

ASI Claims Guide

Version 1

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Aluminium Stewardship Initiative (ASI)

ASI is a not-for-profit standards setting and certification organisation for the aluminium value chain.

Our **vision** is to maximise the contribution of aluminium to a sustainable society.

Our **mission** is to recognise and collaboratively foster responsible production, sourcing and stewardship of aluminium.

Our **values** include:

- Being inclusive in our work and decision making processes by promoting and enabling the participation of representatives in all relevant stakeholder groups.
- Encouraging uptake throughout the bauxite, alumina and aluminium value chain, from mine to downstream users.
- Advancing material stewardship as a shared responsibility in the lifecycle of aluminium from extraction, production, use and recycling.

General Enquiries

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Disclaimer

This document does not intend to, nor does it, replace, contravene or otherwise alter the requirements of the ASI Constitution or any applicable national, state or local government laws, regulations or other requirements regarding the matters included herein. This document gives general guidance only and should not be regarded as a complete and authoritative statement on the subject matter contained herein. ASI documents are updated from time to time, and the version posted on the ASI website supersedes all other earlier versions.

The official language of ASI is English. ASI aims to make translations available in a range of languages and these will be posted on the ASI website. In the case of inconsistency between versions, reference shall default to the official language version.

ASI Claims Guide

Contents

1. Introduction.....	1
1.1. Sustainability Standards and Claims.....	1
1.2. Purpose of this Guide.....	2
1.3. Applicability of this Guide	2
1.4. Compliance with this Guide	2
1.5. Legal Compliance	2
1.6. Related ASI documents	2
1.7. Review of this Guide	2
2. Types of ASI Claims covered by this Guide.....	4
2.1. ASI Membership Claims	4
2.2. ASI Certification Claims	4
2.3. Other marketing claims.....	5
2.4. Claims by non-members	5
2.5. Fees for the use of claims – no additional fees	5
3. General requirements for all ASI-related claims	6
3.1. Introduction	6
3.2. General references to ASI	6
3.3. Principles to avoid misleading or confusing use.....	6
4. ASI Membership claims	7
5. ASI Certification claims – Performance Standard.....	9
6. ASI Certification claims – Chain of Custody (CoC) Standard.....	12
7. Approvals for claims	16
7.1. When is approval required.....	16
7.2. Approvals process	16
7.3. Renewals and reporting	17
7.4. General marketing and communications – approvals not required.....	17
8. ASI logos and use requirements	18
8.1. ASI Style Guide	18
8.2. Exceptions	18
8.3. QR Code	18
9. Monitoring and enforcement.....	19
9.1. Monitoring use of claims.....	19
9.2. Responding to identified misuse by members	19
9.3. Responding to identified misuse by non-members	20
10. Contact ASI.....	20
11. Glossary.....	21
12. Appendix 1 – Claims Approval Requests.....	21

1. Introduction

1.1. Sustainability Standards and Claims

Voluntary sustainability standards, like ASI, enable participating organisations to make **claims**. These tend to differentiate a product, process, or business, with reference to one or more of the three pillars of sustainability: social, economic and/or environmental.

Claims may be public/consumer-facing or business to business (B2B). They usually relate to:

- The intent or mission of the standards system
- Participation in a standards system
- Compliance with a standard
- The impacts of the system
- General marketing or promotional claims ¹

Logos are the most recognisable forms of sustainability claims. Many standards organisations use them to help customers and consumers reliably identify products that comply with a standard. For the purposes of ASI, a claim or representation ('claims') is documented and consists of one or more of:

- Use of an ASI logo
- Use of an ASI Certification number
- A text claim relating to ASI, which may be inside and/or alongside the logo, or standalone
- Access to further information to support the claim, such as a website link

As claims are frequently relied upon by business partners and ultimately consumers, it is essential that they not be inaccurate or misleading. In some jurisdictions, certain terms and concepts like 'sustainable' and 'recycled' have legal restrictions associated with them when used in marketing. Claims that appear absolute or imply performance levels beyond what is actually required or assured in a standard may be accused of 'greenwashing'.

ASI has a clear responsibility to control all relevant ASI-related claims to ensure they are both credible and accurate. Given the diversity of industries and supply chain activities involved in the aluminium value chain, there will be different forms of claim and differing relevance to various participants and their stakeholders. This Guide provides both principles and practical examples of how ASI members may make claims. It is in the interests of all ASI members and supporting organisations to follow the rules regarding ASI-related claims, and thus support the program's ongoing integrity and value.

¹ ISEAL Alliance, *Sustainability Claims Good Practice Guide*, May 2015. Accessed: www.iseal.org/claims

1.2. Purpose of this Guide

The purpose of the ASI Claims Guide is to set out the rules and supporting guidance for the types of claims made regarding ASI Certification and Membership. Specifically, this Guide gives instruction on:

- Claims relating to ASI Membership
- Claims relating to the ASI Performance Standard
- Claims relating to the ASI Chain of Custody Standard
- Use of ASI Logos and QR Code
- Monitoring, enforcement and complaints

1.3. Applicability of this Guide

The Guide must be used by ASI Members when making ASI-related claims, and by any non-members making ASI-related marketing claims. It is also publicly available to assist other stakeholders in their understanding of ASI-related claims.

1.4. Compliance with this Guide

If an ASI Member does not comply with one or more of the rules and conditions specified in this Guide, ASI can withdraw the right to use the ASI logo and/or suspend or terminate ASI membership.

If you see any ASI logos or claims being used inappropriately, or potentially misleading or fraudulent claims or representations about ASI by either members or non-members, please notify us immediately at info@aluminium-stewardship.org so that we may investigate and take action. The procedures of the ASI Complaints Mechanism may apply, where relevant (see section 9).

1.5. Legal Compliance

Organisations that make ASI-related claims are each responsible for legal compliance with Applicable Law, including applicable laws and regulations related to labelling, advertisement, and consumer protection and Antitrust Laws (applicable laws and regulations relating to antitrust and competition), at all times. ASI cannot accept liability for any violations of Applicable Law or any infringement of third-party rights made by other organisations.

1.6. Related ASI documents

ASI has a range of published information to support its program. Please visit the ASI website at www.aluminium-stewardship.org for more information on:

- ASI Membership
- ASI Standards – Performance Standard and Chain of Custody Standard
- ASI Certification and Assurance
- Media resources

1.7. Review of this Guide

The ASI Secretariat will continue to engage with members and stakeholders on the content, implementation and oversight of the requirements of the ASI Claims Guide. The Guide will be

regularly reviewed to take account of implementation experience, and identify where guidance and procedures can be improved.

2. Types of ASI Claims covered by this Guide

2.1. ASI Membership Claims

ASI has six membership classes:

- Production and Transformation
- Industrial Users
- Civil Society
- Downstream Supporters
- Associations
- General Supporters

All ASI members may make claims about their **ASI Membership** to customers, suppliers, consumers, media organisations and stakeholders generally.

Claims relating to ASI membership must be consistent with the scope detailed in the member's application form to ASI. See section 4 for more information.

Tip:

If you are part of the marketing and communications team in your organisation, make sure you know ASI's primary contact in your own organisation. They can help explain the scope of your organisation's ASI membership and/or certification. If you don't know who this is, contact the ASI Secretariat – info@aluminium-stewardship.org

2.2. ASI Certification Claims

ASI Members in the Production and Transformation and Industrial Users membership classes are required to achieve ASI Certification against the ASI Performance Standard, and may also voluntarily seek Chain of Custody (CoC) Certification.

Certified members may make claims about their **ASI Certification** to customers, suppliers, consumers, media organisations and stakeholders generally.

Claims must be consistent with the type and scope of ASI certification that the ASI Member has achieved. See sections 5 and 6 for more information.

2.3. ASI Claims used for other certification programs

ASI encourages the recognition of ASI Chain of Custody (CoC) Certification by relevant sector-specific schemes for the responsible sourcing of materials (for example, in the building and construction sector). Certified members making claims about CoC Certification and/or ASI Aluminium or ASI Credits into such schemes must also abide by any additional rules regarding claims as set out by these schemes. See section 6 for more information.

2.4. Other marketing claims

ASI members may also make claims that relate to corporate commitments or expressions of support that relate to ASI membership and/or certification, but are not necessarily based on or assured by ASI's standards. For example, other marketing claims could include statements expressing their general level of commitment or involvement in ASI's work program, support for responsible sourcing of aluminium, or an intention to work towards certification in their business.

All such claims must be consistent with the general principles set out in section 3 of this Guide.

2.5. Claims by non-members

Organisations that are not members of ASI may be able to make general marketing claims that make reference to ASI, subject to the applicable requirements of this Guide.

In the aluminium value chain, non-members may include:

- **Organisations that wish to support responsible sourcing by expressing preference or commitment to ASI certified suppliers.** This is permitted where claims are in conformance with the general principles set out in section 3 of this Guide. Such organisations are strongly encouraged to also become ASI members in the Downstream Supporters category, to provide tangible support to ASI's management of the certification program.
- **Organisations with a non-controlling interest in a joint venture or similar arrangement that is covered by ASI Certification.** The Entity in Control of the joint venture would need to be an ASI Member in order to seek and achieve Certification (in a jointly controlled JV, only one of the controlling parents needs to be an ASI Member for this purpose). Any separate claims made by non-members must be in conformance with the general principles set out in section 3 and with section 5 and/or 6 on ASI Certification.
- **Organisations that have acquired through ownership or Control one or more businesses or facilities covered by ASI Certification.** The acquiring organisation has 6 months to become an ASI Member and 12 months to have a Surveillance Audit to maintain ASI Certification, else it will be revoked. During this period, any claims must be in conformance with the general principles set out in section 3 and with section 5 and/or 6 on ASI Certification.

2.6. Fees for the use of claims – no additional fees

ASI members pay an annual membership fee to ASI to support its work program. No additional usage or licensing fee currently applies for any legitimate use of the ASI logo or associated claims. The ASI Board reserves the right to review and amend fee structures from time to time.

3. General requirements for all ASI-related claims

3.1. Introduction

The ASI name and logo provide independent assurance for an organisation's commitment to responsible production, sourcing and stewardship of aluminium. Consistent, accurate and appropriate use will help build awareness, recognition and credibility of ASI.

ASI reserves the right to act on any use of its name or logo that it believes to be inappropriate. More information on monitoring and enforcement is found in section 9 of this Guide.

3.2. General references to ASI

The following rules apply to general references to ASI:

- ASI can be referred to as 'Aluminium Stewardship Initiative Ltd', 'Aluminium Stewardship Initiative', and/or 'ASI'.
- The above names and acronyms may not be translated into other languages without also retaining the English version/s for reference.
- Misleading or confusing use of the ASI name or logo is prohibited (see section 3.3).
- Associating the ASI name or logo with products without CoC Certification is prohibited.
- The use of the ASI name or logo as, or as part of, another brand name is prohibited.
- The ASI name or logo must not be placed in such a way that it could be interpreted as belonging to any company or organization other than ASI or its members.
- The use of the ASI name or logo alongside other sustainability/responsible sourcing logos, marks or seals is generally permitted.

3.3. Principles to avoid misleading or confusing use

In addition to the above, the ASI name or logo must never be displayed in a way that could:

- Confuse any audience as to the association of ASI with other brands or logos
- Suggest or imply ASI membership or certification of an entity that is not an ASI member, or part of an ASI member
- Suggest or imply ASI certification before it has been achieved
- Suggest or imply a larger scope of ASI certification than an ASI member has achieved
- Suggest or imply that other metals, materials or products are ASI certified
- Lead to any harm or prejudice to the reputation or credibility of ASI.

If you are unsure about the interpretation of any of the above in a particular situation, contact the ASI Secretariat at communications@aluminium-stewardship.org

4. ASI Membership claims

Table 1, below, focuses on claims related to ASI Membership, who is eligible to make them, examples of permitted claims, and whether approval from ASI is required.

Types of claims	Eligibility	Examples of claims	Approval from ASI required
ASI membership – general	ASI members – all membership classes ('Associations', 'Civil Society', 'Downstream Supporters', 'General Supporters', 'Industrial Users', 'Production and Transformation')	<ul style="list-style-type: none"> <i>[Member name]</i> is a member of the Aluminium Stewardship Initiative (ASI). ASI's mission is to recognise and collaboratively foster the responsible production, sourcing and stewardship of aluminium. <i>[Member name]</i> is proud to be a <i>[insert class eg Production and Transformation / Associations]</i> member of ASI. <i>[Member name]</i> joined ASI in <i>[year]</i>. <i>[Member name]</i> joined ASI on its incorporation in 2015, and was involved in its early development since 2009. 	No
ASI membership – working towards certification	ASI members in 'Production and Transformation' and 'Industrial Users'	<ul style="list-style-type: none"> <i>[Member name]</i> is a member of the Aluminium Stewardship Initiative (ASI). We are committed to achieving ASI Certification to support responsible practices in the aluminium value chain. <i>[Member name]</i> is a member of the Aluminium Stewardship Initiative (ASI). We are working towards achieving ASI Certification by <i>[relevant date e.g. within 2 years of the launch of the ASI Certification or of joining ASI (whichever is later), or an internal target date]</i>. 	No
ASI membership – other	ASI members – all membership classes	<ul style="list-style-type: none"> <i>[Member name]</i> is a member of the Aluminium Stewardship Initiative (ASI). Our membership means that <i>[e.g. we have great practices or are super responsible – in other words, any claim relating to performance, where ASI Certification has not been achieved]</i>. <i>[Member name]</i> is an Associations member of the Aluminium 	Not permitted – seek further Guidance from ASI Secretariat

		Stewardship Initiative (ASI). This means all our members are complying with ASI standards <i>[where this is not the case!]</i> .	
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Table 1 – ASI Membership claims

In general terms, approval is **not** required for claims that relate to objective facts – whether an organisation is an ASI member or not, when they joined, ASI’s aims and activities, or a commitment to achieving certification (which is an undertaking for members joining in the ‘Production and Transformation’ and ‘Industrial Users’ membership classes).

Web-links can be used to link to publicly available information, including ASI members’ own pages on the ASI website.

Tip:

Consider linking to the ASI website: www.aluminum-stewardship.org

Or link to your organisation’s own member page on the ASI website – find yours through:

<http://aluminium-stewardship.org/about-asi/current-members/>

Approval from ASI **is required** for claims that relate to or imply practices, performance or similar, particularly where ASI Certification has not been achieved.

Where such claims go beyond what ASI membership means, or contravene the principles in section 3.3 of this Guide, they would not be permitted. Members will be asked to revise their claims such that they do not contravene the principles in section 3.3 of this Guide.

ASI can assist members with developing an appropriate tailored claim for their situation, based on an understanding of the applicable ASI Certification Scope/s. Further information on the approvals process can be found in section 7.

5. ASI Certification claims – Performance Standard

ASI members in the ‘Production and Transformation’ and ‘Industrial Users’ membership class are eligible to make claims about ASI Certification, once achieved. There are two ASI Standards for certification – the ASI Performance Standard and the ASI Chain of Custody (CoC) Standard (see section 6).

Your organisation may currently be certified against none, one or both – be sure to check, and verify which claims you are eligible to make.

Tip:

It is essential to know the Certification Scope that applies for any ASI Certifications that your organisation holds, as this will affect what you refer to in your claim.

The Certification Scope describes what parts of the business the certification covers – this may be the whole business, selected entities within the business, selected sites/facilities or selected program/product areas. For background please see the ASI Assurance Manual.

If you don’t know your Certification Scope, check your ASI member page for the relevant ASI Certificates that will contain this information – find yours through:

<http://aluminium-stewardship.org/about-asi/current-members/>

Alternatively contact the ASI Secretariat – info@aluminium-stewardship.org

Table 2, below, focuses on claims related to ASI Certification for the **Performance Standard**, who is eligible to make them, examples of permitted claims, and whether approval from ASI is required.

Types of claims	Eligibility	Examples of claims	Approval from ASI required
ASI Certification (Performance Standard) – Business level Certification Scope	Certified entities	<ul style="list-style-type: none"> <i>[Member/entity name]</i> has achieved ASI Performance Standard Certification across its business. Sustainability is important to <i>[Member/entity name]</i>. We are certified against the ASI Performance Standard to demonstrate our commitment to help maximise the contribution of aluminium to a sustainable society. 	No
ASI Certification (Performance Standard) – Business level Certification Scope	Certified entities – <i>Production and Transformation class</i>	<ul style="list-style-type: none"> Sustainability is important to <i>[Member/entity name]</i>. That is why we are Certified against the ASI Performance Standard for responsible production and stewardship of aluminium. 	No
ASI Certification (Performance Standard) –	Certified entities – <i>Industrial Users class</i>	<ul style="list-style-type: none"> Sustainability is important to <i>[Member/entity name]</i>. That is why we are Certified against the ASI 	No

Business level Certification Scope		Performance Standard for responsible stewardship of aluminium.	
ASI Certification (Performance Standard) – Facility level Certification Scope	Members with certified Facilities	<ul style="list-style-type: none"> • <i>[Member name]</i> is an ASI Member and <i>[Facility name]</i> in <i>[Country]</i> has achieved ASI Certification against the Performance Standard. • Sustainability is important to <i>[Member name]</i> and <i>[Facility name]</i> achieved ASI Certification against the Performance Standard in <i>[year]</i>. 	No
ASI Certification (Performance Standard) – Facility level Certification Scope	Members with Certified Facilities – <i>Production and Transformation class</i>	<ul style="list-style-type: none"> • <i>[Member name's] [Facility name]</i> is ASI Certified for responsible production and stewardship of aluminium. 	No
ASI Certification (Performance Standard) – Facility level Certification Scope	Members with Certified Facilities – <i>Industrial Users class</i>	<ul style="list-style-type: none"> • <i>[Member name's] [Facility name]</i> is ASI Certified for responsible stewardship of aluminium. 	No
ASI Certification (Performance Standard) – Program level Certification Scope	Certified entities – <i>Industrial Users class</i>	<ul style="list-style-type: none"> • <i>[Member/entity name]</i> is an ASI Member and <i>[Program name]</i> in <i>[Country]</i> has achieved ASI Certification against the Performance Standard. • Sustainability is important to <i>[Member/entity name]</i> and <i>[Program name]</i> achieved ASI Certification against the Performance Standard in <i>[year]</i>. • <i>[Member/entity name's] [Program name]</i> is ASI Certified for responsible stewardship of aluminium. • <i>[Member name's] [Program description]</i> is ASI Certified for implementation of material stewardship principles for aluminium <i>[in design / recycling / as relevant]</i>. 	No
ASI Certification (Performance Standard) – topic focus	Certified Entities	<ul style="list-style-type: none"> • <i>[Member/entity/facility/program name's]</i> is Certified against the ASI Performance Standard. This provides assurance of our work on <i>[for example, as applicable, forced labour/modern slavery/human</i> 	

		<i>trafficking issues; human rights due diligence; evaluating the life cycle impacts of our products; occupational health and safety].</i>	
ASI Certification (Performance Standard) – Provisional Certification	Entities with Provisional Certification	<ul style="list-style-type: none"> • <i>[Member/entity name]</i> has been granted ASI Provisional Certification and is transitioning to compliance over the next <i>[6 months/1 year]</i>. 	No

Table 2 – ASI Certification – Performance Standard claims

For claims which go beyond the above general examples, ASI can assist members with developing an appropriate tailored claim for their situation, based on an understanding of the applicable ASI Certification Scope/s. Further information on the approvals process can be found in section 7.

6. ASI Certification claims – Chain of Custody (CoC) Standard

Certification **against the ASI Performance Standard alone** (section 5) **does not** permit any claims about ‘certified aluminium’. This is because the ASI Performance Standard requirements relate only to principles and practices applied within the responsibility of the certified entity, and not to the flow of material through the supply chain.

Where claims do relate to **certified aluminium or raw materials** that has been produced or sourced under ASI standards, such claims **must** be supported by **both** the Performance Standard and Chain of Custody (CoC) Certification.

Important point:

Any claims about ASI Aluminium (or other CoC Material eg bauxite, alumina or aluminium-containing products etc) or ASI Credits must be supported by certification against the ASI Chain of Custody (CoC) Standard, covering the relevant scope/s. For more information, see the ASI Assurance Manual and CoC Standards Guidance document, or contact the ASI Secretariat at communications@aluminium-stewardship.org

Table 3, below, focuses on claims related to ASI Certification for the **Chain of Custody (CoC) Standard**, who is eligible to make them, examples of permitted claims, and whether approval from ASI is required.

Note that approval from ASI is required as noted in the table below for product-related claims, in addition to the granting of ASI Certification – these are controlled claims.

Types of claims	Eligibility	Examples of permitted claims, where applicable	Approval required from ASI
ASI CoC Certification			
ASI CoC Certification – general	Members/entities with CoC Certification	<ul style="list-style-type: none"> <i>[Member/entity name]</i> is ASI Chain of Custody Certified. This means we support <i>[as relevant to the message e.g.:</i> <ul style="list-style-type: none"> <i>responsible sourcing of aluminium</i> <i>responsible mining practices</i> <i>reducing greenhouse gas emissions from aluminium smelting</i> <i>enhanced recycling and material stewardship of aluminium]</i> 	No
ASI CoC Certification – general	Members/entities with CoC Certification – up	<ul style="list-style-type: none"> <i>[Member/entity name]</i> is ASI Chain of Custody Certified for production of ASI <i>[Bauxite, Alumina, Aluminium]</i>. 	No

	<i>to and including the Casthouse</i>		
ASI CoC Certification – Provisional Certification	Entities with Provisional Certification	<ul style="list-style-type: none"> [Member/entity name] has been granted Provisional Certification against the ASI Chain of Custody Standard and is transitioning to compliance over the next [6 months/1 year]. 	No
ASI CoC Document – related to physical product	Members/entities with CoC Certification	<ul style="list-style-type: none"> Any standardised information and wording for shipments of CoC Material (including ASI Aluminium), audited as part of CoC audit. 	No
On Product Claims			
ASI CoC Certification and CoC Material – on product claims (Excludes ASI Credits)	Members/entities with CoC Certification	<ul style="list-style-type: none"> Any claims relating to ASI that appear on products, for example imprinted on metal or on packaging. This includes ASI logos and/or text claims. For example: <ul style="list-style-type: none"> The aluminium in this product corresponds to an equivalent mass of ASI Aluminium produced by an unbroken chain of ASI Certified Entities through the supply chain. Not permitted: ‘this product comes from certified sources’, or ‘this product contains responsibly produced aluminium’. Not permitted: On-product claims that reference ASI Credits. Where claims are made as an input into a sector-specific scheme, then the relevant rules of that scheme would also apply. 	Yes
Off Product Claims			
Sourcing ASI Aluminium – off product claims	Members/entities with CoC Certification	<ul style="list-style-type: none"> Any off-product claims relating to ASI Aluminium that are relating to sourcing, or use in product ranges, markets or projects. For example: <ul style="list-style-type: none"> [Member/entity name] sourced [x kg/tonnes] of ASI Aluminium in 2018. This corresponds to an equivalent mass of ASI Aluminium 	No

		<p>produced by an unbroken chain of ASI Certified Entities through the supply chain.</p> <ul style="list-style-type: none"> ○ [Member/entity name] sourced ASI Aluminium which is equivalent to [x%] of our total aluminium purchased in 2018. This corresponds to an equivalent mass of ASI Aluminium produced by an unbroken chain of ASI Certified Entities through the supply chain. ○ [Member/entity name] sourced [x kg/tonnes] of ASI Aluminium on behalf of [XXX building project]. This corresponds to an equivalent mass of ASI Aluminium produced by an unbroken chain of ASI Certified Entities through the supply chain. <ul style="list-style-type: none"> • Where claims are made as an input into a sector-specific scheme, then the relevant rules of that scheme would also apply. 	
Purchasing ASI Credits	Members/entities with CoC Certification	<ul style="list-style-type: none"> • Any claims related to purchasing of ASI Credits. • For example: <ul style="list-style-type: none"> ○ [Member/entity name] purchased ASI Credits which is equivalent to [x%] of our total aluminium purchased in 2018. Purchase of ASI Credits supports responsible production of ASI Aluminium by ASI Certified Casthouses, while we continue to work towards sourcing ASI Aluminium directly through our supply chains. ○ [Member/entity name] purchased ASI Credits on behalf of [XXX building project]. Purchase of ASI Credits supports responsible production of ASI Aluminium 	Yes

		<p>by ASI Certified Casthouses, while we continue to work towards sourcing ASI Aluminium directly through our supply chains.</p> <ul style="list-style-type: none"> • Not permitted: ‘sourcing’ of Credits, ‘this product comes from certified sources’, or ‘this product contains responsibly produced aluminium’. • Not permitted: Claims referencing mass (eg X kg/tonnes) of ASI Credits (excluding ASI Credits Certificates under the CoC Standard, see below). • Claims must not imply that ASI Credits have been allocated to, or are contained within, physical products. • Where ASI Credits are accepted as an input into a sector-specific scheme, then the relevant rules of that scheme would also apply. 	
ASI Credits Certificate	Members/entities with CoC Certification	<ul style="list-style-type: none"> • Standardised information and wording for allocation of ASI Credits, audited as part of CoC audit. 	No
Non-Certified Entities			
Sourcing ASI Aluminium	Members/entities <i>without</i> CoC Certification	<ul style="list-style-type: none"> • Any claims related to sourcing of ASI Aluminium where the Member/Entity is not CoC Certified. 	Yes

Table 3 – ASI Certification – Chain of Custody claims

ASI can assist members with developing an appropriate tailored claim for their situation, based on an understanding of the applicable ASI Certification Scope/s. Further information on the approvals process can be found in section 7, and how to access the ASI Style Guide and ASI logos in section 8.

Note that downstream products may contain a range of other metals (for example in alloys) and/or other materials (for example, plastics, glass, paints and agricultural products). Such materials are not within the scope of ASI’s standards. Product claims must not imply ASI Certification of these other non-aluminium materials.

7. Approvals for claims

7.1. When is approval required

Claims that appear on products, or are related to sourcing ASI Aluminium and ASI Credits require approval from ASI (see table 3 above). This helps to ensure consistency and accuracy of such claims in connection with the relevant ASI certifications.

Organisations seeking to make these on-product or sourcing claims must ensure they meet the following requirements:

- Are a current ASI Member
- Where applicable, have current ASI Certification for **both** the ASI Performance Standard and ASI Chain of Custody Standard that includes the relevant production/product within its scope
- Agree to submit a description/visual of the proposed claim/s to ASI for advance review/approval.

ASI has the right to decline, suspend or withdraw approval for use of its logo and/or related claims where there is a risk that it may be misleading or confusing or bring ASI into disrepute. These decisions will be made at ASI's discretion.

7.2. Approvals process

The following steps provide a guide to the process and timelines for approval of ASI product-related claims.

- **Step 1:** Submit text/design to ASI for approval using the Claims Approval Request Form (see Appendix 1).
- **Step 2:** ASI will review, and aim to provide a response within 10 days in most circumstances.
- **Step 3:** If approved, the member may proceed with use of the text/design. If not, the design will need to be adjusted and re-submitted.
- **Step 4:** (Where applicable) ASI will review the re-submitted design, and aim to provide a response within 10 days in most circumstances.
- **Step 5:** Details of all applications and approvals will be recorded. Each approved application will be assigned a unique identifier to enable future traceability.

Claims content or designs should not be finalised or printed for commercial application until approval is granted by ASI. Examples of approved claims will be incorporated into future revisions of this Guide to provide additional guidance for submissions.

ASI seeks to support an efficient approvals process, so where groups of related products can be covered under the one approval process, this is encouraged. Related products should be overseen through common management systems in a member organisation, to ensure the approved claim/s and ASI's associated requirements are consistently followed.

Tip:

The Claims Approval process has been integrated into the ASI Assurance Platform – elementAL, enabling electronic submission and response. See Appendix 1 of this Guide for a summary of the information required.

To gain user account access to elementAL, contact the ASI Secretariat – info@aluminium-stewardship.org

7.3. Renewals and reporting

Approvals will be valid for a period of 12 months from the date of approval, or the date of launch of the product/s, whichever is most relevant.

ASI will contact members regarding renewal of approved claims approximately 1 month in advance of the end of a 12 month approval period, to confirm:

- Whether the claim is still being used 12 months after approval
- Whether a renewal of the approval for the next 12 months is sought
- Whether any changes to the claim detail are requested
- Any feedback to ASI on the claims approval system and/or stakeholder feedback on the member's claims that can be shared with ASI

If the claim is not renewed, it must be removed from the Entity's website promptly and no later than 1 month after the end of the approved claim validity. Without a current claim approval, no on-product claims can be produced.

7.4. General marketing and communications – approvals not required

ASI members may elect to make general marketing and communications claims in addition to, or instead of, the types of claims described in sections 4, 5 and 6.

These may relate to current and future commitments regarding responsible production, sourcing and/or stewardship of aluminium. Non-members, such as retailers and others that receive finished products with associated on-product or off-product ASI claims, may also wish to make these kinds of claims. These do not need further approval from ASI but must follow the same principles laid out in section 3.3 of this Guide. The ASI Secretariat will implement oversight procedures, as outlined in section 9 of this Guide, to monitor and enable enforcement of the requirements of this Guide.

While approvals are not required for these kinds of claims, the ASI Secretariat welcomes the opportunity to review members' communications about ASI and to provide advice and input as appropriate.

8. ASI logos and use requirements

8.1. ASI Style Guide

The ASI Style Guide contains information on:

- Available ASI logo formats
- Minimum size of logos
- Colours and permitted adaptations
- Background colours
- Exclusion zone
- Visual examples of acceptable and incorrect uses of logo placement, size, colour etc

It is available on the ASI website at: <http://aluminium-stewardship.org/about-asi/legal-finance-policies/>

For an electronic copy of relevant ASI logos in relevant formats, please contact the ASI Secretariat: communications@aluminium-stewardship.org

8.2. Exceptions

If you have a request for exceptions to the display requirements outlined in the ASI Style Guide due to space limitations or other reasons, or wish to confirm use in a particular application, please contact ASI. The request will be reviewed and a decision made with consideration of the principles of section 3.3 of this Guide.

All requests and decisions, including details of the exception, how it applied, and whether it was for a limited application or time period, will be recorded and taken into account for future revisions of this Guide.

8.3. QR Code

A QR Code is a machine-readable optical label that contains information about the item to which it is attached. They can be used in documents or on products or packaging.

ASI has developed a QR Code that takes viewers to the ASI website:



QR Code reader apps are freely available for both iOS and android systems.

If you would like an electronic copy of an ASI QR Code, or have a request for the development of a new ASI QR Code with more specific information or a different link, please contact the ASI Secretariat: communications@aluminium-stewardship.org

9. Monitoring and enforcement

9.1. Monitoring use of claims

ASI will adopt the following strategies to monitor use of ASI-related claims:

- Members' use of approved claims will be monitored as part of the ASI assurance process, particularly during surveillance and re-certification audits against the Chain of Custody Standard. This will be carried out by ASI Accredited Auditors.
- Additional surveillance for non-compliant or non-approved claims will be carried out.
 - For members, checks will be carried out at the time of annual renewal of membership. This will be carried out by the ASI Secretariat and will involve an inquiry to the member about any claims being made, along with follow-up checks of the member's website.
 - More generally, a Google Alert service is in place to identify internet-based claims and cross-check these with permitted and approved claims. This is overseen by the ASI Secretariat.
- ASI Complaints Mechanism: interested parties can report concerns relating to ASI claims or logo use, which will be followed up and/or investigated as per the procedure. The ASI Complaints Mechanism is available on the ASI website, and is overseen by the ASI Secretariat.

The risk of fraudulent or misleading claims will be regularly analysed as part of the ASI Risk Assessment and ASI's monitoring strategies may be expanded or adapted accordingly.

9.2. Responding to identified misuse by members

In the case of ASI members, the ASI Secretariat will:

- Notify the member of any identified false, misleading or otherwise inappropriate claims
- Seek immediate corrective action from the member, providing guidance on appropriate claims (including this Guide)
- Track corrective action by the member and confirm outcomes
- Log key steps in this process

Where corrective action is not undertaken in a timely manner or is inadequate, suspension of the claim approval and/or ASI Certification may come into effect for specified periods. The ASI Secretariat will provide notifications of suspension, and will identify the steps the member is required to undertake in order to lift the suspension.

In serious cases of deliberate fraud, and/or which bring ASI into disrepute, the offending member may undergo a disciplinary process following which their ASI membership may be suspended or terminated. ASI's disciplinary procedures are contained in the ASI Constitution.

In cases where approved claims, ASI Certification or ASI Membership are suspended or withdrawn, organisations who have relied on these claims in good faith will be notified. General information will also be added to the ASI website for transparency purposes.

In the majority of cases, the status of related products already in the supply chain will not be affected. Product already in the supply chain beyond the offending member/stage in the chain can continue to carry the claim, since it was supplied when ASI Certification was still valid. There is no requirement to retroactively remove claims from material that was supplied before the suspension/withdrawal took effect.

However some members may evaluate the potential impact of a suspension/withdrawal situation on their own ASI-related claims, and are welcome to contact the ASI Secretariat for additional guidance.

9.3. Responding to identified misuse by non-members

Where misuse of ASI logo and/or claims is made by non-members, the ASI Secretariat will:

- Notify the organisation of any identified false, misleading or otherwise inappropriate claims
- Seek immediate corrective action from the organisation, explaining ASI's requirements
- Track corrective action by the organisation and confirm outcomes
- Log key steps in this process

Where corrective action is not undertaken in a timely manner or is inadequate, the matter will be escalated. The ASI Secretariat may seek legal advice, the result of which could include 'cease and desist' letters and/or legal action. ASI will also publish information about the misuse on the ASI website and its social media accounts as both a deterrent to the offending organisation and to inform members and stakeholders of the issue.

10. Contact ASI

This Guide aims to cover the key information relating to making ASI-related claims. ASI welcomes your feedback and questions, which will be used to inform future revisions of the Guide.

To seek approval for product-related claims, or if you have any questions, comments or concerns regarding ASI claims or logo use, please contact us by email at:

communications@aluminium-stewardship.org

The ASI website also has a range of material available on its standards and certification processes:

www.aluminium-stewardship.org

11. Glossary

Aluminium	Aluminium is a chemical element with symbol Al and atomic number 13. It is a silvery-white, soft, nonmagnetic, ductile metal. Aluminium is the third most abundant element, and the most abundant metal in the Earth's crust. It can be pure or alloyed with other metals (Mg, Si, Mn, Cu, Zn, Fe, Cr and others). In ASI documents, the raw materials used to produce the metal (bauxite ore and alumina) as well as Aluminium alloys may be referred to as Aluminium in its generic meaning. ASI covers metallic Aluminium and not other forms of chemical compounds that may contain aluminium.
Applicable Law	The relevant international and/or national and/or state and/or local laws of the country or countries where the Entity operates. This may include, but is not restricted to, acts, regulations and statutory policies. Where a conflict arises between Applicable Law and the requirements of the ASI Performance Standard, the Entity should comply with the higher standard except where this would result in a violation of Applicable Law. (Adapted from Responsible Jewellery Council – Code of Practices 2013)
ASI	Aluminium Stewardship Initiative Ltd
ASI Accredited Auditors	An independent third party person or organisation meeting ASI's objective selection criteria and accredited to carry out ASI Audits.
ASI Certification	An attestation, based on the results of a Certification Audit by an ASI Accredited Auditor, that the required level of Conformance has been achieved against the applicable ASI Standard and for the documented Certification Scope.
ASI Chain of Custody (CoC) Standard	Sets out systems for the sourcing, custody and/or supply of responsibly sourced aluminium.
ASI Complaints Mechanism	Aims to ensure the fair, timely and objective resolution of complaints relating to ASI's standards setting processes, certification program, auditor conduct and ASI policies and procedures.
ASI Member	An entity or group of entities that is a current member of one of ASI's six membership classes: <ul style="list-style-type: none"> ▪ Production and Transformation (eligible for ASI Certification) ▪ Industrial Users (eligible for ASI Certification) ▪ Civil Society ▪ Downstream Supporters ▪ Associations ▪ General Supporters
ASI Performance Standard	Defines environmental, social and governance principles and criteria, with the aim to address sustainability issues relevant to the production and material stewardship of aluminium, from the extraction of bauxite to the production of commercial and consumer goods, and the recycling of pre- and post-consumer aluminium scrap.
ASI Standards	Includes the ASI Performance Standard and the ASI Chain-of-Custody Standard.
Association	An ASI membership class that is open to industry and other trade associations that represent commercial interests in any part of the aluminium value chain, such as aluminium associations, green building councils, and downstream sector associations.
Certification Scope	The Certification Scope is defined by the Member and sets out what parts of a business, Facilities and/or Business Activities are covered by an ASI Certification. There are three types of approaches to Certification Scope: <ul style="list-style-type: none"> ▪ Business Level: covers a whole Member company, a subsidiary of a Member or a business unit of a Member.

	<ul style="list-style-type: none"> Facility Level: covers a single Facility or group of Facilities which are a subset of a Member's total operations. Product/Program Level: covers a single identifiable Product/Program or group of Products/Programs.
Civil Society	An ASI membership class that is open to not-for-profit organisations serving the public interest, such as environmental and human rights NGOs, labour organisations, Indigenous Peoples and community-based organisations, at either an international, regional, national or local level.
Control	<p>Control by a Member consists of:</p> <ol style="list-style-type: none"> Direct or indirect majority ownership, or Control (alone or pursuant to an agreement with other Members) of 50% or more of the voting rights (or equivalent) of the Controlled business or Facility; and/or Direct or indirect (including pursuant to an agreement with other Members) power to remove, nominate or appoint at least half of the members of the Board of the directors or management (or equivalent of the Controlled business or Facility); and/or Day-to-day executive management of the Controlled Business Activity or Facility such as by setting workplace standards and enforcing their application; or Any legally recognised concept of 'Control' analogous to those described in (1) to (2) above in a relevant jurisdiction.
Downstream Supporter	An ASI membership class that is open to organisations that manufacture consumer or commercial goods containing aluminium in the: aerospace, automotive, construction, consumer durables, engineering, IT, and similar sectors; organisations in the beverage, food, pharmaceutical and similar sectors that use aluminium in packaging for their products; and organisations that trade physical aluminium or collect aluminium for re-melting or recycling. Downstream Supporters are not required to seek ASI Certification.
Entity	A business or similar which is under the ownership or Control of an ASI Member. An Entity can constitute part or whole of an ASI Member. In relation to the application of an ASI Standard, the Entity seeks or holds ASI Certification and is responsible for implementation of the Standard in the defined Certification Scope.
General Supporter	An ASI membership class that is open to organisations that support ASI's mission not falling into one of the other membership classes, such as: governments and regulators, international institutions, investment sector, parallel initiatives, academic and research institutions, specialist agencies, consultancies, media organisations, and related industries (for example, waste processing of bauxite residue, dross or spent pot-lining). This class excludes organisations seeking to carry out independent third party-audits: they must go through the ASI auditor accreditation process and cannot also be members of ASI.
Industrial Users	An ASI membership class that is open to organisations that manufacture consumer or commercial goods containing aluminium in the: aerospace, automotive, construction, consumer durables, engineering, IT, and similar sectors; and organisations in the beverage, food, pharmaceutical and similar sectors that use aluminium in packaging for their products.
Production and Transformation	An ASI membership class that is open to organisations with activities in one or more of: bauxite mining, alumina refining, aluminium smelting, aluminium re-melting and refining, semi-fabrication and/or material conversion.

Appendix 1 – Claims Approval Requests

Background information to application

Claims relating to products and ASI Certification or ASI CoC Aluminium require advance approval from ASI. Applicants must ensure they meet the following requirements:

- Are a current ASI Member
- Have current ASI Certification that includes the relevant production/product within scope, for **both** the ASI Performance Standard and ASI Chain of Custody Standard
- Agree to submit annual reports on the approximate volume of related ASI CoC Certified aluminium for the 12 months following approval or renewal of the claim

ASI has the right to decline, suspend or withdraw approval for use of its logo and/or related claims where there is a risk that it may be misleading or confusing or bring ASI into disrepute. These decisions will be made at ASI's discretion.

Approvals will be valid for a period of 12 months from the date of approval, or the date of launch of the product/s, whichever is most relevant. ASI will contact members regarding renewal of approved claims approximately 1 month in advance of the end of a 12-month approval period.

Contact: communications@aluminium-stewardship.org

Information required by ASI for Claims Approvals

Please provide the following information in support of your request for approval of a product-related claim. (This can be submitted in elementAL, ASI's Assurance Platform – contact the ASI Secretariat for account access).

Name of ASI Member	
ASI Performance Standard Certification – Certification number	
ASI Chain of Custody Certification – Certification number (if applicable)	
Type and/or description of product/s (eg bauxite, alumina, primary aluminium, secondary aluminium, semi-fabricated product, or component or final product for aerospace, automotive, construction, consumer durables, engineering, IT, packaging or other)	
Identify whether this is for a single type of product, or a group of related products that is under a common management system	
Proposed claim/s – text or visual (please add details and content, or attach graphic for review)	
Proposed location of claim (explain where the claim will appear, and how it will be applied eg printed, embossed etc)	
Who are the recipients of the claim (eg B2B/supply chain, consumers)	
When will the product claim/s be launched (eg as soon as approval received, or future date)	
Other information or questions to ASI	
Contact person for this request (include name, job title, email and phone number)	



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