



CEN-CLC JTC 13/WG 9

Horizontal cybersecurity for products with digital elements

Update @ SEMI - 2025.09.17

Ben Kokx – Convenor of JTC 13/WG 9

(EU) 2024/2847 “EU Cyber Resilience Act” Summary Slide

Timeline



- Entry into force: December 10, 2024
- Date of applicability:
 - conformity: **December 11, 2027**
 - reporting: **September 11, 2026**

Addresses



Economic Operators placing / making available products on the Union market

- **manufacturers**
- authorized representatives
- importers
- distributors

Focus



“Products with digital elements”

- Software
- Hardware
- Remote data processing solutions
- Open-source part of commercial activities

Excluded

- MDR/IVDR, cars, aeronautical products

Implementation



Regulation

- binding and directly applicable in all member states
- no national transposition

Based on **New Legislative Framework**

Presumption of conformity

- harmonized standards
- common specification
- cybersecurity certification schemes

Penalties

- manufactures up to 15 M€ or 2.5% of the worldwide annual turnover
- others 10 M€ or 2.0%

Aim



Uniform legal framework for cybersecurity of “Products with digital elements” placed on the Union Market

Obligations



Fulfillment of essential cybersecurity requirements

- risk based approach
- security properties
- product lifecycle processes
- vulnerability handling

Reporting

- actively exploited vulnerabilities
- incidents having impact on product

Conformity assessment

Cyber Resilience Act

Main timeline





- Published in OJEU : 2024-11-20
- Entry into Force** : **2024-12-10**
- Stand. Req. M/606 : 2025-02-03
- Std. Req. Accepted : 2025-03-02
- Draft implementing act : 2025-03-13
- ESO's provided work program : 2025-04-03
- Implementing act : Exp. 2026-Q1
- Delegated acts : ?
- Horizontal process standards** : **2026-08-30**
- Reporting obligation** : **2026-09-11**
- Vertical standards** : **2026-10-30**
- Horizontal product standards** : **2027-10-30**
- Date of applicability** : **2027-12-11**


CRA Standardization Request M/606





The SR asks in total for 41 items, 15 horizontal and the remaining are vertical deliverables for specific products, e.g. processors, networking equipment, operating systems, hypervisors, smartcards, certain toys, smart home products with security functions, etc., all to be delivered by 30/10/2026!

 **JTC13 / WG9**
Horizontal cybersecurity for products with digital elements

 Established: March 27, 2023
Convenor : Ben Kokx
Secretariat : NEN

 Committee members : 382
National organizations : 24
Liaisons : 16

 WG9 meets bi-weekly with a 3-day hybrid plenary every 2 months.
Project teams have weekly meetings

 Three project teams working on the horizontal deliverables for the CRA.
Currently meeting > 16 hours/week!

WG9 Deliverable

Project team 1

Cybersecurity requirements for products with digital elements – Principles for cyber resilience

CRA Stand. Req. Item : 1

Document type : EN

WI number : JT013089

Status : Draft Comment resolution

Next phase : Submit for ENQ, Sep. 30

DAV target date : October 2026

- ✦ Covers CRA Annex I, Part 1, Requirement 1
- ✦ **Process** standard to ensure products are developed and maintained with a risk-based approach to cover **any** security risks (as a catch-all, as 2a-m do not cover all possible cybersecurity risks)
- ✦ Implementation demonstrated via documented process outputs
- ✦ **Covers all** process activities

WG9 Deliverable

Project team 1

Cybersecurity requirements for products with digital elements – Principles for cyber resilience

CRA Stand. Req. Item : 1

Document type : EN

WI number : JT013089

Status : Draft Comment resolution

Next phase : Submit for ENQ, Sep. 30

DAV target date : October 2026

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Project team 2; item 1

Cybersecurity requirements for products with digital elements – Generic security requirements

CRA Stand. Req. Item : 2 - 14

Document type : EN

WI number : JT013091

Status : On Hold

Next phase : Draft review, Jan 2026

DAV target date : January 2027

- ✘ Covers CRA Annex I, Part 1, Requirement 2 (a-m)
- ✘ **Product** standard addressing a specific set of security requirements by mapping security objectives to a catalog of possible security controls;
- ✘ Implementation demonstrated via the product itself and/or supported by technical documentation;
- ✘ **Refers to PT1 (/ PT3)** for process activities and might augment technical documentation content requirements;
- ✘ Builds upon the EN 18031:2024 series, augmented with additional security controls.



Project team 2; item 1

Cybersecurity requirements for products with digital elements – Generic security requirements

CRA Stand. Req. Item : 2 - 14

Document type : EN

WI number : JT013091

Status : On Hold

Next phase : Draft review, Jan 2026

DAV target date : January 2027

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Project team 2; item 2

Cybersecurity requirements for products with digital elements – Threats and Security Objectives

CRA Stand. Req. Item : Supports PT2 & verticals

Document type : TR

WI number : JT013097

Status : On Hold

Next phase : Ballot, Jan 2026

DAV target date : August 2026

- ⚠ This TR provides guidance on the common threats related to the essential product requirements of Annex I, Part 1, requirement 2 and the security objectives.
- ⚠ The NWIP was circulated with a mature draft text to expedite the availability to all CRA standard writers.



Project team 2; item 2

Cybersecurity requirements for products with digital elements – Threats and Security Objectives

CRA Stand. Req. Item : Supports PT2 & verticals

Document type : TR

WI number : JT013097

Status : On Hold

Next phase : Ballot, Jan 2026

DAV target date : August 2026

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WG9 Deliverable

Project team 3

Cybersecurity requirements for products with digital elements – Vulnerability handling

CRA Stand. Req. Item : 15

Document type : EN

WI number : JT013090

Status : Draft Comment resolution

Next phase : Submit for ENQ, Oct. 20

DAV target date : October 2026

- 🛡️ Covers CRA Annex I, Part 2
- 🛡️ **Process** standard to ensure products are maintained in a secure state using a risk-based approach
- 🛡️ Implementation demonstrated via documented process outputs and actions in the market (updates, notifications, recalls, etc.)
- 🛡️ **Augments PT1** activities with specific requirements and assessment criteria
- 🛡️ Perceived as a horizontal standard that the verticals should be able to normatively reference with no or minimal adoptions.
- 🛡️ The only horizontal standard of the three that hopefully might be suited for citation to provide a presumption of conformity for Annex I, part II.
- 🛡️ Strong normative dependency on the SOTA standards EN ISO/IEC 30111 and 29147.

WG9 Deliverable

Project team 3

Cybersecurity requirements for products with digital elements – Vulnerability handling

CRA Stand. Req. Item : 15

Document type : EN

WI number : JT013090

Status : Draft Comment resolution

Next phase : Submit for ENQ, Oct. 20

DAV target date : October 2026

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WG9 Deliverable

WG9 (shared by all PT's)

Cybersecurity requirements for products with digital elements – Vocabulary

CRA Stand. Req. Item : T&Ds for WG9 documents

Document type : EN

WI number : JT013095

Status : Drafting

Next phase : Submit for ENQ, Sep. 30

DAV target date : October 2026

- 🛡️ Ensure consistent use of **terms and definitions** for all horizontal deliverables of JTC13/WG9 for the CRA.

Horizontal standards have a dual purpose

- ❖ State-of-the-art for all stakeholders to understand the expectations of what is required under the CRA
 - 🔒 Manufacturers of the default class products (>90%) can understand what they must do and what security capabilities their products should have.
 - 🔒 Should be aligned with market surveillance authorities' views.
 - 🔒 Can be used by third parties for evaluation where verticals do not exist (yet).
- ❖ Can serve as a basis for vertical standards
 - 🔒 The “General principles for cyber resilience” provides a skeleton and sets the expectations what verticals would need to address
 - 🔒 The “Generic security requirements” can be used by the verticals as a normative reference to specific controls or be used as the basis for the product specific controls

Thank you

Ben Kokx

