

The CRA document checklist

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Every document the EU Cyber Resilience Act requires, what each one has to contain, and when it is due. Each row names the Article or Annex it comes from, so you can check it against the text rather than take our word for it.

ALREADY IN FORCE · SINCE 11 SEPTEMBER 2026

Reporting an actively exploited vulnerability: 24 hours, 72 hours, 14 days.

Article 14. This duty runs now, and Article 69(3) extends it to products you placed on the market before December 2027. Filing needs an account set up in advance.

The documents you must hold

DOCUMENT	WHAT IT HAS TO CONTAIN	REFERENCE
Technical documentation	Your product description and architecture, the risk assessment against every Annex I requirement, how you handle vulnerabilities, your list of software components, and the test reports. Drawn up before you place the product on the market, and kept current.	Article 31 Annex VII
EU declaration of conformity	Eight items: the product identified, your name and address, a statement of sole responsibility, the object of the declaration, the statement of conformity, any standards or certificates relied on, notified-body details if one was involved, signature. One declaration covers every Union act that requires one.	Article 28 Annex V
Information for the user	The things that ship with the product, among them where to report a vulnerability, the end date of your support period, and how security updates are delivered. Must be retained for ten years after placing on the market, or the support period, whichever is longer.	Article 13(18) Annex II
Vulnerability disclosure policy	A published policy telling researchers how to report a flaw to you, plus the contact address it names. You have to enforce it, not just publish it, so the timelines in it are commitments.	Annex I Part II, point 5
Support period reasoning	Not the date on its own — why that date. At least five years unless the product is genuinely expected to be in use for less, with the reasoning recorded.	Article 13(8)

The dates

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| 11 Sep 2026 | Reporting duties apply. Running now. |
| 11 Dec 2027 | Everything else applies. No file, no CE mark, no EU sales. |
| 11 Jun 2028 | Existing cybersecurity certificates stay valid until here. |

No harmonised standard for this Regulation has had its reference published in the Official Journal yet — so a file written today needs revisiting, and there is probably nothing you can legitimately cite in Annex V point 6 right now.

In what order to do it

1. Settle whether the Regulation applies at all, and which Annex III class you are in. Everything downstream depends on that answer.
2. Set up reporting first, because that duty is already running: pick the Member State whose CSIRT you report to, register for the platform, and name the person who files.
3. Write the risk assessment against Annex I. It is the argument the rest of the file rests on, and with no harmonised standards published it is the whole of your case.
4. Decide the support period and write down why. Five years is the floor, not the answer.
5. Publish the disclosure policy and its contact address, then build the technical documentation and the user information around what you have already decided.
6. Sign the declaration of conformity last. It is a claim about everything above it.

Before you do any of it — this may not be you

Pure software-as-a-service, where nothing is installed, is generally outside the scope, and so is free and open-source software that nobody monetises. Medical devices, cars, aircraft, boats and defence equipment are carved out and regulated elsewhere. If you do not place the product on the EU market, none of this reaches you.

If you would rather not start from a blank page

Editable versions of these documents, with the Official Journal wording quoted in each, are €39 at conformancehouse.com/templates. Having them written for your product, kept current as the standards land and retained for the full ten years, is €390 a year.

Check every line against Regulation (EU) 2024/2847 in the Official Journal, and use the current consolidated text — the Regulation has been the subject of corrigenda. Nothing here is legal advice, and holding these documents is not the same as being compliant.