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EU exporter timeline: Machinery Regulation, CRA and AI Act

For Indian machine builders and robot cell integrators · Asset Online Pvt Ltd (AOPL) · aopl.tech · status as of 28 Oct 2026

Three EU laws now apply to the same exported machine. The AI Omnibus, Regulation (EU) 2026/1744 of 8 July 2026, set the AI Act high-risk dates below and moved machinery AI into the Machinery Regulation. CRA reporting is already live. This is a working summary of the official texts, not legal advice.

1. One timeline, three laws

Date	Law	What applies	Article
11 Jun 2026	CRA	Rules for CRA notified bodies apply	CRA Art 71(2)
27 Jul 2026	AI Act	Omnibus in force: machinery moved to Annex I Section B	Reg. 2026/1744
11 Sep 2026	CRA	Report exploited vulnerabilities and severe incidents (24h / 72h / final), incl. products already sold	CRA Art 14, 69(3)
20 Jan 2027	MR	Machinery Regulation applies; Directive 2006/42/EC repealed	MR Art 54 (corr.)
2 Dec 2027	AI Act	High-risk rules for Annex III uses (e.g. AI rating workers)	AI Act Art 113(c)(i)
11 Dec 2027	CRA	All CRA requirements apply; CE marking covers cybersecurity	CRA Art 71(2)
11 Jun 2028	CRA	Older cyber type-examination certificates lapse	CRA Art 69(1)
2 Aug 2028	AI Act / MR	Annex I high-risk AI rules; MR AI requirements apply by this date	AI Act Art 113(c)(ii); MR Art 8

2. Who does what in the EU

Role	Duties	Article
Indian manufacturer	Designs, risk-assesses, draws up the technical file, CE marks, sets support period, reports to ENISA	MR Art 10; CRA Art 13, 14
EU authorised representative	Written mandate; holds file and declaration 10 years; answers authorities. Cannot draw up the file	MR Art 12; CRA Art 18
EU importer	Checks route, file, CE marking, instructions; puts its name on the machine; must stop non-compliant goods	MR Art 13; CRA Art 19
Any of the above in the EU	Product may be placed on the market only with an EU-established responsible operator	Reg. 2019/1020 Art 4

CRA fines: up to EUR 15m or 2.5% of worldwide turnover for Annex I, Art 13 or Art 14 breaches (Art 64(2)); EUR 10m or 2% for importer, authorised rep, CE marking and file duties (Art 64(3)). Machinery Regulation penalties are set by each Member State (Art 50).

3. Combined technical file

	Item	Reference
☐	Description, intended use, software versions	MR Annex IV A(a); CRA Annex VII 1
☐	One risk assessment covering safety (EHSRs) and cybersecurity	MR Annex IV A(b); CRA Art 13(3)-(4), Annex VII 3
☐	Drawings, circuits, system architecture	MR Annex IV A(c)-(d); CRA Annex VII 2(a)
☐	Standards applied, or other specifications	MR Annex IV A(e)-(f); CRA Annex VII 5
☐	Test reports: product and vulnerability handling	MR Annex IV A(g); CRA Annex VII 6
☐	Instructions and user information, in the destination language	MR Art 10(7), Annex IV A(i); CRA Annex II
☐	Safety software source code, on reasoned request	MR Annex IV A(m)
☐	Sensor-fed / autonomous function description	MR Annex IV A(n)
☐	SBOM, machine-readable, top-level dependencies at least	CRA Annex I Part II(1), Annex VII 8
☐	Support period (min. 5 years) and its basis; end date shown at purchase	CRA Art 13(8), 13(19), Annex VII 4
☐	Keep file 10 years (CRA: or support period if longer)	MR Art 10(3); CRA Art 13(13)

4. CRA reporting via the ENISA single reporting platform

	Item	Reference
☐	Early warning within 24 hours of becoming aware	Art 14(2)(a), 14(4)(a)
☐	Notification within 72 hours	Art 14(2)(b), 14(4)(b)
☐	Final report: 14 days after fix (vulnerability) / 1 month (incident)	Art 14(2)(c), 14(4)(c)
☐	No EU establishment: CSIRT of the Member State of your authorised rep, else importer, else distributor, else most users	Art 14(7)
☐	Inform affected users and the mitigations they can apply	Art 14(8)

5. Questions to ask your notified body

☐	Notified under Regulation 2023/1230 (not only the Directive) for our Annex I category and module? NANDO reference?
☐	Also notified under the CRA, if our product is an important or critical product?
☐	Can you assess Annex III 1.1.9 and 1.2.1 cybersecurity and accept CRA evidence?
☐	Will you audit our Indian plant, in English? In what language must the file be submitted?
☐	How must safety software source code be shared, and under what confidentiality?
☐	How will you handle ML-based safety functions before and after 2 Aug 2028?
☐	Lead time for an EU type-examination certificate before 20 Jan 2027?

Sources: Regulation (EU) 2023/1230 (as corrected, OJ L 169, 4.7.2023); Regulation (EU) 2024/2847; Regulation (EU) 2024/1689 as amended by Regulation (EU) 2026/1744 (OJ 24.7.2026); Regulation (EU) 2019/1020; ENISA, CRA single reporting platform launch, 11 Sep 2026; European Commission machinery and notified bodies pages; NANDO. All opened 28 Oct 2026. Full explainer at aopl.tech/blog. Asset Online Pvt Ltd (AOPL) supplies and integrates solutions in this area. Contact: aopl.tech/contact-us