

ASI Standards Committee

Teleconference Minutes

15 September 2021

Antitrust Compliance Policy

Attendees are kindly reminded that ASI is committed to complying with all relevant antitrust and competition laws and regulations and, to that end, has adopted a Competition Policy, compliance with which is a condition of continued ASI participation.

Failure to abide by these laws can have extremely serious consequences for ASI and its participants, including heavy fines and, in some jurisdictions, imprisonment for individuals.

You are therefore asked to have due regard to this Policy today and in respect of all other ASI activities.



Acknowledgement of Indigenous People

ASI acknowledges Indigenous Peoples and their connections to their traditional lands where we and our members operate. We aim to respect cultural heritage, customs and beliefs of all Indigenous people and we pay our respects to elders past, present and emerging.



ASI Ways of Working



ASI is a multi- stakeholder organisation. Dialogue is at the heart of everything we do. It is critical to ensure that the organisation delivers on its mission. We welcome all participants and value the diversity of backgrounds, views and opinions represented in this meeting. We recognise that we have different opinions; that is the heart of healthy debate and leads to better outcomes. To ensure our meetings are successful, we need to express our views and hear the views of others in a respectful and professional way, protecting the dignity and safety of all participants and enabling full participation from all attendees.

Agenda

	Topic		Time	Lead
1	a. Welcome b. Introduction & Apologies c. Objectives d. Documents Circulated	e. Previous Minutes f. Conflicts of Interest/Duty g. Log of Actions	5	Chair
2	Assurance Manual		15	ASI - Cameron
3	Principle 4		20	ASI – Cameron
4	Principle 6		25	ASI – Chris
5	Principle 11		25	ASI - Chris
6	Principle 7		25	ASI - Chris
7	<i>Principle 10 (time allowing)</i>			ASI - Krista
8	a. Agreed upon actions for Committee members	b. Agreed upon actions for the Secretariat c. Close	5	Chair

1a,b Welcome, Introduction & Apologies

a) Welcome

b) **Chair:** Kendyl Salcito (Nomogaia)

Attendees: Abu Karimu (Settle Ghana), Annemarie Goedmakers (Chimbo), Anthony Tufour (Arconic), Gesa Jauck (Trimet), Jessica Sanderson (Novelis), Jostein Søreide (Hydro), Louis Biswane (KLIM), Marcel Pfitzer (Daimler), Nadine Schaufelberger (Ronal Group), Neill Wilkins (IHRB), Steinunn Steinson (Nordural), Tina Bjornestal (Tetra Pak), Warrick Jordan (Job Hunters)

ASI: Cameron Jones, Camille Le Dornat, Chris Bayliss, Klaudia Michalska, Krista West, Laura Brunello, Marieke van der Mijn, Mark Annandale, Natalie Sharp, Penda Diallo,

Apologies: Gina Castelain (IPAF), Hugo Rainey (WCS), Justus Kammuehler (WWF), Rosa Garcia Pineiro (Alcoa), Samir Whitaker (FFI), Stefan Rohrmus (Schueco),

Alternatives: Oliver Neel for Catherine Athenes (Constellium)

Proxies: Jostein Soreide (Hydro) for Rosa Garcia Pineiro (Alcoa), Kendyl Salcito (Nomogaia) for Stefan Rohrmus

1c,d Objectives & Documents Circulated

c) Objectives

1. Adopt minutes of the previous meeting
2. Agree to direction on Principles Assurance Manual, 4, 6, 7 & 11
3. *If time available – Agree to direction on Principles 10*

d) Documents Circulated

1. ASI SC Teleconference 15Sep21
2. ASI SC Teleconference Minutes 07Jul21 –
3. For SC PUBLIC Round 1 Consultation Log of Input April21
4. Disclosure of Conflicts of Interest/Duty
5. ASI - SCMemberApptProxyForm 15Sep21
6. ASI –SCMemberAlternateForm 15Sep21
7. ASI CoCWG Teleconference Minutes 17March21

1e,f Previous Minutes & Conflicts of Interest/Duty

e) Approval of Previous meeting minutes draft: 07 July 2021 will be published on the ASI website.

- The minutes were approved.

e) Conflicts of Interest/Duty

Disclosure sent with meeting package

1g Log of Actions

g) Log of Meeting Actions open or closed since last meeting.

Meeting where Action was Identified	Assigned To	Action	Date Due
24Mar2021	Secretariat	Ensure that there is time to be dedicated to discussing the Theory of Change and M&E program post-revision.	Post-revision
02Jun21	Secretariat	Share public version of AECOM impartiality review with SC	Completed via email 26 July 2021

- A participant asked to put the AECOM Impartiality Review on the agenda in the future as it is an important issue. The Secretariat agreed to put this on the agenda for early 2022.

2 Assurance Manual

Section / Area	Summary of Feedback	Time allocated
Non-conformances	Log item 105 – ASI's Assurance Manual should require companies to publish in full the audits assessing compliance with ASI's Performance Standard.	~ 5 minutes

- Currently reports have a Public Headline Statement with full findings confidential to ASI.
- In many cases there is not a significant difference between the two sets of findings.
- Is there value in the current system? Is it worth the 'cost' of being perceived as not fully transparent?

2 Discussion

- A member of the Secretariat pointed out that there is a very large amount of information in most full audit reports, which may well run into the hundreds of pages. How usable and practical would that be for public consumption? A shorter audit report might be more efficient for the reader – understanding ‘user experience’. Moreover, this would require a significant amount in resources.
- A participant stated that it is important to go beyond the current system because audit reports often aren’t very helpful to understand how conformance was established.
- Another participant clarified that the Secretariat would need to line edit the entire audit report. The formatting would take a significant amount of time. Having hyperlinks however would be helpful to understand conformance determination.
- A participant who was audited stated they were in favour of transparency, but a lot of the documentation provided during an audit is internal and to some degree confidential/sensitive, so there is a need to find some sort of balance. 3 other participants in the chat agreed to this view, one participant is expecting quite a few changes ASI requires more public disclosures – with supporting hyperlinks.
- Secretariat stated that there is room for improvement in the public reports. Hyperlinks are mandatory for quite a few criteria. Auditors do increasingly use hyperlinks, and there is a calibration module for all auditors which is mandatory on how to prepare a good public headline statement.

2 Discussion

- Secretariat stated that an average report is around 6,000 words, a full audit would be 100,000-150,000 words, so significantly greater and the language needs to be looked at throughout.
- A participant asked whether it would be an option for the public to request further information/clarification? The Secretariat stated that in the medium term, that's something that can be explored. ASI is looking, in the next 9-12 months, for everything to be all online, which might help facilitate the process.
- Secretariat stated that there would be benefit from tailoring the system to audience needs/desires - more transparent than a 'data dump' (which would invariably result in broken links and a high word count).
- The SC agreed *not* to require more public audit reporting and that the Secretariat would explore a 'middle-ground' as discussed above.

3 Criterion 4.1 – Guidance discussion

- The focus of this Criterion is on environmental life cycle impacts, though other types of life cycle impacts may also be considered within an assessment as desired.
- If conducting a full Life Cycle Assessment, these should be conducted according to the principles set out in ISO 14040:2006 and ISO 14044:2006 (see references below) to advance consistency and comparability of assessments. Ensure appropriate expertise is involved in the assessment.
- The **expected minimum requirements** in undertaking a cradle-to-gate Life Cycle Assessment (LCA) include the following:
 - Identify and quantify the relevant raw materials and energy used (the ‘inputs’)
 - Identify the processes involved in the production of saleable product (manufacturing, handling, operation of equipment, maintenance, Waste management etc.)
 - Identify and quantify the relevant outputs generated from the production processes, including atmospheric emissions (including GHG emissions), Waste water, solid and liquid Wastes
 - All Products produced (including any by-products).
- RMSWG had concerns that the Draft Guidance suggests this is ‘normative’. Alternate wording (to replace text in **red**) was discussed. **RMSWG agreed to revise wording to:**
Definition of the goal and scope of a ~~cradle-to-gate~~ Life Cycle Assessment (LCA) and analysis of the Life Cycle Inventory (LCI) can include the following:
 - *Identification and quantification of the relevant raw materials and energy used (the ‘inputs’)*
 - *Identification of the processes involved in the production of saleable product (manufacturing, handling, operation of equipment, maintenance, Waste management etc.)*
 - *Identification and quantification of relevant outputs generated from the production processes, including atmospheric emissions (including GHG emissions), Waste water, solid and liquid Wastes*
 - *Identification and quantification of all products produced (including any by-products)*

3 Discussion

- The SC agreed to incorporate the RMSWG recommendation.

3 Criterion 4.1 – Guidance discussion

4.1 Environmental Life Cycle Assessment

The Entity shall:

- a. Evaluate life cycle impacts of its major Product lines for which Aluminium is considered or used.
- b. Upon customer request, the Entity shall provide adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium (containing) product(s).
- c. Ensure any public communication on LCA includes public access to the LCA information and its underlying assumptions including system boundaries.

- RMS Working Group agreed that both ‘Attributional Life Cycle Assessment’ (Cut-Off) and ‘Consequential Life Cycle Assessment’ (Avoided Burden) are equally appropriate according to ISO 14040 and 14044. However, both Standards are not necessarily considered ‘equal’ as, both methodologies are valid, but do different things for different audiences.
- **Recommendation from RMSWG for change to guidance: the Guidance for 4.1 be revised to ensure that both approaches are valued equally.**

3 Discussion

- A participant stated that its important for the SC to know that this is a tense discussion in the aluminium industry currently, and suggested not to accept this recommendation unless it has been properly discussed. It isn't a technical question, but rather is about how you regard the sustainability impact of scrap. The participant objects to the recommendation for the Guidance that both approaches are to be regarded equally.
- A Secretariat member stated the aim was to see them as equal footing for Guidance to be changed in the future (taking into account that Guidance would be updated much more frequently).
- A participant suggested it would be worthwhile to have this discussion at ASI and leverage ASI's multi-stakeholder format.
- A participant added that there was an emphasis on the fact that we should be transparent about *which* methodology to use appropriate for the goal and scope of the LCA.
- Another participant responded that ISO standards do require transparency.
- It was stated that perhaps there is the opportunity to say that there are indeed those two methods, without necessarily saying that they are equally appropriate.
- Another participant stated that the issue is more fundamental in that the Aluminum Association has used some terms that are not consistent with ISO definitions and terms. Consultation was sparse, especially in the U.S., and some of the new terms that have emerged are not aligned. Need to get some of this terminology straight and consistent with ISO.

3 Discussion

- A participant said that that is covered in 4.1.c, which includes public access to the LCA information and underlying assumptions: this is where transparency is needed about the choice of methodology. It would be problematic to consider them equal when not fully discussed.
- A member of the Secretariat noted that the current wording favours one approach (End of Life – Avoided Burden) and so if not including wording to bring the other approach to equal validity, there was a need to edit current wording to leave the Guidance neutral as to method choice.
- The SC agreed not to include wording that explicitly states that both approaches are equally valid for the time being.

3 Criterion 4.3 – Guidance discussion

4.3 Aluminium Process Scrap

The Entity shall:

- a. The Entity shall minimise the generation of Aluminium Process Scrap within its own operations and, where generated target 100% of scrap for collection, recycling and/or re-use.
- b. The Entity shall seek to separate Aluminium alloys and grades for recycling.

- It was discussed at the RMSWG that the Guidance mentioned the development of a documented scrap management plan but this was not specified in the wording of the criterion itself. For recyclers, they wouldn't necessarily have a documented plan, as it is the very nature of their operations
- **Recommendation from RMSWG for change to guidance:**
'The overall approach to Criterion 4.3 could include a scrap management and recycling plan that is regularly updated to increase associated benefits, and can be either a stand-alone plan or integrated into an existing Waste or materials management plan.'

3 Discussion

- The SC agreed to the recommendation from RMSWG to change the Guidance.

3 Criterion 4.4 – Criterion discussion

4.4 Collection and Recycling of Products at End of Life

The Entity, where engaged in Material Conversion and/or other manufacturing or sale of products containing Aluminium, shall:

- a. Implement a recycling strategy, including specific timelines, activities and targets.
- b. Regularly evaluate the effectiveness of the recycling strategy, and where required, identify and implement improvements.

Where engaged in Aluminium Re-melting/Refining, operating a Casthouse, Semi-Fabrication, Material Conversion, and/or other manufacturing or sale of products containing Aluminium:

- a. Engage with local, regional or national collection and recycling systems to support accurate measurement and efforts to increase recycling rates in their respective markets for their Products containing Aluminium.

This Criterion excludes Products containing Aluminium where comparative Life Cycle Assessment demonstrates that material recycling is not the best option for the environment.

- Discussion held on adding “*and within their range of impact*” into b): “Regularly evaluate the effectiveness of the recycling strategy, and where required **and within their range of impact**, identify and implement improvements.”
- RMSWG agreed this was obvious and therefore superfluous wording.
- **RMSWG agreed to leave the Criterion as is – no change recommended.**

3 Discussion

- The SC agreed to the RMSWG recommendation to leave the Criterion as is.

4 Performance Standard Principle 6: Emissions, Effluents and Waste

The Entity shall minimize emissions and effluents that have the potential to adversely impact human health and safety or that of the environment, and manage Waste according to the Waste Mitigation Hierarchy.

- Where example amended text is shown in the following slides it is to illustrate what implementation of the Standards Committee decision on a given log item/issue might look like
- Detailed input on wording is not sought, but direction and decision on each item is, as well as discussion where noted
- Pre-consultation changes in red

6.1 **Emissions to Air.** The Entity shall:

- a. Quantify and publicly ~~report~~ disclose Emissions to Air that have adverse effects on humans or the environment and implement plans to minimise these adverse impacts.
- a.b. Regularly review the effectiveness of the plan and, where required, identify and implement improvements.

➤ Log items 28 & 352: Include Area of Influence

- Alignment with 7.1 and 8.1;
- Examples of dusting along bx transport corridors & power station emissions
- Proposal: accept inclusion

- Example amended text in light of SC decision:

The Entity shall:

- a. Quantify and publicly disclose Emissions to Air from activities within its Area of Influence, with the potential to impact adversely human wellbeing or the environment.
- b. Implement plans to minimise exposure to and adverse impacts from Emissions to Air.
- c. Regularly review the effectiveness of the plans and, where required, identify and implement improvements.

4 Discussion

- The SC agreed to accept the inclusion of this wording into the criterion.

6.2 **Discharges to Water.** The Entity shall:

- a. Quantify and publicly ~~report~~ disclose Discharges to Water that have adverse effects on humans or the environment and implement plans to minimise these adverse impacts.
- ~~a.~~b. Regularly review the effectiveness of the plan and, where required, identify and implement improvements.

➤ Log item 353: Include Area of Influence

- Alignment with 7.1 and 8.1 (and 6.1);
- Examples of emissions from waste water treatment plant serving the Entity
- **Proposal: accept inclusion**

- Example **amended** text in light of SC decision:

The Entity shall:

- a. Quantify and publicly disclose Discharges to Water from activities within its Area of Influence, with the potential to impact adversely human wellbeing or the environment.
- b. Implement plans to minimise exposure to and adverse impacts from Discharges to Water.
- c. Regularly review the effectiveness of the plans and, where required, identify and implement improvements.

4 Discussion

- The SC agreed to accept the inclusion of this wording into the criterion.

- 6.3 **Assessment and Management of Spills and Leakage.** The Entity shall:
- a. Conduct an assessment of major risk areas of operations where Spills and Leakage may contaminate air, water and/or soil.
 - b. Following completion of this assessment, have a management and external communication plans, compliance controls and a monitoring programme in place to prevent and detect these Spills and Leakage.

- Log item 255: Insert “pro-actively predict”
 - No rationale offered by commentator – prediction suggests risk-based approach
 - Proposal: accept inclusion of ‘predict’; reject “pro-actively” as it is redundant

- Log item 434: Remediation of spills and leakages missing
 - No rationale offered by commentator – linkage with 6.4
 - Proposal: accept inclusion
 - Example amended (and reordered) text in light of SC decision :
 - b. Following completion of this assessment, have in place a management plan, compliance controls and a monitoring programme to predict, prevent, detect and remediate Spills and Leakages and an external communications plan to inform Affected Populations.*

4 Discussion

- RE. Log item 255: A participant pointed out that when one ‘prevents’, one inherently wants to foresee what will happen, ‘predict’ is thus not needed, superfluous and doesn’t add value.
- A participant stated that operators that have low maturity may not know they need prognostication in order to prevent. They may benefit from the use of ‘predict’.
- A participant stated that on top of: ‘affected populations’, it may be also ‘affected environmental values’. A member of the Secretariat noted that elsewhere in the Standard the term ‘Affected Populations and Organisations’ was used and should be applied here (and will)
- A participant raised the question and the issue of what the expectation is for the auditor. It would be good to use risk-based wording. It would be hard to meet the auditor’s expectation concerning the term ‘predict’. Another participant agreed to prefer a risk-based wording.
- The Secretariat could include some risk-based language in the Guidance, such as ‘predict’.
- A participant said we want to shift to risk based and keep concept of prognostication, and inclusion of remediation language.
- RE. Log item 434: A participant noted that an "external communications plan to inform" populations is likely to include information to environmental NGOs.
- SC agreed to test that language in the public consultation: to remove ‘predict’ to build that in the Guidance, and include ‘remediate’ in the Standard.

- 6.4 Reporting of Spills. The Entity shall:
- Disclose to affected parties the volume, type and potential impact of significant Spills and Leakages immediately after an incident.
 - Publicly disclose Impact Assessments of the Spills and Leakages and remediation actions taken, ~~and report publicly~~ on an annual basis.

- Log item 457: Remove “potential” from 6.4a
- Focus on impact; conversely, impacts do not necessarily occur “immediately”
 - STANDARDS COMMITTEE Guidance sought: focus on what has happened (lagging indicator, too narrow?) or what might happen (leading indicator, too broad?)
- Log item 434: Insert “root cause analysis” in 6.4b
- Proposal: accept inclusion
 - Example amended text in light of SC decision:
Reporting of Spills and Leakage. The Entity shall:
 - Disclose to Affected Populations the volume, type and [potential] impact of significant Spills and Leakages immediately after an incident.
 - Publicly disclose Impact Assessments of significant Spills and Leakages, root cause analyses and remediation actions taken on an annual basis.

4 Discussion

- RE. Log item 457: a participant suggested to put ‘the potential’ in brackets: there are cases in which you don’t exactly know, but there still is a potential.
- A member of the Secretariat stated that brackets are not helpful in implementation and would leave it open to questions.
- **The SC agreed not to remove potential from 6.4a.**
- RE. Log item 434: a participant pointed out the issue with wording. When doing a root cause analysis, it involved people testimonies with names. Concern that if you want to be efficient in conducting root cause analysis, people may refrain from being fully transparent. Documentation for RCA is usually quite detailed, it would be difficult to have it disclosed.
- **The SC agreed to use the term ‘the reason for’ or ‘root causes’ instead of ‘root cause analyses’, in order to answer the question as to *why* it happened.**
- A participant asked whether the term ‘significant’ has been discussed? A member of the Secretariat stated that this was discussed in the HRWG. Other standards also don’t really define ‘significant’. At this point, it had been agreed to accepting language that says ‘significant impact’, and it is something to tidy up throughout the Standard.
- A member of the Secretariat recommended to err on the side of working for a localised risk-based approach. The Secretariat will explore ‘significant’ across different criteria’ to ensure consistency throughout.
- A participant stated that on top of: ‘affected populations’, it may be also ‘affected environmental values’. A member of the Secretariat noted that elsewhere in the Standard the term ‘Affected Populations and Organisations’ was used and should be applied here (and will).

6.6

Bauxite Residue. The Entity, where engaged in Alumina Refining, shall:

- a. Have constructed storage areas in a manner that effectively prevents the release of Bauxite Residue and leachate to the environment.
- b. Perform regular checks and controls, including those conducted by third parties, to ensure the integrity of the Bauxite Residue storage.
- c. Control and neutralise water discharge from Bauxite Residue storage, to minimise impacts to the environment.
- d. Assess the impact of the water discharge from Bauxite Residue storage and mitigate any material potential impacts to the environment.
- ~~d.e.~~ Not discharge Bauxite Residue to ~~marine and~~ aquatic environments.
- ~~e.f.~~ Establish a timeline and a roadmap for the elimination of Bauxite Residue lagooning in favour of state of the art technologies for Bauxite Residue storage or re-use of the Bauxite Residue. Any Alumina Refining Facility starting production after 2020 shall only

use state of the art technologies for Bauxite Residue storage or re-use of the Bauxite Residue.
- ~~f.g.~~ Remediate the Bauxite Residue area after closure of the Alumina Refining Facility to a state that can adequately mitigate the risk of future environmental contamination.

- Log item 591: Define “state of the art” in 6.6f – source & judgement basis
 - Reference(s) required (“source”)
 - Criteria for decision required (“judgement”)
- Guidance currently references IAI (2015) “Bauxite Residue Management: Best Practice”
 - https://www.world-aluminium.org/media/filer_public/2015/10/15/bauxite_residue_management_-_best_practice_english_oct15edit.pdf due for update end 2021 – **propose inclusion of latest edition**, when public.
 - IAI Bauxite & Alumina Committee moving away from Best Practice to “Good Practice”, which takes account of specificities at site and (a range of) tailored solutions.
 - IAI Guidance allows good practice to be defined for a given site.
- Example **amended** text in light of SC decision:
 - f. Establish a timeline and a roadmap for the elimination of Bauxite Residue lagooning in favour of **good practice** technologies for Bauxite Residue storage or re-use of the Bauxite Residue. Any Alumina Refining Facility starting production after 2020 shall only use **good practice** technologies for Bauxite Residue storage or re-use of the Bauxite Residue.

4 Discussion

- RE. Log item 591: A participant said we should use the term that aligns with IAI that will be the Guidance.
- The SC agreed to these changes.

➤ Log items 79, 403 & 549: Include management plan; “Shouldn't they say HOW they deal with red mud”

- Alignment with 6.3 and other criteria
- Proposal: inclusion of text aligned with 6.3 (see below)
- Example amended (and reordered) text in light of SC decision (pre-consultation in red):

The Entity, where engaged in Alumina Refining, shall:

- Not discharge Bauxite Residue to ~~marine and~~ aquatic environments.
- Establish a timeline and a roadmap for the elimination of Bauxite Residue lagooning in favour of [good practice] technologies for Bauxite Residue storage or re-use of the Bauxite Residue. Any Alumina Refining Facility starting production after 2020 shall only use [good practice] technologies for Bauxite Residue storage or re-use of the Bauxite Residue.
- Have constructed storage areas in a manner that effectively prevents the release of Bauxite Residue and leachate to the environment.
- Have in place a management plan, compliance controls and a monitoring programme to predict, prevent, detect and remediate release of Bauxite Residue and leachate and an external communications plan to inform affected parties.
- [Perform regular checks and controls, including those conducted by third parties, to ensure the integrity of the Bauxite Residue storage.]
- Assess the impact of the water discharge from Bauxite Residue storage and mitigate any material potential impacts to the environment.
- Control and neutralise water discharge from Bauxite Residue storage, to minimise impacts to the environment.
- Remediate the Bauxite Residue area after closure of the Alumina Refining Facility to a state that can adequately mitigate the risk of future environmental contamination.

4 Discussion

- The SC agreed to the inclusion of text aligned with 6.3.

- Log item 56: Align with ICMM Global Industry Standard on Tailings Management
 - https://globaltailingsreview.org/wp-content/uploads/2020/08/global-industry-standard_EN.pdf
 - Incorporate ICMM Requirement 4.1: “consequence of failure” classification
 - Incorporate ICMM Principle 5:
 - “DEVELOP A ROBUST DESIGN THAT INTEGRATES THE KNOWLEDGE BASE AND MINIMISES THE RISK OF FAILURE TO PEOPLE AND THE ENVIRONMENT FOR ALL PHASES OF THE TAILINGS FACILITY LIFECYCLE, INCLUDING CLOSURE AND POST-CLOSURE.”
 - Incorporate timelines for ICMM Standard alignment (likely 2023/2025)
 - **STANDARDS COMMITTEE** guidance sought for Secretariat ACTION (revision of PS criterion text & Guidance)
- Log item 80: Consider public disclosure of storage locations
 - Commentator references “tailings” – take this to apply to bauxite residue storage areas (BRSA) as well
 - Legacy or operations/certified Entity?
 - No refinery without BRSA, so implicit in refinery location (broadly), or is more info required?
 - **STANDARDS COMMITTEE** guidance sought for Secretariat ACTION (revision of PS criterion text)

4 Discussion

- RE. Log item 56: A participant commented that the ICMM work was commissioned with a view to prevent repetition of major disasters such as Brumadinho and Sanmarco. ASI's relationship with ICMM is that there is an overlap in membership. Including this in guidance makes sense for an industry overlap standpoint. No harm in incorporating it into the Guidance. The SC agreed to include it in the Guidance.
- RE. Log item 80: The SC agreed not to include public disclosure of storage locations.

- 6.7 **Spent Pot Lining (SPL).** The Entity, where engaged in Aluminium Smelting, shall:
- a. Store and manage SPL to prevent the release of SPL or leachate to the environment.
 - b. Optimise processes for the recovery and recycling of carbon and refractory materials from SPL.
 - c. Not landfill Untreated SPL where there is the potential for adverse environmental effects.
 - d. Review at least annually alternative options to landfilling of treated SPL and/or stockpiling of SPL.
 - e. Not discharge SPL to freshwater and brackish water environments.
 - e.f. Not discharge SPL to a marine environment unless the SPL is treated and contained in floodpits and it can be demonstrated that there are no adverse impacts from the discharge.
 - f. ~~Not discharge SPL to marine or aquatic environments.~~

➤ Log item 460: Should make reference to first & second cut

- Proposed change to Glossary ONLY, no additional text in criterion (but reference in Guidance):

“Spent Pot Lining (SPL) – A by-product of the Aluminium Smelting process generated from the relining of electrolytic cells (pots). These contaminated pot linings comprise a carbonaceous fraction, known as first cut SPL, and a refractory material, referred to as second cut SPL. Both first and second cut SPL are considered a Hazardous Waste because of their fluoride, cyanide and reactive metal content. Also known as Spent Pot Liner or Spent Cell Liner.”

➤ Log item 475: There is currently not a definition or guidance on what is “treated SPL”

- Propose reference to IAI (2020) “Sustainable Spent Pot Lining Management Guidance” in Guidance
- https://www.world-aluminium.org/media/filer_public/2020/03/16/final_spl_guidance_-16_mar_2020.pdf

➤ Log item 81: Include appropriate storage prior to disposal

- Covered under 6.7a?
- What additional could be added to criterion?
- Storage, Handling and Transport included in IAI (2020) “Sustainable Spent Pot Lining Management
- Proposal: no change; 6.7a and Guidance covers

4 Discussion

- RE. Log item 460: SC agreed not to include that term in the criterion, but to make the change in the Glossary and reference in Guidance.
- RE. Log item 475: SC agreed to the proposal.
- RE. Log item 81: SC agreed not to include 'appropriate storage prior to disposal'.

- Log item 64: Include “a) Strive to reduce or eliminate generation of toxic SPL or 2nd cut SPL; b) Strive to reduce toxicity of SPL or 2nd cut SPL”
 - Propose ignore “toxic” language and differentiation of cuts ([revised] Glossary notes both cuts Hazardous)
 - Generation of SPL is a function of current smelting technologies process – do other, non-SLP generating technologies yet exist? Inert anode will deliver such.
 - How could “strive to reduce or eliminate” be audited? Reduction in SPL generation could be through extended pot life...
 - Reduction in toxicity of SPL – via treatment, in which case it would be toxicity of SPL in a given situation (the SPL generated wouldn’t be any less toxic, but post treatment it could be detoxified – this is covered to some extent by 6.7c
 - **STANDARDS COMMITTEE** guidance sought for Secretariat ACTION (revision of PS criterion text & Guidance)
- Log item 593: Supplement requirements on anode carbon dust following criteria 6.7
 - **STANDARDS COMMITTEE** guidance sought for Secretariat ACTION (New criterion & Guidance)...

4 Discussion

- RE. Log item 64: The SC agreed to these changes
- RE. Log item 593: The SC agreed to leave this requirement for now.

- 6.8 **Dross.** The Entity, where engaged in Aluminium Re-melting/Refining and/or operating a Casthouse, shall:
- a. Store and manage Dross to prevent the release of Dross and leachate to the environment.
 - ~~a.b.~~ Maximise the recovery of Aluminium by treatment of Dross and Dross residues.
 - ~~b.c.~~ Maximise the recycling of treated Dross residues.
 - d. Demonstrate that they regularly review alternative options to landfilling of Dross residues.

- Log item 81: Include appropriate storage prior to disposal
- Covered under 6.8a?
 - What additional could be added to criterion?
 - No IAI Guidance (as for SPL); other sources?

4 Discussion

- RE. Log item 81: The SC agreed not to change the criterion, and seek out Dross guidance to add to Guidance.

6.9 Waste Reporting. The Entity shall report the following information to the ASI Secretariat on the designated template in *elementAI* within **six** months after the end of each calendar year, as applicable:

a. Where engaged in Alumina Refining:

- i. Total quantity of Bauxite Residue generated (in metric tonnes)
- ii. Total quantity of Bauxite Residue treated (in metric tonnes) using (i) lagooning, (ii) neutralisation, (iii) dry stacking, (iv) recycling, including the nature of recycling or, (v) other – please state other treatment or use
- iii. Quantity of Bauxite Residue generated (in metric tonnes) per tonne of Alumina produced.

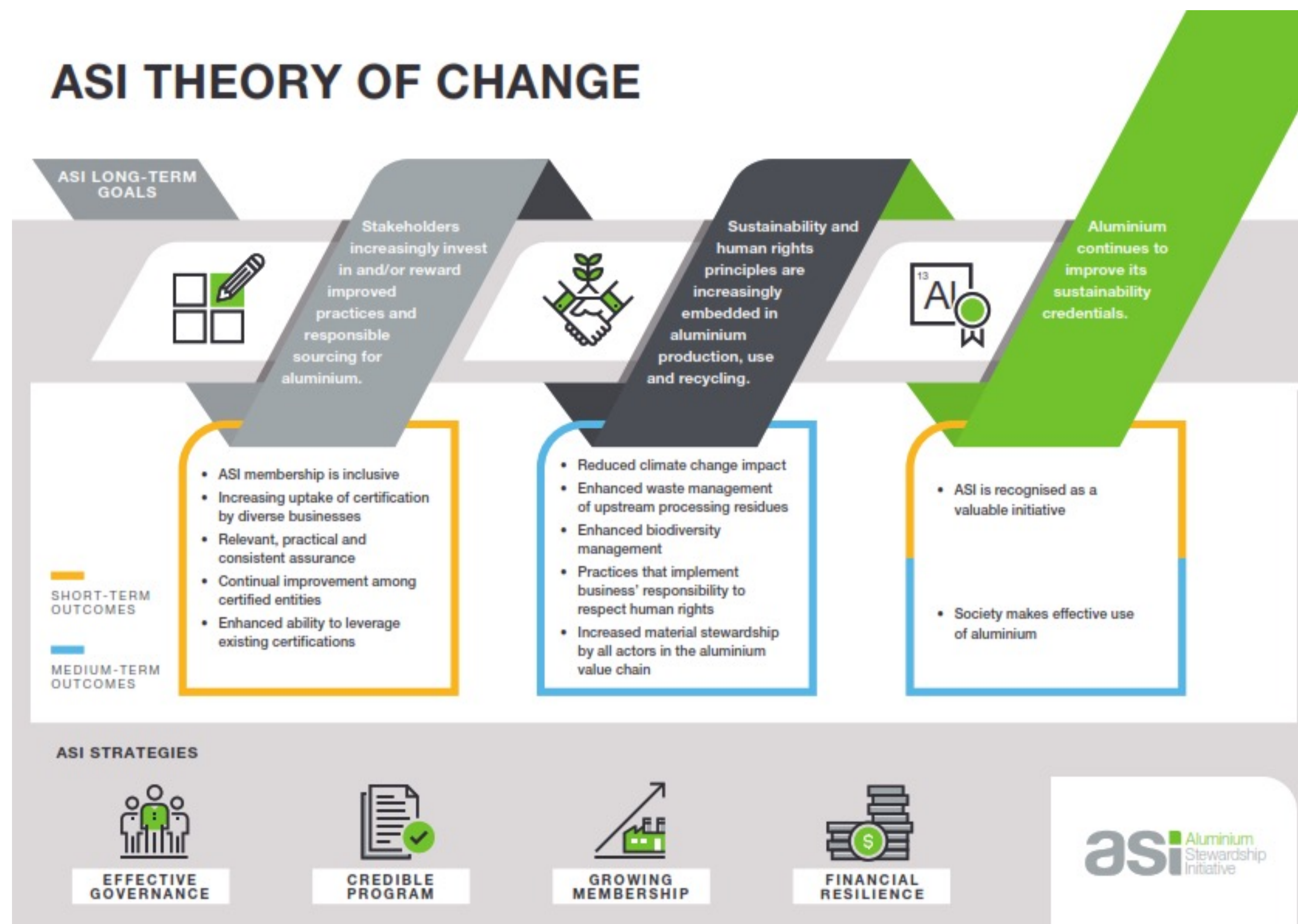
b. Where engaged in Aluminium Smelting:

- i. Total quantity of SPL generated (in kilograms)
- ii. Total quantity of SPL recycled (in kilograms)
- iii. Quantity of carbon and refractory materials that are recycled (in kilograms) per tonne of Aluminium produced

c. Where operating a Re-melter/Refiner & Casthouse:

- i. Total quantity of Dross generated (in kilograms)
- ii. Total quantity of Dross recycled (in kilograms)

- Log items: Data is already reported, lack of justification for ASI to collect – remove/significantly alter criteria
- #160 – data already reported to regulatory authorities & via corporate sustainability communication
 - #185, 405, 550 – suggest public disclosure as per other criteria, as opposed to data collection by ASI – why only for waste?
 - #291, 292, 307, 4019 – confidential business information for recycling companies (dross) & administrative burden
 - #503 – consider integrating with/getting data reports from IAI reports



- ASI should demonstrate impact
- “Enhance waste management”
- Adoption and implementation of management systems should be matched by measurements of their “success”

Some options on 6.9 for Standards Committee consideration

1. Remove criteria 6.9 (ignore following slides);
2. Retain criteria 6.9 (with amendments based on decisions on following slides' log items);
3. Change criteria 6.9 from Waste Reporting (to ASI) to Public Disclosure:
 - a. On named waste streams/metrics?
 - b. Generically on solid wastes – could expand in Guidance?
 - c. Roll all public disclosure (emissions, wastes, etc) together?
4. Change criteria 6.9 from Waste Reporting (to ASI) to Waste Reporting (to x):
 - a. x = regulatory authorities?
 - b. x = IAI/associations?
 - c. x = authorities and IAI
 - Is there potential for ASI to access such information via IAI-ASI MoU (split per ASI/non-ASI Entities) to allow linkage with Theory of Change? Confidentiality challenges to be overcome?
5. Combination of 3 and 4
6. Other?...

...FOR STANDARDS COMMITTEE DECISION

- Log item 592: Entities in aluminum smelting shall report the quantity of untreated overhaul SPL for policy-compliance disposal (kg)
 - Untreated disposal with potential for adverse impacts (policy-compliant or not) is non-compliant with 6.7c and thus reporting (under 6.9 Waste Reporting) would not be possible by a certified Entity.
 - Treated disposal could be inferred from reporting of generation minus recycled.

- Log item 599: Refining/Remelting & Casthouse Entities shall report the quantity of dross & salt-slag for policy-compliance disposal (kg)
 - Dross disposal could be inferred from reporting of generation minus recycled; salt slag would require a new sub-criterion 6.9d

- Log item 551: Assuming alumina production is reported this number could be calculated
 - Alumina production is not reported/requested – throughout denominators are not included, could be added

4 Discussion

- A participant said that there is a general concern of ‘reporting burden’. There is no appetite to increase reporting, it is already done in a lot of ways (associations, public domain etc.), and in many ways this criterion is not aligned with others, there is no such requirement to report to ASI on other data. Would rather see public disclosure.
- Two other participants agreed with public disclosure. We shouldn’t mix the roles of ASI and IAI.
- What should this public disclosure include? A participant said: with all reporting, it needs to reflect on materiality, this might differ according to position in value chain etc. Need some materiality reference, and the Guidance could highlight what that should be.
- Secretariat: if we went to public disclosure, would need to be formulated similarly to GHG and CoC: how do we get good enough data that we can link it back to ASI’s Theory of Change. There could be an Agreement of flow of information from ASI-IAI in a confidential way to allow to measure sector-wide impact.
- **The SC agreed to the proposal of public disclosure.** What that means needs to be explored further in terms of materiality. Further discussion needed. So proposal to remove 6.9, but when we have public disclosures throughout, explore what that might mean as tied to materiality.

8 Agreed Upon Actions & Close

- a. Agree any final post-meeting actions and timeframes by Committee members
- b. Agree actions by Secretariat
- c. Chairs and Secretariat thanks to all participants and close of meeting
 - One member stated that they received the ASI newsletter and had questions about where the 'Horizon Issues' originated and why there was no consultation with the Standards Committee on them. It was agreed that the 'Horizon Issues would be put on the agenda for early 2022 and ASI would present the origin and context of this piece of work.

Next Meetings:

- 06 October
- 20 October – all SC decisions by this date
- 01 December – final review and approve documents for consultations

Thank you