able to identify suppliers and customers for ten years (Art. 23)</td><td>All economic operators</td></tr><tr><td>01-11</td><td>(optional) Use harmonised standards, common specifications or EU certification for the presumption of conformity and monitor their changes (Art. 27)</td><td>Manufacturers</td></tr><tr><td>01-12</td><td>(optional) Freely choose the notified body, appeal against its decisions and use reduced fees for SMEs (Art. 32 & 48, Annex VIII Part II)</td><td>Manufacturers</td></tr><tr><td>01-13</td><td>(optional) Rely on certificates under other Union law during the transition (Art. 69)</td><td>Manufacturers</td></tr><tr><td colspan="3">General Obligations</td></tr><tr><td>01-14</td><td>Make available only products that meet the essential cybersecurity requirements (Art. 6)</td><td>All economic operators</td></tr><tr><td>01-15</td><td>Consider interfaces with the AI Act, the General Product Safety Regulation and other harmonisation legislation (Art. 11 & 12)</td><td>Manufacturers</td></tr><tr><td>01-16</td><td>Set out delegation to an authorised representative in a written mandate and fulfil non-delegable obligations oneself (Art. 18, Annex VIII Part I)</td><td>Manufacturers Authorised representatives</td></tr><tr><td>01-17</td><td>Treat information obtained in cooperation under the CRA, such as trade secrets or source code, as confidential (Art. 63)</td><td>All economic operators</td></tr><tr><td>01-18</td><td>When supplying public procurers, keep evidence on Annex I available, as procurement procedures take it into account (Art. 5)</td><td>All economic operators</td></tr><tr><td>01-19</td><td>(optional) Use pre-market facilitations: trade fairs with a visible non-conformity notice, time-limited test versions, regulatory sandboxes (Art. 4 & 33)</td><td>Manufacturers</td></tr></table>			#	CRA requirement	Role	Scope & Classification			01-01	Determine for each product whether it falls within the scope of the CRA (Art. 2)	All economic operators	01-02	Determine the role as economic operator per product (Art. 3)	All economic operators	01-03	Classify products as default, important or critical and review the classification when the Commission amends the lists of important and critical products (Art. 7 & 8, Impl. Reg. 2025/2392)	Manufacturers	01-04	Assess changes to products for substantiality; anyone who substantially modifies a product or sells it under their own brand assumes the manufacturer's obligations (Art. 21 & 22)	All economic operators	01-05	Observe the dates of application and the rules for legacy products (Art. 69 & 71)	All economic operators	Conformity Assessment & CE Marking			01-06	Select the conformity assessment procedure according to the product class and carry it out before placing on the market (Art. 13 & 32, Annex VIII Part I)	Manufacturers	01-07	Where a designated conformity assessment body (notified body) is involved: apply for its assessment, report changes and enable its surveillance (Art. 31, Annex VIII Part II & IV)	Manufacturers	01-08	After a positive assessment, draw up the EU declaration of conformity and affix the CE marking (Art. 13 & 28–30, Annex V & VI)	Manufacturers	01-09	Label products unambiguously and indicate contact details (Art. 13 & 19)	Manufacturers Importers	01-10	Be able to identify suppliers and customers for ten years (Art. 23)	All economic operators	01-11	(optional) Use harmonised standards, common specifications or EU certification for the presumption of conformity and monitor their changes (Art. 27)	Manufacturers	01-12	(optional) Freely choose the notified body, appeal against its decisions and use reduced fees for SMEs (Art. 32 & 48, Annex VIII Part II)	Manufacturers	01-13	(optional) Rely on certificates under other Union law during the transition (Art. 69)	Manufacturers	General Obligations			01-14	Make available only products that meet the essential cybersecurity requirements (Art. 6)	All economic operators	01-15	Consider interfaces with the AI Act, the General Product Safety Regulation and other harmonisation legislation (Art. 11 & 12)	Manufacturers	01-16	Set out delegation to an authorised representative in a written mandate and fulfil non-delegable obligations oneself (Art. 18, Annex VIII Part I)	Manufacturers Authorised representatives	01-17	Treat information obtained in cooperation under the CRA, such as trade secrets or source code, as confidential (Art. 63)	All economic operators	01-18	When supplying public procurers, keep evidence on Annex I available, as procurement procedures take it into account (Art. 5)	All economic operators	01-19	(optional) Use pre-market facilitations: trade fairs with a visible non-conformity notice, time-limited test versions, regulatory sandboxes (Art. 4 & 33)	Manufacturers	Domain 02 Regulatory Reporting <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>02-01</td><td>Register on ENISA's reporting platform, determine the competent CSIRT and assign responsibility for notifications (Art. 14 & 16)</td><td>Manufacturers</td></tr><tr><td>02-02</td><td>Report actively exploited vulnerabilities within 24 hours, 72 hours and 14 days after a fix (Art. 14 & 24)</td><td>Manufacturers Open-source software stewards</td></tr><tr><td>02-03</td><td>Report severe incidents within 24 and 72 hours and submit a final report one month after the incident notification (Art. 14 & 24)</td><td>Manufacturers Open-source software stewards</td></tr><tr><td>02-04</td><td>Submit intermediate reports and inform the public upon request of the CSIRT (Art. 14 & 17)</td><td>Manufacturers</td></tr><tr><td>02-05</td><td>Fulfil reporting obligations for legacy products as well, from 11 September 2026 (Art. 69 & 71)</td><td>Manufacturers</td></tr><tr><td>02-06</td><td>(optional) Request a delay in the dissemination of a notification (Art. 16)</td><td>Manufacturers</td></tr><tr><td>02-07</td><td>(optional) Voluntarily report vulnerabilities, cyber threats and near misses (Art. 15)</td><td>Manufacturers</td></tr><tr><td>02-08</td><td>(optional) Use the CSIRT helpdesk on reporting obligations (Art. 17)</td><td>Manufacturers</td></tr></table>			#	CRA requirement	Role	02-01	Register on ENISA's reporting platform, determine the competent CSIRT and assign responsibility for notifications (Art. 14 & 16)	Manufacturers	02-02	Report actively exploited vulnerabilities within 24 hours, 72 hours and 14 days after a fix (Art. 14 & 24)	Manufacturers Open-source software stewards	02-03	Report severe incidents within 24 and 72 hours and submit a final report one month after the incident notification (Art. 14 & 24)	Manufacturers Open-source software stewards	02-04	Submit intermediate reports and inform the public upon request of the CSIRT (Art. 14 & 17)	Manufacturers	02-05	Fulfil reporting obligations for legacy products as well, from 11 September 2026 (Art. 69 & 71)	Manufacturers	02-06	(optional) Request a delay in the dissemination of a notification (Art. 16)	Manufacturers	02-07	(optional) Voluntarily report vulnerabilities, cyber threats and near misses (Art. 15)	Manufacturers	02-08	(optional) Use the CSIRT helpdesk on reporting obligations (Art. 17)	Manufacturers	Domain 03 Product Development & Test Management <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>03-01</td><td>Design, develop and produce products in accordance with the essential cybersecurity requirements (Art. 13)</td><td>Manufacturers</td></tr><tr><td>03-02</td><td>Test product security regularly before placing on the market and during the support period (Annex I Part II)</td><td>Manufacturers</td></tr></table> Domain 04 Quality Management <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>04-01</td><td>Ensure that every unit produced and every version delivered remains compliant, including after changes to the product, production or applied standards (series production) (Art. 13)</td><td>Manufacturers</td></tr><tr><td>04-02</td><td>(optional) Demonstrate conformity through a quality system covering design, development, testing and vulnerability handling that a notified body approves and monitors (full quality assurance) (Annex VIII Part IV)</td><td>Manufacturers</td></tr></table> Domain 05 Product Documentation <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>05-01</td><td>Draw up technical documentation including the risk assessment that demonstrates conformity before placing on the market (Art. 13 & 31, Annex VII)</td><td>Manufacturers</td></tr><tr><td>05-02</td><td>Keep the technical documentation up to date during the support period and retain it for at least ten years (Art. 13 & 31)</td><td>Manufacturers</td></tr><tr><td>05-03</td><td>Accompany products with clear user information and instructions and keep them available for at least ten years or the support period, if longer (Art. 13, Annex II)</td><td>Manufacturers</td></tr><tr><td>05-04</td><td>(optional) Use the simplified technical documentation format for micro and small enterprises (Art. 33)</td><td>Manufacturers</td></tr></table> Domain 06 Product Lifecycle Management <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>06-01</td><td>Determine the support period per product based on the expected use time, as a rule at least five years, and communicate it to users at purchase and upon expiry (Art. 13)</td><td>Manufacturers</td></tr><tr><td>06-02</td><td>(optional) Limit vulnerability handling to the latest version if users receive it free of charge and without additional costs, and provide earlier versions only with a risk notice (Art. 13)</td><td>Manufacturers</td></tr></table>			#	CRA requirement	Role	03-01	Design, develop and produce products in accordance with the essential cybersecurity requirements (Art. 13)	Manufacturers	03-02	Test product security regularly before placing on the market and during the support period (Annex I Part II)	Manufacturers	#	CRA requirement	Role	04-01	Ensure that every unit produced and every version delivered remains compliant, including after changes to the product, production or applied standards (series production) (Art. 13)	Manufacturers	04-02	(optional) Demonstrate conformity through a quality system covering design, development, testing and vulnerability handling that a notified body approves and monitors (full quality assurance) (Annex VIII Part IV)	Manufacturers	#	CRA requirement	Role	05-01	Draw up technical documentation including the risk assessment that demonstrates conformity before placing on the market (Art. 13 & 31, Annex VII)	Manufacturers	05-02	Keep the technical documentation up to date during the support period and retain it for at least ten years (Art. 13 & 31)	Manufacturers	05-03	Accompany products with clear user information and instructions and keep them available for at least ten years or the support period, if longer (Art. 13, Annex II)	Manufacturers	05-04	(optional) Use the simplified technical documentation format for micro and small enterprises (Art. 33)	Manufacturers	#	CRA requirement	Role	06-01	Determine the support period per product based on the expected use time, as a rule at least five years, and communicate it to users at purchase and upon expiry (Art. 13)	Manufacturers	06-02	(optional) Limit vulnerability handling to the latest version if users receive it free of charge and without additional costs, and provide earlier versions only with a risk notice (Art. 13)	Manufacturers	Domain 07 Third-Party Component Management <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>07-01</td><td>Exercise due diligence when integrating third-party components, including open-source software (Art. 13)</td><td>Manufacturers</td></tr><tr><td>07-02</td><td>Document components in a machine-readable software bill of materials (SBOM) (Annex I Part II)</td><td>Manufacturers</td></tr><tr><td>07-03</td><td>(optional) Use voluntary security attestations of open-source components (Art. 25)</td><td>Manufacturers</td></tr></table> Domain 08 Supplier Management <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>08-01</td><td>Verify before making available that manufacturer and importer have met their obligations (Art. 19 & 20)</td><td>Importers Distributors</td></tr><tr><td>08-02</td><td>Withhold non-compliant products and inform the manufacturer and authorities in case of significant risk; importers also report non-technical risk factors (Art. 19 & 20)</td><td>Importers Distributors</td></tr><tr><td>08-03</td><td>Report vulnerabilities to the manufacturer and, in case of significant risk, to market surveillance (Art. 19 & 20)</td><td>Importers Distributors</td></tr></table>			#	CRA requirement	Role	07-01	Exercise due diligence when integrating third-party components, including open-source software (Art. 13)	Manufacturers	07-02	Document components in a machine-readable software bill of materials (SBOM) (Annex I Part II)	Manufacturers	07-03	(optional) Use voluntary security attestations of open-source components (Art. 25)	Manufacturers	#	CRA requirement	Role	08-01	Verify before making available that manufacturer and importer have met their obligations (Art. 19 & 20)	Importers Distributors	08-02	Withhold non-compliant products and inform the manufacturer and authorities in case of significant risk; importers also report non-technical risk factors (Art. 19 & 20)	Importers Distributors	08-03	Report vulnerabilities to the manufacturer and, in case of significant risk, to market surveillance (Art. 19 & 20)	Importers Distributors	Domain 09 Cyber Risk Management <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>09-01</td><td>Assess the cybersecurity risks of each product and take them into account throughout the product life cycle (Art. 13)</td><td>Manufacturers</td></tr><tr><td>09-02</td><td>Document the risk assessment and keep it up to date during the support period (Art. 13)</td><td>Manufacturers</td></tr><tr><td>09-03</td><td>(optional) Embed the risk assessment for high-risk AI systems into the AI Act risk management (Art. 13)</td><td>Manufacturers</td></tr></table> Domain 10 Information Security Management <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>10-01</td><td>Make products available with a secure-by-default configuration and a reset to the original state (Annex I Part I)</td><td>Manufacturers</td></tr><tr><td>10-02</td><td>Protect the integrity of data, commands, programs and configuration within the product (Annex I Part I)</td><td>Manufacturers</td></tr><tr><td>10-03</td><td>Have the product process only the data necessary for its intended purpose (Annex I Part I)</td><td>Manufacturers</td></tr><tr><td>10-04</td><td>Limit the product's attack surface, including external interfaces (Annex I Part I)</td><td>Manufacturers</td></tr></table> Domain 11 Identity & Access Management <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>11-01</td><td>Protect products from unauthorised access through authentication and identity or access management (Annex I Part I)</td><td>Manufacturers</td></tr><tr><td>11-02</td><td>Have the product detect and report possible unauthorised access (Annex I Part I)</td><td>Manufacturers</td></tr></table> Domain 12 Cryptography & Data Deletion <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>12-01</td><td>Protect the confidentiality of data stored, transmitted and processed by the product, e.g. by encryption (Annex I Part I)</td><td>Manufacturers</td></tr><tr><td>12-02</td><td>Enable users to securely and permanently remove all data and settings from the product (Annex I Part I)</td><td>Manufacturers</td></tr><tr><td>12-03</td><td>Ensure the secure transfer of data from the product to other products or systems (Annex I Part I)</td><td>Manufacturers</td></tr></table>			#	CRA requirement	Role	09-01	Assess the cybersecurity risks of each product and take them into account throughout the product life cycle (Art. 13)	Manufacturers	09-02	Document the risk assessment and keep it up to date during the support period (Art. 13)	Manufacturers	09-03	(optional) Embed the risk assessment for high-risk AI systems into the AI Act risk management (Art. 13)	Manufacturers	#	CRA requirement	Role	10-01	Make products available with a secure-by-default configuration and a reset to the original state (Annex I Part I)	Manufacturers	10-02	Protect the integrity of data, commands, programs and configuration within the product (Annex I Part I)	Manufacturers	10-03	Have the product process only the data necessary for its intended purpose (Annex I Part I)	Manufacturers	10-04	Limit the product's attack surface, including external interfaces (Annex I Part I)	Manufacturers	#	CRA requirement	Role	11-01	Protect products from unauthorised access through authentication and identity or access management (Annex I Part I)	Manufacturers	11-02	Have the product detect and report possible unauthorised access (Annex I Part I)	Manufacturers	#	CRA requirement	Role	12-01	Protect the confidentiality of data stored, transmitted and processed by the product, e.g. by encryption (Annex I Part I)	Manufacturers	12-02	Enable users to securely and permanently remove all data and settings from the product (Annex I Part I)	Manufacturers	12-03	Ensure the secure transfer of data from the product to other products or systems (Annex I Part I)	Manufacturers	Domain 13 Capacity & Performance Management <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>13-01</td><td>Protect the availability of the product's essential functions, including against denial-of-service attacks (Annex I Part I)</td><td>Manufacturers</td></tr><tr><td>13-02</td><td>Minimise the product's impact on the availability of other devices and networks (Annex I Part I)</td><td>Manufacturers</td></tr></table> Domain 14 Vulnerability & Patch Management <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>14-01</td><td>Have policies and procedures for vulnerability handling (Art. 13 & 24)</td><td>Manufacturers Open-source software stewards</td></tr><tr><td>14-02</td><td>Have a coordinated vulnerability disclosure policy with a contact address for reports and a single point of contact for users (Art. 13, Annex I Part II)</td><td>Manufacturers</td></tr><tr><td>14-03</td><td>Make products available without known exploitable vulnerabilities (Annex I Part I)</td><td>Manufacturers</td></tr><tr><td>14-04</td><td>Systematically identify and document vulnerabilities (Art. 13)</td><td>Manufacturers</td></tr><tr><td>14-05</td><td>Remediate vulnerabilities without delay and in relation to the risks (Annex I Part II)</td><td>Manufacturers</td></tr><tr><td>14-06</td><td>Report vulnerabilities in integrated components to their maintainer and share own fixes (Art. 13)</td><td>Manufacturers</td></tr><tr><td>14-07</td><td>Ensure that vulnerabilities can be addressed through security updates, automatically where appropriate (Annex I Part I)</td><td>Manufacturers</td></tr><tr><td>14-08</td><td>Distribute security updates separately from functionality updates, securely, without delay and free of charge, and keep them available for at least ten years or the support period, if longer (Art. 13, Annex I Part II)</td><td>Manufacturers</td></tr><tr><td>14-09</td><td>Publicly disclose information about fixed vulnerabilities (Annex I Part II)</td><td>Manufacturers</td></tr></table> Domain 15 Incident Management <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>15-01</td><td>Have a process to detect, assess and classify incidents and actively exploited vulnerabilities (Art. 14)</td><td>Manufacturers</td></tr><tr><td>15-02</td><td>Record and monitor security-relevant activity in the product (Annex I Part I)</td><td>Manufacturers</td></tr><tr><td>15-03</td><td>Reduce the impact of incidents through exploitation mitigation mechanisms (Annex I Part I)</td><td>Manufacturers</td></tr><tr><td>15-04</td><td>Determine the root cause of severe incidents and manage remediation (Art. 14)</td><td>Manufacturers</td></tr><tr><td>15-05</td><td>Inform impacted users about actively exploited vulnerabilities and severe incidents (Art. 14)</td><td>Manufacturers Open-source software stewards</td></tr></table>			#	CRA requirement	Role	13-01	Protect the availability of the product's essential functions, including against denial-of-service attacks (Annex I Part I)	Manufacturers	13-02	Minimise the product's impact on the availability of other devices and networks (Annex I Part I)	Manufacturers	#	CRA requirement	Role	14-01	Have policies and procedures for vulnerability handling (Art. 13 & 24)	Manufacturers Open-source software stewards	14-02	Have a coordinated vulnerability disclosure policy with a contact address for reports and a single point of contact for users (Art. 13, Annex I Part II)	Manufacturers	14-03	Make products available without known exploitable vulnerabilities (Annex I Part I)	Manufacturers	14-04	Systematically identify and document vulnerabilities (Art. 13)	Manufacturers	14-05	Remediate vulnerabilities without delay and in relation to the risks (Annex I Part II)	Manufacturers	14-06	Report vulnerabilities in integrated components to their maintainer and share own fixes (Art. 13)	Manufacturers	14-07	Ensure that vulnerabilities can be addressed through security updates, automatically where appropriate (Annex I Part I)	Manufacturers	14-08	Distribute security updates separately from functionality updates, securely, without delay and free of charge, and keep them available for at least ten years or the support period, if longer (Art. 13, Annex I Part II)	Manufacturers	14-09	Publicly disclose information about fixed vulnerabilities (Annex I Part II)	Manufacturers	#	CRA requirement	Role	15-01	Have a process to detect, assess and classify incidents and actively exploited vulnerabilities (Art. 14)	Manufacturers	15-02	Record and monitor security-relevant activity in the product (Annex I Part I)	Manufacturers	15-03	Reduce the impact of incidents through exploitation mitigation mechanisms (Annex I Part I)	Manufacturers	15-04	Determine the root cause of severe incidents and manage remediation (Art. 14)	Manufacturers	15-05	Inform impacted users about actively exploited vulnerabilities and severe incidents (Art. 14)	Manufacturers Open-source software stewards	Domain 16 Government & Stakeholder Relations <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>16-01</td><td>Provide correct and complete evidence and documents to authorities on request and cooperate with them (Art. 13, 19, 20, 24, 52, 53, 56, 57 & 64)</td><td>All economic operators</td></tr><tr><td>16-02</td><td>Inform authorities and users about the manufacturer ceasing operations (Art. 13, 19 & 20)</td><td>Manufacturers Importers Distributors</td></tr><tr><td>16-03</td><td>(optional) Submit statements when the European Commission decides on measures against one's own product, such as an EU-wide sales ban or recall (Art. 55–57)</td><td>All economic operators</td></tr></table> Domain 17 Product Recall Management <table><tr><th>#</th><th>CRA requirement</th><th>Role</th></tr><tr><td>17-01</td><td>Take corrective action without delay in case of non-conformity, up to withdrawal and recall (Art. 13, 19, 20 & 52)</td><td>Manufacturers Importers Distributors Open-source software stewards</td></tr><tr><td>17-02</td><td>Implement measures required by authorities or the Commission Union-wide and on time (Art. 54 & 56–58)</td><td>All economic operators</td></tr></table>			#	CRA requirement	Role	16-01	Provide correct and complete evidence and documents to authorities on request and cooperate with them (Art. 13, 19, 20, 24, 52, 53, 56, 57 & 64)	All economic operators	16-02	Inform authorities and users about the manufacturer ceasing operations (Art. 13, 19 & 20)	Manufacturers Importers Distributors	16-03	(optional) Submit statements when the European Commission decides on measures against one's own product, such as an EU-wide sales ban or recall (Art. 55–57)	All economic operators	#	CRA requirement	Role	17-01	Take corrective action without delay in case of non-conformity, up to withdrawal and recall (Art. 13, 19, 20 & 52)	Manufacturers Importers Distributors Open-source software stewards	17-02	Implement measures required by authorities or the Commission Union-wide and on time (Art. 54 & 56–58)	All economic operators
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
Scope & Classification																																																																																																																																																																																																																																																																																																																				
01-01	Determine for each product whether it falls within the scope of the CRA (Art. 2)	All economic operators																																																																																																																																																																																																																																																																																																																		
01-02	Determine the role as economic operator per product (Art. 3)	All economic operators																																																																																																																																																																																																																																																																																																																		
01-03	Classify products as default, important or critical and review the classification when the Commission amends the lists of important and critical products (Art. 7 & 8, Impl. Reg. 2025/2392)	Manufacturers																																																																																																																																																																																																																																																																																																																		
01-04	Assess changes to products for substantiality; anyone who substantially modifies a product or sells it under their own brand assumes the manufacturer's obligations (Art. 21 & 22)	All economic operators																																																																																																																																																																																																																																																																																																																		
01-05	Observe the dates of application and the rules for legacy products (Art. 69 & 71)	All economic operators																																																																																																																																																																																																																																																																																																																		
Conformity Assessment & CE Marking																																																																																																																																																																																																																																																																																																																				
01-06	Select the conformity assessment procedure according to the product class and carry it out before placing on the market (Art. 13 & 32, Annex VIII Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
01-07	Where a designated conformity assessment body (notified body) is involved: apply for its assessment, report changes and enable its surveillance (Art. 31, Annex VIII Part II & IV)	Manufacturers																																																																																																																																																																																																																																																																																																																		
01-08	After a positive assessment, draw up the EU declaration of conformity and affix the CE marking (Art. 13 & 28–30, Annex V & VI)	Manufacturers																																																																																																																																																																																																																																																																																																																		
01-09	Label products unambiguously and indicate contact details (Art. 13 & 19)	Manufacturers Importers																																																																																																																																																																																																																																																																																																																		
01-10	Be able to identify suppliers and customers for ten years (Art. 23)	All economic operators																																																																																																																																																																																																																																																																																																																		
01-11	(optional) Use harmonised standards, common specifications or EU certification for the presumption of conformity and monitor their changes (Art. 27)	Manufacturers																																																																																																																																																																																																																																																																																																																		
01-12	(optional) Freely choose the notified body, appeal against its decisions and use reduced fees for SMEs (Art. 32 & 48, Annex VIII Part II)	Manufacturers																																																																																																																																																																																																																																																																																																																		
01-13	(optional) Rely on certificates under other Union law during the transition (Art. 69)	Manufacturers																																																																																																																																																																																																																																																																																																																		
General Obligations																																																																																																																																																																																																																																																																																																																				
01-14	Make available only products that meet the essential cybersecurity requirements (Art. 6)	All economic operators																																																																																																																																																																																																																																																																																																																		
01-15	Consider interfaces with the AI Act, the General Product Safety Regulation and other harmonisation legislation (Art. 11 & 12)	Manufacturers																																																																																																																																																																																																																																																																																																																		
01-16	Set out delegation to an authorised representative in a written mandate and fulfil non-delegable obligations oneself (Art. 18, Annex VIII Part I)	Manufacturers Authorised representatives																																																																																																																																																																																																																																																																																																																		
01-17	Treat information obtained in cooperation under the CRA, such as trade secrets or source code, as confidential (Art. 63)	All economic operators																																																																																																																																																																																																																																																																																																																		
01-18	When supplying public procurers, keep evidence on Annex I available, as procurement procedures take it into account (Art. 5)	All economic operators																																																																																																																																																																																																																																																																																																																		
01-19	(optional) Use pre-market facilitations: trade fairs with a visible non-conformity notice, time-limited test versions, regulatory sandboxes (Art. 4 & 33)	Manufacturers																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
02-01	Register on ENISA's reporting platform, determine the competent CSIRT and assign responsibility for notifications (Art. 14 & 16)	Manufacturers																																																																																																																																																																																																																																																																																																																		
02-02	Report actively exploited vulnerabilities within 24 hours, 72 hours and 14 days after a fix (Art. 14 & 24)	Manufacturers Open-source software stewards																																																																																																																																																																																																																																																																																																																		
02-03	Report severe incidents within 24 and 72 hours and submit a final report one month after the incident notification (Art. 14 & 24)	Manufacturers Open-source software stewards																																																																																																																																																																																																																																																																																																																		
02-04	Submit intermediate reports and inform the public upon request of the CSIRT (Art. 14 & 17)	Manufacturers																																																																																																																																																																																																																																																																																																																		
02-05	Fulfil reporting obligations for legacy products as well, from 11 September 2026 (Art. 69 & 71)	Manufacturers																																																																																																																																																																																																																																																																																																																		
02-06	(optional) Request a delay in the dissemination of a notification (Art. 16)	Manufacturers																																																																																																																																																																																																																																																																																																																		
02-07	(optional) Voluntarily report vulnerabilities, cyber threats and near misses (Art. 15)	Manufacturers																																																																																																																																																																																																																																																																																																																		
02-08	(optional) Use the CSIRT helpdesk on reporting obligations (Art. 17)	Manufacturers																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
03-01	Design, develop and produce products in accordance with the essential cybersecurity requirements (Art. 13)	Manufacturers																																																																																																																																																																																																																																																																																																																		
03-02	Test product security regularly before placing on the market and during the support period (Annex I Part II)	Manufacturers																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
04-01	Ensure that every unit produced and every version delivered remains compliant, including after changes to the product, production or applied standards (series production) (Art. 13)	Manufacturers																																																																																																																																																																																																																																																																																																																		
04-02	(optional) Demonstrate conformity through a quality system covering design, development, testing and vulnerability handling that a notified body approves and monitors (full quality assurance) (Annex VIII Part IV)	Manufacturers																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
05-01	Draw up technical documentation including the risk assessment that demonstrates conformity before placing on the market (Art. 13 & 31, Annex VII)	Manufacturers																																																																																																																																																																																																																																																																																																																		
05-02	Keep the technical documentation up to date during the support period and retain it for at least ten years (Art. 13 & 31)	Manufacturers																																																																																																																																																																																																																																																																																																																		
05-03	Accompany products with clear user information and instructions and keep them available for at least ten years or the support period, if longer (Art. 13, Annex II)	Manufacturers																																																																																																																																																																																																																																																																																																																		
05-04	(optional) Use the simplified technical documentation format for micro and small enterprises (Art. 33)	Manufacturers																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
06-01	Determine the support period per product based on the expected use time, as a rule at least five years, and communicate it to users at purchase and upon expiry (Art. 13)	Manufacturers																																																																																																																																																																																																																																																																																																																		
06-02	(optional) Limit vulnerability handling to the latest version if users receive it free of charge and without additional costs, and provide earlier versions only with a risk notice (Art. 13)	Manufacturers																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
07-01	Exercise due diligence when integrating third-party components, including open-source software (Art. 13)	Manufacturers																																																																																																																																																																																																																																																																																																																		
07-02	Document components in a machine-readable software bill of materials (SBOM) (Annex I Part II)	Manufacturers																																																																																																																																																																																																																																																																																																																		
07-03	(optional) Use voluntary security attestations of open-source components (Art. 25)	Manufacturers																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
08-01	Verify before making available that manufacturer and importer have met their obligations (Art. 19 & 20)	Importers Distributors																																																																																																																																																																																																																																																																																																																		
08-02	Withhold non-compliant products and inform the manufacturer and authorities in case of significant risk; importers also report non-technical risk factors (Art. 19 & 20)	Importers Distributors																																																																																																																																																																																																																																																																																																																		
08-03	Report vulnerabilities to the manufacturer and, in case of significant risk, to market surveillance (Art. 19 & 20)	Importers Distributors																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
09-01	Assess the cybersecurity risks of each product and take them into account throughout the product life cycle (Art. 13)	Manufacturers																																																																																																																																																																																																																																																																																																																		
09-02	Document the risk assessment and keep it up to date during the support period (Art. 13)	Manufacturers																																																																																																																																																																																																																																																																																																																		
09-03	(optional) Embed the risk assessment for high-risk AI systems into the AI Act risk management (Art. 13)	Manufacturers																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
10-01	Make products available with a secure-by-default configuration and a reset to the original state (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
10-02	Protect the integrity of data, commands, programs and configuration within the product (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
10-03	Have the product process only the data necessary for its intended purpose (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
10-04	Limit the product's attack surface, including external interfaces (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
11-01	Protect products from unauthorised access through authentication and identity or access management (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
11-02	Have the product detect and report possible unauthorised access (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
12-01	Protect the confidentiality of data stored, transmitted and processed by the product, e.g. by encryption (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
12-02	Enable users to securely and permanently remove all data and settings from the product (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
12-03	Ensure the secure transfer of data from the product to other products or systems (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
13-01	Protect the availability of the product's essential functions, including against denial-of-service attacks (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
13-02	Minimise the product's impact on the availability of other devices and networks (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
14-01	Have policies and procedures for vulnerability handling (Art. 13 & 24)	Manufacturers Open-source software stewards																																																																																																																																																																																																																																																																																																																		
14-02	Have a coordinated vulnerability disclosure policy with a contact address for reports and a single point of contact for users (Art. 13, Annex I Part II)	Manufacturers																																																																																																																																																																																																																																																																																																																		
14-03	Make products available without known exploitable vulnerabilities (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
14-04	Systematically identify and document vulnerabilities (Art. 13)	Manufacturers																																																																																																																																																																																																																																																																																																																		
14-05	Remediate vulnerabilities without delay and in relation to the risks (Annex I Part II)	Manufacturers																																																																																																																																																																																																																																																																																																																		
14-06	Report vulnerabilities in integrated components to their maintainer and share own fixes (Art. 13)	Manufacturers																																																																																																																																																																																																																																																																																																																		
14-07	Ensure that vulnerabilities can be addressed through security updates, automatically where appropriate (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
14-08	Distribute security updates separately from functionality updates, securely, without delay and free of charge, and keep them available for at least ten years or the support period, if longer (Art. 13, Annex I Part II)	Manufacturers																																																																																																																																																																																																																																																																																																																		
14-09	Publicly disclose information about fixed vulnerabilities (Annex I Part II)	Manufacturers																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
15-01	Have a process to detect, assess and classify incidents and actively exploited vulnerabilities (Art. 14)	Manufacturers																																																																																																																																																																																																																																																																																																																		
15-02	Record and monitor security-relevant activity in the product (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
15-03	Reduce the impact of incidents through exploitation mitigation mechanisms (Annex I Part I)	Manufacturers																																																																																																																																																																																																																																																																																																																		
15-04	Determine the root cause of severe incidents and manage remediation (Art. 14)	Manufacturers																																																																																																																																																																																																																																																																																																																		
15-05	Inform impacted users about actively exploited vulnerabilities and severe incidents (Art. 14)	Manufacturers Open-source software stewards																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
16-01	Provide correct and complete evidence and documents to authorities on request and cooperate with them (Art. 13, 19, 20, 24, 52, 53, 56, 57 & 64)	All economic operators																																																																																																																																																																																																																																																																																																																		
16-02	Inform authorities and users about the manufacturer ceasing operations (Art. 13, 19 & 20)	Manufacturers Importers Distributors																																																																																																																																																																																																																																																																																																																		
16-03	(optional) Submit statements when the European Commission decides on measures against one's own product, such as an EU-wide sales ban or recall (Art. 55–57)	All economic operators																																																																																																																																																																																																																																																																																																																		
#	CRA requirement	Role																																																																																																																																																																																																																																																																																																																		
17-01	Take corrective action without delay in case of non-conformity, up to withdrawal and recall (Art. 13, 19, 20 & 52)	Manufacturers Importers Distributors Open-source software stewards																																																																																																																																																																																																																																																																																																																		
17-02	Implement measures required by authorities or the Commission Union-wide and on time (Art. 54 & 56–58)	All economic operators																																																																																																																																																																																																																																																																																																																		