



Photo: Fairtrade MAPP

# Mass balance: Fairtrade under the EU-Deforestation Regulation

Relevant for micro, small and  
medium and large operators



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## Mass balance under the EUDR

The EUDR prohibits the mixing of deforestation-free products with products that carry a deforestation risk or whose origin cannot be verified ([see FAQ 1.4](#)).

To comply with the EUDR, companies must therefore ensure that deforestation-free products and raw materials remain separate from any products or materials that cannot be demonstrated to be deforestation-free throughout the entire supply chain.

## When is mixing allowed under the EUDR?

The EUDR allows mixing only if all products and/or raw materials involved are demonstrably deforestation-free. This means that, under the EUDR, the only permissible form of "mass balance" is the combination of:  
deforestation-free product/material + deforestation-free product/material.

### Important:

**In such cases, companies must be able to provide full due diligence documentation and proof of compliance for each product and each site of production.**

EUDR FAQs 1.24: "For instance, a large, bulk shipment of soy that has been sourced in several hundred plots of land from several countries would need to be associated with a due diligence statement that includes all relevant countries of production and geolocation information for every single plot of land from all of these countries that have contributed to the shipment."

## Mass-balanced cocoa: sector practices

The cocoa industry is primarily characterised by mass balance sourcing, which is essential for blending. In practice, this blending usually occurs after the cocoa is imported into the EU and during the processing or manufacturing stages.

**Further guidance material:**  
Cocoa

## EUDR FAQ (April 2026)

1.4: The Regulation requires that the commodities used for all products falling under the scope be traceable to the plot of land.

Mass balance chains of custody that allow for the mixing, at any step of the supply chain, of deforestation-free commodities with commodities of unknown origin or non-deforestation-free commodities are not allowed under the Regulation, because they do not guarantee that the commodities placed on the EU market, or exported, are deforestation-free.

Therefore, the commodities placed on the EU market, or exported, need to be segregated from commodities of unknown origin or from non-deforestation-free commodities at every step of the supply chain.

1.5: If identification and separation cannot be done, for instance because the non-compliant products have been mixed with the rest, then the whole relevant product is non-compliant.

## How does Fairtrade support companies?

Geolocation data from Fairtrade producers involved in mass-balanced supply chains, in line with Fairtrade Standards

Assurance that geolocations are subject to deforestation risk assessments

Expertise and support on supply chain traceability

# Can Fairtrade mass balance cocoa still be sourced under the EUDR?

In Fairtrade, mass balance is a traceability system that allows Fairtrade certified and Fairtrade non-certified ingredients to be mixed within the supply chain, provided that for each product sold as Fairtrade on the consumer market, an equivalent volume has been sold by producers under Fairtrade terms.

## This approach helps to:

- increase sales opportunities for farmers by allowing companies to scale their commitment to Fairtrade sourcing (e.g. by avoiding prohibitively high segregation costs)
- give consumers confidence that the volume of certified ingredients sold matches the volume originally produced by certified farmers.

**This approach to mass balance can meet the requirements of the EUDR - as long as Fairtrade materials are not mixed with non-deforestation free materials or materials of unknown origins.**

## Traceability models in Fairtrade

Fairtrade distinguishes between different traceability levels/chain of custody models:

### Identity Preserved (IP)

- Full traceability back to the specific producer organisation and plot of land
- Voluntary under Fairtrade Standards
- Applies only to a limited number of products

### Segregated

- Certified products are kept physically separate from non-certified products throughout the supply chain

### Mass Balance

- Certified and non-certified products may be mixed
- Strict monitoring and accounting of certified volumes is required

**EUDR compliance does not require a switch from mass balance to identity preserved or segregated. Given that geolocations from all connected origins are collected under the EUDR, the Fairtrade mass balance model can continue. Full preservation of identity is not required as long as a deforestation free origin is secured.**

## Key Takeaways

Mixing compliant and non-compliant products or materials is not allowed and will render the entire product non-compliant.

Segregation, both physical and digital, is essential to ensure EUDR compliance.

Products or materials from different sources may be mixed only if all are EUDR compliant; in such cases, due diligence information must be collected for each product and production site.

Fairtrade can support companies in addressing traceability requirements and related challenges.

