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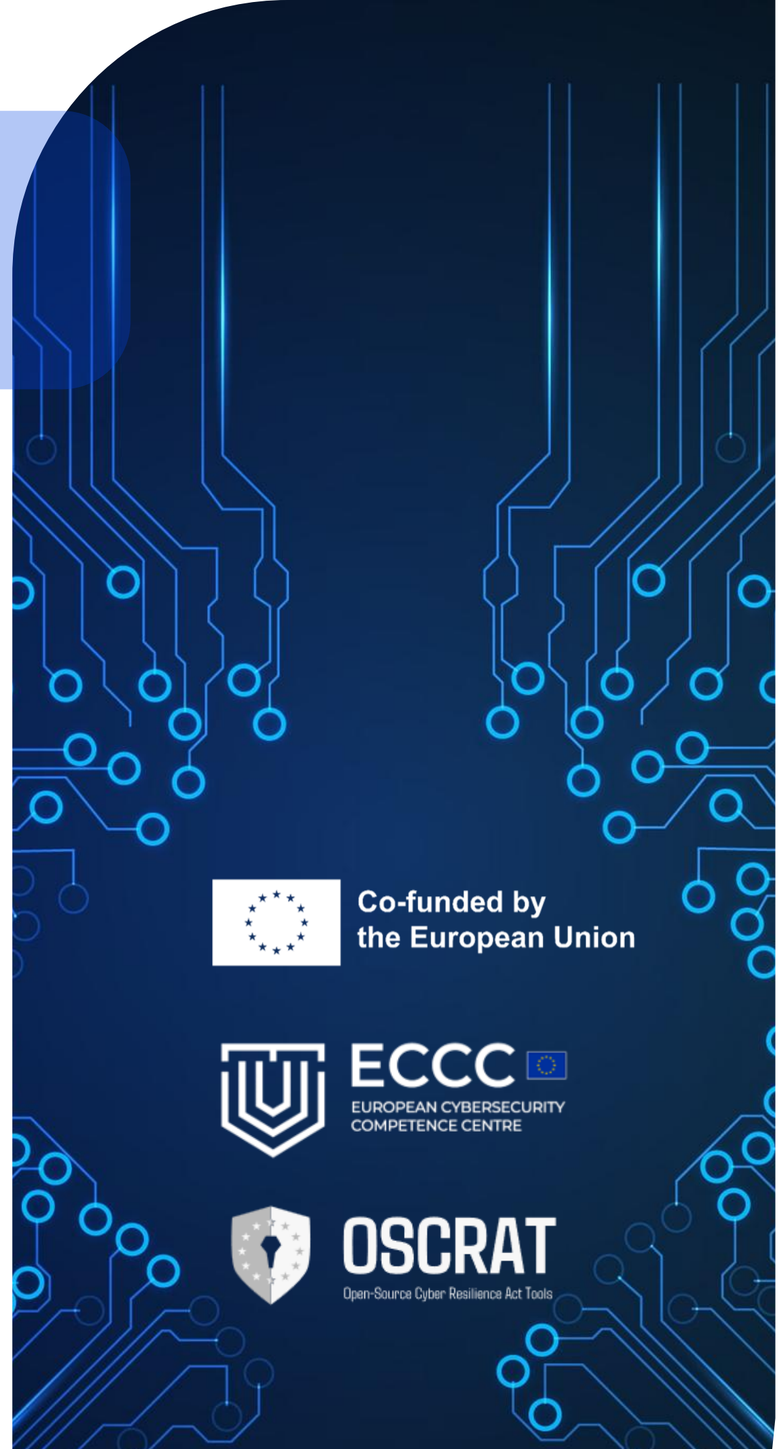
Regulation (EU) 2024/2847

Creating a CRA Compliance Roadmap

A practical, structured approach to achieving CRA readiness

December 2025



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What a CRA Roadmap Must Achieve

A roadmap must:

- Close the gaps identified in analysis
- Establish required processes and documentation
- Prepare for CE marking
- Integrate CRA duties into the product lifecycle
- Demonstrate continuous compliance

Core Pillars of a CRA Roadmap

A complete roadmap addresses:

1. **Processes** — SDL, vulnerability handling, risk assessments
2. **Policies** — CVD, incident reporting, update management
3. **Technical controls** — secure-by-default, logging, testing evidence
4. **Documentation** — technical file (Annex VII)
5. **People & roles** — responsibilities, training
6. **Monitoring & maintenance** — ongoing compliance

Roadmap Structure Overview

A clear roadmap is built in **three** phases:

Phase 1: Foundation (0–3 months)

Policies, roles, gap closure planning, documentation structure

Phase 2: Integration (3–6 months)

Process implementation, SBOM, secure development controls

Phase 3: Demonstration (6–12 months)

Evidence collection, internal audits, CE marking readiness

Phase 1: Foundation (0–3 months)

Focus on:

- Formal roles & responsibilities
- Core policies (risk assessment, SDL, CVD, updates, vulnerability handling)
- Initial CRA gap closure actions
- Define support period determination rules
- Establish documentation framework (Annex VII structure)

Phase 2: Integration (3–6 months)

Focus on:

- Embedding secure development practices
- Implementing vulnerability handling workflow
- Automating SBOM generation
- Security testing processes & evidence
- Update management workflow
- Initial monitoring/logging integration

Phase 3: Demonstration (6–12 months)

Focus on:

- Building the full technical documentation package
- Evidence collection & traceability
- Internal audit / conformity check
- Selecting and engaging with notified bodies (if needed)
- Preparing CE marking declarations
- Finalizing incident reporting workflows

Key Roles Needed for Roadmap Execution

- Product Security Lead
- Compliance Manager / CRA Lead
- Engineering Lead (SDL owner)
- Incident Response/Vulnerability Manager
- Documentation Manager

Example Roadmap (High-Level)

Month 1–3:

✓ Policies

✓ Risk assessment method

✓ Documentation structure

✓ CVD setup

✓ Support period definition

Month 3–6:

✓ SDL rollout

✓ SBOM automation

✓ Vulnerability workflow

✓ Update pipeline

Month 6–12:

✓ Technical file (Annex VII)

✓ Internal audits

✓ Final documentation

✓ CE marking package

CRA Compliance Roadmap

PHASE 1 – 📋 FOUNDATION (0–3 months)

- Define roles & responsibilities
- Establish core CRA policies (SDL, CVD, Vulnerability Handling, Updates)
- Design Technical Documentation structure (Annex VII)
- Begin SBOM tooling & evaluation
- Start cybersecurity risk assessment approach

PHASE 2 – 🛠️ INTEGRATION (3–6 months)

- Implement SDL practices in development workflows
- Deploy SBOM automation pipeline
- Implement vulnerability triage workflow & evidence tracking
- Secure OTA updates (signing & verification)
- Strengthen logging & monitoring on device/platform
- Start collecting evidence for the Technical file

PHASE 3 – 🧭 DEMONSTRATION (6–12 months)

- Build full Annex VII Technical File
- Collect evidence: tests, logs, SBOMs, risk assessments
- Internal conformity assessment
- Prepare CE marking package
- Finalize Article 14 reporting workflow (24h/72h)
- Pre-market readiness validation

Final Takeaways

To build an effective CRA roadmap:

- Start with reality (gap analysis)
- Build the foundation (policies, roles, structure)
- Integrate processes into daily work
- Collect evidence continuously
- Treat CRA as an ongoing lifecycle, not a project

THANK YOU

FOR YOUR ATTENTION

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