

CRA Market Surveillance

Post and Telecom Authority

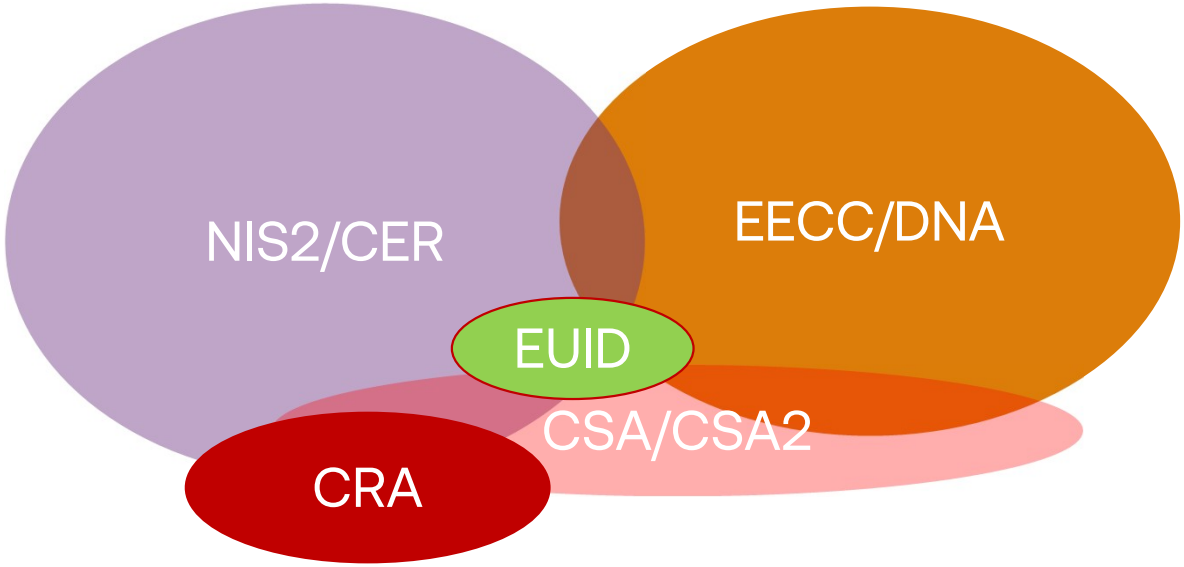
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Complex map of cyber regulations

Some regulations are interlinked with dependencies while others have overlapping requirements

Supervision requires high levels of competence in technology and law

Strong drivers for
- International cooperation
- **Prioritisation of activities**
- Outsourcing of activities



Selection of regulations that PTS Cybersecurity Department supervises

How to prioritise products for market control?

The following variables may be considered when deciding which products the MCA should focus on:

- Products:
  - In important and critical categories
  - in the general scope of CRA and have a large market penetration
  - that have relatively less sophisticated cybersecurity controls
  - barriers to entry for manufacturers are low
  - users are less sophisticated

A framework to prioritise market surveillance

Product	Important/ critical	Large market penetration	Less sophisticated cyber-security	Low barriers to entry	Less sophisitcated users	Riskprofile for product
Drone	No	No	?	Yes	Yes	Medium
Smartphone	No	Yes	No	No	Yes	Low
Robot vacuum-cleaner	No	Yes	Yes	Yes	Yes	Low
Connected toy	No	(Yes)	Yes	Yes	Yes	Medium

Other considerations

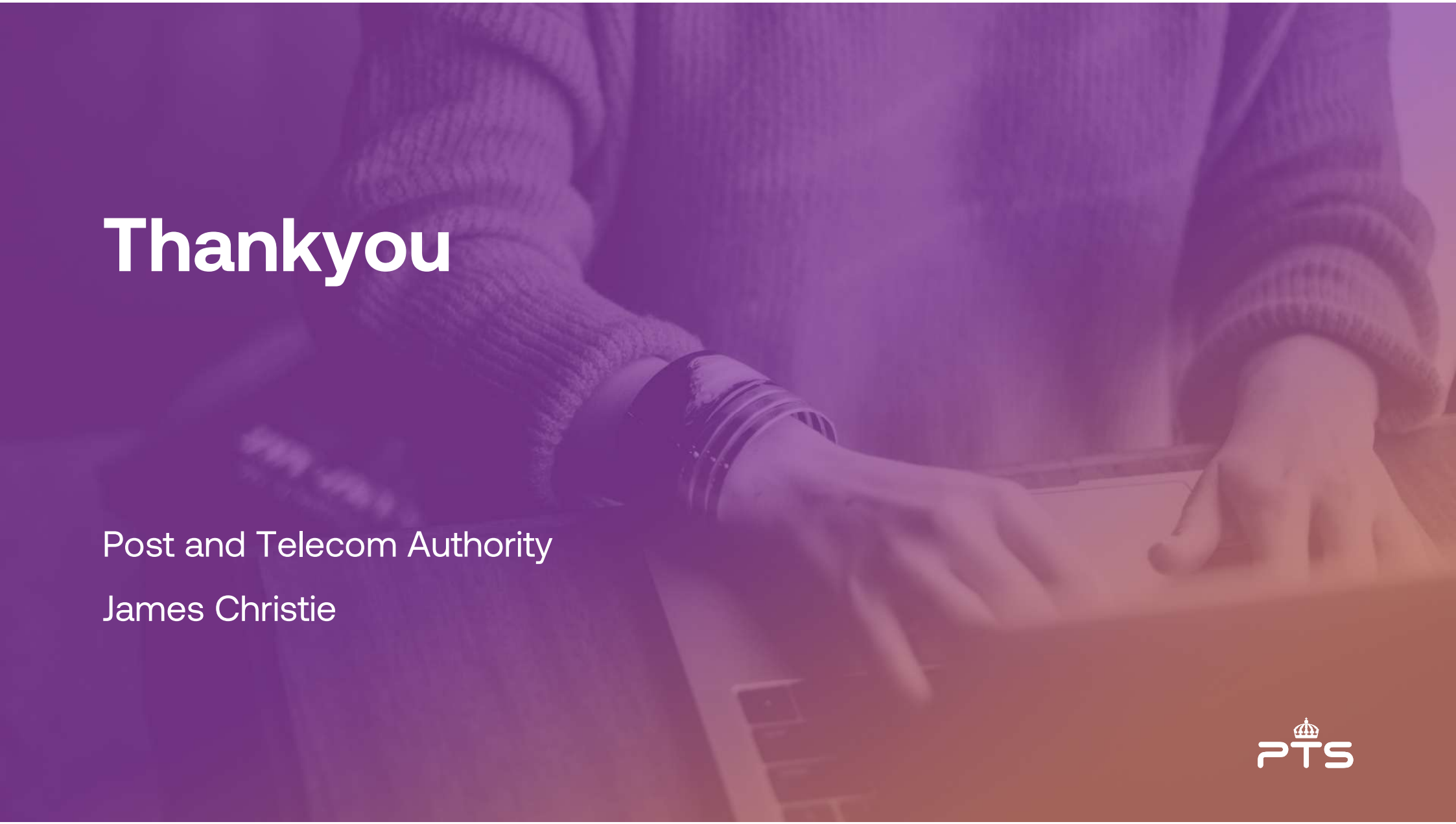
- Should other non-product factors be considered
  - Distribution of products
    - Via established distributors
    - Mostly online inside EU/international
    - Standalone and embedded software
  - Certain user groups
    - Consumer/family
    - Consumer tech hobbyist
    - Commercial
    - Industrial
  - Unlawful use of ”lawful” products
  - Purposefully illegal products/antagonistic/criminal intent

Test case Freezer hacks

- Danfoss (manufacturer), but not exclusively
- Use management tools therefore can be controlled remotely
- The vulnerability was discovered earlier and patches made available for currently supported models
- EOL models did not receive any patch

How should this work under CRA?

- Danfoss should report this as an actively exploited vulnerability to the CSIRT in their country of establishment and via the SRP this should be distributed to all EU MS where their products are available and to ENISA (from 20260911)
- Any importer or distributor should inform Danfoss and the MKM (from 20271211)
- Danfoss are compliant to CRA article 13 but it may be a MKM activity to consider if the EOL period is too short
- No information as yet if a CRA report was received at NCSC



Thankyou

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