

Micro, Small and Medium Trader Obligations



FAIRTRADE

Co-funded by
the European Union

Relevant for Micro, Small and Medium (SME) Traders

Last update: 27 January 2026

Who is considered as an SME Trader under the EUDR?

Under the EU Deforestation Regulation (EUDR), traders are companies that make relevant commodities or products available on the EU market without being the first to place them on the market. The suppliers of traders already submitted a due diligence statement and traders do not change the relevant HS code via processing. SME traders are traders that fall under the EU definition of micro, small and medium-sized enterprises (SMEs). Compared to large companies, they benefit from simplified obligations under the EUDR.

What reliefs apply to SME traders under the EUDR?

A. No Due Diligence Statement (DDS) Requirement

SME traders do not need to carry out their own due diligence if the products they sell are already covered by a DDS submitted by an upstream operator. Thus they do neither need to collect geolocations nor submit a DDS.

However, SME traders must collect and keep for 5 years:

- Suppliers information (Article 5a)
- Downstream trading partners information (Article 5b)
- Only in case of being the first trader: existing DDS reference number or declaration identifier
- Provide that information to the competent authorities upon request.

B. No compliance officer or independent audit

Unlike large operators, SME traders are not required to appoint a compliance officer, or commission an independent audit.

Nevertheless, SME traders must still:

- Notify the relevant authorities and the traders to whom they supplied the product about any risk of non-compliance.
- Ensure they do not knowingly place non-compliant products on the EU market.

C. No Annual Reporting Obligation

SME traders do not need to publish an annual report.

SME traders are only required to keep records of relevant supply chain information and the related Due Diligence Statement (DDS) for five years.

Relevant EUDR Article 5: Obligation of Traders

SME traders shall collect and keep the following information relating to the relevant products they intend to make available on the market:

- (a) the name, registered trade name or registered trade mark, the postal address, the email address and, if available, a web address of the operators or the traders who have supplied the relevant products to them, as well as the reference numbers of the due diligence statements associated to those products;
- (b) the name, registered trade name or registered trade mark, the postal address, the email address and, if available, a web address of the operators or the traders to whom they have supplied the relevant products.

EUDR readiness with Fairtrade



Is this helpful to you?
Please let us know!

eudr-support@fairtrade-deutschland.de

