

# REDDA - CRA SEMINAR

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# Cyber resilient Products

- **Standards, Assessments and Future Outlook**
- **From RED Delegated Act to Cyber Resilience Act (CRA)**
- **Focus:**
  - RED-DA Requirements
  - CRA Preparation
  - EN 18031 Assessments
  - ETSI / IEC / ISO Cybersecurity Standards
  - CRA Readiness Roadmap
  - Practical Compliance Strategies
  - Take-away

# Why This Topic Is Critical Now

## Cybersecurity Becomes a Product Requirement

### In the Past:

Focus on functionality

Security as an optional feature

Penetration testing only  
project-specific

### Today:

Cybersecurity is CE-relevant

Security by Design is  
becoming mandatory

Manufacturers are liable for  
vulnerabilities

Lifecycle security becomes  
mandatory

### Affected Products:

IoT Devices

Radio Equipment

Embedded Systems

Industrial Devices

Consumer Electronics

Smart Home

MedTech

Automotive Components



### Key Takeaway:

Even basic connectivity may trigger CRA applicability.

# European Cybersecurity Regulation

## The New Regulatory Landscape

### RED Delegated Act (RED-DA)

Focus:

Radio equipment

Product cybersecurity

Mandatory since August 2025

### Cyber Resilience Act (CRA)

Focus:

All products with digital elements

Horizontal cybersecurity regulation

Full application from December 2027

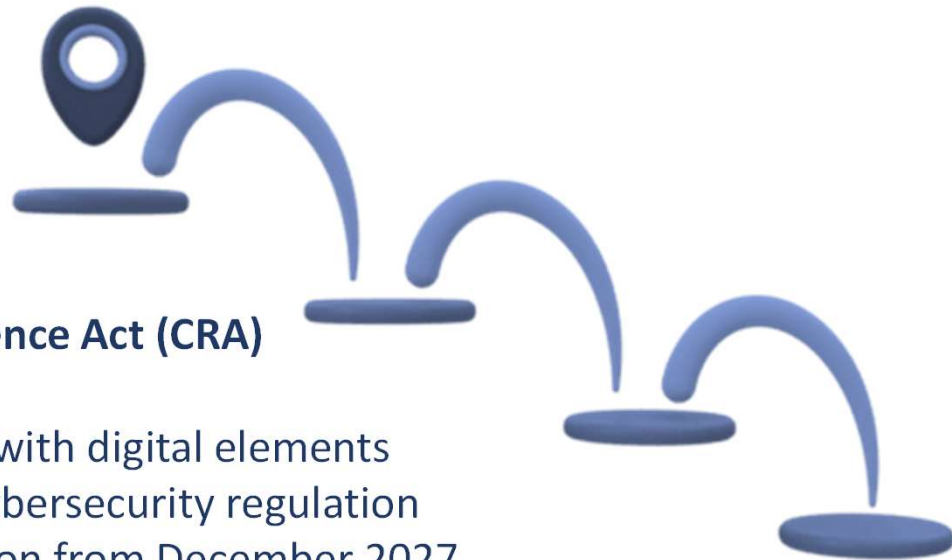
### EU Objectives:

Protection of critical infrastructure

Consumer protection

Reduction of cyberattacks

Harmonized security level



## RED Article 3(3)(d)(e)(f)

### **Art. 3(3)(d)**

Protection of Networks

No harmful impact on communication networks

Protection against misuse

### **Art. 3(3)(e)**

Privacy & Data Protection

Protection of personal data

Access protection

Secure processing

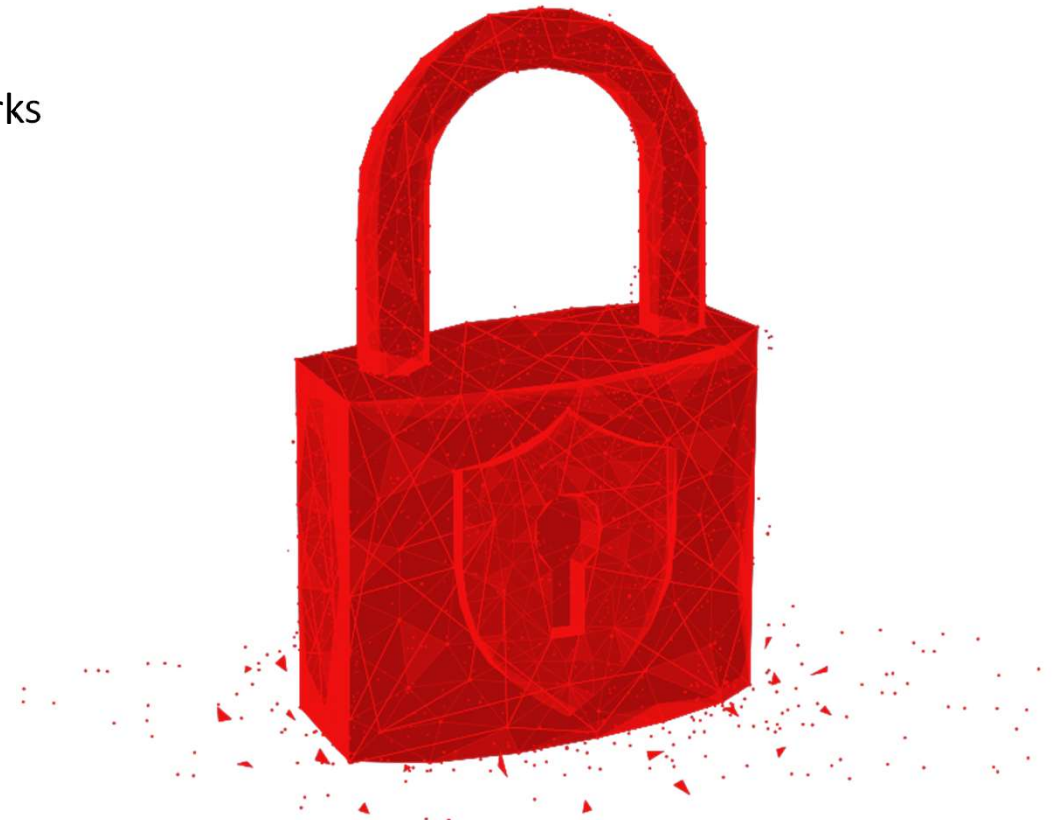
### **Art. 3(3)(f)**

Fraud Protection

Protection of virtual assets

Protection of payment functions

Protection against identity misuse



# EN 18031 Standards Family



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## Technical Basis for RED-DA

### EN 18031-1:2024

Internet-connected Radio Equipment

### EN 18031-2:2024

Protection of Privacy & Personal Data

### EN 18031-3:2024

Fraud Prevention & Financial Protection

## Main Assessment Areas:

Authentication

Access Control

Secure Update

Secure Boot

Cryptography

Logging

Data Protection

Hardening

Vulnerability Handling



# CRA: The Major Shift

## Cyber Resilience Act (CRA)

### Applies to:

- ✓ Software
- ✓ Hardware
- ✓ Embedded Systems
- ✓ IoT Devices
- ✓ Cloud-connected Products

### Core Principles:

- Security by Design
- Security by Default
- Vulnerability Management
- Secure Development Lifecycle
- Security Updates
- Incident Reporting

### New Reality:

Cybersecurity becomes part of the entire product lifecycle.



# CRA Timeline

## CRA Timeline

**December 10, 2024**

CRA officially enters into force

**September 11, 2026**

Mandatory:

- Vulnerability Reporting
- Incident Reporting

**December 11, 2027**

Full CRA applicability

## Challenge:

Companies already need:

- Processes
- Security Governance
- Documentation
- Engineering Readiness

# Key Cybersecurity Standards

## Cybersecurity Standards Landscape

- ETSI EN 303 645 With TS 103 701

### Consumer IoT Security

- IEC 62443-4-1

### Secure Development Lifecycle

- IEC 62443-4-2

### Security Technical Requirements

- ISO/IEC 27001

### Information Security Management

- ISO/SAE 21434

### Automotive Cybersecurity

- **Practical Reality:**

No single standard covers everything.



# Assessment Methodology

## Typical Cybersecurity Assessment Flow

### 1. Scope Definition

Understanding the product & architecture

### 2. Gap Analysis

Comparing standards against the product

### 3. Technical Assessment

Technical verification

### 4. Evidence Review

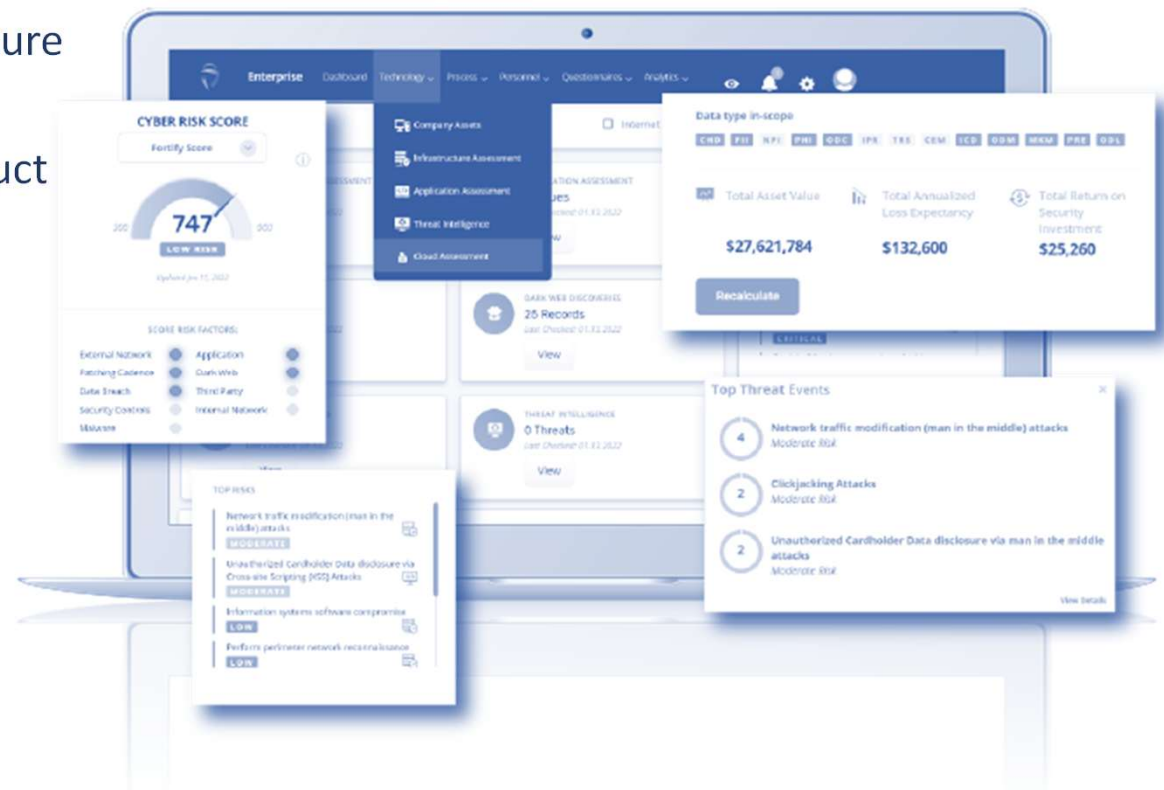
Documentation review

### 5. Risk Evaluation

Risk & threat analysis

### 6. Final Compliance Report

Proof of conformity



# Typical Technical Assessments

## Security Assessment Examples

### Technical Evaluations:

- ✓ Password Security
- ✓ Secure Boot
- ✓ Firmware Integrity
- ✓ Encryption Validation
- ✓ OTA Update Security
- ✓ Access Rights
- ✓ API Security
- ✓ Session Handling
- ✓ Vulnerability Scanning
- ✓ Misconfiguration Review

### Goal:

- ✓ Demonstrating structured security controls.



# Common Weaknesses

## What Companies Often Underestimate

### Typical Findings:

- ✗ Default Passwords
- ✗ Insecure Update Processes
- ✗ Missing SBOM
- ✗ No Vulnerability Policy
- ✗ Weak Cryptography
- ✗ Missing Logs
- ✗ Insecure APIs
- ✗ Hardcoded Credentials

### Reality:

Many products fail more because of processes than technology.



# CRA Readiness Roadmap

## Practical Implementation Approach

### Phase:

1. **Regulatory Screening**
2. **Gap Analysis**
3. **Security Improvements**
4. **Testing & Assessments**
5. **Technical Documentation**
6. **Lifecycle Compliance**

### Important:

CRA is not a one-time project.



# Phase 1 – Screening

## “Is my product even affected?”

The first step is to evaluate the regulatory relevance of the product.

### Key Questions:

- Does the product contain software, firmware, or digital functions?
- Can the product send, receive, or process data?
- Does the product include network or radio communication?
- Will the product be placed on the EU market?
- Is it a consumer or industrial product?
- Is there already RED relevance?

### Objective of this Phase:

- Determine the CRA scope
- Determine the RED-DA scope
- Assess the criticality of the product
- Identify the product class
- Define applicable regulatory requirements

### Typical Outcome:

- ✓ Product Classification
- ✓ Regulatory Scope Matrix
- ✓ Initial Risk & Compliance Assessment

# Phase 2 – Gap Analysis

## “Where do we stand today against the requirements?”

This phase consists of a structured comparison of the existing product against relevant standards and regulatory requirements.

### Typical References:

EN 18031-1/-2/-3  
ETSI EN 303 645  
IEC 62443-4-1  
IEC 62443-4-2  
CRA Annex I (part I and II)  
CRA Annex II (User info.)  
CRA Annex VII (technical doc).  
Internal Security Policies

### Evaluated Areas:

#### Technical Security

Secure Boot  
Authentication  
Encryption  
Access Control  
Secure Updates  
Logging  
Hardening

### Organizational Security

Secure Development Lifecycle  
Vulnerability Management  
Incident Handling  
Supplier Security  
SBOM Management

### Objective:

Achieve transparency regarding:  
Existing compliance gaps  
Technical weaknesses  
Missing processes  
Missing evidence

### Typical Outcome:

✓ Gap Analysis Report  
✓ Prioritized Findings  
✓ CRA Readiness Score

# Phase 3 – Remediation

## “How do we close the identified gaps?”

After the analysis, the actual technical and organizational implementation begins.

### **Technical Measures:**

- Implementation of Secure Boot
- Improvement of password policies
- Introduction of secure OTA updates
- API hardening
- Cryptography improvements
- Deactivation of insecure services

### **Organizational Measures:**

- Introduction of a Vulnerability Disclosure Policy
- Establishment of an Incident Response Process
- Implementation of a Secure Development Lifecycle
- Strengthening supplier management
- Integration of SBOM management

### **Important:**

Many CRA requirements affect not only the product itself, but also company-wide processes.

### **Typical Outcome:**

- ✓ Improved Product Architecture
- ✓ Defined Cybersecurity Processes
- ✓ Security Governance Framework

# Phase 4 – Evidence Package

“How do we demonstrate compliance?”

CRA and RED-DA require traceable and well-structured technical documentation.

## Typical Contents:

### Technical Documentation

Product description  
Architecture diagrams  
Data flow  
Security design

### Risk Analysis

Threat modelling  
Attack surface analysis  
Risk treatment

## Test Evidence

Test reports  
Assessment reports  
Vulnerability scans  
Penetration testing results

## Process Evidence

Update policy  
Vulnerability handling  
Incident management  
Secure Development Lifecycle

## Important:

It is not enough to implement security —  
it must also be documented in a verifiable manner.

## Typical Outcome:

- ✓ Technical Compliance Dossier
- ✓ Audit-Ready Documentation
- ✓ Preparation for Notified Body Assessment

# Phase 5 – Conformity Assessment

## “Which assessment procedure is required?”

Depending on the product and risk class, different conformity assessment routes may apply.

### Possible Routes:

#### Internal Production Control

The manufacturer declares conformity independently.

#### Notified Body Involvement

Required for:

- Certain critical products
- Missing harmonized standards
- Higher assurance requirements

#### Role of the Notified Body:

- Technical evaluation
- Documentation review
- Independent conformity assessment
- Support for regulatory confidence

#### Challenge:

- Many companies underestimate:
  - Preparation time
  - Documentation quality
  - Technical depth of assessments

#### Typical Outcome:

- ✓ CE Compliance Readiness
- ✓ Audit Readiness
- ✓ EU Market Access

# Phase 6 – Lifecycle Compliance



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**“Compliance does not end after certification.”**

CRA fundamentally changes the understanding of product compliance.

## **New Reality:**

Cybersecurity becomes a continuous process.

## **Manufacturer Obligations After Market Placement:**

### **Monitoring**

Monitor vulnerabilities

Follow threat intelligence

### **Vulnerability Handling**

CVE management

Security patches

Responsible disclosure

### **Security Updates**

Secure update processes

Update availability

Update integrity

## **Post-Market Surveillance**

Analyze security incidents

Evaluate customer feedback

Continuously monitor compliance

## **Important:**

A product remains compliant only if security is actively maintained.

## **Typical Outcome:**

✓ Sustainable Compliance

✓ Reduced Cyber Risks

✓ Long-Term Regulatory Stability

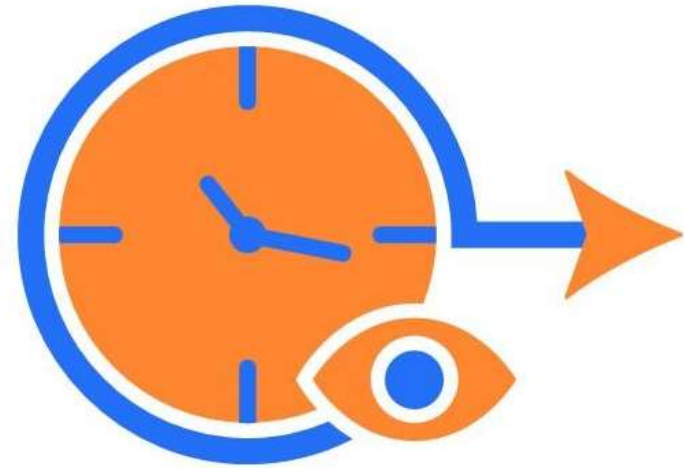
## Where Is the Market Heading?

### Expected Developments:

- More mandatory certifications
- Higher SBOM requirements
- AI security requirements
- Supply chain security focus
- Cloud & OTA governance
- Global alignment of cybersecurity standards

### Trend:

Cybersecurity becomes a market access requirement.



# Closing & Key Takeaways

## Key Learnings

### RED-DA

Already a reality for radio products

### CRA

Transforms the entire product development lifecycle

### Successful Companies:

- ✓ Integrate security early
- ✓ Establish SDLC processes
- ✓ Build compliance strategically
- ✓ Combine technology + governance

**Cybersecurity Compliance = Business Enablement**



# Take-Away

- Cyber Resilience is a product lifecycle
- Standards Competence + Assessments + Documentation
- Vulnerability Management is crucial.
- Cybersecurity Compliance = Business Enabler





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