

EU Cyber Resilience Act: manufacturer checklist

For connected products sold in the EU. Reporting under Article 14 applies from 11 September 2026; the rest from 11 December 2027.

- ☐ Confirm which of your products are sold in the EU and are products with digital elements.
- ☐ Check whether each product is listed in Annex III or Annex IV, to choose the conformity assessment route.
- ☐ Name the person who reports actively exploited vulnerabilities and severe incidents, with the authority to report within 24 hours.
- ☐ Know which CSIRT you report to and how you reach ENISA's Single Reporting Platform.
- ☐ Publish a coordinated vulnerability disclosure policy and a single point of contact for vulnerability reports.
- ☐ Produce an SBOM for every release, in a commonly used machine-readable format, covering at least the top-level dependencies.
- ☐ Set the support period for each product, at least five years unless the product is expected to be in use for less, and show its end date at the time of purchase.
- ☐ Run and document the cybersecurity risk assessment, and update it during the support period.
- ☐ Map your evidence to Annex I, Part I (security requirements) and Part II (vulnerability handling).
- ☐ Prepare the technical documentation of Annex VII and the user information of Annex II.
- ☐ Keep the technical documentation and the EU declaration of conformity for at least ten years, or for the support period if longer.
- ☐ Keep each security update available for at least ten years after it is issued, or for the rest of the support period if longer.
- ☐ Draw up the EU declaration of conformity and affix the CE marking before placing products on the market from 11 December 2027.

Sources

- Regulation (EU) 2024/2847, the Cyber Resilience Act: <https://eur-lex.europa.eu/eli/reg/2024/2847/oj>
- European Commission, CRA reporting obligations: <https://digital-strategy.ec.europa.eu/en/policies/cra-reporting>

A guide to where the evidence is, not legal advice or certification. Your lab, notified body or regulator makes the final call.
magdox.io/blog/eu-cra-timeline-and-checklist/