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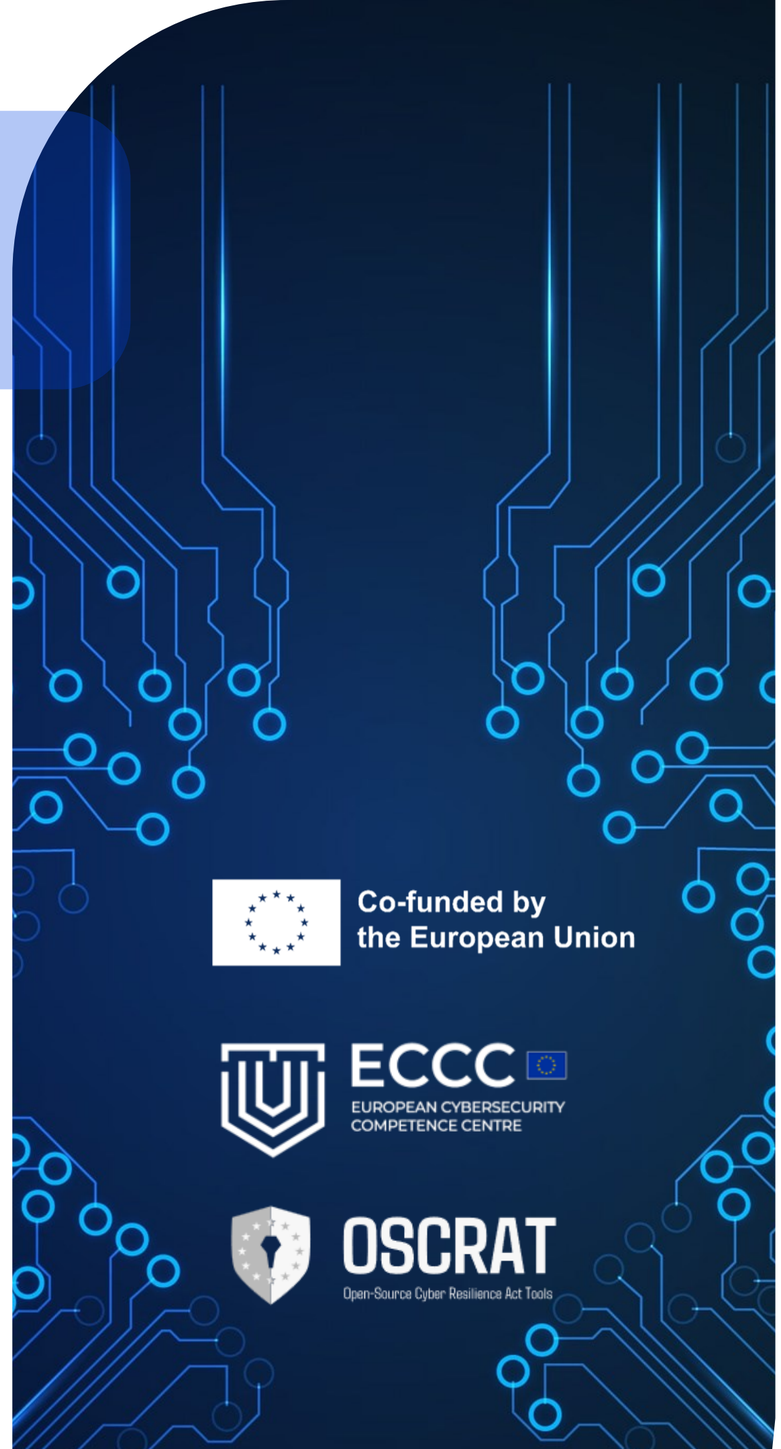
Regulation (EU) 2024/2847

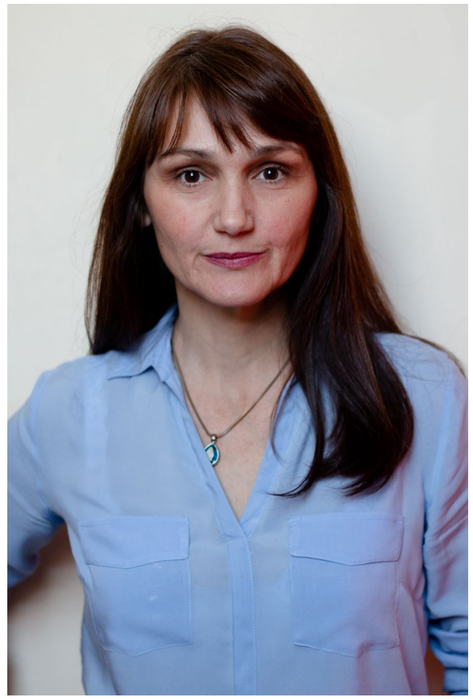
CYBER RESILIENCE ACT

November 2025



Digital Innovation Hub
Trakia

Introduction



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Cyber Resilience Act

Integrating the Cyber Resilience Act with Risk Management Processes

- Bridging compliance, security, and lifecycle risk management

Uncertainty: The New Normal

“We must accept that we live in a world with much more uncertainty. Uncertainty is the new normal.”
— Kristalina Georgieva, Managing Director, IMF

*ISO 31000 defines risk as **“the effect of uncertainty on objectives.”***

Managing risk means navigating uncertainty — not avoiding it.

Defining “Cybersecurity Risk” under the CRA

Term	CRA Definition	Interpretation
Cybersecurity risk - Art. 3 (37)	*“The potential for loss or disruption caused by an incident, expressed as a combination of the **magnitude** of such loss or disruption and the **likelihood** of occurrence of the incident.”*	Quantitative concept: **impact** × **likelihood** — aligns with ISO 31000 / 27005 risk formula.
Significant cybersecurity risk - Art. 3 (38)	*“A cybersecurity risk which, based on its technical characteristics, can be assumed to have a **high likelihood** of an incident that could lead to a **severe negative impact**, including considerable material or non-material loss or disruption.”*	High-impact, high-likelihood scenario; used for prioritization, reporting, and classification.

Why Integration Matters

CRA and Risk Management: Two Sides of the Same Coin

- CRA treats cybersecurity as a business risk, not just a technical issue.
- Integration ensures **vulnerabilities**, **incidents**, and **updates** follow the same cycle as financial and operational risks.
- Builds traceability and accountability across development, compliance, and management.
- Effective integration reduces duplication with ISO 27001 / DORA / NIS2

CRA Risk-Based Provisions

Where the CRA Embeds Risk Thinking

CRA Reference	Focus Area	Risk Relevance
Article 13	Secure design, development, delivery, maintenance	Lifecycle risk minimization
Annex I	Essential cybersecurity requirements	Risk control categories
Annex VII (3)	Cyber risk assessment in technical documentation	Traceability: **Risk → Control → Evidence**

Annex VII, Point 3 Explained

Cyber Risk Assessment as Part of Technical Documentation

- Identify and evaluate cybersecurity risks across the product lifecycle
- Link each risk to specific Annex I controls
- Demonstrate mitigation and residual risk
- Provide traceability: **Risk → Control → Evidence**
- Integrate updates and vulnerability management as continuous risk reassessment

CRA Mapped to ISO 31000 / ISO 27005

CRA Aligned with the ISO Risk Lifecycle

ISO 31000 / 27005 Phase	CRA Equivalent Obligation
Context & Asset Identification	Art. 13 – Design and development context
Risk Identification	Annex VII (3) – Cyber risk assessment
Risk Analysis & Evaluation	Mapping to Annex I controls
Risk Treatment	Secure design, vulnerability management, encryption
Risk Communication	Annex II – User information
Monitoring & Review	Ongoing vulnerability handling, updates and reassessment of residual risk

Documentation and Traceability

What to Document, How, and for Whom

Document type	Audience	Content / Purpose
Technical Documentation	Authorities / auditors	Full risk assessment results, methodology, mapping to Annex I, residual risk levels
Internal Risk Register (ISMS)	Management / Security team	Continuous tracking: detailed risks, treatments, KPIs
User Information (Annex II)	Clients / end users	Summary of security assurances, safe configuration, update policy

Example: SmartTech Software Company

Risk Identification

Risk	Likelihood	Impact	Related CRA Requirement
Unpatched open-source library exploited	Medium	High	Annex I (6) – Vulnerability handling
Insecure API integration with external vendor	High	High	Annex I (2) – Access control
Lack of process to notify ENISA of incidents	Low	Critical	Article 14 – Incident reporting

Example: SmartTech Software Company

Risk Treatment and Traceability

Identified Risk	Annex I Requirement	Mitigation / Control	Evidence
Unpatched open-source library exploited	Annex I (6) – Vulnerability handling	SBOM management, 30-day patch policy integrated into CI/CD	Patch policy, automated scan logs
Insecure API integration with external vendor	Annex I (2) – Access control	Vendor assessment checklist and API authentication hardening	Supplier audit record
Lack of process to notify ENISA of incidents	Annex I (4) – Data protection	Establish a formal Incident Reporting Procedure	Approved Incident Reporting Procedure; notification log

Example: SmartTech Software Company

Documentation under CRA

Document Type	CRA Reference	Content Related to the Example	Audience / Purpose
Technical Documentation	Article 23, Annex VII	– Full cyber risk assessment (risks, controls, evidence) – Mapping to Annex I requirements – Patch management and vulnerability policy – Test results and verification evidence	Authorities / Conformity assessment bodies
Information & Instructions for the User	Article 13, Annex II	– Secure configuration and update procedure – Minimum system requirements – Known limitations or foreseeable misuse – Security support and update period	End users / Integrators

Continuous Integration Workflow

This diagram was generated using ChatGPT (GPT-4o), an AI-powered tool for visual content creation.

Integration Benefits

Why CRA Integration Strengthens the Organization

- Unified risk picture for CRA, DORA, and NIS2 compliance
- Streamlined documentation and audits
- Stronger supplier due diligence and client assurance
- Enhanced trust and market reputation

THANK YOU

FOR YOUR ATTENTION

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