

ASI Strategic Plan – 2019 to 2022

Adopted by the ASI Board on 30 October 2018

Our vision	To maximise the contribution of aluminium to a sustainable society.
Our mission	To recognise and collaboratively foster responsible production, sourcing and stewardship of aluminium.
Our values	<ul style="list-style-type: none"> • Being inclusive in our work and decision making processes by promoting and enabling the participation of representatives of 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.
Our members	<p>ASI has a global, multi-stakeholder membership of organisations that support our mission. Members are grouped into six membership classes:</p> <ul style="list-style-type: none"> • Associations • Civil Society • Downstream Supporters • General Supporters • Industrial Users • Production and Transformation
Our objects	<p>ASI’s Constitution defines our objects as:</p> <ul style="list-style-type: none"> • To define globally applicable standards for sustainability performance and material chain-of-custody for the aluminium value chain • To promote measurable and continual improvements in the key environmental, social and governance impacts of aluminium production, use and recycling • To develop a credible assurance and certification system that both mitigates the risks of non-conformity with ASI standards and minimises barriers to broad scale implementation • To become and remain a globally valued organisation advancing programs for sustainability in the aluminium value chain, which is financially self-sustaining and inclusive of stakeholder interests.
Our strategic priorities and goals	<ol style="list-style-type: none"> 1. Effective governance: Support organisational performance through effective governance processes, including multi-stakeholder engagement and decision-making. 2. Credible program: Build and implement rigorous and credible systems for ASI’s certification program that comply with the ISEAL Codes of Good Practice. 3. Growing membership: Strengthen the future success of ASI by encouraging membership growth and certification uptake throughout the global aluminium value chain. 4. Financial resilience: Enhance the financial resilience of the organisation to enable it to securely plan and positively adjust to risks and changing circumstances.

1. Background and context

1.1 History

The 2019 Strategic Plan will be ASI's fourth, following plans developed for the 2016, 2017 and 2018 financial years. Each of ASI's Strategic Plans has been structured around the four strategic priorities of:

- Effective governance
- Credible program
- Growing membership
- Financial resilience

In 2018, a major shift in strategy was that the focus under Credible Program shifted from standards-setting and program development, into program implementation and oversight, following the launch of the ASI Certification program in December 2017.

1.2 Overview of 2019 priorities

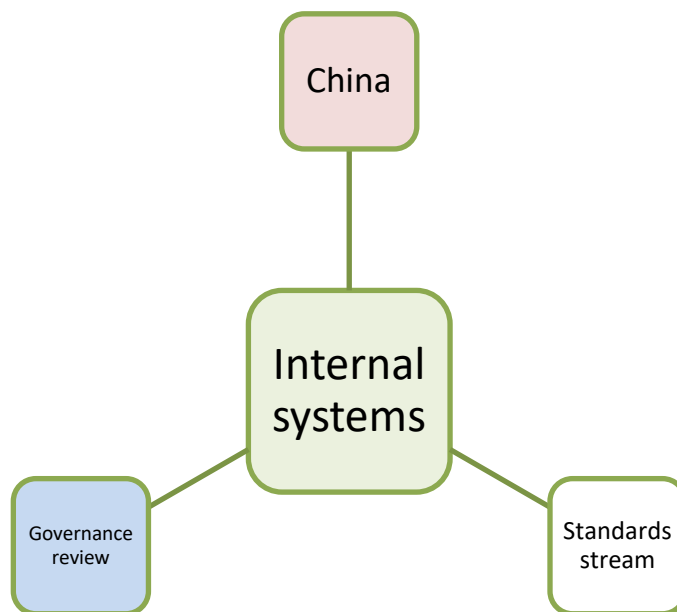


Figure 1 – Overview of 2019 priorities

Developing, implementing and improving **Internal Systems** under the Credible Program pillar will be the major area of focus for ASI in 2019. These systems are critical to ASI's ability to deliver on every other desired objective and outcome, and the timing aligns with our 12 month anticipated transition from Associate Member to Full Member of the ISEAL Alliance. Key areas include an expanded focus on Monitoring and Evaluation (M&E), Oversight, and member and auditor capacity building, supported by the appropriate levels of human resources and digital investment. The overall aims of these efforts are to:

- Build the necessary business systems for an effective, efficient and credible program
- Identify and address emerging issues that arise in any new program rollout
- Embed an organisational culture of learning and improvement
- Capture corporate memory and embed new and evolving responsibilities to support business resilience
- Position ASI for future scalability in both uptake for aluminium, and potential future expansion to other metals.

China continues to be a significant focus for ASI that flows through a number of strategic priorities. In 2019, this is expected to include:

- Continuing to integrate implementation needs (e.g. translations and support) into ASI systems
- Expanding local member and stakeholder engagement mechanisms (e.g. a China roundtable) in proportion to growth of interest and uptake in China
- Agreeing a model for establishment of a legal entity in China
- When resources permit, initiating the entity registration process and putting in place the associated requirements for this, including leasing an office space, having local staff, establishing a local bank account, and integrating these with current ASI systems
- Preparing for the 2020 ASI AGM in China.

In 2019, it is also proposed that ASI commence its **Governance Review**, as set out in the ASI Constitution, which must be undertaken between the 3rd and 5th anniversary of the Constitution's adoption in April 2016. The timing and procedures for this process are to be determined by the Directors. However under the Constitution, the Governance Review:

- Must commence no later than the 4th anniversary from its adoption (April 2020).
- Aims to identify any desirable changes to ASI's governance structures and/or constituent documents.
- Must be notified to Members at least 3 months in advance of the commencement.
- Must be undertaken in consultation with the ASI Standards Committee, the ASI Governance Committee, the ASI Secretariat, the Indigenous Peoples Advisory Forum and any other ASI stakeholders determined by the Directors.

Additional financial resources have been allocated to expand staffing, including a new role for M&E activities, which would enable the CEO to oversee the Governance Review process in 2019. This would bring the process a year ahead of its mandatory commencement time.

Once the Governance Review was completed, and if this was achieved within 2019, this would enable a comprehensive Standards Revision process to commence in 2020 and ideally conclude by the end of 2021, four years after the launch in 2017 and a year earlier than the mandatory 5 year review cycle. The scope of the Standards Revision would include topics in the Performance Standard currently under discussion in the Biodiversity and Ecosystem Services Working Group, as well as those identified through implementation, other Working Group and stakeholder issues, and by the Secretariat – within all ASI normative documents. This includes the Performance Standard and Guidance, Chain of Custody Standard and Guidance, Assurance Manual and Claims Guide.

The standards-related stream under ASI's various Working Groups will continue to progress during 2019, in preparation for revision activities from 2020. Regarding the Biodiversity and Ecosystem Services Working Group, the Board has noted the following:

- The issues under discussion are critical to some members. Exploration of the potential implications for bauxite mines in the close vicinity of protected areas should continue to be explored.
- While all stakeholders are keen to see these resolved as soon as possible, there are limits on how quickly the process can be moved. The stakeholder engagement and dialogue needs to be respectful and done well.
- Consensus-building is the responsibility of the participants, and the Secretariat's role is to facilitate, enable and support the process. External engagement by ASI members may accelerate the process and help develop clear recommendations to the Standards Committee.
- The sooner the BESWG can reach a position, the sooner the Standards Committee can discuss and formulate a proposal for the 2020 consultation.
- Once the recommendation of the BESWG has been reviewed by the Standards Committee, the upcoming revision changes can be supported by Board-level communications ahead of the consultation process, providing a clear signal to all relevant stakeholders.

Two face-to-face Standards Committee meetings are proposed for 2019, a brief one during AGM Week, and a more significant one later in the year, alongside a face-to-face meeting for the relevant Working Group/s. The 2019 face-to-face Board meeting would be expanded to two days, and continue to take place as a key part of the AGM Week. This approach will enable a better separation of meetings that relate to (a) corporate governance and general member and stakeholder engagement (AGM Week) vs (b) deeper topic-based content and standards-setting activities with elected and/or thematically interested participants (Standards Committee

and Working Group/s). Programming, organising and running these two streams within the one short week each year has always been extremely challenging for the Secretariat, but has been done this way due to very limited resources and a relatively overlapping stakeholder group for each stream. As ASI matures, both of these factors are evolving, so ASI’s approaches to governance and engagement should also follow suit.

Overall, the 2019 priorities have been developed to reflect that *ASI is not yet an organisation operating as a ‘steady-state’*. While the outwardly visible aspects of the program – the normative documents and essential procedures for members and auditors – are in place, there is still a significant amount of work to do on the supporting architecture. These include the wide range of internal management systems and procedures underneath that are needed to ensure appropriate processes and outcomes, as well as a higher-level layer of communications and information for stakeholders that can convey key aspects of ASI’s program to a new or general audience.

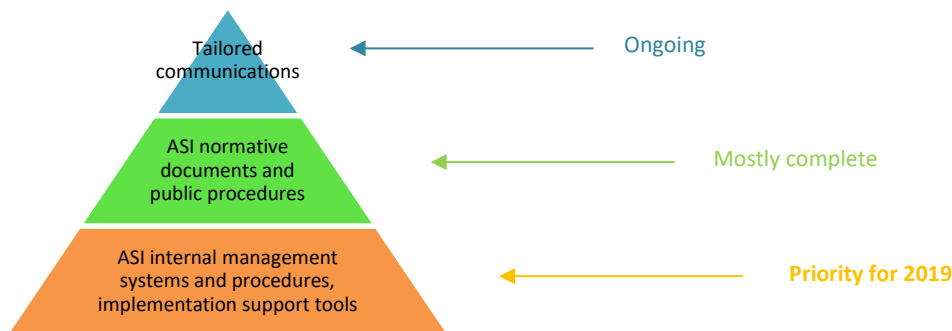


Figure 2 – ‘Layers’ of systems and information for the ASI program

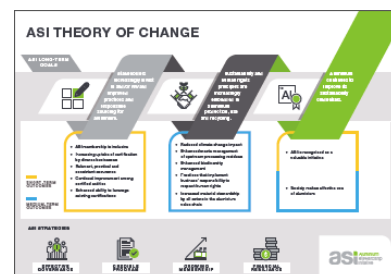
Delivering this bottom layer in particular, to embed the foundations for organisational-level competency and the short-term outcomes identified in ASI’s Theory of Change, is a pre-requisite before strategies can be developed towards diversification into other metals, or other specific goals and ambitions for ASI in future.

Looking ahead, the high-level priorities for 2019-2022 are illustrated below. While a range of input to the next standards revision will be captured and taken into account, it highlights that there is still more work to be undertaken by the Biodiversity and Ecosystem Services Working Group to inform the next revision process. These matters are discussed in more detail in a supporting paper to this Plan.

2019	2020	2021	2022
Internal systems, including annual ISEAL Code assessments, and then updating for revisions from 2022			
ASI Governance Review			
China – engagement, legal, AGM			
BESWG – technical input	Standards revision process – all documents		Transition period

1.3 Links to ASI Theory of Change

ASI’s new visualisation of its Theory of Change (V3) illustrates how the four strategic priorities support ASI’s desired long-term goals and short- and medium-term outcomes. The ASI Board oversees these organisation-level strategies via this Strategic Plan and has the overarching responsibility to review progress, emerging risks and future adjustments.



The 2019 Strategic Plan includes a new section 3 with the ASI Theory of Change visualisation, and a supporting narrative including an analysis of assumptions and causal pathways that sit behind ASI’s proposed strategies.

ASI’s short- and medium-term outcomes, their indicators and data collection methods, are the focus of the ASI Monitoring and Evaluation (M&E) Plan which is developed in consultation with the ASI Standards Committee.

1.4 Reporting to the Board

The Board’s oversight of risk, strategy and organisation-level performance is one of its key roles.

The ‘Balanced Scorecard’ model below summarises the ongoing reporting to Directors via identified performance measures in the strategic plan. Those with a ‘✓’ are already being reported to the Board on a regular or periodic basis. The frequency / timing of reporting is also noted (*italicised in brackets*).

‘Balanced Scorecard’ for Board reporting:

<p>Effective governance</p> <ul style="list-style-type: none"> ✓ Participation in and feedback on AGM (<i>Annual</i>) ✓ Member participation in nominations and elections for governance vacancies (<i>Annual, and for casual vacancies</i>) ✓ Annual reviews of Board and Committee effectiveness (<i>Annual</i>) ▪ Complaints mechanism (<i>Annual/quarterly, but not yet triggered</i>) 	<p>Credible program</p> <ul style="list-style-type: none"> ✓ Reports on strategic issues as identified (<i>Each meeting</i>) ✓ Reports on operational issues as identified (<i>Each meeting</i>) ✓ Reports on IT program (<i>Each meeting</i>) ✓ Growth of certifications (<i>Each meeting</i>) ✓ Growth of accredited auditors (<i>Each meeting</i>) ✓ Delivery of training (<i>Each meeting</i>)
<p>Growing membership</p> <ul style="list-style-type: none"> ✓ Growth in ASI members (<i>Each meeting</i>) ✓ Distribution of growth across membership classes (<i>Each meeting</i>) ✓ Pipeline of potential new members (<i>Each meeting</i>) ✓ Reports on China engagement (<i>Each meeting</i>) 	<p>Financial resilience</p> <ul style="list-style-type: none"> ✓ YTD and EOY performance against budget (<i>Each meeting</i>) ✓ Operating reserves (<i>Each meeting</i>) ✓ Cash flow (<i>Each meeting</i>) ✓ Financial Dashboard (<i>Each meeting</i>) ✓ Management letter from financial auditors (<i>Annually</i>)

1.5 Contents

The remainder of the Plan addresses:

- **Section 2** – Goals, strategies, objectives and performance for 2019 for each of the four strategic areas.
Note: Green shading highlights the new and/or expanded activities for 2019.
- **Section 3** – ASI Theory of Change – visualisation and supporting narrative

1.6 Related documents

To be read in conjunction with this Plan:

- ASI Budget 2019
- Biodiversity and Ecosystem Services – supporting information for Board discussion.

2. Goals, strategies and objectives

Goal 1 – Effective governance – Support organisational performance through effective governance processes, including multi-stakeholder engagement and decision-making.



Strategies

- Ensure clearly articulated responsibilities for members, stakeholders and the ASI Secretariat
- Ensure Board engagement on corporate governance responsibilities
- Provide opportunities for participation in ASI governance for members and stakeholders through nomination and election processes, meetings and consultations
- Conduct at least annual reviews of governance effectiveness
- Ensure awareness of, and access to, the ASI Complaints Mechanism.

2019 Objectives

1. Hold annual governance elections for the Board and any Standards Committee casual vacancies and induct new elected candidates.
2. Hold the Annual General Meeting (AGM) as part of a week-long event to deepen engagement with both members and stakeholders on ASI's progress and implementation.
3. Hold scheduled Board, Committee, Indigenous Peoples Advisory Forum (IPAF) and Working Group meetings to continue progress on their core activities and support effective governance, including face-to-face meetings for:
 - a. IPAF (1 week) in India in February 2018.
 - b. Board (1.5-2 days) and Standards Committee (0.5 day) during the AGM week, mid-year in Norway.
 - c. Standards Committee and Biodiversity and Ecosystem Services Working Group (3-4 days), separate to AGM Week, late year, location tbd.
4. Agree an appropriate model for legal registration of an ASI entity in China, as well as associated local engagement mechanisms.
5. Commence, and ideally conclude, a Governance Review of ASI, as set out under the ASI Constitution clause 1.5.
6. Hold an annual in-person planning and calibration meeting for the ASI Secretariat, separate from the AGM Week, to support governance and operational efficiencies and improvements.
7. Enhance stakeholder awareness of the ASI Complaints Mechanism, supported by translations, in collaboration with IPAF and the Human Rights Working Group.
8. Conduct reviews of Board and Committee effectiveness and identify opportunities for improvements.

Performance measures:

- Participation in and feedback on AGM
- Member participation in nominations and elections for governance vacancies
- Participation in and feedback through the annual ASI governance survey
- Activities under the Complaints mechanism
- Progress and outcomes of the Governance Review
- Publication of new resources for the ASI Complaints Mechanism.

Goal 2 – Credible program – Build and implement rigorous and credible systems for ASI’s certification program that comply with the ISEAL Codes of Good Practice.



Strategies

- Invest in digital platforms to enhance program management efficiencies
- Continue to build ASI’s internal systems to achieve full ISEAL Membership
- Support capacity building for program implementation
- Enable effective processes for program improvements
- Identify and grow effective partnerships and ‘inter-operability’ opportunities
- Nurture a culture of innovation and learning.

2019 Objectives

1. Plan and implement a comprehensive management review for all internal systems related to program implementation and oversight, with a focus on future scalability.
2. Commission an independent IT systems audit with a focus on security and conformance with ASI’s IT Handbook.
3. Close out remaining gaps against the ISEAL Codes of Practice to transition from Associate to Full membership, and prepare for the first independent review of ASI’s conformance.
4. Begin implementing the full ASI Oversight Mechanism, including convening the Independent Accreditation Review Panel, and undertaking the first witness audits.
5. Begin implementing the ASI Monitoring and Evaluation (M&E) Plan, including development of indicator protocols, data collection, research collaborations and supporting systems.
6. Continue to develop additional functionalities and improvements in elementAI to streamline workflows, including enhancements in languages other than English, particularly Chinese and French.
7. Continue to develop and deliver member and auditor training through educationAI, as well as provide general onboarding, support and feedback, to build capacity for conformance and assurance.
8. Continue work on thematic issues with participating members and stakeholders through ASI Working Groups on Biodiversity and Ecosystem Services, Human Rights, Benchmarking and Harmonisation, Recycling and Material Stewardship, GHG, and Environmental Impacts, to develop implementation guidance and/or prepare for future standards revisions.
9. Continue to roll out the internal ASI Certification oversight processes to ensure integrity and consistency of ASI assurance processes.
10. Continue to roll out the ASI auditor accreditation and registered specialists programs to increase geographical and topic-based coverage.

Performance measures:

- Reports on strategic issues as identified
- Reports on operational objectives as identified
- Reports on IT program
- Growth of certifications
- Growth of accredited auditors
- Delivery of training

Goal 3 – Growing membership – Strengthen the future success of ASI by encouraging membership growth and certification uptake throughout the global aluminium value chain.



Strategies

- Make ASI membership understandable and accessible to diverse stakeholders
- Support regular outreach with a diverse range of sectors, geographies and types of organisations
- Continue to build engagement with stakeholders in China, in recognition of their significant share of global aluminium production
- Strengthen relationships with member associations to support outreach among their own members
- Continue to build relationships with government agencies and international institutions to position ASI's work within global action on sustainability issues
- Make effective use of ASI's website, social media and communications channels.

2019 Objectives

1. Grow ASI membership in all membership classes.
2. Continue ASI's relationship building and outreach program with stakeholders in China.
3. Develop new communications strategies and supporting systems relating to ASI Certifications and oversight of Claims that can scale to anticipated growth.
4. Continue focus on downstream users of aluminium and develop tailored communications materials for key use sectors such as packaging, transport and construction.
5. Develop a strategy for enhanced participation of and outreach with and through Associations members.
6. Continue to develop relevant high-level communications materials, including the first progress report to be based on some initial M&E data, to support public reporting and membership growth.
7. Continue to develop ASI communications activities via website, e-news and social media outreach.
8. Support awareness raising of ASI's mission and progress through events and outreach, including with the involvement of government agencies and other institutions.

Performance measures:

- Growth in ASI members
- Distribution of growth across membership classes
- Pipeline of potential future members
- Reports of China engagement

Goal 4 – Financial resilience – Enhance the financial resilience of the organisation to enable it to securely plan and positively adjust to risks and changing circumstances.



Strategies

- Continue to grow membership income to increase available financial resources for ASI’s work program
- Continue to grow opportunities for non-membership income and in-kind support
- Invest in human resources to support organisational resilience
- Ensure an appropriate level of accessible cash operating reserves
- Continue to implement and improve ASI’s Financial Controls Policies and Procedures.

2019 Objectives

1. Continue growth of membership income via member growth and small annual fee increases to keep pace with inflation.
2. Continue to identify and grow revenue streams in addition to membership fee income, including for the AGM Week.
3. Grow the ASI Secretariat in line with growth in income, particularly expanding technical and regional competence to service a growing membership and program needs.
4. Continue to grow operating reserves at least 20% of annual expenditure to provide a financial buffer.
5. Review management letter from financial auditors as part of the annual financial audit, to identify any opportunities to improve the quality of ASI’s financial administration.

Performance measures:

- YTD and EOY performance against budget
- Operating reserves
- Cash flow
- Financial dashboard
- Management letter from financial auditors

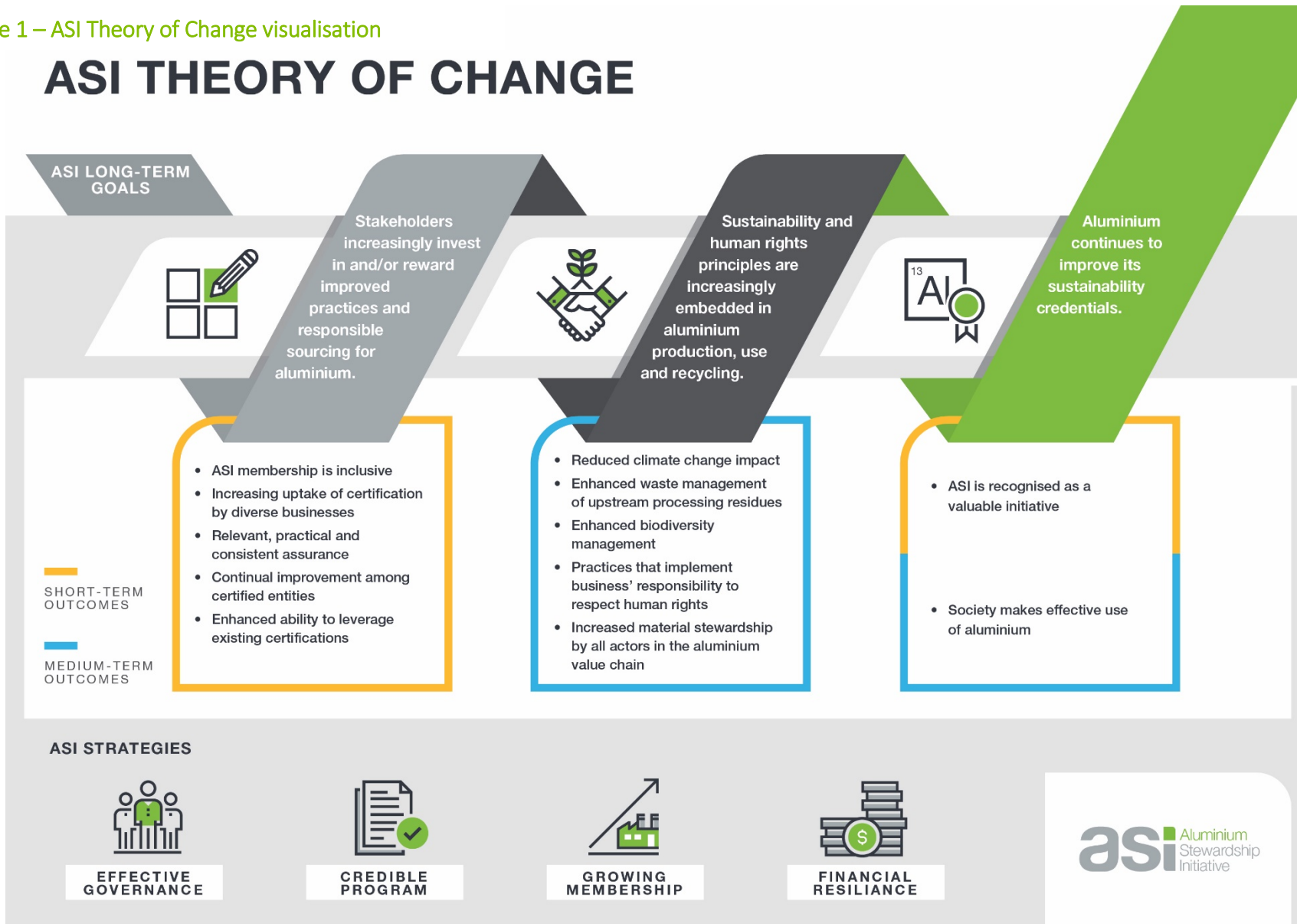
In August 2017, the Board agreed to the principle of annual membership fee increases that would seek to meet program needs and at minimum keep pace with the Australian annual CPI. Using a CPI figure of 2.5%, this would result in the following fee levels for 2019:

Membership Class	Large More than US\$1billion	Medium Between US\$100 million and US\$1 billion	Small Between US\$10 million and US\$100 million	Micro Less than US\$10 million
<ul style="list-style-type: none"> • Production and Transformation • Industrial Users • Downstream Supporters 	US\$30,750 (+750)	US\$12,300 (+300)	US\$1230 (+30)	US\$246 (+6)
Membership Class	Large More than 1000 FTE staff	Medium Between 100-1000 FTE staff	Small Between 10-100 FTE staff	Micro Less than 10 FTE staff
<ul style="list-style-type: none"> • Civil Society • Associations 	US\$5381 (+131)	US\$1076 (+26)	US\$538 (+13)	US\$108 (+3)
Membership Class	Governmental and commercial organisations		Non-profit or academic	
<ul style="list-style-type: none"> • General Supporters 	US\$5381 (+131)		US\$538 (+13)	

Note: Civil Society organisations serving on the ASI Standards Committee and Working Groups will continue to have their annual membership fee waived.

Figure 1 – ASI Theory of Change visualisation

ASI THEORY OF CHANGE



3. ASI Theory of Change

The ASI CEO first started developing a 'Theory of Change' in March 2015, with ASI members, the IUCN Standards-Setting Group (SSG) and through a public consultation opportunity. The insights from these processes have helped to guide the development of ASI's overall program since then.

A Theory of Change approach to planning and evaluation is increasingly being considered an important practice for many organisations, and is a common way for standards organisations to meet the ISEAL Impacts Code. While a visualisation (such as ASI's on p10) is a valuable communication tool to simplify key elements, real life is always much messier. This section sets out supporting narratives, which aim to provide additional context and explanation of ASI's visualised Theory of Change.

3.1 Distinctiveness: how ASI positions itself to create change

ASI has some distinctive elements that differentiate it from similar standards systems:

- Multi-stakeholder from inception
- Whole of value chain approach, from mine to downstream use sectors
- Additional focus on recycling and material stewardship
- Full spectrum of ESG issues and not driven by a single issue or sector
- Flexible approaches to support participation growth
 - Scope: whole company, or subset of facilities or products
 - Chain-of-custody: mass balance and credits models
 - Risk and maturity: tailoring intensity and frequency of audits
- Strong focus on innovation, including through digital investment.

3.2 Key assumptions

The development and implementation of organisational strategies rests on assumptions about how we think change happens and why. If these assumptions are found to not hold true in practice, it can make the achievement of desired objectives more problematic. For ASI, key assumptions underlying this Strategic Plan include:

- External political and economic factors do not undermine the business case for certification
- Growing certification uptake strengthens ASI's capacity and value to stakeholders
- ASI can support change by encouraging individual, organisational and collective learning and improvement
- Stakeholder priorities are diverse and evolving
- ASI members and stakeholders in governance roles are competent and act in good faith
- Short-term outcomes can provide a stepping stone to medium-term outcomes and longer-term goals
- Change occurs through many pathways, and ASI is not the only driver
- ASI has sufficient human and financial resources to deliver on agreed objectives.

3.3 Influencing factors

External factors outside of ASI's direct control can positively or negatively influence the achievement of our desired outcomes and long-term goals. These include:


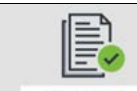


- Supply and demand of raw materials for the aluminium value chain
- Trade-related uncertainties, disputes and sanctions
- Global financial and market stability or disruptions
- Changes in beneficial ownership and/or priorities of commercial entities
- Existing level of industry practices
- Commercial drivers and benefits for ASI Certification
- Regulatory changes, including those related to government priorities, raw material flow, development approvals, and sustainability and human rights principles
- Complimentary or detrimental interventions from key actors
- Impact of currency exchange rates on ASI income and expenditure.

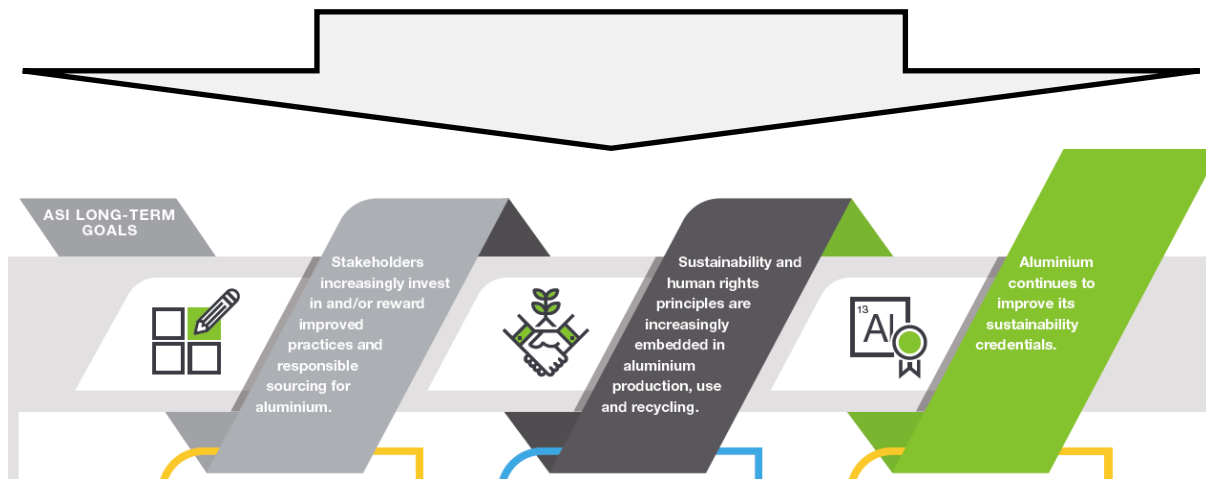
These and other risks are addressed in more detail in ASI’s Risk Assessment, which is regularly reviewed and updated by the ASI Board.

3.4 Causal pathways

In ASI’s Theory of Change, our Strategies set the structure and foundation for the inputs identified as necessary to achieve our short- and medium-term outcomes, and support our long-term goals. While there are many inter-relationships, the table and arrows below aim to show some of the more significant casual links.

Financial Resilience plays a fundamental *enabling* role for ASI’s other strategies, and Growing Membership strategies aim to support the *scaling up* of short- and medium-term outcomes. ASI’s technical program is designed for *driving progress* towards desired outcomes, while ASI’s consultation, participation and decision-making structures are for *governing* the organisation overall.

Strategic priorities	Summary of strategies	Short- and medium-term outcomes
 EFFECTIVE GOVERNANCE <i>Governing</i>	<ul style="list-style-type: none"> • Clear responsibilities • Opportunities to participate • Annual reviews • Board’s corporate governance • Complaints Mechanism 	<ul style="list-style-type: none"> • ASI membership is inclusive • Increasing uptake of certification by diverse businesses • Relevant, practical, consistent assurance • Continual improvement among certified entities • Enhanced ability to leverage existing certifications • ASI is recognised as a valuable initiative • Reduced climate change impact • Enhanced waste management • Enhanced biodiversity management • Practices that implement business’ responsibility to respect human rights • Increased material stewardship by all actors in the aluminium value chain • Society makes effective use of aluminium
 CREDIBLE PROGRAM <i>Driving</i>	<ul style="list-style-type: none"> • Digital investment • ISEAL compliance • Program implementation • Program improvement • Partnerships • Culture of innovation and learning 	
 GROWING MEMBERSHIP <i>Scaling</i>	<ul style="list-style-type: none"> • Accessible membership • Stakeholder engagement • China • Associations • Regulators • ASI communications 	
 FINANCIAL RESILIENCE <i>Enabling</i>	<ul style="list-style-type: none"> • Membership income • Non-membership income / support • Human resources • Cash reserves • Financial controls 	



3.5 Unintended effects

Certification programs like ASI can also have unintended effects, which may be positive or negative.

Various discussions among the ASI Board, Committees and Working Groups, the Indigenous Peoples Advisory Forum, key stakeholders and the Secretariat over the past 3 years of ASI's development (2015-2018) have identified the following as some of the more significant potential unintended effects from ASI:

- Increased supply chain transparency (positive)
- Stakeholder learning about the nature of the aluminium supply chain (positive)
- New communities of practice develop around thematic areas (positive)
- ASI as a catalyst for impact outside of the standards, for example through IPAF (positive)
- Higher standards on some topics discourage uptake and therefore progress on a broader range of issues (negative)
- Voluntary 'no-go' or threshold type commitments by some companies leave the field open for poorer performing companies to go in (negative)
- Supply/demand for ASI Aluminium adversely disrupts supply chains or commodity markets (negative)
- Investments in certification are overly burdensome for some (negative)
- Expectations about commercial or other benefits of certification are not met (negative).

Unintended consequences will also be further explored in ASI's Risk Assessment, and subject to stakeholder feedback through periodic surveys under ASI's Monitoring and Evaluation Plan.