Position Paper of the VDW (German Machine Tool Builders' Association) on the EU Cyber Resilience Act (CRA):

The complex regulations of the CRA place excessive demands on the machine tool industry, and the implementation period is far too short.

The VDW is the voice of the German machine tool industry. Its members manufacture machine tools for metalworking. The association represents around 100, mostly medium-sized, industrial companies that produce around €15 billion worth of machines and services annually in Germany. The industry operates worldwide, exporting more than 70 percent of its products and producing another €4 billion of machines abroad. Its main competitors in terms of production and exports are China, Japan, the United States, Italy, Switzerland, South Korea, and Taiwan. The machines are purchased and operated by companies in the manufacturing sector that process metal. The client sectors include the mechanical engineering industry, the automotive industry and its suppliers, and the aerospace, medical technology, electrical and electronics industries. Customers include industrial companies of all sizes, as well as contract manufacturers and craft metalworking businesses.

Machine tools (MTs) are at the heart of all industrial production. All kinds of machines, systems, and products require machine tools – either for the entire manufacturing process, or to produce individual parts. The industry's core competence lies in building machines that can process steel, iron, and non-ferrous materials at high productivity, reliability and quality levels, and with maximum precision. Since the introduction of the first computer-aided control systems (CNC controls) in the 1970s, digitalization has been of supreme importance to the industry. Today, metalworking is characterized by digitalized processes and value chains.

The advances in computer network technology and the connection of production assets to IT infrastructures, resulting in a heightened risk of cyberattacks, have been a concern for the industry for some time [1,2].

Therefore, we welcome the European Union's initiative to introduce the Cyber Resilience Act (CRA) as an important step toward strengthening the cybersecurity and resilience of machines and systems which incorporate digital elements. We hope this initiative will foster fair competition and establish clear responsibilities between manufacturers and operators.

However, after thoroughly examining the CRA’s requirements for MT products, we have concluded that the current schedule places too much pressure on companies and their complex supply chains. Furthermore, MT products are neither critical nor important products as defined in the Regulation, and some requirements for such products are excessive when applied to MTs.

We would therefore prefer to see the CRA introduced in a differentiated manner, in at least a two-stage approach for component suppliers and integrators.

Machine tool manufacturers, as integrators of complex systems, should be granted an additional two-year extension for the CRA to become fully applicable (by the end of 2029).

We support adopting a risk-based approach for the introduction of the CRA, with correspondingly lower requirements for simple and non-critical components. Machine tools and their components should be considered non-critical.

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Rationale and background information:

- The Regulation [3] took effect on December 10, 2024. It will apply to all products by December 11, 2027, at the latest. There is no transition period or grandfather clause for established products.
- We acknowledge that a longer lead time until the Regulation is applicable has already been granted but, based on our intensive examination of the issue, we fear this is not sufficient.
- Companies that manufacture MTs operate at the end of complex supply chains. They integrate components, assemblies, and subsystems into finished products such as control and drive systems, automation and handling systems (such as industrial robots), cooling units, and measurement technology.
- All these components, assemblies, and subsystems are, in turn, "products with digital elements" as defined in the CRA, and are integrated into a comprehensive system, the MT.
- Many of these components, as well as the entire MT, are not "important or critical products" under the Regulation.
- The (sub)contractors of MT manufacturers must also re-design their complex products to comply with the CRA. It is therefore to be expected that they themselves will use up much of the current implementation period.
- Consequently, the MT manufacturers, as system integrators, will only be able to take advantage of a fraction of the implementation period to make their products compliant.
- The machine tool industry is characterized by project-based business. Machines are configured to customer specifications and requirements, or custom-built to meet the customers' specific needs. The design process begins only after an order has been placed. Accordingly, the procurement of components, assemblies, and systems must be completed well before a machine is assembled and delivered. Consequently, lead times of one year or longer are not uncommon. Therefore, machine tool manufacturers must have CRA-compliant components available approximately one year before the Regulation is applicable; i.e., by the end of 2026.
- Harmonized standards are also a prerequisite for standardized implementation to simplify the process of obtaining a declaration of conformity. The EU Commission has recognized this, and initiated corresponding standardization measures in the first quarter of 2025. However, harmonized standards are only expected for certain aspects of the products. For example, product-related "Essential Cybersecurity Requirements" will not be available until 2027 at the earliest.

Currently, the time required to integrate CRA-compliant components into the complex end product (the machine tool), the lead times required by suppliers, and the time needed for developing the necessary standards are diverging.

If the current implementation deadlines and scope of regulation remain in place, this will pose an unacceptable technical and economic risk to manufacturers of machinery and equipment. Companies would find themselves in an economically and legally unsustainable position through no fault of their own.

Many medium-sized technology leaders would be severely impacted, which would negatively affect their customers' productivity and jeopardize competitiveness and prosperity in the EU. Given this situation, extending the transition period for complex technical equipment not only makes good sense, but is also imperative.

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[1, 2] Guidelines for cybersecurity on machine tools, https://vdw.de/security
[3] Regulation (EU) 2024/2847, https://eur-lex.europa.eu/eli/reg/2024/2847/oj/eng