

LightingEurope's recommendations for the Cyber Resilience Act (CRA) Commission's guidelines

Position Paper

Our Message in a nutshell

Following the entry into force of the Cyber Resilience Act (CRA) in December 2024, LightingEurope emphasises the need for clear rules and coordinated enforcement to ensure effective implementation. This position paper highlights specific challenges identified by the lighting sector and provides recommendations for the upcoming European Commission's guidelines that will enable clear compliance requirements.

For the CRA Commission's guidelines to be produced, LightingEurope suggests focusing on:

- Alignment between the CRA and the Radio Equipment Directive (RED)
- The ability for users to apply manufacturer-supplied security updates
- Allowing flexible, contract-based product support
- Defining what a substantial modification is for existing products

Characteristics of lighting systems

Lighting products are systems composed of various components, each playing a crucial role in their functionality. Luminaires, in particular, are composed of a wide range of components. This variety is due to luminaires' complexity and diversity of applications.

The lighting sector's supply chains are complex due to the large range of components involved. The intricate integration of components into end-products might necessitate multiple certifications to comply with the CRA, each with its specific requirements. The implementation of the CRA can thus unnecessarily increase the costs while not necessarily better protecting lighting systems, therefore, a coherent implementation avoiding unnecessary administrative burdens for lighting product manufacturers is needed to avoid any potential effect on the market competitiveness and innovation of the sector.

Once a lighting product is delivered to the end-user or the warranty period expires, **manufacturers may lose control over the product.** These factors are important to consider when considering the liability of producers, and they make it difficult to deliver patches or updates.

Ensuring the efficient implementation of the CRA

1) Alignment with the Radio Equipment Directive

Alignment between the CRA and the revision of the RED is required to provide coherent timelines and a clear understanding of which products are affected. While RED focuses on radio equipment and will be mandatory from August 1, 2025, the CRA has a broader scope covering "products with digital elements" and is set to become mandatory in late 2027. This overlap in scope creates potential confusion for manufacturers. For instance, connected devices with radio components may need to comply with both directives. **A harmonised approach that delineates which products fall under each regulation and aligns implementation timelines** is urgently needed for clarity and effective compliance.

2) User-managed security updates

Specifications are needed for Annex I Part II paragraph 8, which requires that "where security updates are available to address identified security issues, they are disseminated without delay". Manufacturers should provide security updates for lighting products with digital elements, but their **deployment should be left to individual end users due to the complex nature of some applications**. Clear guidelines are needed for information sharing, including the types of information, communication channels, and response timeframes. The end user should be explicitly responsible for updates and patching. Additionally, security should be balanced with operational continuity as systems rarely operate in isolation. The owner must test updates and confirm they do not impact any existing systems which may be using dated protocols or interfaces. Due to the nature of many lighting installations, where components often lack permanent internet or network connections, automatic updates by manufacturers may not be feasible. Updates may require local access and specific tools, as well as pose safety risks if applied automatically.. For example, turning off light fixtures during the reboot process after application of a software patch can cause accidents. Therefore, while manufacturers should provide security updates and notify users of their availability, the application of these updates is best handled by local operators during "safe" maintenance windows.

3) Product support period duration challenges

The CRA Article 13 paragraph 8 details that manufacturers must determine a support period for their products that reflects the expected time of use. Lighting products have a long lifetime with little obsolescence, creating a difference in the expected time of use between manufacturers and owners. LightingEurope suggests that manufacturers identify potential environmental factors affecting product support periods. They should consider third-party component support when determining their support commitments, which could be **aligned with the warranty of the manufacturer's products, with a minimum period equal to or greater than the legal guarantee period**. While manufacturers are willing to provide extended support beyond the initial period through contractual agreements, careful case-by-case management is crucial to avoid disruptions in global supply chains and minimise impacts on various sectors. Therefore, considering Recital 19, the Annex I part I (2) (b) and part II (8) and the tailor-made nature of most of the B2B products, those obligations shall be negotiated through a private contract, as part of the liability of the manufacturer.

4) Product owner's responsibility for substantial modifications

Article 69, paragraph 2 details that products placed on the market before the CRA's effective date are only subject to its requirements if they undergo substantial modifications afterwards. **The term “substantial modification” should be defined more precisely**, particularly with regard to the specific product components affected. For example, a distinction should be made between modifications of light sources and software components when considering lighting products with digital elements. Moreover, determining substantial modifications to these existing assets should be the responsibility of the product owner (or by whoever is responsible for the re-launch of the product on the market following the substantial modification), as manufacturers may no longer be involved or even exist. In the lighting sector, many assets were designed, manufactured, and delivered decades ago, often with manufacturers losing visibility after delivery.

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LightingEurope is the voice of the lighting industry, based in Brussels and representing 32 companies and national associations. Together, these members account for over 1,000 European companies, a majority of which are small or medium-sized. They represent a total European workforce of over 100,000 people and an annual turnover exceeding 20 billion euros. LightingEurope is committed to promoting efficient lighting that benefits human comfort, safety and wellbeing, and the environment. LightingEurope advocates a positive business and regulatory environment to foster fair competition and growth for the European lighting industry. More information is available at www.lightingeurope.org.