

The Reporting Obligations at a Glance

A process map for manufacturers · Reporting obligations apply from **11 September 2026**

CLOCK STATUS

 **Clock not running**

PHASE 1 Intake

A signal arrives: researcher, customer, your own team, an authority, the media. It lands in the defined reporting channel (single point of contact).

 *Log receipt with a timestamp.*

 **Clock not running**

but you must assess **without undue delay**

PHASE 2 Initial assessment (without undue delay)

Assess against both triggers:

- 1** Is the vulnerability being actively exploited?
- 2** Is there a severe incident under para. 5?

 *Record the start and outcome of the assessment with timestamps.*

No to both: no reporting obligation

Treat as a normal vulnerability and document the decision. Voluntary reporting under Art. 15 remains possible.

VERIFIED = AWARENESS

 **The clock starts now.**

Record the moment with a timestamp.

 **Vulnerability track**

 **Incident track**

PHASE 3 Early warning

Via the Single Reporting Platform to the CSIRT + ENISA: product, title, countries of distribution (vulnerability) or suspected malicious act (incident).

 *In parallel: immediate technical countermeasures.*

 **Hour 0–24**

PHASE 4 Detailed notification

Follow up with analysis: nature, initial assessment, measures taken, workarounds for users. For incidents: time of detection and occurrence.

 *From now on (para. 8): inform affected customers directly.*

 **Hour 24–72**

PHASE 5 Develop the fix

Develop and test a patch or mitigation measure.

 *Record when it becomes available: that starts the final deadline (for vulnerabilities).*

 **No statutory deadline**

PHASE 6 Final report

Vulnerability: no later than 14 days after a fix is available. **Incident:** within 1 month of the 72-hour notification.

 *Publish an advisory, machine-readable as CSAF.*

 **≤ 14 days / ≤ 1 month**

 **Case closed — and provable**



Throughout: document everything



Every step lands in the case timeline with a timestamp.



Interim report (para. 6) = **an export, not a reconstruction.**



Provable: what you knew when, and which check ran when.