

# ASI Standards Committee

Teleconference

2 March 2022

# Antitrust Compliance Policy

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*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

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*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

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*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
2a	Priority issues		50	ASI - Chris
	BREAK		5	
2b	Priority issues (continued)		45	ASI - Chris
3	Next Steps		10	ASI - Chris
4	a. Agreed upon actions for Committee members b. Agreed upon actions for the Secretariat c. Close		5	Chair

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- A participant raised as other business the need to check whether a war situation/sanctions situation are well covered in the ASI Standards.

# 1a,b Welcome, Introduction & Apologies

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**Chair:** Kendyl Salcito (Nomogaia)

**Attendees** (<https://aluminium-stewardship.org/about-asi/asi-standards-committee/>):

Abdoul Diallo (ONG AGEDD), Abu Karim (Settle Ghana), Alexander Leutwiler (Nestlé Nespresso S.A.), Andy Doran (Novelis), Annemarie Goedmakers (Chimbo Foundation), Anthony Tufour (Arconic), Catherine Athènes (Constellium), Gesa Jauck (TRIMET), Jostein Søreide (Hydro), , Justus Kammüller (WWF), Marcel Pfitzer (Daimler), Nadine Schaufelberger (Ronal AG), Rosa Garcia Piñeiro (Alcoa), Stefan Rohrmus (Schüco), Steinunn Dögg Steinsen (Norðurál), Tina Björnestål (Tetra Pak)

**ASI Secretariat** (<https://aluminium-stewardship.org/about-asi/asi-team/>):

Chinelo Etiaba, Chris Bayliss, Ghaidaa Kotb, Klaudia Michalska, Laura Brunello, Marieke van der Mijn, Roshan Bhuyan

**Apologies:** Hugo Rainey (WCS)

**Proxies:** Chair for Hugo Rainey (WCS)

# 1c Objectives

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1. Adopt minutes of the previous meeting
2. Decisions on first set of priority areas for Standards revision
3. Decision on publication of (edited) consultation log



# 1d Documents Circulated

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1. ASI SC Teleconference 11Feb22
2. v2 DRAFT ASI SC Teleconference Minutes 11Feb22
3. Disclosure of Conflicts of Interest/Duty
4. ASI - SCMemberApptProxyForm 2Mar22
5. ASI –SCMemberAlternateForm 2Mar22
6. NOT FOR PUBLIC 2nd Public Consultation log 25-02-2021
7. Review & disclosure overview 24-02-22
8. 25-02-2025 Latest DRAFTS ASI documents

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

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e) Approval of Previous meeting minutes draft: 11 February 2022 will be published on the ASI website.

f) Conflicts of Interest/Duty

*Disclosure sent with meeting package*

# 1g Log of Actions

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
15Sep2021	Secretariat	Include 2020 AECOM Impartiality Review as agenda item for discussion.	Early 2022
15Sep2021	Secretariat	'Horizon Issues' (from the ASI August Newsletter) to be put on the agenda and ASI will present the origin and context of this piece of work.	Early 2022
01Dec2022	Secretariat	Circulate non-exhaustive list of topics for post-consultation consideration	Jan 2022 - CLOSED

## 2 – Priority issues – Log of comments

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- Following input from SC members, a number of Secretariat Actions changed to SC Priority – we have almost 200 items to cover in the next 3 meetings (but grouped)
- No “research” items remain – all now no action/secretariat action/sc priority or post-revision
- We will work from the log of comments today:
  - ‘NOT FOR PUBLIC 2nd Public Consultation log 25-02-2021.xlsx’
  - Filter column ‘SC meeting number’ by “1 (2 Mar)”
- Consideration and discussion of Column ‘Secretariat Recommendation to SC

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- A participant raised concern on the 'immunity' for amendment of Criterion 9.8 under LME/OECD Alignment Assessment. For downstream companies, one of the very reason to join ASI is to manage issues that cannot be controlled further down the supply chain. The obligation to carry out such extensive due diligence for downstream companies kind of undermines the purpose of ASI.
  - **Secretariat: proposal to have a meeting to discuss that.**
  - A participant asked whether would it be possible to make a list of all the items that are now meant for post-revision.
  - **Secretariat action: create a list of all items that are for post-revision (see following slide).**

# Post-revision issues (from email from C Bayliss to SC of 17 Jan 2022)

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1. Items for post revision (not in order of priority)
2. non-normative document regular update process
3. alignment with (revised) ASI strategy (<https://aluminium-stewardship.org/about-asi/asi-strategy/>)
4. recycled content
5. alternatives/additions to mass balance for CoC
6. claims process (including but not limited to claims guide)
7. embedding indicators / threshold value or performance related criteria – outcomes driven (linkage with M&E plan)
8. how can the Standards better deliver for Indigenous Peoples (development of FPIC Guidance and Beyond Certification)?
9. relative value of PS and CoC and new audiences/coverage for (new) standards products: financial community in particular (criteria for lenders), but also downstream users etc
10. Green Aluminium/Low Carbon Aluminium
11. role/scoping of the Entity and linkage with Membership classes

# AM/CG/CoC Logged comments categorized as “post-revision” (some crossover with previous page and duplication between commentators)

ASI Document Name	Type of Comment	Page number	Criterion/Section/ Figure/Table Number	Comment
ASI Assurance Manual (Version 2, draft 2)	Specific		46Table 11	Consider introducing a new rule that an Entity that is seeking certification for the first time that is not part of a Member that has existing certifications, cannot be awarded a High overall maturity rating. As noted above, this too would improve oversight.
ASI Assurance Manual (Version 2, draft 2)	General			The assurance manual should be shortened.
ASI Assurance Manual (Version 2, draft 2)	General		918.21	As discussed in our cover letter, full ASI audit reports should be public, with any commercially sensitive or proprietary information redacted.
ASI Assurance Manual (Version 2, draft 2)	Specific	19-21	3.7 Harmonisation and recognition of external standards & schemes	Recognised External Standards & Schemes should include “ISO-50001 Energy management systems”, and additionally also ISO 31000:2018 Risk Management System and ISO 22301:2012 Business Continuity Management System. Both of the latter standards relate to the risk management systems of the company so have a general relevance for most criteria (e.g. 2. Policy and Management, and other criteria that are explicitly related to risk management and/or business continuity).
ASI Chain of Custody Standard (Version 2, draft 2)	General		Input/output (CoC Material) 7diagram	As the technology evolves bauxite residue could be reprocessed and potentially valorized. One example of this is the extraction of High purity alumina. - How could this be represented in the chain of custody/input material?
ASI Chain of Custody Standard (Version 2, draft 2)	General			Eligible Scrap – Why making a difference between pre- and post-consumer scrap?  Target 1: Maximizing the aluminium recycling quote - The most important target is to maximize the recycling quote of aluminium. Does it make any difference for the environment if we recycle post-consumer or pre-consumer scrap? I am confident that both of us would answer NO!  Target 2: Minimizing the production (pre-consumer) scrap - The final product needs to be charged with the total CO2 footprint rather than adding its proportion to the pre-consumer scrap! There is no profit without scrap! Charging the scrap with a proportion of the CO2 footprint sends out the wrong message and reduces motivation to minimize the production scrap of each manufacturer!  Conclusion: There is just a certain amount of scrap available and the most important thing is to use all of it à Circular Economy! For the environment it does not make any difference at all, if the material derives from post-consumer scrap or technically needed production scrap! The environment needs to be protected not the manufacturer. The differentiation of scrap is the wrong signal and provides opportunities to implement “green washing” by reducing the CO2 footprint of the product and charging the scrap with a CO2 portion. The manufacturer is responsible for the amount of scrap, respectively he is responsible for the entire CO2 footprint of his production process!
ASI Chain of Custody Standard Guidance (draft 2)	General			The guidance should be shortened.
Claims Guide (Version 2, draft 2)	General			There is no guidance on what claims a trader can make

# PS Logged comments categorized as “post-revision” (some crossover with previous page and duplication between commentators)

ASI Document Name	Type of Comment	Page number	Criterion/Section/Figure/Table Number	Comment
ASI Performance Standard (Version 3, draft 2)	Specific		6.3b	Further to above, it is unclear what the communication plan needs to inform affected populations and organisations. Is it what was spilled/leaked, the impacts, the monitoring program?? Please specify and provide guidance. See also comments about 6.4 below
ASI Performance Standard (Version 3, draft 2)	General		5.3 a)	As the methodology is not available yet – hard to rate during an audit yet
ASI Performance Standard (Version 3, draft 2)	Editorial		8.3	More guidance would be nice to have a clear understanding of the expectation or to comply with the criterion and to explain the terminology, as this is not widely know yet. Additionally the dependance on identified risks in 8.1 and applicability in case risks where identified could be stated more precisely (in wording itself or in guidance).
ASI Performance Standard (Version 3, draft 2)	General		8.7	For future revisions: What about an rehabilitation plan for alumina refineries? At first glance it appears 2.6, in relation to New Projects and Major Change - social impact assessment and mitigation, would be a good fit for the worker dialogue aspects of Just Transition. There is potentially an analogue between more participatory SIA approaches and Just Transition dialogue.
ASI Performance Standard (Version 3, draft 2)	Specific	11 & 12	2	2.11b explicitly is in the right ballpark in relation to the closure side of Just Transition and would be augmented with explicit workforce transition/Just transition planning
ASI Performance Standard (Version 3, draft 2)	Specific		199.1c	We stuck this in here during the HRWG but really this should be a stand-alone criteria earlier in the standard before APOs even come up...maybe in P2? The guidance document would benefit from being shortened and more relevant to each criterion, new draft requirements are to a large degree not described in the guidance.
ASI Performance Standard (Version 3, draft 2)	General			This may well become a critical challenge, and we would strongly recommend to test-run new criteria (as well as challenging old ones) with one or more accredited certifying body. In this way, ASI will reduce the risk of having criteria where compliance or conformance can only be proved by proxy or through bureaucratic document productions.
ASI Performance Standard (Version 3, draft 2)	Specific	25 ff	2.6	The requirements are very demanding for small and medium companies, which should comply within 2 years after joining ASI. Further support and guidance on how to practically implement these criteria would be needed.
ASI Performance Standard (Version 3, draft 2)	Specific		5.3 b GHG Emission Reduction 15Plan	The GHG Emission reduction plan should have a holistic view based on the following logic: for a company which is investing in optimizing and expanding its recycling capacity it is certainly true that its absolute direct emissions (Scope 1) associated to gas burners in the CH will increase but also true the company’s whole carbon fingerprint will be reduced due to the reduction of Primary material consumption which is intensive in terms of CO2 emissions
ASI Performance Standard Guidance (draft 2)	Specific		7.1b	Guidance for 7.1b should include examples of water related impacts particularly for water stressed areas.
ASI Performance Standard Guidance (draft 2)	General			The guidance should be shortened.



# 2 – Priority issues – Logged items to address today

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1. Cross-cutting issues (~30 mins)
  - Review & disclosure (REF: review & disclosure overview 24-02-22.xlsx)
  - Major changes/new projects
  
2. Chain of Custody (~5 mins)
  - **NEW ITEM – not in log, see following slide**
  
3. PS Principle 6 (Emissions, Effluents & Waste) (~15 mins)
  - Area of influence
  - Tidying language of 6.1 and 6.2
  - SPL marine disposal
  
4. PS Principle 7 (Water Stewardship) (~5 mins)
  - Guidance
  
5. PS Principle 4 (Material Stewardship) (~10 mins)
  - Strengthening 4.3b / loosening 4.4c
  
6. PS Principle 5 (GHG Emissions) (~30 mins)
  - Endorsed method
  - Scope 3 disclosure uncertainty
  - Minimum reporting requirements
  - Independent verification of energy data

# 1. Cross-cutting issues

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- One participant stated the 5-year review to be adequate. Only concern: when it comes to projects: at some point the project becomes absorbed into the life of the plant. At what point does it still make sense to talk about impact assessments. Also issue in language: specific review linked to an event . A *breach* of code of conduct pertains rather to process/control, rather than speaking to the effectiveness of it. It shouldn't lead to review, it's more if you have an *emerging* issue that is not in it. Thus need to differentiate between code/policy/process.
- Secretariat: proposal to disclose to the latest *active* version. If project reaches an end, there's nothing to disclose and so disclosure would then no longer be applicable
- The participant agreed to later share some language around public disclosure for New Projects
- Another participant commented on the Public Disclosure Excel, on line 26, on Protected Areas, they *can* change, i.e. species that need extra protection.
- **The Secretariat will add that to the discussion in meeting number 3.** Proposal to remove the wording 'breach of' and reorient the language to changes to business that alters material risk. 3-part component: 1. regular review (5 yearly minimum) 2. change in risk 3. identified gaps in controls.

# 1. Cross-cutting issues

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- A participant stated the need for clarity about scoping of some of these disclosure requirements: Entity vs Facility level (some of the items are produced at Facility level, i.e. Emergency Response Plan).
- **Secretariat:** this is differentiated across criteria, some are process, some are not. For policies/plans, it would be at an Entity level, whereas performance, it would be Facility level. Proposal to have as default: Entity, exception: then it would be Facility.
- **The Secretariat will standardise language across criteria and identify any uncertainties/exceptions, to be done by email in coming weeks.**
- A participant stated that in practical terms, requirements for yearly reporting can be done via GRI
- **Secretariat:** Agree, to reference GRI reports as part of yearly reporting when applicable, and prioritise GRI in the Guidance
- A participant highlighted the comment in line 9: Governance is part of Sustainability Reporting, not tied to 2.1 specifically. **No change, Secretariat will keep it in.**
- A participant expressed hesitancy at the disclosure requirements in Criterion 2.1 ESG Policy as it is quite detailed and would be cumbersome to disclose
- Another participant disagreed stated that disclosure of policies is essential
- **Secretariat:** propose to include and link 3.1 specifically to 2.1 using language that ties the 2 together (policy disclosure is driven by issues against which performance is measured – to avoid disclosure of detailed policy that swamps the critical issues).
- A participant expressed the desire to link disclosure (i.e. under GRI) to the publication of sustainability reports, would streamline and offer further transparency. This participant will share some suggestions per e-mail.
- **Secretariat: proposal to link performance disclosure with GRI report at every point in the Guidance.**
- The Standard currently doesn't require emergency response plans to be publicly disclosed. A participant opposed that, because it is important for communities around them, you DO need to publicly disclose. Thus amend the language and require public disclosure of the emergency response plan.
- 2.6e: move towards language to 'seek to' or not. **SC agreed not to include 'seek to'.**

# Chain of Custody Criterion 3.1b

## ASI Bauxite.

An Entity engaged in Bauxite Mining shall have systems in place to ensure that ASI Bauxite is produced only from Bauxite Mines that are:

- a. Within the Entity's CoC Certification Scope and/or in which the Entity holds a legal interest and are within the CoC Certification Scope of another CoC Certified Entity.
- b. Certified against the **ASI Performance Standard** or certified against a Responsible Mining Standard that has been formally recognised by ASI as comparable to the **ASI Performance Standard**.

## PROPOSE:

### ASI Bauxite.

An Entity engaged in Bauxite Mining shall have systems in place to ensure that ASI Bauxite is produced only from Bauxite Mines that are:

- a. Within the Entity's CoC Certification Scope and/or in which the Entity holds a legal interest and are within the CoC Certification Scope of another CoC Certified Entity.
- b. Certified against the **ASI Performance Standard** ~~or certified against a Responsible Mining Standard that has been formally recognised by ASI as comparable to the ASI Performance Standard.~~

### Rationale:

- No Responsible Mining Standard has been recognised since launch of PS/CoC in 2017
- Unlikely to happen in the near future – significant secretariat resources required for limited value
- Risks for ASI in recognising standards that are dynamic – also requires significant resourcing

## For information, new definition in Glossary – Internally Generated Scrap (no impact on CoC criteria as mass balance never “sees” this internal loop)

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### NEW

Internally Generated Scrap	Pre Consumer Scrap which does not leave the generating Entity’s Certification Scope prior to aluminium recovery and material containing Aluminium that is diverted from the waste stream from a manufacturing process or similar, in which the material is reclaimed within the same process that generated it.
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### EXISTING

Post-Consumer Scrap	Material containing Aluminium that is reclaimed from a consumer or commercial product that has been used for its intended purpose by individuals, households or commercial, industrial and institutional facilities as end-users of the product which can no longer be used for its intended purpose. (Adapted from ISO 14021:2016)
Pre-Consumer Scrap	Material containing Aluminium that is diverted from the waste stream from a manufacturing process or similar, in which the material has not been intentionally produced, is unfit for end use and not capable of being reclaimed within the same process that generated it. (Adapted from ISO14021:2016)

# Chain of Custody Criterion 3.1b and Glossary change

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- The SC agreed to remove the reference to the Responsible Mining Standard.
- New definition of Internally Generated Scrap. One participant states that there's one point that isn't treated in this definition: internally generated scrap that would be tolled elsewhere.
- **Secretariat:**
  - Need further thinking/research on this. Add to list of post-revision items.
  - Internally Generated Scrap definition as written to be added to Glossary

# Principle 6

## 6.5 Waste Management and Reporting

The Entity shall:

- a) Implement a Waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy.
- b) Publicly disclose, on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated Waste disposal methods.

Comment	Commentator Suggested Wording Changes	Initial Secretariat Response	Secretariat Recommendation to SC
<p><b>6.5a:</b> Before a strategy can be developed, should the Entity not identify and quantify the waste streams and their impacts? The strategy must then address these wastes in accordance with the hierarchy. There needs to be a pre-step first, in the same was as 5.1 for GHG, 6.1 for air emissions and 6.2 for water discharges. This is consistent with GRI</p>	<p>The Entity shall :</p> <ul style="list-style-type: none"> <li>(a) identify the quantity of Hazardous and Non-Hazardous Waste generated by the Entity from activities within its Area of Influence, and associated Waste disposal methods , and assess adverse impacts to human well being and the environment.</li> <li>(b) Implement a Waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy, and regularly reviewed.</li> <li>(c) Publicly disclose, on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, the associated Waste disposal methods, and progress against the waste management strategy.</li> </ul>	<p>Amend to align with 5.1, 6.1 and 6.2</p>	<p>Propose to accept this reformulation? But reformulate slightly to align with previous criteria. (a) would combine the quantification and disclosure.</p> <ul style="list-style-type: none"> <li>a. Quantify and publicly disclose Hazardous and Non-Hazardous Waste generated by the Entity from its activities within its Area of Influence and associated Waste disposal methods with the potential to have material impacts on human wellbeing or the environment.</li> <li>b. Assess the material impacts to human well-being and the environment of the elements in (a)</li> <li>c. Implement a Waste management strategy that is designed in accordance with the Waste Mitigation hierarchy.</li> </ul>

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- SC agreed on alignment of 6.5 with other criteria.



# Principle 6

## 6.6 Bauxite Residue

An Entity, where engaged in Alumina Refining, shall:

d) Assess the impact of the water discharge from Bauxite Residue storage area and mitigate any material potential impacts to the environment.

Comment	Commentator Suggested Wording Changes	Initial Secretariat Response	Secretariat Recommendation to SC
<b>6.6d:</b> Mitigation should be for potential and actual adverse impacts. And is the impact just from water - could be surface runoff, subsurface leachate into groundwater or soil. And 6.6f specifically deals with water discharges	e. Assess the impacts from surface or subsurface contamination from Bauxite Residue storage and mitigate any adverse actual or potential impacts to the environment.		SC to decide: no change or proposed wording change

- Expand to also include actual (instead of adverse).
- A participant stated that that is important, and adds value.
- **SC: agreed, Secretariat will make that change**

# Principle 6 – SPL marine disposal

## 6.7 Spent Pot Lining (SPL)

An Entity, where engaged in Aluminium Smelting, shall:

e) Not discharge SPL to freshwater and brackish water environments.

Comment	Commentator Suggested Wording Changes	Initial Secretariat Response	Secretariat Recommendation to SC
<b>6.7e:</b> This practice has been phased out in most parts of the world except in Iceland and should be prohibited as per 6.7e. Long term impacts are still unknown and the ASI Standard should phase out this practice (in the same way it has with Bauxite Residue lagooning in 6.6a or GHG emissions from smelters in 5.2		<p>My understanding and the SPL isn't marine deposited, though neutralised leachate is...and addressed through 6.7a.</p> <p>as written is only focused on SPL, not leachate discharge...so may need some tidying up....also 6.6.</p>	<p>SC decision on alternative: f. Not discharge SPL to a marine environment <del>unless the SPL is treated and contained in floodpits and it can be demonstrated that there are no adverse impacts from the discharge.</del></p>

- Proposal to delete this exception.
- SC agreed with the decision.

# Principle 6 – Area of Influence

## 6.1 Emissions to Air (Air Emissions).

### The Entity shall:

- a. Quantify and publicly disclose Emissions to Air from activities within its Area of Influence, with the potential to impact human wellbeing or the environment.
- b. Implement plans to minimise exposure to, and impacts from, Emissions to Air.
- c. Regularly review the effectiveness of the plan and, where required, identify and implement improvements. The duration of time between reviews shall not exceed five years.

Comment	Commentator Suggested Wording Changes	Initial Secretariat Response	Secretariat Recommendation to SC
<p>Please consider revision, as an Entity will not be able to quantify emissions from the sources of legal entities, which are not controlled by the Entity within its Area of influence. In other words it will be impossible to meet the criterion, as data on air emissions from other legal entities within the Area of Influence likely will not be accessible.</p>	<p>a. Quantify and <del>publicly report</del> <b>publicly disclose</b> Emissions to Air <del>from the Entity's activities within its Area of Influence, with the potential to impact adversely human wellbeing or the environment, that have</del> <b>adverse effects on humans or the environment and</b>.            b. Implement plans to minimise <del>exposure to, these</del> <b>and</b> adverse impacts <del>from, Emissions to Air.</del>            a-c. Regularly review the effectiveness of the plan and, where required, identify and improvements. <del>The duration of time between reviews shall not exceed five years.</del></p>	<p>SC to review Area of Influence across water and emissions.</p>	<p>SC decision on alternative:            a. Quantify and publicly disclose material Emissions to Air from its activities and, where possible, from those within its Area of Influence.</p>
<p>This should be clarified by limiting the disclosure to "regulated or material" emissions. Any emission will in some way or another have the "potential to impact adversely human wellbeing or the environment." This phrase is just far too generic.</p>	<p>Consider adding "reports to authorities, that will be made publicly available by these authorities, are compliant with this criterion." This would help preventing double reporting efforts.</p>	<p>Use the same language as P5: 'where material'?</p>	<p>Regulated and material are 2 different things. Propose to include a definition of 'material' to the Glossary and use the concept of materiality in this criterion. Adapted from RJC it would read like: 'Issues that are relevant or significant and includes aspects that reflect an ASI member's significant economic, environmental and social impacts'. (meeting 3)</p>

# Principle 6 – Area of Influence

## 6.2 Discharges to Water

### The Entity shall:

- a. Quantify and publicly disclose Discharges to Water from activities within its Area of Influence, with the potential to impact human wellbeing or the environment
- b. Implement plans to minimise exposure to and impacts from Discharges to Water.
- c. Regularly review the effectiveness of the plan and, where required, identify and implement improvements. The duration of time between reviews shall not exceed five years.

Comment	Commentator Suggested Wording Changes	Initial Secretariat Response	Secretariat Recommendation to SC
<p>Please consider revision, as an Entity will not be able to quantify emissions from the sources of legal entities, which are not controlled by the Entity within its Area of influence. In other words it will be impossible to meet the criterion, as data on discharges from other legal entities within the Area of Influence likely will not be accessible.</p>	<p>a. Quantify and <del>publicly report</del> <b>disclose</b> Discharges to Water <del>from the Entity's activities within its Area of Influence, with the potential to impact adversely human wellbeing or the environment. that have</del> <b>adverse effects on humans or the environment and</b></p> <p>b. <del>Implement plans to</del> <b>minimise these exposure to and adverse impacts from Discharges to Water.</b></p> <p><del>a-c. Regularly review the effectiveness of the plan and, where required, identify and implement improvements. The duration of time between reviews shall not exceed five years.</del></p>	<p>SC to review Area of Influence across water and emissions.</p>	<p>SC decision on alternative:</p> <p>a. Quantify and publicly disclose material Discharges to Water from its activities and, where possible, from those within its Area of Influence.</p>

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- A participant had a question: is this at Certification scope level or Entity level?
  - Secretariat: About facilities, will include in the Guidance
  - The participant asked, for SMEs, is it also possible to include area of influence?
  - Indeed that's where the language 'where possible' comes in.
  - **SC agreed with the changes and harmonized languages between the 2 criteria above.**

# Principle 7

## 7.1 Water Assessment and Disclosure

### The Entity shall:

- a. Identify, document and publicly disclose its water withdrawal and use by source and type.
- b. Assess and, where material, publicly disclose water-related risks in Watersheds in the Entity's Area of Influence.

Comment	Commentator Suggested Wording Changes	Initial Secretariat Response	Secretariat Recommendation to SC
The criteria can be strengthened with concepts of water stress and water footprinting as per the ISO 14046 standards in terms of the risk and impact assessment. It is noted these terms are briefly noted in the guidance but there is an opportunity to ensure the risk assessment takes these concepts into account.	7.1b Assess and, where material, publicly disclose water-related risks that includes water stress and water footprinting impacts for Watersheds in the Entity's Area of Influence.		According to ISO 14046, Water footprint is a 'metric(s) that quantifies the potential environmental impacts related to water'. The water-related risk would encompass that? Similarly, water stress as defined by the European Environment Agency 'a situation where there is not enough water of sufficient quality to meet the demands of people and the environment' would also encompass 'water-related risks' If anything propose to flesh out in the Guidance these 2 concepts?
Time bound targets should also be context and science based in line with the WWF Contextual Water Targets document (April 2021)	Implement water management plans, developed in conjunction with Affected Populations and Organisations with context time-bound targets that address material risks identified in Criterion 7.1(b).	Somewhat explicit that they should be contextual, as the context is that it should address material risks that are clearly defined. To my unexpert knowledge it seems to just add another word. But flesh out in Guidance?	SC to decide: no change, change to guidance only or proposed wording change

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- **SC: no decision yet today on the concept of water stress and water foot printing, will be added to the BESWG for input.**
  - **Secretariat: WWF Contextual Water target and ISO to be added to the Guidance.**

# Principle 4 – Strengthening 4.3b/loosening 4.4c

## 4.3 Aluminium Process Scrap

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

b. Seek to separate Aluminium allows and grades for recycling

## 4.4 Collection and Recycling of Products and End of life

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

c. 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.

Comment	Commentator Suggested Wording Changes	Initial Secretariat Response	Secretariat Recommendation to SC
Too aspirational in the current wording. Strengthen the expectation to maximise recycling and recovery of aluminium.	<b>4.3b</b> Use best available techniques to separate Aluminium alloys and grades for recycling.		SC to decide: no change or proposed wording change
This could be wishful thinking! If local ...collection or recycling systems do not wish to engage, an entity cannot force them to. These systems are heavily regulated (at least in Germany), may have slightly different business/commercial interests etc., preventing them from engaging with us.	<b>4.4c</b> Change the criterion to "Seek to engage with...."	Amend the Guidance	Propose no change? Guidance could be amended to include: The Entity has carried out as far as is practically possible, efforts to engage with relevant local, regional, or national collection.... This would mean that if indeed it isn't possible to do so, the Entity has shown good faith attempts



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- Strengthening 4.3b → Some methodologies are effective without necessarily being ‘best available techniques’. The separation isn’t the issue, but rather to keep separate.
  - **SC agreed, will make that change: remove ‘seek to’ under 4.3b**
  - **The SC agreed with the Secretariat Recommendation to amend Guidance under 4.4c.**

# Principle 5 – Endorsed methodology

## 5.3 GHG Emissions Reduction Plans.

### The Entity shall:

- a. Establish a GHG Emissions Reduction Plan and ensure a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario, using an ASI endorsed methodology when available.

Comment	Commentator Suggested Wording Changes	Initial Secretariat Response	Secretariat Recommendation to SC
5.3. a – Please specify what ASI “endorsed methodology” are is, and where it can be found. If ASI “endorsed methodology” is not available, what GHG Emissions Reduction Pathway an Entity shall be consistent with? Could you specify that please?			<p>Guidance outlines not yet available. In absence I propose the sectoral slope applied to the Entity's activities (TABLE 4 from IAI - <a href="https://international-aluminium.org/wp-content/uploads/2021/10/1.5-Scenario-Dataset.xlsx">https://international-aluminium.org/wp-content/uploads/2021/10/1.5-Scenario-Dataset.xlsx</a>):</p> <p>2018-2030 2018-2040 2018-2050            Primary Aluminium (Cradle to Gate) -28% -86% -97%            Recycled Aluminium (Gate to Gate) -22% -59% -82%            Semis (Gate to Gate) -28% -45% -81%</p>
It should be really clearly stated that the ASI approved SBT methodology should be approved by the Standards Committee .			<p>Recommend no change - ASI approved methodology will be articulated in updated Guidance (which by definition will require SC sign off).</p>

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- A participant stated that it is such a critical and debated issue, somehow strange to put it in the Standards itself, but it should be named.
  - Another participant stated that the new standard can be published with an introductory note to mention that.
  - Secretariat: Board is aware that we may need normative change before the next Standards review cycle
  - A participant stated that there's a lot of work ongoing to establish this methodology. Introducing the emission reductions is problematic if you are on the less developed end of the spectrum, so understand the need to have a methodology to map this against. Need to come back to this when all these methods are developed.
  - Another participant agreed, using numbers is also problematic, esp. as we do not know what the methodology will look like.
  - **Secretariat: will look at how the decision flows through. It may be done through the Guidance.**

# Principle 5 – Minimum disclosure requirements for 5.1

## 5.1 Disclosure of GHG Emissions and Energy Use.

### The Entity shall:

- a. Account for and publicly disclose, where material, energy use and GHG emissions by source on an annual basis.
- b. Ensure that all publicly disclosed GHG emissions data are independently verified, prior to publication.

Comment	Commentator Suggested Wording Changes	Initial Secretariat Response	Secretariat Recommendation to SC
<p>Our view is that the following statements around reporting units should be made MINIMUM requirements for an ASI Entity to achieve Conformance on minimum levels of GHG disclosure, rather than framed as just "recommendations" or just "good practice". If there are no minimum levels defined on expectations, then the bar is set much lower for conformance, and some ASI Entities will inevitably chose only to disclose the bare minimum (i.e. any number/value/unit for GHG and Energy use, but not necessarily one that enables and improves transparency and accountability across time and space, vs. other Entities). A low bar for Conformance reduces the value of the ASI Performance Standard. Our view is that disclosure of GHG Emissions and Energy in terms of both absolute and production-based intensity units should be a minimum.</p> <p>"- It is recommended that emissions data disclosure include absolute (t CO2e) and intensity values (t CO2e/t Product)</p> <p>- It is recommended that energy data disclosure include absolute (e.g. GJ; kWh) and intensity values (e.g. GJ /t product; kWh/t Product)</p> <p>- Use of company-derived reporting units such as 'kt CO2-e/million m2 foil products' or 't-CO2e/t-Cu equivalents' for example, is not recommended." (Current Guidance, p.61)</p>	<p>"- Emissions data disclosure must include absolute (t CO2e) and intensity values (t CO2e/t Product) as a minimum</p> <p>- Energy data disclosure must include absolute (e.g. GJ; kWh) and intensity values (e.g. GJ /t product; kWh/t Product) as a minimum</p> <p>- Use of company-derived reporting units alone such as 'kt CO2-e/million m2 foil products' or 't-CO2e/t-Cu equivalents' for example, do not meet the minimum level of disclosure expected for emissions and energy intensities."</p>		<p>SC to decide: no charge or proposed wording change</p>

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- A participant stated that there are some issues related to specific data: to make it comparable, we need to limit it to different process steps
  - Another participant agreed, but when it comes to the process, really need to define the boundaries i.e. smelters: which kinds of electricity you account for. THEN you can compare.
  - Another participant stated that it also essential that secretariat can compare data of different companies to show what ASI is achieving.
  - A participant stated that every company has different levels of integration, what level of process/detail is required here? Need to define the level of specificity.
  - **Secretariat:** this conversation can't be resolved in the coming 4 weeks, thus suggest to instead amend Guidance later on, keep it in mind.
  - The meeting ended after 2 hours, with some issues related to Principle 5 and agenda items 3 and 4 not covered.
  - **Secretariat to ask for written input around the remaining issues.**
  - **Secretariat to make a written report on any potential impact of sanctions.**

Thank you