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Which Products Fall Under the CRA

Digital Innovation Hub Trakia

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OSCRAT Open-Source Cyber Resilience Act Tools

Introduction

1

“Products with digital elements” = hardware + software + connectivity.

2

CRA applies to both consumer and industrial products.

3

Security becomes a *legal requirement* for all connected products.

Definition of “Products with Digital Elements”

1

IoT Devices

smart TVs, home assistants, industrial sensors, connected cars.

2

Software

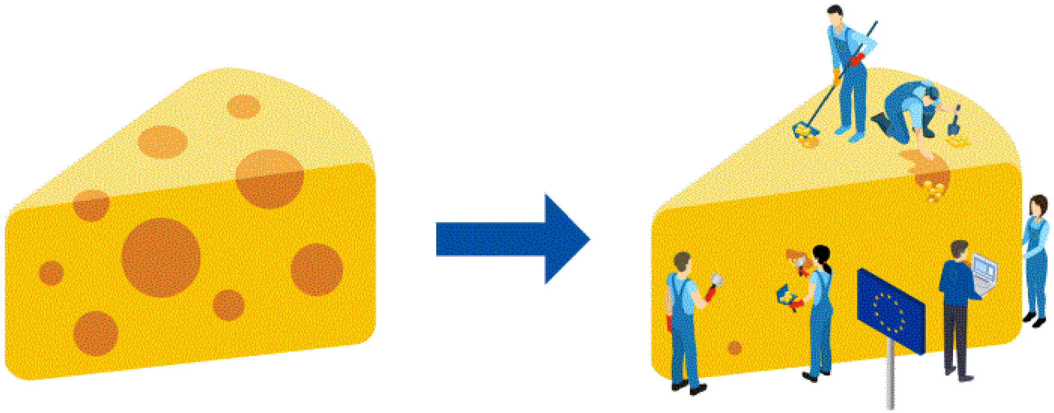
operating systems, antivirus, productivity tools, firmware, apps.

3

Embedded Hardware

routers, PLCs, smart meters, medical devices.

The EU’s Mission: Filling the Security Gaps in Digital Products



CRA Product Classification

- **Important products** (Annex III): general connected devices, business and consumer software.
- **Critical products** (Annex IV): high-impact items such as security software, network management systems, industrial control equipment.
- **Class I and II** for critical products, depending on risk and functionality.

In scope: *“Products with Digital Elements”*

Hardware products *(including components placed on the market)* – laptops, smart appliances, mobile phones, network equipment, CPUs

Software products *(including components placed on the market)* – operating systems, word processing, games or mobile apps, software libraries *...including their remote data processing solutions!*

Outside the Scope

❌ **Non-commercial products**
(e.g. hobby or research devices not sold on the market)

❌ **Services, in particular standalone SaaS**
(websites, web-only tools — covered by NIS2 or DORA)

❌ **Outright exclusions**
(cars, medical devices, certified aeronautical and marine equipment)

💡 *CRA applies only to “products with digital elements” placed on the market.*

Real-World Examples

- A **smart thermostat** (IoT): needs security updates, vulnerability management, CE marking.
- A **mobile banking app** (software): must handle data securely and report vulnerabilities.
- A **connected medical device** (embedded hardware): must meet stricter requirements — likely a *critical product*.
- A **cloud-based network monitoring tool**: falls under both CRA and the EUCS (Cloud Services Scheme).

Key Takeaways

- CRA covers *any connected product* — IoT, software, embedded hardware.
- Two levels of control: *Important* and *Critical products*.
- Ensures *secure by design* principles.
- Builds consumer trust and supports the EU’s *Digital Single Market*.

Thank you!

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