

How I Learned to Stop Worrying and Love the NLF

fukami • ORCWG: CRA Mondays • May 26, 2025



Who I am



- fukami aka Christian Horchert
 - EU Policy Advisor at OpenSSF in Brussels
 - Type C Member EC CRA Expert Group by the European Commission
 - Member ETSI; Observer CEN-CLC/JTC13/WG9 and CEN-CLC/JTC25/WG2
 - Rapporteur for EN 304 623
 - FIRST Liaison, Co-chair AISSIG
- Past
 - worked at SektionEins most of the life (pentesting, code audits, consultancy)
 - ISO at EBRAINS/Human Brain Project
 - Digital rights advocate in Brussels

The OpenSSF

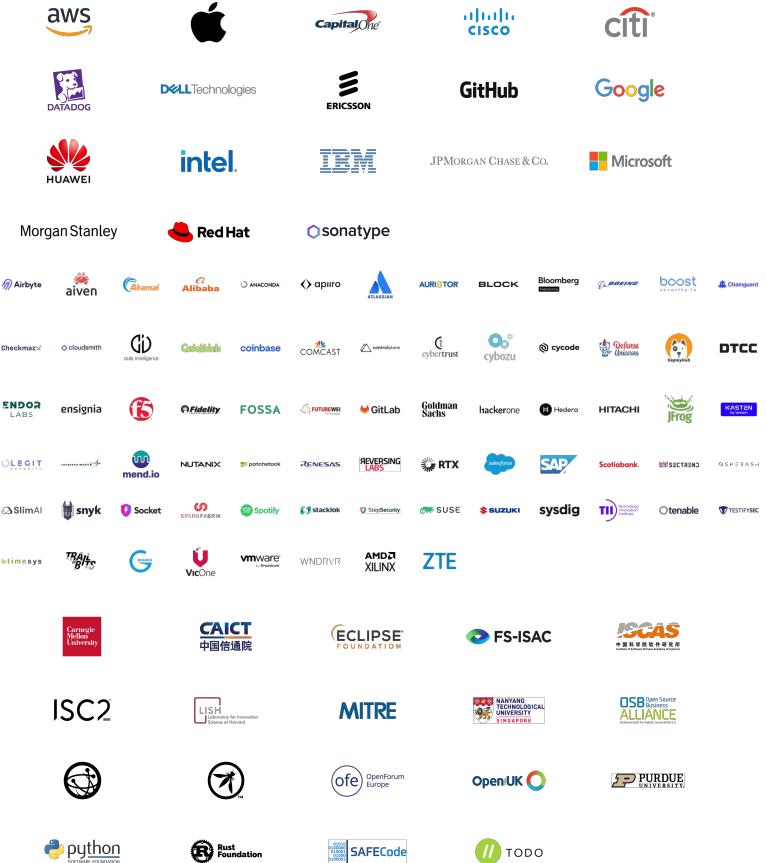


OpenSSF

OPEN SOURCE SECURITY FOUNDATION

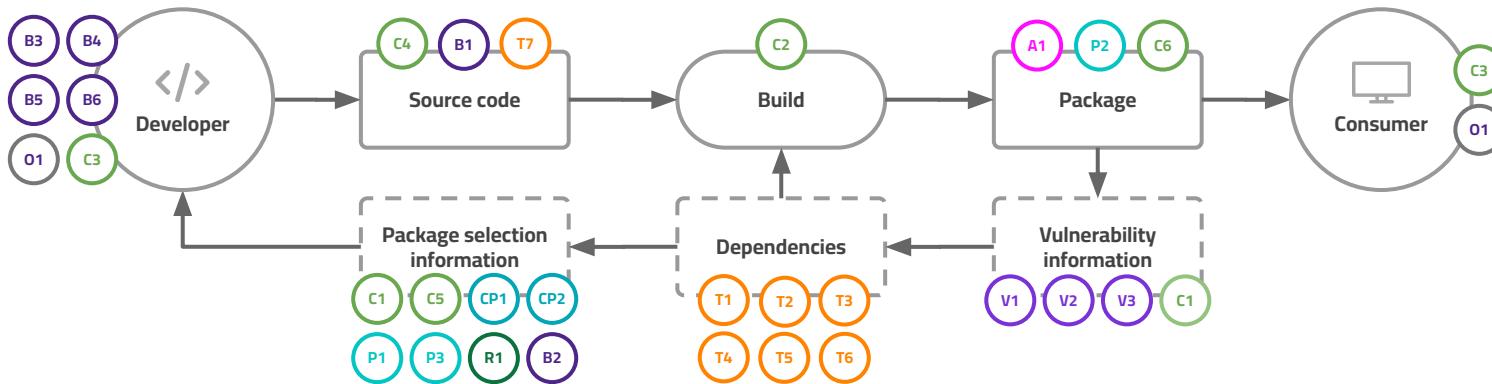
What is the OpenSSF?

- **Cross-industry forum** for collaborative improvement of open source software security as part of **The Linux Foundation**.
- Mission to **sustainably secure the development, maintenance, and consumption of the open source software (OSS) we all depend on**
- Works on various **technical and educational initiatives** to improve the security of the open source software ecosystem.



<https://openssf.org/about/members>

OpenSSF Technical Initiatives Landscape



Best Practices

- B1. [OpenSSF Best Practices Badge](#) project
- B2. [OpenSSF Scorecard](#) project
- B3. [Education](#) SIG
- B4. [Memory Safety](#) SIG
- B5. [C/C++ Compiler Options](#) SIG
- B6. [Python Hardening](#) SIG

Supply Chain Integrity

- C1. [Security Insights](#) project
- C2. [SLSA](#) project
- C3. [S2C2F](#) project
- C4. [Gittuf](#) project
- C5. [GUAC](#) project
- C6. [Zarf](#) project M

Security Tooling

- T1. [SBOM Everywhere](#) SIG
- T2. [OSS Fuzzing](#) SIG
- T3. [SBOMit](#) project
- T4. [Protobom](#) project
- T5. [bomctl](#) project
- T6. [Fuzz Introspector](#) project
- T7. [Minder](#) project

Securing Critical Projects

- CP1. [criticality_score](#) project
- CP2. [Package Analysis](#) project

ORBIT (Open Resources for Baselines, Interoperability, and Tooling)
O1. [OSPS Baseline](#) project

Global Cyber Policy

DevRel Community

AI/ML Security

- A1. Model Signing SIG & Project

BEAR (Belonging, Empowerment, Allyship, and Representation)

Securing Software Repositories

- R1. [RSTUF](#) Project

Vulnerability Disclosures

- V1. [CVD Guides](#) SIGs
- V2. [OSV Schema](#) project
- V3. [OpenVEX](#) SIG
[OpenVEX](#) Project

Projects

- P1. [Alpha & Omega](#) project
- P2. [Sigstore](#)
- P3. [Core Toolchain Infrastructure \(CTI\)](#)

OpenSSF Projects

Best Practices Badge



bomctl



bomctl

gittuf



GUAC



OpenSSF Scorecard



OpenVEX



OpenVEX

RSTUF



S2C2F



SBOMit



Sigstore



SLSA



Zarf



Protobom



Minder



Criticality Score



Fuzz Introspector



Model Signing



OSPS Baseline



OSV Schema



Security Insights



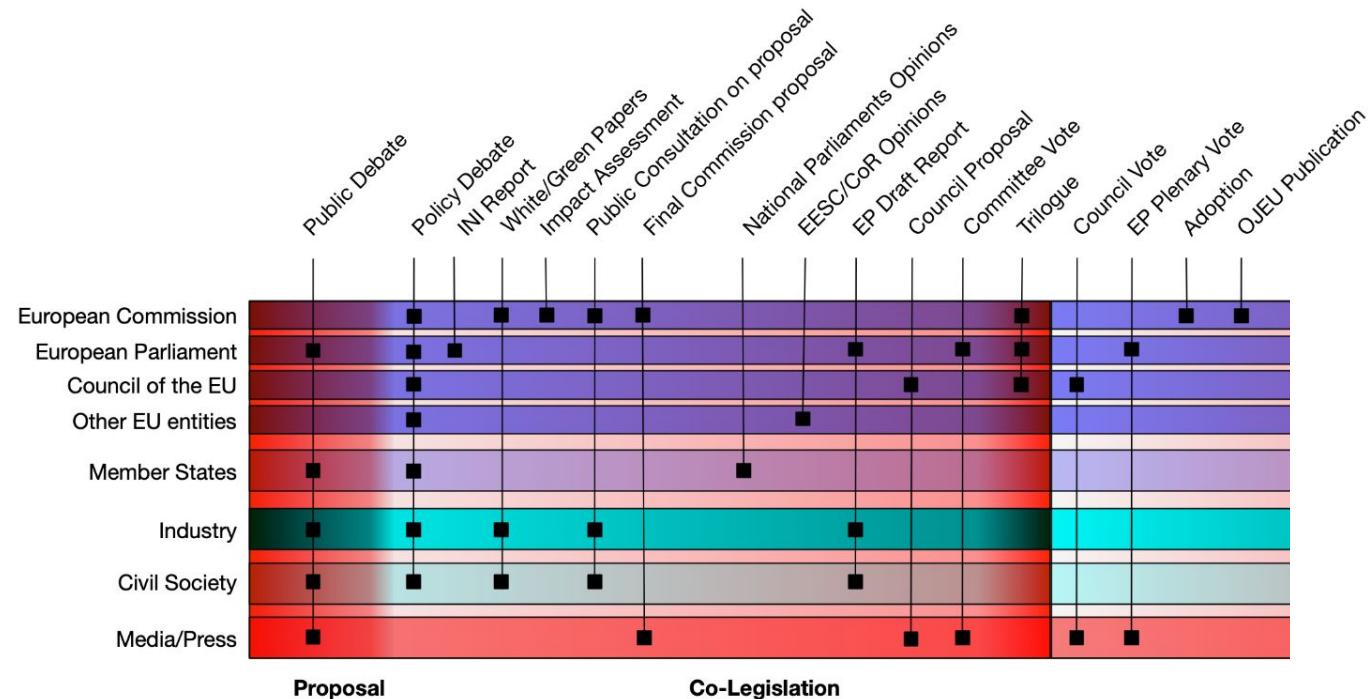
Package Analysis



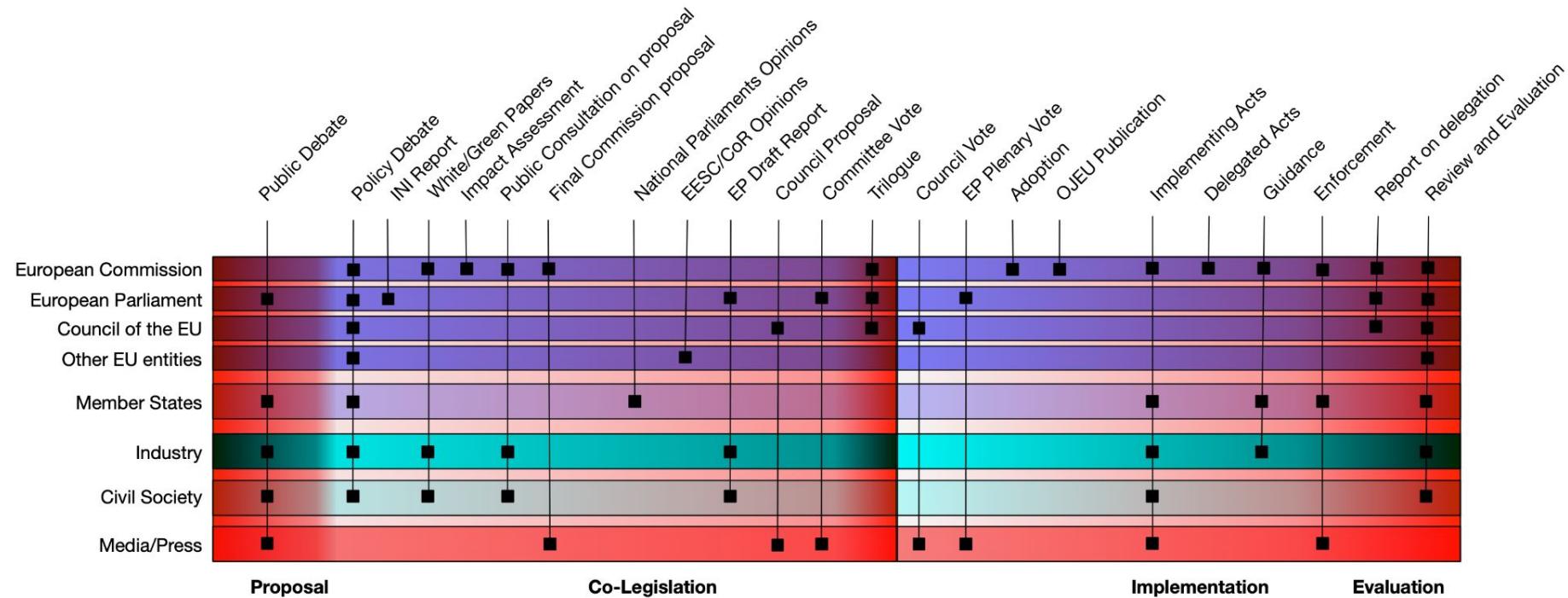
<https://openssf.org/projects>

Past EU engagement

Legislative timeline

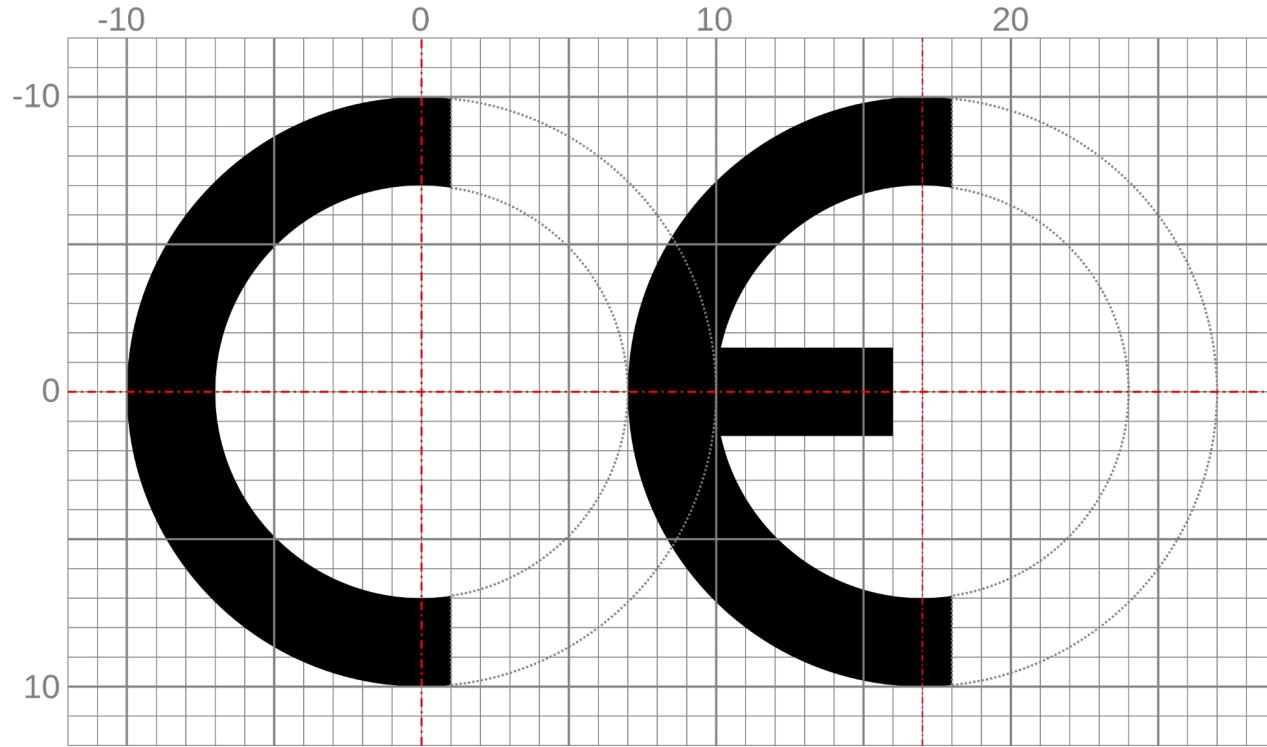


Legislative timeline

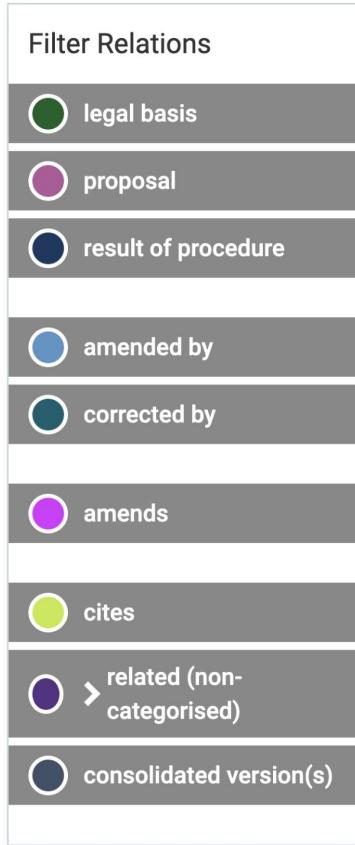


Personal Discoveries

CRA: CE for software



EUR-Lex: Relationship Graph



Notes on the “cheese meme”

CRA in a nutshell



PDO, PGI, GI and TSG



Geographical indications and quality schemes for food and drinks

- PDO: Protected Designation of Origin
- PGI: Protected Geographical Indication
- GI: Geographical Indication
- TSG: Traditional Speciality Guaranteed

Example from Dutch cheese (see PGI-NL-00329-AM02): *Must be uniform in colour with a few small round holes. 'Edam Holland (Bros)' has a large number of small holes. 'Edam Holland (Stip)' has some small round holes or very many small holes. The colour of the cheese varies from ivory to yellow.*

The New Legislative Framework

History of the NLF



Framework for the internal market for goods:

- Improving market surveillance
- Boosting the quality of conformity assessments

Short history of EU legislation for goods:

- Traditional approach or **Old Approach**
- **New Approach (1985)**
- Global Approach: **Conformity assessment instruments (1989)**
- **New Legislative Framework** based on New Approach principles (2008)

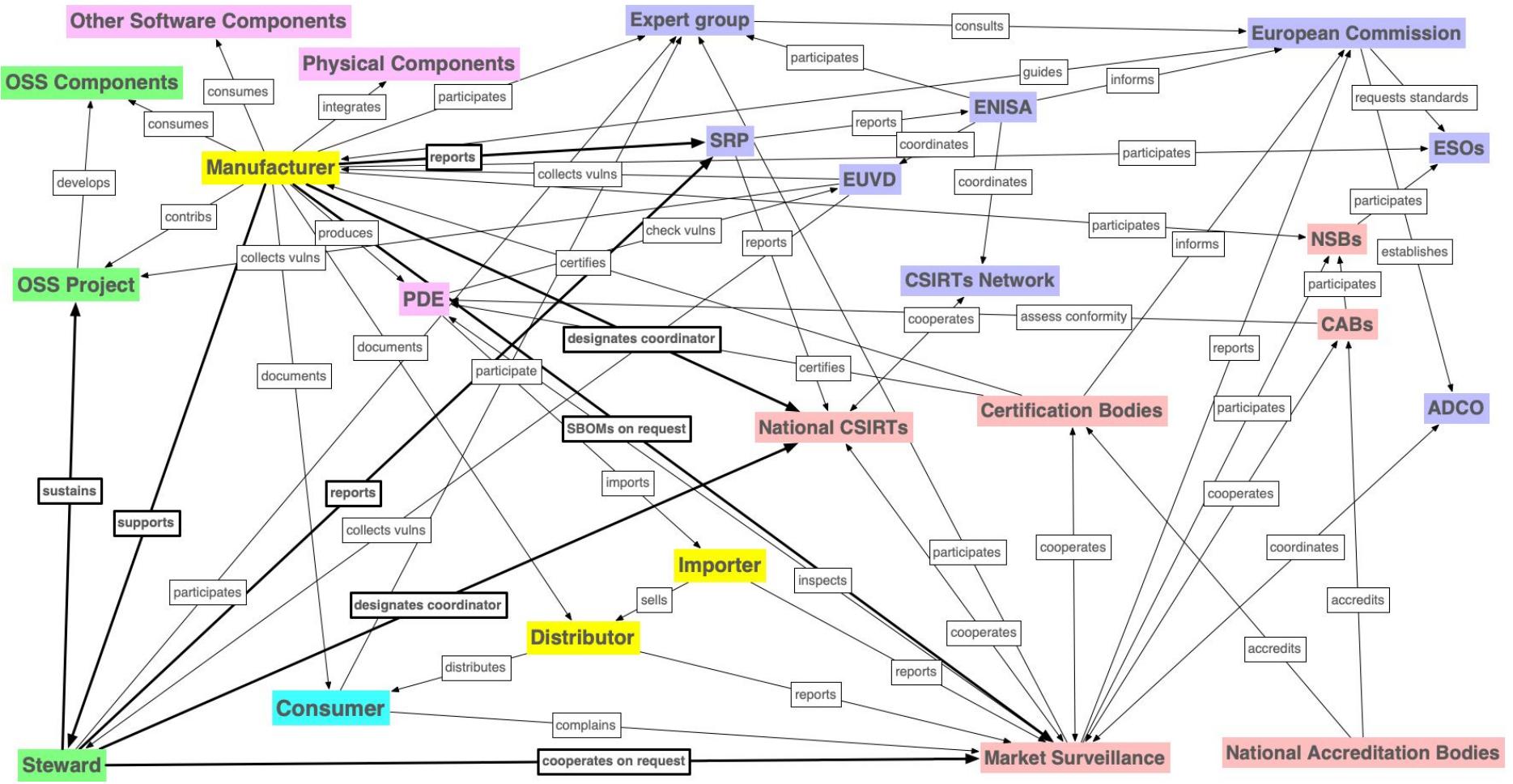
New Approach principles

- Harmonisation is **limited to essential requirements**.
- Only **products fulfilling the essential requirements** may be **placed on the market and put into service**.
- **Harmonised standards** which have been transposed into **national standards**, are presumed to be conform.
- Application of **harmonised standards** remains **voluntary**, and manufacturers are **free to choose** any technical solution that provides compliance.
- Manufacturers may choose between **different conformity assessment procedures** provided **in the applicable directive** (CRA in Annex VIII: Modules A, B/C and H).

The Market



- **"Making available on the market"** is the overall concept. Any **transfer between economic operators** of a product is considered as making available.
- **"Placing on the market"** is a specific case of making available when the product is the **first time introduced** on the market and EU legislation applies.
- **"Putting into service or use"** takes place at the moment of **first use within the Union** by the end user for the purposes for which it was intended.
- **Roles:** Economic operators (manufacturers, authorized representative, importer and distributor) plus end users with no obligations. The manufacturer has the ultimate responsibility for the conformity. The CRA introduces a new actor: open source software stewards.



Summary NLF



Offers a common framework for safe, secure and sustainable products in the EU

- Enhanced market surveillance
- Conformity assessment processes and bodies
- Standardization for presumption of conformity
- Eco design and sustainability principles
- Mutual recognition of goods
- Representative actions
- Accessibility requirements
- Regulatory sandboxes

Blue Guide on implementing EU product rules

29.6.2022

EN

Official Journal of the European Union

C 247/1

II

(Information)

INFORMATION FROM EUROPEAN UNION INSTITUTIONS, BODIES, OFFICES
AND AGENCIES

EUROPEAN COMMISSION

COMMISSION NOTICE

The 'Blue Guide' on the implementation of EU product rules 2022

(Text with EEA relevance)

(2022/C 247/01)

New Single Market Strategy

New Single Market Strategy



- **Tackle the 'Terrible Ten'** (harmful barriers)
- **Immediate action to reduce red tape** (simplification)
- **Boosting European services market** with focus on sectors import for the twin transition (green/digital)
- **Better support for SMEs and SMCs** to act in the European market (think small)
- **Strengthens market cooperation and enforcement** between member states (ownership)
- Paradigm shift in **EU spending** (synergies)

The ‘Terrible Ten’

- Complicated business establishment and operations
- Overly complex EU rules
- Long delays in standard-setting
- Lack of ownership by Member States
- Limited recognition of professional qualifications
- Fragmented rules on packaging, labelling and waste



- Outdated product rules and lack of product compliance
- Burdensome procedures for temporary posting of workers
- Restrictive and diverging national services regulation
- Territorial supply constraints (TSCs)

Ongoing



Communication

- [Commission work programme 2025](#)
- [The Single Market: our European home market in an uncertain world](#)
- [Digitalisation and alignment of common specifications](#)
- [Simplification and Implementation](#)

Have your say

- [European Business Wallet: digital identity, secure data exchange and legal notifications for simple, digital business](#)
- [Burden reduction and simplification for competitiveness of small mid-cap enterprises](#)

Thank you for your attention!
Any questions?

Ways to Participate



Join a [Working Group/Project](#)



Come to a Meeting (see [Public Calendar](#))



Collaborate on [Slack](#)



Contribute on [GitHub](#)



Become an [Organizational Member](#)



Keep up to date by subscribing to the [OpenSSF Mailing List](#)

Engage with us on social media

-  X
[@openssf](https://twitter.com/@openssf)
-  LinkedIn
[OpenSSF](https://www.linkedin.com/company/openssf/)
-  Mastodon
social.lfx.dev/@openssf
-  YouTube
[OpenSSF](https://www.youtube.com/c/OpenSSF)
-  Facebook
[OpenSSF](https://www.facebook.com/OpenSSF)

Is your organization a member?

Questions? Contact membership@openssf.org

[openssf.org/join](https://openSSF.org/join)



Thank You



Legal Notice

Copyright © [Open Source Security Foundation](#)®, [The Linux Foundation](#)®, & their contributors. The Linux Foundation has registered trademarks and uses trademarks. All other trademarks are those of their respective owners.

Per the [OpenSSF Charter](#), this presentation is released under the Creative Commons Attribution 4.0 International License (CC-BY-4.0), available at <<https://creativecommons.org/licenses/by/4.0/>>. You are free to:

- Share — copy and redistribute the material in any medium or format for any purpose, even commercially.
- Adapt — remix, transform, and build upon the material for any purpose, even commercially.

The licensor cannot revoke these freedoms as long as you follow the license terms:

- Attribution — You must give appropriate credit , provide a link to the license, and indicate if changes were made . You may do so in any reasonable manner, but not in any way that suggests the licensor endorses you or your use.
- No additional restrictions — You may not apply legal terms or technological measures that legally restrict others from doing anything the license permits.