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E-002610/2026

Answer given by Executive Vice-President Virkkunen
on behalf of the European Commission
(17.9.2026)

The Cyber Resilience Act (CRA)¹, applying in full from 11 December 2027, requires manufacturers of products with digital elements² to keep up-to-date technical documentation at least during the product's support period. That documentation shall include, where applicable, a description of the system architecture explaining how software components build on or feed into each other and integrate into the overall processing. This may include identifying relevant application programming interfaces (APIs) and control server addresses. Furthermore, where a product is substantially modified as defined in Article 3(30) of the CRA after placement on the market, it is required to undergo a new conformity assessment.

The Radio Equipment Directive³ does not specifically require the manufacturer to disclose control server addresses and APIs. It requires manufacturers to draw up a technical documentation, which, where appropriate, should include versions of software or firmware affecting compliance with relevant essential requirements set out in that Directive.

In the framework of the Ecodesign for Sustainable Products Regulation⁴ and the 2025-2030 Work Programme⁵, the Commission has been working on the ecodesign of servers and data storage products, as well as on addressing, where relevant, aspects linked to software, durability and upgradability.

Finally, the proposed revision of the Cybersecurity Act⁶ puts forward a framework to address strategic Information and Communication Technologies (ICT) supply chain risks and monitor dependencies in several critical ICT supply chains including cloud services. Within this framework, a range of targeted and proportional derisking measures, also transparency-related, could be taken.

¹ Regulation (EU) 2024/2847 of the European Parliament and of the Council of 23 October 2024 on horizontal cybersecurity requirements for products with digital elements and amending Regulations (EU) No 168/2013 and (EU) 2019/1020 and Directive (EU) 2020/1828 (Cyber Resilience Act) (Text with EEA relevance), OJ L, 2024/2847, 20.11.2024, ELI: <http://data.europa.eu/eli/reg/2024/2847/oj>.

² A product with digital elements includes its remote data processing solutions, in accordance with Article 3(1).

³ Directive 2014/53/EU of the European Parliament and of the Council of 16 April 2014 on the harmonisation of the laws of the Member States relating to the making available on the market of radio equipment and repealing Directive 1999/5/EC (Text with EEA relevance), OJ L 153, 22.5.2014, pp. 62–106, ELI: <http://data.europa.eu/eli/dir/2014/53/oj>.

⁴ Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC (Text with EEA relevance), OJ L, 2024/1781, 28.6.2024, ELI: <http://data.europa.eu/eli/reg/2024/1781/oj>.

⁵ Communication from the Commission 'Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025-2030', https://environment.ec.europa.eu/document/download/5f7ff5e2-ebc9-4bd4-a139-db881bd6398f_en?filename=FAQ-UPDATE-4th-Iteration_clean.pdf.

⁶ COM/2026/11 final.