



Import/Export from Switzerland under EU Deforestation Regulation



Following information applies to micro, small, medium, or large sized operators importing/exporting from and to Switzerland

Last update: 15 September 2026

The EU Deforestation Regulation (EUDR) requires all companies placing relevant commodities on the EU market to prove that products are deforestation free, produced in accordance with the relevant legislation, and covered by a Due Diligence Statement (DDS). Switzerland, as a non-EU country, is treated as a third country under the EUDR and is therefore not directly subject to EU legislation. However, Swiss companies may still be indirectly affected when supplying to the EU and directly with an EU branch subject to the EUDR. Even though legal submission responsibility lie with the EU-based importer and Swiss-based exporters are expected to provide verifiable data. The document focuses on the key EUDR roles and requirements for different import and export scenarios between the European Union and Switzerland.

1 Scenario 1: Swiss Company Exports to the EU

A common misconception is that the first EU company automatically becomes responsible for EUDR compliance when products are supplied from Switzerland. In most cases, the EU importer bringing the product into the EU (for example, chocolate or roasted coffee purchased from a Swiss supplier) is the operator and must fulfil the EUDR obligations. However in case of a Swiss company itself imports the product into the EU and releasing it for free circulation, the first EU-established company subsequently placing the product on the EU market is also considered an operator (see Article 7 and [FAQ 3.7](#)).

As a consequence of Article 7, there may be two operators in the same supply chain with independent EUDR obligations:

1. The non-EU operator (Swiss company) who must conduct due diligence and submit a DDS.
2. The EU-based operator must also conduct due diligence and submit a DDS (Article 7 EUDR)

The first EU-based company receiving and placing the product on the EU market becomes the Operator under EUDR.

Information requirements vary based on whether an EU-based company is importing:

- a) commodities grown and harvested in Switzerland and exported directly to EU from a small or micro enterprise e.g. timber, cattle or soy → EU based company requires information for a simplified declaration (Article 4a EUDR)
- b) products manufactured in Switzerland using raw materials from a standard- or high-risk Country e.g. chocolate with cocoa from Côte d'Ivoire → Providing information for the full due diligence so that the EU-based company can submit a DDS (Article 8 EUDR)

2 Scenario 2: Swiss trading entity between two EU transactions

e.g. import of coffee into the EU, export to Switzerland for roasting, followed by the re-import and placing on the EU market of the roasted coffee.

- **EU based company import of EUDR relevant products to the EU:** carry out due diligence and submit a DDS.
- **EU company export of coffee from the EU to Switzerland:** DDS reference must be available and linked to export declaration.
- **Manufacturing in Switzerland:** Swiss manufacturer is not an EU operator under the EUDR but maintains the EUDR status and traceability of the coffee.
- **Re-import of roasted coffee into the EU:** the EU-importer may refer to the relevant existing DDS(s) rather than duplicating due diligence efforts.

3 Scenario 3: EU Company Exports Directly to Switzerland

Requirements for products being exported from the EU to Switzerland are straightforward: according to the EUDR, all products and commodities entering and leaving the EU market must comply with the regulation and EU-based company act as a (first) downstream operator.

Export commodities to Switzerland require:

- Ensure due diligence has been carried out and a DDS exists, obtain the DDS reference number
- Keep records of supplier and downstream actor for at least 5 years (Article 12(3) EUDR)
- Downstream operators do not include DDS reference in the customs declaration (Article 26 (4) EUDR)



Should Swiss companies prepare a DDS for EU Operators?

In many cases, yes, but not always. The answer depends on the Swiss company's role in the transaction and whether it qualifies as a non-EU operator under the EUDR (see the scenarios page 1).

Do Swiss companies have access to the TRACES-information system?

In order to access the TRACES platform, a company is required to have a EORI (Economic Operators' Registration and Identification) Number. Businesses established outside the EU may also obtain an EORI number in an EU Member State. In general, the application should be submitted in the first Member State where the business intends to place products on the EU market.

Can a Swiss company act as “authorised representative” for an EU company?

No, an authorised representative must be established in the Union. Swiss companies without a branch in a European Member State will have access to TRACES even with an EORI number in the role of an operator.

If the Swiss company has its own legal entity or subsidiary established in the EU, they can act as an authorised representative under the following conditions:

- the company intending to act as the authorised representative must possess an EORI Number
- both parties must have a written agreement stating respective responsibilities

The authorised representative submits the DDSs in the Information System (TRACES) on behalf of an operator. The EU-Company retains responsibility to demonstrate compliance with the due diligence regulations (conduct due diligence; perform risk assessments; collect geolocation data) and must be able to provide proof if audited.

Practical Guidance for Swiss Companies

- Collect and maintain all EUDR-required due diligence information.
- Be able to provide geolocation and legality evidence to EU customers.
- Support EU customers during audits and regulatory inquiries.
- Act as an authorised representative only through a legal entity or subsidiary established in the EU. (FAQ 3.7)

Practical Guidance for EU Companies sourcing from Swiss Companies

- Determine whether the EU company qualifies as the operator responsible for placing the product on the EU market.
- Obtain and retain all EUDR-required due diligence information from the Swiss supplier.
- Clarify responsibilities related to customs clearance and assess whether Article 7 EUDR applies and whether independent operator obligations arise for the EU entity.
- Pay particular attention to Swiss traders, toll manufacturers, and re-import scenarios.

