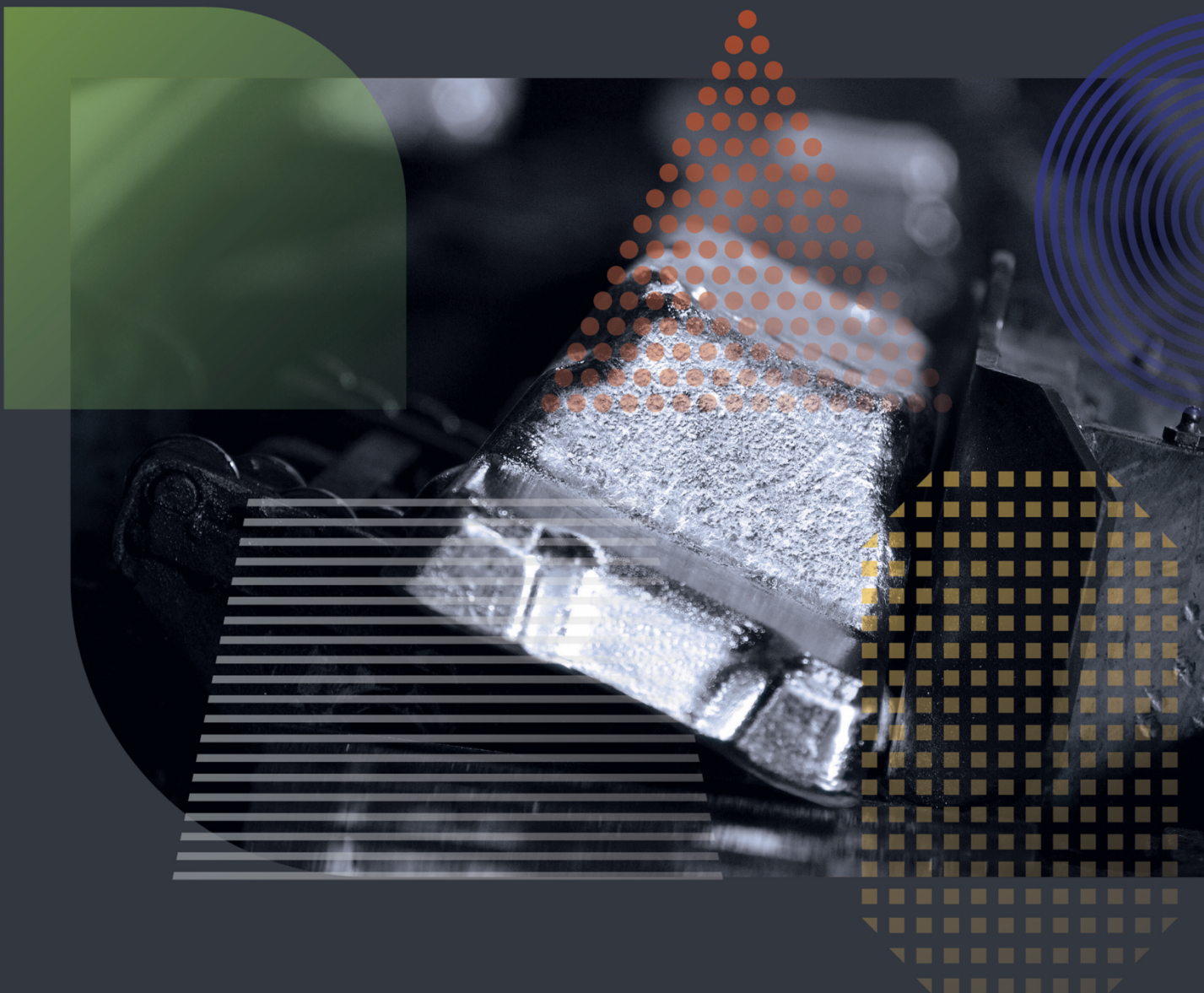


Drivers, Benefits and Challenges of ASI Membership and Certification:

ASI Certification Survey 2021-2022

April 2023



1. Executive Summary

This report provides an analysis of the results from an ASI survey that was sent to Production and Transformation and Industrial Users members who achieved ASI Performance Standard and/or Chain of Custody Standard Certification between November 2021 and November 2022. This analysis is an update to an ongoing survey that started in November 2021. The previous analysis, published in February 2022, captured Certifications achieved from the start of the ASI Certification program until November 2021.

The aim of the survey is to seek feedback from members on the drivers, benefits, and challenges of ASI Certification and to monitor key trends and shifts in those. For the 2021-2022 cohort, 30 responses were received (compared with 40 for the 2017-2021 cohort).

Drivers to seek ASI Performance Standard Certification have stayed relatively constant between the two cohorts of Entities. For this round, the top 4 drivers for companies to join ASI and seek ASI Performance Standard Certification were: to meet customer expectations, improve on responsible business practices, gain competitive advantage, and demonstrate responsible business practices (the latter three options being chosen equally). There has been a stark decrease in responses to 'understanding and reducing our business risk' (chosen by 40% in the 2017-2021 cohort, down to 0% in the 2021-2022 cohort).

- ASI is and will continue to respond to evolving expectations by preparing and actioning regular updates to the Guidance documents, ASI Assurance Manual, Claims Guide, and/or procedural updates.

The reasons to certify against the CoC Standard have also stayed relatively constant. The main drivers to seek ASI CoC Certification continue to be to implement responsible sourcing and to meet customer demand. Making claims was still chosen by a minority of respondents (20% chose on-product claims, and 7% chose off-product claims in the 2021-2022 cohort).

- ASI will continue to raise awareness of the value of driving sustainable practices and traceability all along the value chain, and the role that CoC Certification can play to support that.

For the 2021-2022 cohort, the majority (83%) of respondents have responded that they have derived benefit from ASI Certification by choosing 'agreeing' or 'strongly agreeing' for the question 'From your perspective, is ASI Certification positive for your business?'. In addition, 73% of respondents confirmed there had been changes made or in progress to their business practices through ASI Certification. For the 2021-2022 cohort, while 55% of respondents foresaw no challenges to being able to maintain ASI Certification, 28% responded that they did anticipate challenges, with a further 17% unsure. This represents a slight shift from the 2017-2021 cohort, with some decrease in confidence, likely related to the strengthening of the updated 2022 Standards.

- ASI will continue to maintain and enhance the value of Certification through regular Standards and Guidance revisions to keep pace with members 'pain points' and stakeholder expectations, by using various feedback channels and making implementation tools available to members.

When asked about how easy it was to go through the ASI Audit process, there was a moderate shift in perceived difficulty between the 2 cohorts. For the 2017-2021 cohort, a little over half (53%) of respondents found it a moderate to a difficult process. This number jumped up to 87% for the 2021-2022 cohort. The percentage of respondents finding it straightforward decreased by 30 percentage points between the 2 cohorts. Additionally, comments left for other questions throughout the survey highlighted variability in topic understanding from auditor to auditor.

- ASI conducts regular calibration calls for ASI auditors where there are identified gaps or inconsistencies, and uses results to feed back in the learning, assurance, and other relevant workstreams at ASI.
- In December 2022, the ASI Board approved an update to ASI's Auditor Accreditation Procedure. Version 4 includes a new section for applicable conditions and processes for the approval of auditors to participate in audits in countries where there is currently insufficient local auditor capacity.

Similarly to the previous cohort, the majority of respondents found the Self-Assessment process to be moderate, with the time taken to upload evidence into ASI's Assurance Platform mentioned in 2 comments. Language was identified as a potential barrier to completing the Self-Assessment in 2 comments.

- ASI is currently building a new version of elementAL 2.0 in a new hosting environment, with the aim to launch it by the end of 2023.

In the comment sections throughout the survey, difficulties related to the implementation of Standards requirements were mentioned (energy data requirements for Performance Standard V3, complexity in requirements throughout, and Chain of Custody Standard requirements).

- ASI continues, through various channels, to identify areas or tools for improvements and clarification to help Members in their Certification journey. For example, ASI has developed a CoC Material Accounting Tool (CoC MAT) to support CoC Certifying Entities in building their own CoC Material Accounting Systems.

The importance of language accessibility was also mentioned several times in the comment sections throughout the survey.

- ASI will continue to translate all documents in the various ASI languages, and consider translation options for learning videos and other platforms.

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3. Introduction

ASI's ongoing Certification Survey provides an opportunity for Certified Members to share feedback on the ASI Certification process, its strengths and challenges, and the broader value that ASI Certification(s) is perceived to deliver. Responses to this survey inform the calibration and continual improvement of organization's Certification program and various workstreams.

4. Methodology and Limitations

The collection of data for this survey was carried out between November 2021 and March 2023, and was collected via SurveyMonkey (the web-based survey platform), using 2 channels.

1. Firstly, a link to the survey was sent alongside each e-mail sent by ASI Secretariat to ASI Members when they achieve Certification or re-Certification against either the Performance Standard or the CoC Standard. Four respondents answered using that link between the 23rd of November 2021 and the 30th of November 2022, so there was only a 4% response rate for the first channel.
2. Secondly, the survey was also sent as an e-mail invitation reminder, on the 8th of March 2023, to all of those contacts responsible for a Certification or re-Certification between 23 November 2021 and 30 November 2022¹.

In total, 96 invitations were sent and 26 respondents answered using the link in the e-mail, a 27% response rate for the second channel.

In total (using both channels), there were 30 respondents (31% of eligible respondents). Therefore, the percentages gathered are all based on a response rate of 30 respondents, unless specified otherwise (except for Q2, Q6, and Q7, where one participant skipped the question, and Q8 and Q9, where 3 participants skipped the question)².

The survey is made up of a mix of multiple-choice questions (for questions 1 and 2), and single-choice questions (for the rest of the questions) with options for free text comments, allowing for the collection of quantitative and qualitative data. A copy of the survey is available in Appendix 1.

The survey was designed in four sections in order to seek feedback on:

1. the drivers for ASI Certification,
2. the perceived value of ASI Certification,
3. the challenges of Certification,
4. changes and improvements driven by ASI Certification.

¹ The survey was sent to the person who is listed in elementAI, ASI's online Assurance platform, as the main contact person for the Self-Assessment for the current issue of each Certification, taking into account multiple revisions of Certifications (i.e. recertifications/surveillance audits etc.). This is because they would usually be the most involved in preparing the latest Self-Assessment for the subsequent Audit process and thus have on-the-ground knowledge and insights about that particular Certification scope.

² See Appendix 2

Survey questions were the same as the ones developed by the ASI Secretariat for the previous iteration³, with a few amendments (additional response options for questions 1 and 2). The survey was made available to potential respondents in both English and Chinese via the web-based SurveyMonkey platform.

Eighteen out of the 30 respondents (60%) of respondents provided qualitative feedback in the form of at least one comment. Both quantitative and qualitative feedback provide useful information and their analysis can help ASI to improve its various workstreams.

Respondents could choose to provide their contact details for follow-up, and 30% of the total respondents did so. The option of anonymity was provided throughout the survey to ensure that respondents felt able to answer freely, including negative feedback where relevant, without being identifiable. As a result, survey responses are not broken down by geography, supply chain activity or other potentially identifying variable. Moreover, this survey didn't differentiate between a Certification or Re-certification, nor against which version of the Standard(s) it was achieved. It is likely that answers to some of the questions would have differed according to this status. The survey was blanket targeted towards *all* Entities having Certified or re-Certified, in order to get a broad, high-level view of the ASI Certification process, its strengths and challenges. Future iterations of the survey will include questions to differentiate first from subsequent Certifications, which version of the Standard(s) it was done against, which Supply Chain Activity is included in the Certification, as well as questions specific to Standards criteria understanding and implementation.

As the number of respondents was limited, this survey should not be considered as a systematic and representative review, but rather an indication of the general sentiment of the 2021-2022 certifying cohort.

Another limitation was that an exact side-by-side comparison of the previous (2017-2021) cohort vs the 2021-2022 cohort results was not always possible (for questions 1 and 2). This is because, for these 2 questions, the response options have been expanded since the last round to provide more granular data. For the other questions, comparison graphs were created (2017-2021 survey respondents = 40; 2021-2022 survey respondents = 30).

It is also worth noting that the analysis includes the qualitative feedback left by respondents who wished to do so. Although they are included and discussed in the report, the qualitative responses come from only a minority of respondents, and care should be taken not to give more weight than is proportional when reading the overall sentiment of this cohort.

³ http://aluminium-stewardship.org/wp-content/uploads/2022/02/Project-Report_-_Evaluation-of-Benefits-and-Value-of-ASI-Membership-and-Certification-2022.pdf

The Certification survey remains open for responses and periodic analysis and reporting will take place on at least an annual cycle. ASI will continue to publish periodic reports on the outcomes from member surveys on its website.

5. Drivers for companies to join ASI and seek Performance Standard Certification

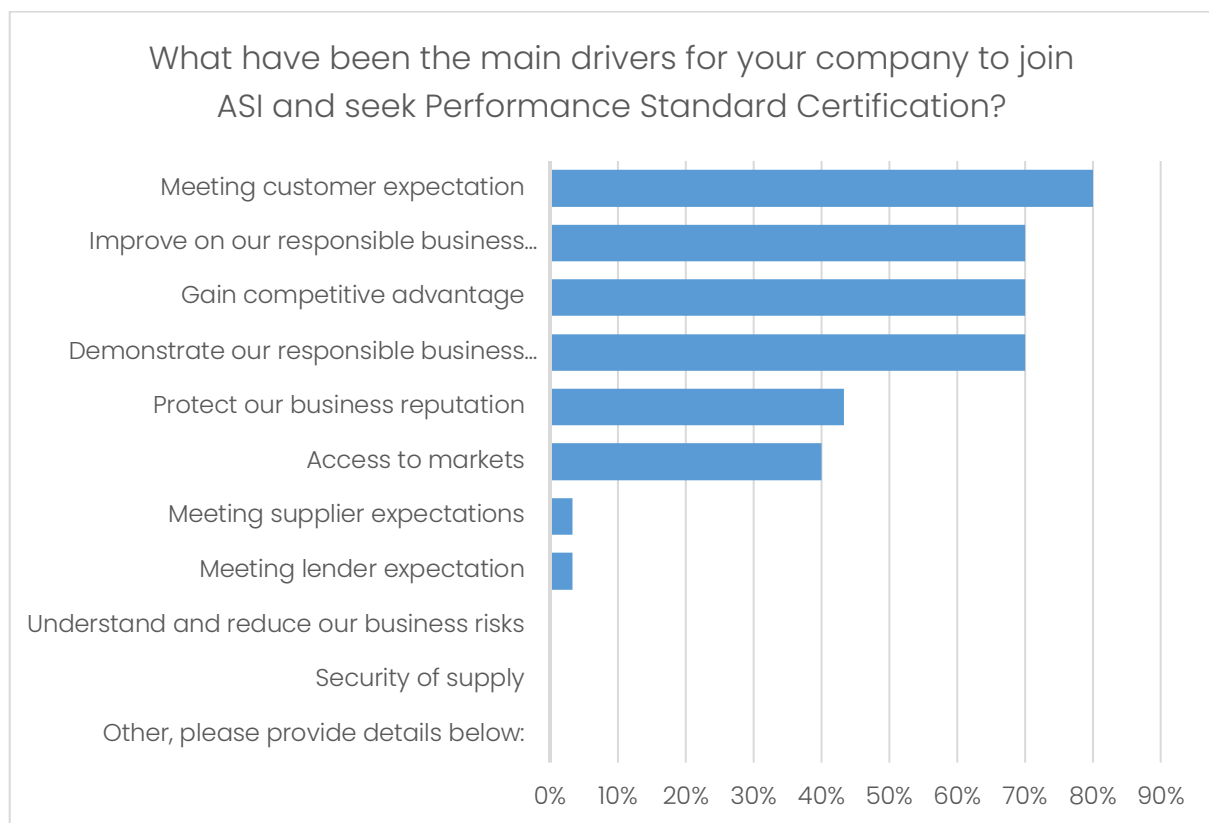


Figure 1- Drivers for companies to join ASI and seek Performance Standard Certification for the 2021-2022 cohort (n=30), as a percentage of respondents choosing each option (Multiple Choice Question).

Entities were given the option to choose more than one driver. Overall, the top 4 drivers for companies to join ASI and seek ASI Performance Standard Certification were: to meet customer expectations, improve on responsible business practices, and to gain competitive advantage and demonstrate responsible business practices (the latter three options being chosen equally).

These responses are similar to the 2017-2021 cohort of certified Entities, which indicated an outward-facing commitment, aligned with the notion of a 'social licence to operate' for business. ASI Performance Standard Certification was (and still is) seen as an important credential to credibly participate in the industry, and validation that the company is operating responsibly. The next most common response ('protecting business reputation') is also linked to

this idea of credibility to the outside world. A text comment in a later question (question 3) stated that *'A bonus is that our stakeholders, including the community within which we operate, our customers, shareholders and employees feel assured in their relationship with our company.'* This signals that ASI Certification continues to be seen by companies participating in the program as something worth obtaining and helpful for continued market participation.

In the 2021–2022 survey questions, 'meeting stakeholder or customer expectations' (which was a single option in the previous survey) was split between meeting either: 'customer', 'lender', or 'supplier' expectations, in order to have more granular detail of who those stakeholders are, that are requesting ASI Certification.

The least chosen options (with 2 or less respondents) were: meeting lender expectations, meeting supplier expectations, understanding and reducing business risk, and security of supply. It is thus clear that lenders and suppliers are not (yet) the ones exerting pressure on companies to become certified. Although the responses for lender requirements are low, this may not be a reflection of its importance for the business as a whole. Indeed, according to the IFC⁴, sustainability-linked finance is expected to continue growing and evolving rapidly across a range of markets, and so it is expected to become a topic of increasing relevance.

The high response rate for 'meeting customer expectations', compared to 'supplier expectations', indicates that this push to get certified comes from downstream in the value chain, and is directed towards upstream actors. This corresponds to one respondent's feedback, which stated that *'Although most of the value chain had committed to ASI, our customers had not'*, and that a challenge was *'convincing our clients to become certified in order to use the ASI logo'*. (In a related comment from the same respondent, the feedback is relevant for ongoing updates to the ASI Claims Guide and Chain of Custody: *'After 2 years and many players in the can manufacturing become certified, only one client GLOBALLY, had become certified and is NOT using the logo'*).

A key principle of ASI is that *all* supply chain activities have a role to play in advancing sustainability, through their own activities as well as responsible sourcing. This is why it has been decided, during the 2022 revision, that all parts of the ASI Performance Standard (previously, it was only the Material Stewardship section) will over time become applicable to Industrial User entities, wherever they sit in the value chain. It also sends a signal to downstream entities that they are also making a broad ESG commitment, not just cascading the effort back upstream.

The lack of responses to 'Understanding and reducing our business risk' (chosen by 0% of respondents) in the 2021–2022 cohort stands in stark contrast with the 2017–2021 cohort, where it was chosen by almost 40% of respondents. There could be multiple reasons for this.

⁴https://www.ifc.org/wps/wcm/connect/publications_ext_content/ifc_external_publication_site/publications_listng_page/sustainability-linked+finance

Though not discernible from the survey data, it is plausible to assume that the ‘first generation’ of certification occurred at a time when the concept of ‘whole-spectrum’ ESG issues in the aluminium value chain was still relatively novel and not yet well implemented or understood by companies. ASI’s initial contribution may have included helping companies understand what these risks are, in the absence of any other ESG framework focused on the aluminium value chain. Over time, the value of ASI Certification evolved from understanding these risks to the Business, towards responding to increasing customer (and possibly regulatory) expectations, and improvements to a Business’ *already existing* ESG practices. Indeed, companies also face increasing requirements by law to be transparent about their sustainability performance, and although the responsibility always lies with the company itself, the ASI Performance Standard can be an important aid in these reporting efforts. The launch of the revised ASI Performance Standard V3 in May 2022 is a reflection of this increase in ESG practices and expectations, and strengthens the expectations for Certifying Entities.

In order to maintain this relevance and continue to stay abreast of shifting and growing expectations, ASI has resolved, during its last Revision period, to update its Guidance and Assurance documents on a significantly more regular basis⁵. The first revision of ASI’s suite of standards and guidance occurred on a 5 year timeframe, in line with ISEAL requirements, with revised versions issued in 2022. Going forward, updates will now occur on an annual or bi-annual basis depending on the document in question, to enable ASI to remain agile and respond swiftly to external factors and shifts in stakeholder expectations/ perceptions.

ASI action/improvement areas:

- Continue to respond to changes in evolving expectations by preparing and actioning regular updates to the Guidance documents, ASI Assurance Manual, Claims Guide and/or procedural updates⁶.

⁵ <https://aluminium-stewardship.org/wp-content/uploads/2022/12/ASI-Standards-Setting-and-Revision-Procedure-V4.pdf>

⁶ See ASI Standards Setting and Revision Procedure V4: <https://aluminium-stewardship.org/wp-content/uploads/2022/12/ASI-Standards-Setting-and-Revision-Procedure-V4.pdf>

6. Drivers for different types of companies to seek ASI Chain of Custody Standard Certification

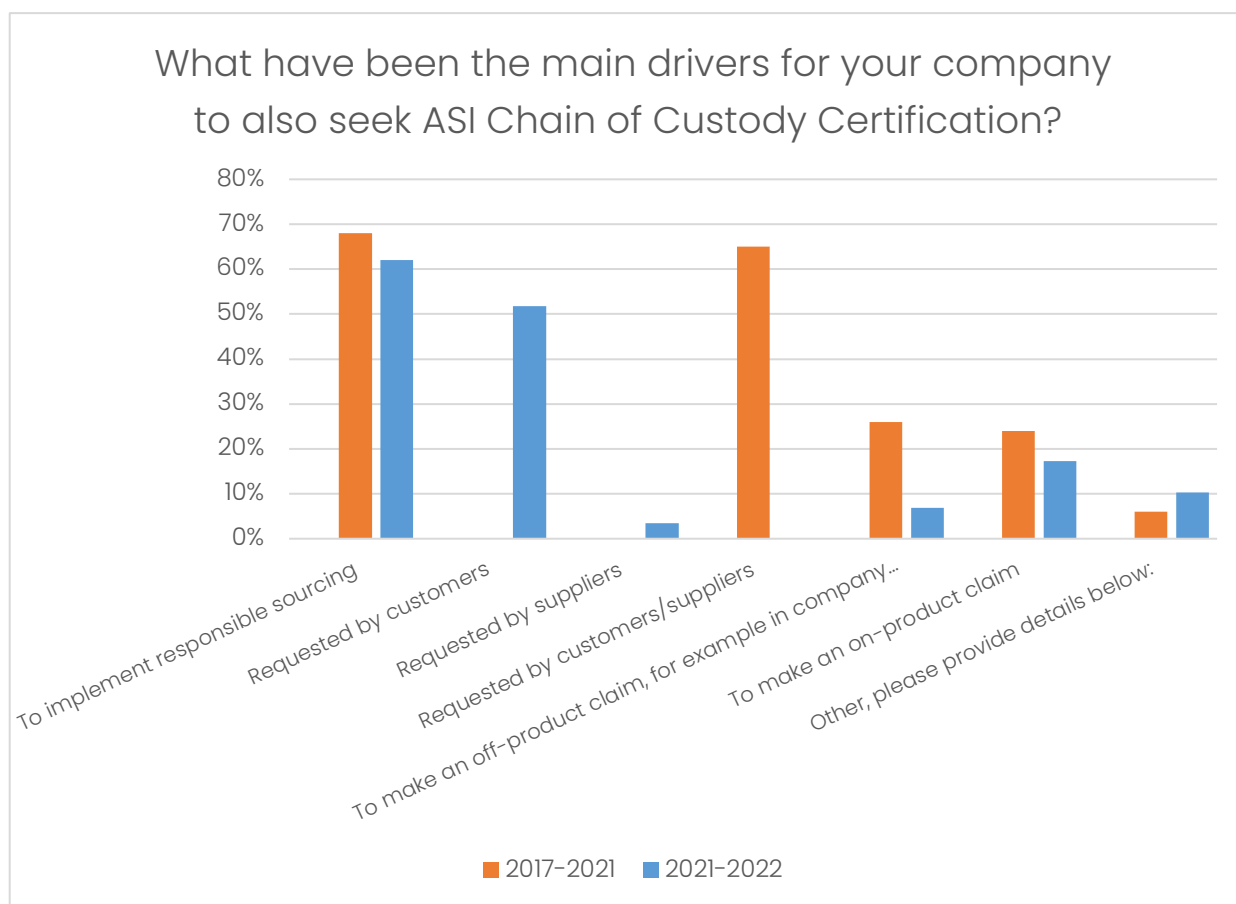


Figure 2 - Drivers for companies to also seek ASI Chain of Custody Standard Certification, for the 2017-2021 cohort (n=40) and 2021-2022 (n=30) cohort, as a percentage of respondents choosing this option (Multiple Choice Question). For the 2021-2022 cohort, the options 'Requested by customers/suppliers', was split between 'Requested by customers', and 'Requested by suppliers'.

Based on the responses in both cohorts, the reasons to certify against the CoC Standard have stayed relatively constant. The main drivers to seek ASI CoC Certification continue to be to implement responsible sourcing and to meet customer demand, in order to create a link between companies so that they have the assurance that they are acquiring responsibly sourced aluminium.

For 2021-2022, the previously combined option 'Requested by customers/suppliers' (in the first round of the survey) was also split into 2 responses: requested by either customers, or suppliers. This enabled more granularity for this category. The results align with what was observed in the Question 1 response. Customer (downstream) pressure for these respondents is far more important than supplier pressure as a driver to obtain CoC Certification.

One would assume that this is so that customers can make claims about ASI material, however the results for these respondents indicate that on-product claims (any claim that is either affixed to or associated with a product at the point of sale to the consumer) only accounted for a little under 20% of respondents' choices for the 2021-2022 cohort. Off-product claims decreased from being chosen as an option by 22% of respondents in 2017-2021, to about 7% of respondents in 2021-2022.

The 'Other' option had 2 respondents suggesting that they are expecting a growing demand for responsible sourced/sustainable aluminium; and 1 other comment was advancing sustainability goals more broadly. These comments are shown below:



As noted in the comment section and highlighted in the results (for both cohorts), making claims is not the main driver to become ASI CoC Certified for these respondents. It is expected that results would be highly correlated to the supply chain activity of the company and thus the sample may not be representative of the full 2021-2022 cohort of Certified Entities.

ASI action/improvement areas:

- ASI should continue to raise awareness of the value of driving sustainable practices and traceability all along the value chain, and the role that CoC Certification can play to support that.
- One resource that has already been developed to highlight this can be found on the ASI website: <https://aluminium-stewardship.org/the-value-of-asi-chain-of-custody-coc-certification-to-producers-and-consumers-of-aluminium-products>

7. Changes, improvements and challenges linked to ASI Certification

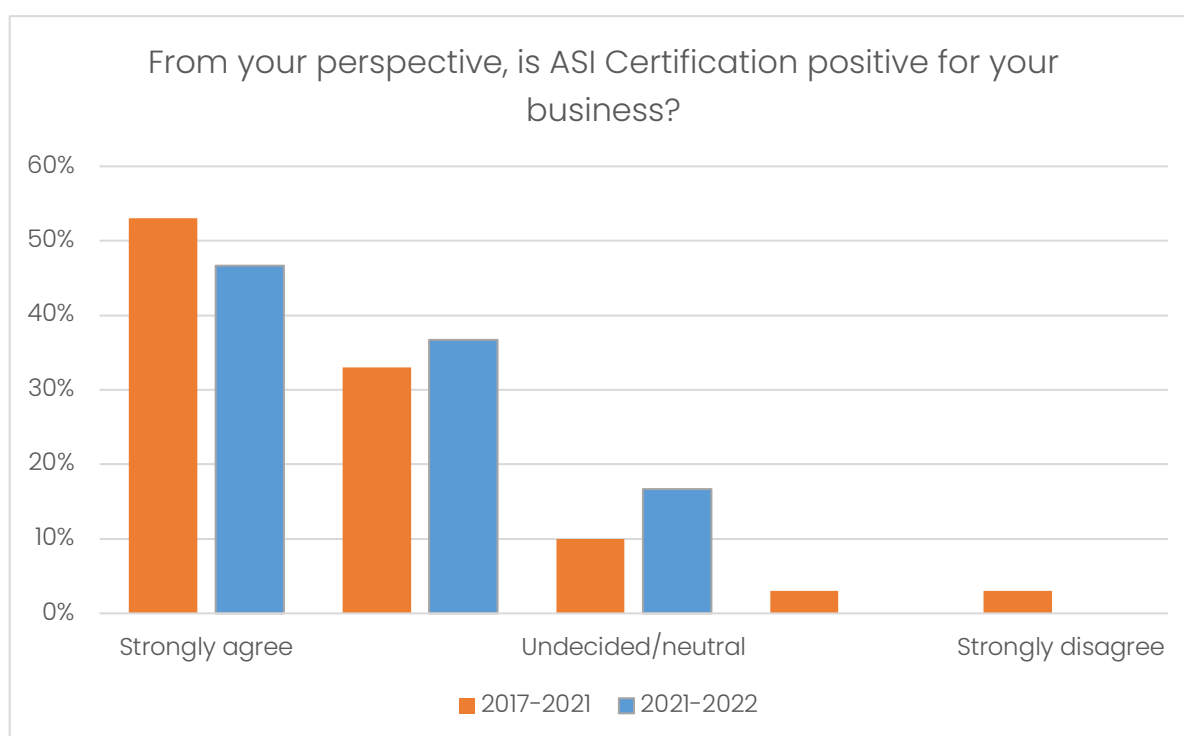


Figure 3- Perceived value of ASI Certification, for both the 2017-2021 cohort (n=40), and the 2021-2022 cohort (n=30), as a percentage of respondents choosing each option.

The majority of respondents have identified that they have derived benefit from ASI Certification, with 83% of all participants in the 2021-2022 cohort 'agreeing' or 'strongly agreeing' that Certification was positive for their business.

The qualitative comments provided indicate that ASI Certification has positive benefits in a number of ways: to streamline internal practices (*'link with internal environmental policy and ISO 14001 certification'*), or general improvements in business practices (*'Our ASI membership is important because it drives us to be more socially responsible. It is also in line with our company ethos and goal to continually improve on our legislative, environmental and social responsibilities.'*)

However, 2 out of the 6 comments provided for this question related to the perceived low value of ASI certification by customers. According to these 2 comments, downstream actors sometimes do not feel compelled/convinced of the value of ASI Certification to become themselves certified: *'Although most of the value chain had committed to ASI, our customers had not'*, and customers *'do not yet honor the efforts by ordering ASI aluminium'*. The first comment also made reference to the can manufacturing industry specifically, as shared earlier in this report: *'After 2 years and many players in the can manufacturing become certified, only*

one client globally, had become certified and is not using the logo'. Therefore, benefits such as improved market access, premiums and profitability do not always materialise. Becoming ASI certified can introduce additional costs to reach and sustain compliance, in terms of time, effort, and finances. These will form part of a company's reflections on their 'return on investment'.

However, overall, responses to this question still indicate a strong positive association between ASI Certification and benefits to members that has stayed constant since the inception of the ASI Certification program.

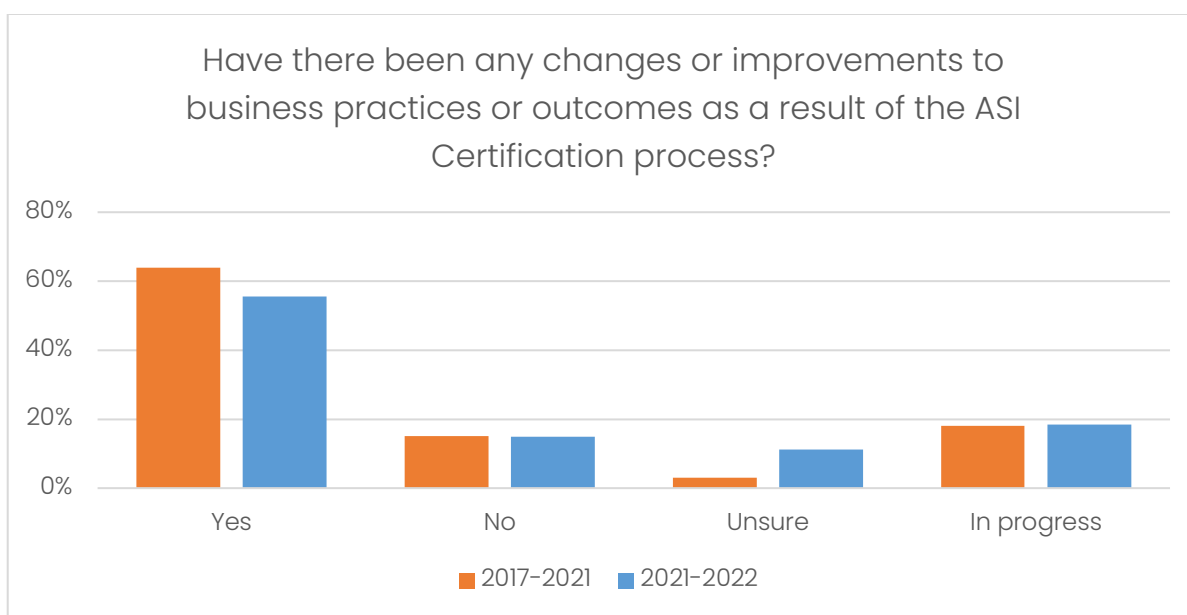


Figure 4- Changes or improvements to business practices or outcomes as a result of ASI Certification, for both the 2017-2021 cohort (n=40), and the 2021-2022 cohort (n=30), as a percentage of respondents choosing each option.

Similarly to responses to Question 3, changes or improvements in practices and outcomes have stayed at similar levels between cohorts. Clearly, ASI Certification is positive or strongly positive for businesses as it (continues to) yield measurable improvements in practices or outcomes.

For the 2021-2022 cohort, 55% of respondents confirmed there had been changes made to their business practices through ASI Certification, with a further 18% noting changes still in progress, a total of 73%. In terms of timing, 33% of respondents noted these improvements had occurred prior to, or in preparation for the ASI Certification Audit, 11% as a result of corrective action for non-conformances, and 33% as 'both'. These figures are also similar to the 2017-2021 cohort of Entities.

One commentator noted that, for companies located in jurisdictions with high level of requirements, there was *'Unexpected complexity around human rights due diligence, gender questions, biodiversity, etc..'* and suggested that requirements or evidence for conformance should be adapted to the local context: *'having to create documentation about the "obvious" to demonstrate compliance [human rights and labour criteria] while being based in EU and operating in an industry that (in the EU) does not have a reputation respective non-compliance.'* This same commentator had noted that they had not found any material improvements to business practices or outcomes as a result of the ASI Certification process.

Nevertheless, the ASI standard is a global standard, whose requirements have to be assessed – and proof of conformance substantiated – in a similar way regardless of geographic location. Business benefits are not realised uniformly, and it is expected that companies operating in a more stringent regulatory context, and/or who have well-established systems and practices in place, are less likely to see large leaps in improvements.

For those who selected having seen improvements as a result of the ASI Certification process, key areas of improvement identified in the comments section included: *'continual improvement in legislative, environmental and social responsibilities'*, and *'increased awareness of sustainability, responsible sourcing and responsible production among the staff and senior management'*.

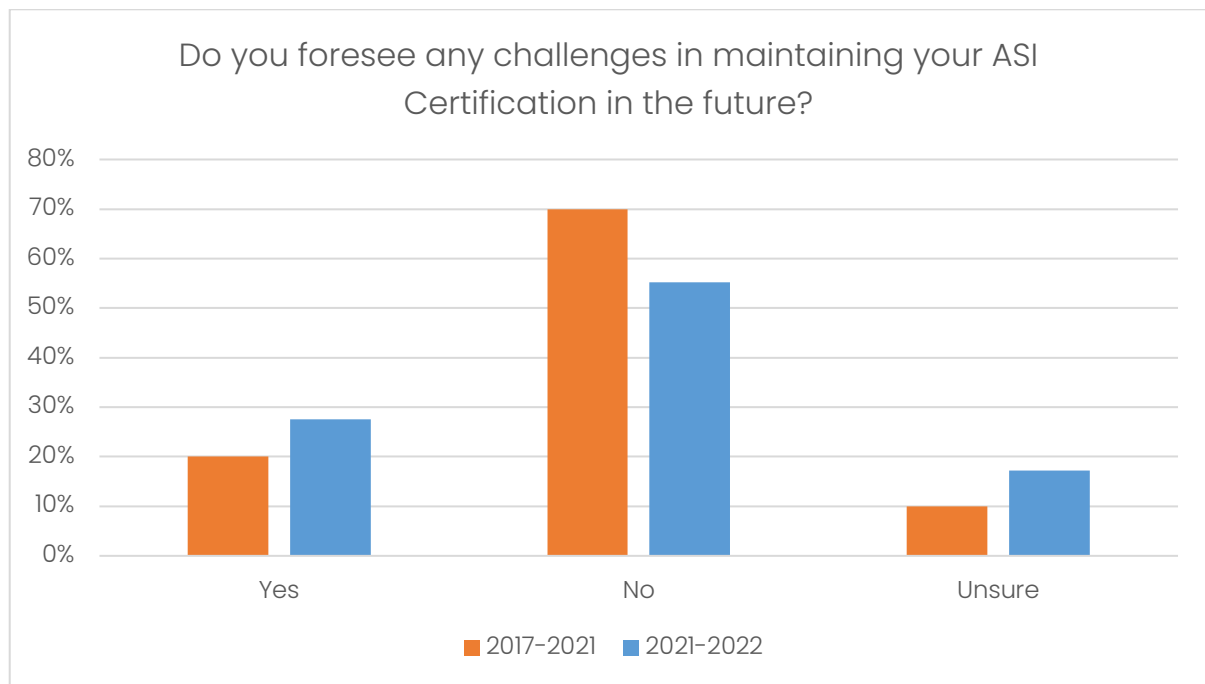


Figure 5- Expected challenges in maintaining ASI Certification in the future, for the 2017-2021 cohort (n=40) and the 2021-2022 (n=30) cohort, as a percentage of respondents choosing each option.

Figure 5 addresses the challenges foreseen in maintaining ASI Certification in the future for both cohorts of certified Entities. For the 2021-2022 cohort, while 55% of respondents foresaw no challenges, 28% responded that they did anticipate challenges, with a further 17% unsure. This represents a slight shift from the 2017-2021 cohort, with some decrease in confidence in being able to maintain ASI Certification. This reflects the current transition from V2 to V3 of the Performance Standard (including the expansion of requirements applicable -in a phased approach- to Industrial User members with only Material Conversion facilities).

Specific challenges mentioned in the qualitative comments provided were: internal resources, downstream (packaging) company buy-in, and V3 standards requirements related to verification of energy data for Principle 5.

ASI thus clearly has a role in continuing to support ASI Members in their Certification efforts as the complexity and stringency of requirements has stepped up. The ways in which it is/will do that is summarized in the green box below.

ASI action/improvement areas

- The value of ASI Certification appears to be tangible in terms of general improvements in business practices, especially in preparation of, or prior to the Audit. Value will be maintained over time through ASI Standards and Guidance revisions that keep pace with member 'pain points' and stakeholder expectations. This includes through tools for implementation that are being made available, for example, the CoC Material Accounting tool, the FAQs, and one-on-one calls with members about specific questions.
- ASI should continue to capture the business benefits through open and targeted feedback channels (such as this survey) and use insights to strengthen and communicate the business case of using the ASI Standard(s) to all actors along the value chain.

8. General feedback areas

A. ASI Audit process and ASI Auditors

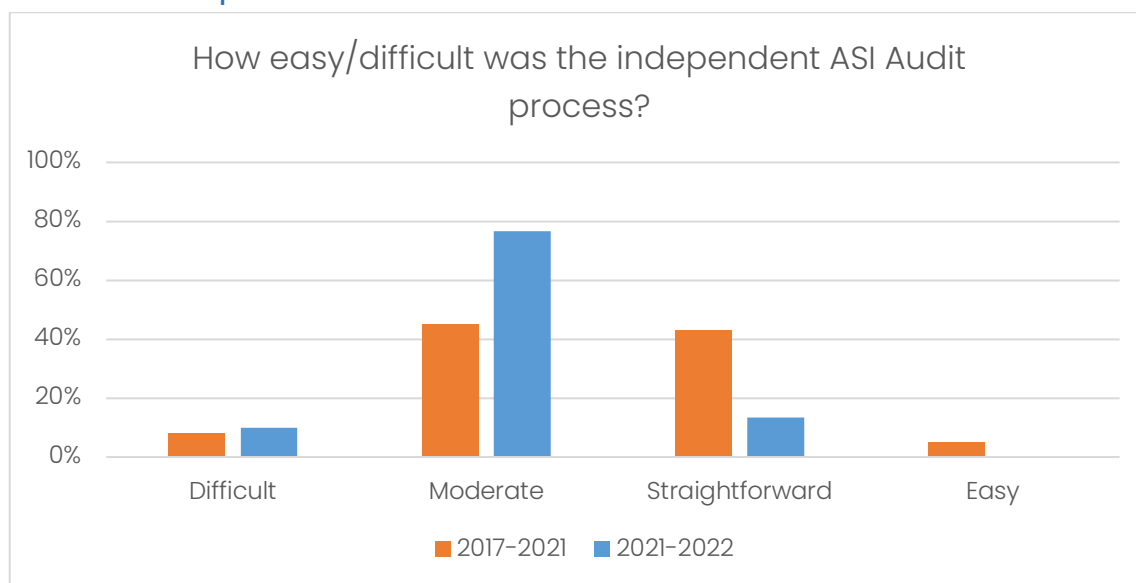


Figure 6– Perceived difficulty of the independent ASI Audit process, for the 2017-2021 cohort (n=40), and the 2021-2022 cohort (n=30), as a percentage of respondents choosing each option.

There was a moderate shift in perceived difficulty in the audit process between the 2 cohorts. For the 2017-2021 cohort, a little over half (53%) of respondents found it a moderate to difficult process. This number jumped up to 87% for the 2021-2022 cohort. The percentage of respondents finding it straightforward decreased by 30 percentage points between the 2 cohorts. In this iteration of the survey, 0 respondents found the process 'easy'.

Three respondents left comments to this question. Although one comment indicated that they had an *'excellent knowledgeable auditor'*, two other comments highlighted logistical difficulties in organizing the audit (*'For some locations, it has been a challenge to reach the auditors, get the planning, etc'*), and another referred to issues specific to a single auditor, who was physically impaired at the time of the audit.

Comments left for other questions throughout the survey highlighted variability in topic understanding from auditor to auditor: *'Concerns regarding consistent/uniform audit protocols competencies'* (comment to Q3), and *'The understanding of Indigenous People were quite different from auditor to auditor'* (comment to Q6). One commentator noted the auditor pool as a constraining factor in achieving ASI Certification, and another noted the slow response rate

of their auditor in closing out audit reports (Question 6). Responses in the 2017-2021 cohort provided similar feedback in a few comments⁷.

In terms of auditor knowledge and competence, the ASI Secretariat holds regular calibration calls with ASI Accredited Auditors. Their aim is to provide updates and refresher training related to ASI assurance and/or Standards, a space for auditors to share experiences and good practices amongst themselves, and feedback to the ASI Secretariat.

ASI action/improvement areas:

- Continue to conduct calibration calls for ASI auditors where there are identified gaps or inconsistencies, and use results to feedback in the learning, assurance and other relevant workstreams at ASI.
- In December 2022, the ASI Board approved an update to ASI's Auditor Accreditation Procedure. Version 4 includes a new section for applicable conditions and processes for the approval of auditors to participate in audits in countries where there is currently insufficient local auditor capacity. This enables ASI audits to be conducted by auditors with an appropriate level and breadth of experience (including regional experience).

B. ASI Self-Assessment



⁷ http://aluminium-stewardship.org/wp-content/uploads/2022/02/Project-Report_-_Evaluation-of-Benefits-and-Value-of-ASI-Membership-and-Certification-2022.pdf

Figure 7 – Perceived difficulty of conducting the Self-Assessment, for the 2017-2021 cohort (n=40), and the 2021-2022 cohort (n=30), as a percentage of respondents choosing each option.

Similarly to the previous cohort, the majority of respondents found the Self-Assessment process to be moderate. No respondent in this survey round found the process to be 'easy'. There was a slight increase in respondents choosing 'difficult'.

Also similarly to comments left by the previous cohort of certified Entities, the amount of time taken to upload and edit the evidence into elementAL, ASI's online assurance platform, was mentioned by 2 respondents. Another respondent noted that the platform was not well designed, and suggested for questions in the Self-Assessment to be grouped together.

Language was also noted as a potential obstacle to a smooth Self-Assessment in 2 comments, with one of them suggesting having the Self-Assessment questions available in Spanish. [Note: any language can be used to complete Self-Assessment responses in elementAL].

ASI action/improvement areas:

- ASI is currently building a new version of elementAL 2.0 in a new hosting environment, with the aim to launch it by the end of 2023. (Many of the limitations in the current version of elementAL relate to the host platform on which it is built.) Feedback from all users is being taken into account as part of the development process.
- Options for AI-generated translations continue to be explored, while maintaining a focus on accuracy and data governance.

C. Standards

There were a few comments shared in the free text options throughout the survey that related to ASI Standards.

Three comments related to difficulties in access to data and the level of verification required by the Standard. Two comments referred specifically to energy data requirements found in Principle 5 of the Performance Standard V3. Obstacles noted were the '*collection and evaluation of energy data from suppliers*' (translated from Chinese), and '*SBT and external verification of ALL GHG and energy data, incl. scope 3.*' The third difficulty related to data was about estimation of weight, presumably linked with CoC and the tracking of CoC Material Inputs and Outputs.

Another comment (already mentioned earlier in the survey) noted that the new Performance Standard V3 was too burdensome in terms of requirements, as were the documents needed to prove compliance: '*For a company with EU business: Unexpected complexity around human rights due diligence, gender questions, biodiversity, etc..; 'having to create documentation about the "obvious" to demonstrate compliance with Human Rights, Labour Rights, Child Labour and Forced Labour criteria.*'

Several respondents in the 2017-2021 cohort had identified the Chain of Custody Standard as a more challenging standard to understand, particularly in the context of existing systems. Comments had indicated needing some form of tool to help implementation. This survey round also had one comment on the difficulty in tracking CoC material within the Entity's Certification Scope. ASI has responded to this feedback and developed tools for implementation (see the green box below).

ASI action/improvement areas:

- ASI developed the [CoC Material Accounting Tool \(CoC MAT\)](#) to support CoC Certifying Entities, in building their own CoC Material Accounting Systems. The Tool was designed to be ready to use for all types of Entities, regardless of their size and position along the aluminium value chain. Entities can choose to use the CoC MAT to manage their own Material Accounting System or incorporate elements of it in their existing systems if they wish. Use of the Tool is optional, and the tool will be refined as users test and provide their feedback to the ASI Secretariat.
- Through various channels, including: this Certification Survey, Standards consultations, general feedback, calibration calls with Auditors, and Working Groups and Standards Committee meetings, ASI will continue to identify areas for improvement and clarification. Some feedback gathered through the above channels have already generated changes in the newest versions of the ASI Guidance documents, which will be published in Q2 2023.

D. Language accessibility

Although not as a response to a specific question, language considerations were also raised in the comment sections in the survey.

It was noted by several commentators in the general feedback question at the end, that they would like to be able to choose languages of e-mails received in the future, or to have learning modules showing Chinese captions, or to have face-to-face training to be able to discuss challenges in their own language. As noted for a previous question, language was considered a barrier when conducting their self-assessment.

One comment welcomed the translation of ASI Standard documents in Spanish (it was previously only Japanese, French, Chinese and German).

It is clear that ASI has a global and multilingual membership, and language accessibility/translations is highly appreciated by Members. As noted earlier, the ASI Documents are now all available in 6 languages to reflect this growing global audience.

ASI action/improvement areas:

- Continue to translate all updates to both normative and non-normative documents in the various ASI languages.

- Consider adding other languages in the learning videos as captions, so that they reflect the 6 ASI languages.
- Options for AI-generated translations continue to be explored, while maintaining a focus on accuracy and data governance.

9. Conclusion

The results from the 2021-2022 Certification survey illustrate some key trends and feedback from Certified Entities. It is a rapid and useful way of identifying pain points and challenges for ASI Certified Entities, and ensure that ASI continues to deliver a program of value for its members.

For the most part, drivers to achieve Performance Standard Certification have stayed consistent with a few exceptions. The top four drivers include: meeting customer expectations, improve on responsible business practices, gain competitive advantage, and demonstrate responsible business practices. From the responses, customer request is a stronger motivator than supplier or lender request. 'Understanding and reducing business risks' was chosen by 0 respondents this round (against 40% the previous round).

Drivers for achieving CoC Certification have also stayed similar, with implementation of responsible sourcing and request by customers as the 2 main drivers. Making claims (whether off or on-products) remains of low priority. Similarly to drivers for achieving Performance Standard Certification, customer demand is a significantly stronger motivator than supplier demand.

Overall, ASI Certification is still perceived as largely positive for one's business, and almost three-quarters (73%) of respondents have seen improvements to business practices or outcomes as a result of the ASI Certification Process.

Maintaining ASI Certification was anticipated to be potentially challenging (45% of respondents chose 'yes' or 'unsure' this round) likely as a result of the shift to ASI Performance Standard V3, and CoC Standard V2. The comment sections indicated difficulties with the requirements for both of these.

In the comment sections throughout the survey, the ASI Assurance Platform -elementAI- and language accessibility were identified as somewhat of obstacles to conducting a smooth self-assessment. The possibility of having access to various ASI platforms and channels in different languages was welcomed and encouraged.

Respondents to this Survey represent 31% of Entities during 2021-2022. Qualitative responses were fewer, however and may not be representative of the full 2021-2022 cohort. The survey design does not currently capture key trends between different types of Entities (position in the value chain, supply chain activities), and Certification (whether it is a first certification, or re-certification, and which version of the ASI Standard(s) it has been done against).

Survey feedback has been and continues to inform the relevant ASI workstreams and ensure continual improvement and relevance of the ASI Program. Actions are summarized in Appendix 3.

The survey remains open and the link is shared with each ASI Certification notification. Periodic analysis and reporting will take place on an annual cycle. This will enable trends to be identified in a more granular way over time, and allow ASI to act and adapt swiftly accordingly.

10. Appendix 1 – Certification Survey

ASI Certification Survey

ASI Certification Survey

Introduction

Welcome to the ASI Certification Survey.

ASI is conducting an ongoing internal research project to understand what the drivers, benefits and challenges are for different types of companies seeking ASI Performance Standard (PS) and Chain of Custody (CoC) Standard Certification.

You are receiving this survey because you are listed in elementAI as a main contact for an ASI Certification.

This survey gives you the opportunity to share your experiences of the ASI Certification process and should take around 10 minutes to complete.

The data collected is for ASI Secretariat analysis and your response allows ASI to improve its processes, so we welcome your candour. No individual Members or Entities will be identified or identifiable in any output from the analysis (e.g. published report, communications material, impact indicator) - all data will be aggregated and anonymised.

We thank you in advance for your time and responses.

ASI Certification Survey

Step 1 - Drivers for ASI Certification

*** 1. What have been the main drivers for your company to join ASI and seek Performance Standard Certification?**

Please tick all that apply

- Improve on our responsible business practices
- Gain competitive advantage
- Access to markets
- Protect our business reputation
- Meeting customer expectation
- Meeting supplier expectations
- Demonstrate our responsible business practices
- Meeting lender expectation
- Other, please provide details below:

2. If applicable, what have been the main drivers for your company to also seek ASI Chain of Custody Certification?

Please tick all that apply

- To implement responsible sourcing
- Requested by customers
- Requested by suppliers
- To make an off-product claim, for example in company communications
- To make an on-product claim
- Not applicable
- Other, please provide details below:

ASI Certification Survey

Step 2 - Value of ASI Certification

* 3. From your perspective, is ASI Certification positive for your business?

- Strongly agree
- Agree
- Undecided/neutral
- Disagree
- Strongly disagree

Please add other details or comments below. For example, what have been some of the benefits of ASI Certification? Are there some expected benefits that have not yet been realised? Have the outcomes been different for the Performance Standard or Chain of Custody Standard? (optional)

* 4. When preparing for your ASI Certification, how easy/difficult was it for your business to conduct the Self Assessment?

- Difficult
- Moderate
- Straightforward
- Easy

Please add other details or comments below (optional)

* 5. How easy/difficult was the independent ASI Audit process?

- Difficult
- Moderate
- Straightforward
- Easy

Please add other details or comments below. For example, this could relate to finding a suitable auditor, scheduling an audit, auditors becoming familiar with your business, or other aspect (optional)

ASI Certification Survey

Step 3 - Challenges of certification

*** 6. Have there been any specific challenges or obstacles (internal or external) faced by your company in seeking or achieving ASI Certification?**

- Yes
- No
- Unsure

Please add other details or comments below. For example, if you faced challenges, what were these and how have you worked to overcome them? (optional)

*** 7. Do you foresee any challenges in maintaining your ASI Certification in the future?**

- Yes
- No
- Unsure

Please add other details or comments below (optional)

ASI Certification Survey

Step 4 - Changes as a result of ASI Certification

*** 8. Have there been any changes or improvements to business practices or outcomes as a result of the ASI Certification process?**

- Yes
- No
- Unsure
- In progress

Please add other details or comments below (optional)

* 9. When did these occur?

- Prior to/in preparation for the ASI Certification audit
- As a result of correction action for non-conformances
- Both
- Neither

Please add other details or comments below (optional)

* 10. If you have identified improvements, may ASI follow up with you in the form of a scheduled interview for the development of a Story of Change for publication on the ASI website?

We have been collecting anecdotal evidence and feedback from ASI Members as to how their implementation of the ASI Standards and process of Certification has created change in their activities and real impact on the ground. See for more details: <https://aluminium-stewardship.org/asi-launches-story-of-change-series/>

- Yes
- No

11. Do you have any general feedback for ASI? For example, suggestions for new learning modules, Guidance, data analyses or any other improvement idea?

12. If you would like to be in touch with ASI to develop a Story of Change (Q10above), or to enable us to discuss your feedback further, please include your contact details below.

Alternatively, you can email us directly at info@aluminium-stewardship.org

Name	<input type="text"/>
Company	<input type="text"/>
Email Address	<input type="text"/>

ASI Certification Survey

Thank you for taking part in this survey. Please press the 'Submit' button at the end of this page to submit your answers.

11. Appendix 2 – Quantitative and qualitative data – tables

Question 1 - What have been the main drivers for your company to join ASI and seek Performance Standard Certification? Please tick all that apply (Multiple choice)

Answer Choices	2021-2022	Number of respondents
Other, please provide details below:	0,00%	0
Security of supply	0,00%	0
Understand and reduce our business risks	0,00%	0
Meeting lender expectation	3,33%	1
Meeting supplier expectations	3,33%	1
Access to markets	40,00%	12
Protect our business reputation	43,33%	13
Demonstrate our responsible business practices	70,00%	21
Gain competitive advantage	70,00%	21
Improve on our responsible business practices	70,00%	21
Meeting customer expectation	80,00%	24
	Answered	30
	Skipped	0

Question 2 - If applicable, what have been the main drivers for your company to also seek ASI Chain of Custody Certification? Please tick all that apply (Multiple choice)

Answer Choices	2021-2022	Number of respondents
To implement responsible sourcing	62,07%	18
Requested by customers	51,72%	15
Requested by suppliers	3,45%	1
To make an off-product claim, for example in company communications	6,90%	2
To make an on-product claim	17,24%	5
Not applicable	20,69%	6
Other, please provide details below:	10,34%	3
	Answered	29
	Skipped	1

Question 3 - From your perspective, is ASI Certification positive for your business?

Answer Choices	2021-2022	Number of respondents
Strongly agree	46,67%	14
Agree	36,67%	11
Undecided/neutral	16,67%	5
Disagree	0,00%	0
Strongly disagree	0,00%	0
Please add other details or comments below (optional)	20,00%	6
	Answered	30
	Skipped	0

Question 4 - When preparing for your ASI Certification, how easy/difficult was it for your business to conduct the Self Assessment?

Answer Choices	2021-2022	Number of respondents
Difficult	20,00%	6
Moderate	60,00%	18
Straightforward	20,00%	6
Easy	0,00%	0
Please add other details or comments below (optional)	16,67%	5
	Answered	30
	Skipped	0

Question 5 - When preparing for your ASI Certification, how easy/difficult was it for your business to conduct the independent ASI Audit process?

Answer Choices	2021-2022	Number of respondents
Difficult	10,00%	3
Moderate	76,67%	23
Straightforward	13,33%	4
Easy	0,00%	0
Please add other details or comments below (optional)	10,00%	3
	Answered	30
	Skipped	0

Question 6 - Have there been any specific challenges or obstacles (internal or external) faced by your company in seeking or achieving ASI Certification?

Answer Choices	2021-2022	Number of respondents
Yes	31,03%	9
No	48,28%	14
Unsure	20,69%	6
Please add other details or comments below (optional)	20,69%	6
	Answered	29
	Skipped	1

Question 7 - Do you foresee any challenges in maintaining your ASI Certification in the future?

Answer Choices	2021-2022	Number of respondents
Yes	27,59%	8
No	55,17%	16
Unsure	17,24%	5
Please add other details or comments below (optional)	13,79%	4
	Answered	29
	Skipped	1

Question 8 - Have there been any changes or improvements to business practices or outcomes as a result of the ASI Certification process?

Answer Choices	2021-2022	Number of respondents
Yes	55,56%	15
No	14,81%	4
Unsure	11,11%	3
In progress	18,52%	5
Please add other details or comments below (optional)	0,00%	2
	Answered	27
	Skipped	3

Question 9 - When did these occur?

Answer Choices	2021-2022	Number of respondents
Prior to/in preparation for the ASI Certification audit	33,33%	9
As a result of corrective action for non-conformances	11,11%	3
Both	33,33%	9
Neither	22,22%	6
Please add other details or comments below (optional)	3,70%	1
	Answered	27
	Skipped	3

12. Appendix 3 – Summary of ASI actions/areas of improvement

Standards

- ASI should continue to raise awareness of the value of driving sustainable practices and traceability all along the value chain, and the role that CoC Certification can play to support that. One resource that has been developed to highlight this can be found on the ASI website: <https://aluminium-stewardship.org/the-value-of-asi-chain-of-custody-coc-certification-to-producers-and-consumers-of-aluminium-products>
- The value of ASI Certification appears to be tangible in terms of general improvements in business practices, especially in the preparation of, or prior to the Audit. Value will be maintained over time through ASI Standards and Guidance revisions that keep pace with member 'pain points' and stakeholder expectations, and through tools for implementation that are being made available to members, for example, the CoC Material Accounting tool, the FAQs, and one-on-one calls with members about specific questions.

Communication

- ASI should continue to capture the business benefits through open and targeted feedback channels (such as this survey) and use insights to strengthen and communicate the business case of using the ASI Standard(s) to all actors along the value chain.

Learning and Assurance

- ASI will continue to conduct calibration calls for ASI auditors where there are identified gaps or inconsistencies, and use results to feed back in the learning, assurance and other relevant workstreams at ASI.
- In December 2022, the ASI Board approved an update to ASI's Auditor Accreditation Procedure. Version 4 includes a new section for applicable conditions and processes for the approval of auditors to participate in audits in countries where there is currently insufficient local auditor capacity. This enables ASI audits to be conducted by auditors with an appropriate level and breadth of experience (including regional experience).

Digital

- ASI is currently building a new version of elementAL 2.0 in a new hosting environment, with the aim to launch it by the end of 2023. Feedback from all users is being taken into account as part of the development process.
- Options for AI-generated translations continue to be explored, while maintaining a focus on accuracy and data governance.

General

- ASI will continue to respond to evolving expectations by preparing and actioning regular updates to the Guidance documents, ASI Assurance Manual, Claims Guide and/or procedural updates⁸. This can be done through various channels, including: this Certification Survey, Standards consultations, general feedback, calibration calls with Auditors, and Working Groups and Standards Committee meetings, ASI will continue to identify areas for improvement and clarification.

⁸ See ASI Standards Setting and Revision Procedure V4: <https://aluminium-stewardship.org/wp-content/uploads/2022/12/ASI-Standards-Setting-and-Revision-Procedure-V4.pdf>

- ASI will continue to translate all updates to both normative and non-normative documents in the various ASI languages (French, Japanese, German, Spanish, Portuguese, and Chinese)
- ASI should consider adding other languages in the learning videos as captions so that they reflect the 6 ASI languages.