CRA SAMPLE

D01 Classification, legal framework and assessment procedure

Example after one year of operation, status 28.02.2028 · Nordwald Wärmetechnik GmbH, networked wood chip boiler NWT HACKTHERM 60 connect

Publisher	OT-Cyber.de, Max Gilg, Rosenheim
Sample company	Nordwald Wärmetechnik GmbH, networked wood chip boiler NWT HACKTHERM 60 connect (fictitious)
Note	Free sample, not legal advice

Company, people, data and numbers are fictitious. This is how the document looks after one year of operation.

1 Purpose and scope

Defines which legal acts and standards apply to the wood chip boiler, in which role the company acts, which CRA class applies and which conformity assessment procedure is used. Reviewed monthly (P01).

2 Document control

Field	Entry
Document no.	NWT-CE-D01
Version, status	1.6, approved
Scope	NWT HACKTHERM 60 connect (18 to 60 kW), controller, gateway, portal and app
Author	Jonas Weiß, Engineering and Product Security (PSO)
Checked by	Ingenieurbüro Lechner (safety), Sichtwerk Security (security)
Approval	Michael Berger, Managing Director, 28.02.2028
Next review	15.03.2029 or in the event of a substantial modification
Confidentiality	internal
Filing	Technical documentation NWT-TD-HT60C, retained for at least 10 years after the last unit is placed on the market

3 Role and product

Role: Manufacturer: we build an assembly of machinery (boiler, storage room discharge system, rotary valve, safety controller with common control system) and hand it over at the customer's site; we also place it on the market under our own brand

Basis under the Machinery Regulation: The boiler with motor-driven rotary valve and augers is already machinery (Article 3(1)(a) MR); together with the storage room discharge system and the common control system, the machines form an assembly (point (d)). Name on the rating plate (Article 10(6))

Basis under the CRA: On handover we place the assembly on the market; it is connected via network technology and is therefore a product with digital elements (Article 2(1), Article 3(21) CRA)

Product: NWT HACKTHERM 60 connect, wood chip boiler 18 to 60 kW, boiler class 5, with gateway, portal and app

Product with digital elements: yes: controller, gateway, portal (remote data processing) and app form one unit

CRA class: Default product: core functionality is heat generation; no category from Annex III or IV, checked against the technical descriptions in the implementing regulation (status 05.02.2028)

Gateway: The class is determined by the core functionality of the product (Article 7(1) CRA): heat generation, no category from Annex III or IV. The gateway is a component and does not forward traffic from other devices. If we sold it separately, it would need its own classification

App: Part of the product: usable only together with the boiler, named in the declaration with its software version (app 3.4 or later), and the app store listing links to the declaration. If the authority regards the app as a separate product, it will receive its own declaration; this interpretation has not yet been finally clarified (P01)

Portal: Remote data processing of the product (Article 3(2) CRA): without the portal, convenience functions are unavailable, so it is part of the assessment

Role review in three cases. Case A: own name or own brand, full manufacturer obligations under the MR and the CRA. Case B: assembly of machinery without an own product brand, manufacturer of the assembly under the MR and, if connected, under the CRA. Case C: installation of finished devices only, without modification, no manufacturer obligations. Cases A and B apply to us.

✓ Assembly established: common control system and interdependent safety functions (SF1 to SF10, D04)

✓ Data connection established: gateway, portal and app (D05)

✓ Manufacturer role defined in contracts with customers and suppliers (F03, supply contract section 2)

4 Legal acts

Legal act	Applicable	Procedure	Since
Machinery Regulation (EU) 2023/1230	yes	internal control, Annex VI	15.03.2027 (MD until 19.01.2027)
Cyber Resilience Act (EU) 2024/2847	yes	Module A, Article 32(1)(a)	Article 14 since 11.09.2026, in full from 11.12.2027
EMC Directive 2014/30/EU	yes	internal control	15.03.2027
RoHS Directive 2011/65/EU	yes	internal control	15.03.2027
Ecodesign (EU) 2015/1189 under Directive 2009/125/EC	yes	internal control	15.03.2027
Pressure Equipment Directive 2014/68/EU	no	hot water, STL at 105 °C, never above 110 °C, no steam	checked 12.11.2026
Radio Equipment Directive 2014/53/EU	no	gateway without radio module	checked 12.11.2026
Energy labelling (EU) 2015/1187, up to 70 kW	yes	label, product fiche, EPREL	15.03.2027, not part of the declaration

5 Standards and specifications

Document	Purpose	Status in the Official Journal
EN ISO 12100:2010	Risk assessment	harmonised
EN ISO 13849-1:2023, -2:2012	Safety functions	harmonised
EN 60204-1	Electrical equipment	harmonised
EN 303-5:2021+A1:2022	Solid fuel heating boilers	applied
IEC 62443-4-1, -4-2, -3-2	Security, process and components	specification, not listed
EN 40000-1-2 (draft)	CRA principles	specification, not listed
FprEN 50742	Protection against corruption	specification, not listed

As of this document, no harmonised standard is listed for the CRA or for MR Annex III, section 1.1.9. The solutions are therefore justified individually in D07 and D04. The review takes place monthly in accordance with P01; the result is recorded in the monthly log.

6 Terms and abbreviations

CRA: Cyber Resilience Act, Regulation (EU) 2024/2847

EMC: electromagnetic compatibility

EPREL: EU database for products with an energy label

MD: Machinery Directive 2006/42/EC, applies until 19 January 2027

MR: Machinery Regulation (EU) 2023/1230, applies from 20 January 2027

NWT: abbreviation of the sample company in document and ticket numbers

SF: safety function

STL: safety temperature limiter

7 Revision history and approval

Version	Date	Change	Approval
1.0	12.11.2026	Initial classification	M. Berger
1.1	10.03.2027	Status of standards before the declaration	M. Berger
1.2	11.12.2027	CRA complete: procedure and declaration, variant B	M. Berger
1.3	05.02.2028	Monthly review, list of standards updated	M. Berger
1.4	20.02.2028	Role review: assembly of machinery, three cases recorded	M. Berger

Version	Date	Change	Approval
1.5	28.02.2028	Energy label added; gateway, app and portal delimited	M. Berger
1.6	28.02.2028	Legal review: machinery under Article 3(1)(a) MR, gateway classified by core functionality, pressure equipment checked	M. Berger

Approved: Michael Berger, Managing Director, 28.02.2028 (signed in the original). Free sample from OT-Cyber.de, not legal advice. Company, persons, serial numbers and data are entirely fictitious.