

ASI Circularity Working Group – Call 2

13.00 – 14.30 BST 24 June 2025

Participants:

Fernando Antonanzas (Alcoa)	Marcel Pfitzer (Mercedes-Benz)
Mickaël Faliu (Ball Corporation)	Jon Weiler (Meridian Lightweight Technologies)
Evelin Andrade dos Santos (CBA – Companhia Brasileira de Alumínio)	Fatma Maatar (Nemak)
Olivier Néel (Constellium)	David Waggoner (Recycled Materials Association – ReMA)
Alexander Dampmann (GF Casting Solutions AG)	Adrian Mullins (Rio Tinto)
Jeanette Knutsen (Hydro)	Samuel Stämpfli (SEREO / IGORA)
Carolina Bueno (Hydro Extrusion Brasil S/A)	Thomas Payer (Speira)
John Reves (Independent)	Daniil Ukhanov (UC Rusal)
Donna Kopecky (Kaiser Aluminum Corporation)	Andy Doran (European Aluminium)
Mohammed Abdulaziz Al-Ahmari (Ma'aden)	

ASI Secretariat:

Gabriel Carmona Aparicio
Chelsea Reinhardt
Chris Bayliss

Agenda points:

1. Welcome & Framing (10 mins)
2. Summary of Comments on Draft Criteria (10 mins)
3. Breakout Groups Exercise (25 mins)
4. Group Share-Backs (20 mins)
5. Plenary Discussion (20 mins)
6. Wrap-Up & Next Steps (5 mins)

For further context, refer to the attached presentation.

Discussion Notes:

1 Welcome & Framing

- The Secretariat welcomed participants and introduced the session's objective: to gather targeted feedback on the draft Circularity Criteria v4.0, with a focus on clarity of roles, feasibility across contexts, and appropriate ambition levels.
- It was reminded that the discussion would operate under Chatham House Rule.
- Meeting focus on three criteria: Circularity Strategy & Performance, Lifecycle Assessment (LCA), and Product & Process Design.

2 Summary of Comments on Draft Criteria

- The Secretariat presented a high-level summary of comments received on the three criteria discussed in the session: Circularity Strategy & Performance, Lifecycle Assessment (LCA), and Product & Process Design.
- The Secretariat noted that the focus of responses was primarily on comments made directly to the requirement statements. Comments on the accompanying guidance sections will be addressed at a later stage in the revision process.
- One participant encouraged others to engage directly with the draft criteria. They noted that reading the revised structure helps clarify the direction of change and makes it easier to provide focused input.

2.1 Circularity Strategy & Performance

- Flexibility was requested in how circularity commitments are integrated — stand-alone policies should be acceptable, not just integration within sustainability strategies.
- Clarification was required on the relationship between high-level strategies and operational action plans, and whether both are expected.
- Clarification was required on what counts as “relevant material inputs” — examples and exclusions were requested.
- Participants raised concerns about auditability for smelters and requested clearer guidance on what evidence is expected.

2.2 Lifecycle Assessment (LCA)

- Applicability of LCA to upstream operations (e.g. mining, refining) was questioned.
- Participants proposed separating expectations for method selection and emerging impacts into distinct sub-criteria.
- There was support for extending the LCA update cycle from 3 to 5 years, to align with IAI data and reduce reporting burden.

2.3 Product & Process Design

- Questions about feasibility where entities do not control design decisions; clearer guidance on expected influence was requested.
- It was suggested to distinguish expectations for new builds versus existing systems in process design requirements.
- Participants recommended merging clauses to reduce redundancy and simplify auditability.

3 Breakout Groups Exercise

- Participants were divided into three breakout groups to explore targeted feedback on specific draft criteria. Each group reviewed the requirements and annotated their views using a whiteboard on Canva. Participants were asked to assess feasibility and add any comments whether on clarity, applicability, and ambition. The summaries in the next section reflect the discussions held in each group.

4 Group Share-Backs

4.1 Group 1 – Circularity Strategy & Performance

- Participants revisited 1.1.4 (impact assessment of waste on human health and environment), noting it's already in the current Performance Standard but flagged for poor implementation and inconsistent auditing. Concerns were raised around its feasibility, especially where waste is outsourced and traceability/control is limited. It was suggested that, if retained, the requirement could be scoped to apply only where waste impacts are most significant or material.
- For 1.1.2, the proposed distinction between mineral and non-mineral waste was seen by some downstream participants as unfamiliar and potentially unclear. It was noted that the distinction is more commonly used in upstream contexts, no clear resolution emerged. Participants suggested that more intuitive classifications, such as by disposal method or risk level, could be explored.
- On 1.1.5 (leading practice), measurable targets in action plans were viewed as overly ambitious for some. Participants suggested focusing on strategic intent and timelines, or possibly splitting measurable targets into a separate clause or guidance.
- The group discussed how to define “material inputs relevant to circularity”. It was suggested that companies should retain flexibility based on materiality, supported by guidance (e.g. a materiality map by supply chain activity) to help ensure consistency.
- A suggestion was made to add breakdowns of waste destinations (e.g. percentage recycled, landfilled, incinerated) to improve clarity and performance tracking.

4.2 Group 2 – Lifecycle Assessment (LCA)

- Participants recommended splitting Criterion 2.1.3 into two parts: one covering minimum expectations (e.g. recognised standards for method validation), and another for leading practices (e.g. application of emerging impact categories).
- The distinction between minimum and leading practice was seen to rest largely on the level of verification, with third-party verified results (e.g. EPDs or PEFs) seen as belonging to leading practice.
- The group highlighted differing capacities across entities, especially SMEs, in generating and communicating LCAs. Some rely on external datasets and external practitioners or lack the capacity for detailed disclosures.
- There was support for explicitly defining core impact categories in the guidance. However, there was no consensus on which should be mandatory, and the use of third-party LCI data raised questions about the degree of control entities have over reported results (and the currency of such LCI data, which may be material to the results but could be very old and or broad in scope).
- On 2.2.2, public communication requirements were flagged as overly broad. Participants suggested narrowing the focus of this requirement to (verified) product disclosures, such as EPDs, rather than general references to LCA.
- Potential overlap between LCA disclosures and existing GHG criteria was noted. Clarification is needed to avoid conflicting requirements.
- Some criteria (e.g. 2.2.1 and 2.2.4) appeared redundant or too similar in intent. Participants asked whether consolidation was possible.
- A need for clearer language and boundaries of applicability was raised, particularly around when and how Entities are expected to disclose and use LCA information.

4.3 Group 3 – Product & Process Design

- Participants noted that many entities do not control product design, especially under OEM or contract manufacturing arrangements. The group emphasised that the criteria should clarify what level of influence is expected rather than assume full control.
- The phrase “wherever possible” was considered vague and difficult to audit; “where relevant” was suggested as a clearer alternative.
- There were concerns about demonstrating collaboration in a way that is auditable but does not compromise confidentiality, particularly in cases involving R&D and C2C. It was noted that internal initiatives may also contribute to circularity and should be recognised alongside external collaboration.
- Several participants questioned the distinction between minimum and leading practice clauses (e.g. 3.1.1 vs. 3.1.2), suggesting these may be too similar and could be streamlined.
- For 3.2 (end-of-life guidance), feasibility was questioned for entities that do not place final products on the market; regional policy mechanisms were proposed as a possible compliance pathway, such as eco-design regulations or digital product passports.
- The group discussed the difficulty of separating design-driven from process-driven scrap and recommended focusing on high-impact areas where influence is more practical.
- Process design requirements should target new or significantly modified systems, rather than retrofits.

5 Plenary discussion

- Participants were invited to reflect on three recurring tensions observed in circularity-related criteria: collaboration vs. auditability, confidentiality vs. disclosure, and open-loop vs. closed-loop systems. Comments were captured via sticky notes on the virtual whiteboard (See Annex 1).
- It was also noted that additional feedback on these early drafts will be collected over mid-July to August through auditability assessments by approved auditors and feasibility testing by a sample of ASI entities. Input from underrepresented regions, particularly China, will also be integrated. This additional input will inform the next iteration of draft criteria to be reviewed when the group reconvenes in September.
- The Secretariat also invited feedback on the format and structure of the working group sessions, encouraging participants to share views on what is useful and what could be improved. Technical difficulties experienced during this session were acknowledged and will be addressed for future meetings.

6 Next Steps and Actions

The Secretariat will:

- Review breakout feedback and revise circularity draft accordingly.
- Share updated notes and breakout annotations via email and SharePoint.

Working Group members are invited to:

- Continue submitting written comments, particularly on implementation feasibility and audit readiness (draft will be open for comments until 30th June).
- Review revised materials ahead of the next session.

Next Meeting: **22 July 2025** – Focus: Process Scrap, Extended Producer Responsibility, Responsible Recycling.

Annex I. General discussion

Collaboration vs auditability

Need to focus on BIG changes - that are not drowned by the “noise” of data uncertainty, or marginal actions

Excellent!

There does need to be a threshold defined for the collaboration. Sometimes work is done in-kind. E.g. Material offered to universities for a post-graduate student to perform studies on. I would suggest this doesn't meet the intent of a collaboration, however sponsorship of this work would.

criteria must be designed for auditability - clarity for the entity and the auditor needed on the expectation

Collaboration could be evidenced during audit (contracts, meetings minutes, email exchanges...).

Avoid unnecessary reporting / over reporting.

The ability to audit leading vs lagging indicators - circularity often leading and so needs “counterfactuals” or just an assessment of systems that may lead to change....perhaps give thought to guidance for auditors on weighting of each (leading vs lagging)

Confidentiality vs disclosure

Does all disclosure need 3rd party verification? How to build trust not just “more public data”

sensitive data / relevant process or product data cannot publicly disclosed

Public disclosure needs to drive change.

In some cases, it may be counterproductive. Some data are considered as sensitive and may only get an internal target, which may suffice to drive change.

Businesses would likely be promoting as much as possible their efforts to increase circularity. However, confidentiality MUST be considered where IP protection required. Some businesses could be critical as recycling/reuse might be their primary business function.

The balance between confidentiality and disclosure should be found. as now disclosure is more emphasized. Variant with upon requests can be a compromise.

Harmonization and recognition of reporting standards such as CSRD and IFRS would be helpful to avoid reporting fatigue

I've heard people remarking “we're not going to save the world through disclosures”. Need to make sure where disclosures are prescribed there is need for accountability.

The confidentiality of innovation must be safeguarded to ensure the protection and realization of benefits arising from technological advancements and ongoing innovation.

Open vs close loop

This is not delinked from global geopolitics and we should be mindful of that - and how markets may change

there might be a default hierarchy between open and closed loop. Then, what is actually driving change will depend on market / sector situation.

aluminium scrap was recycled and reused since ever

I think any opportunity for re-use should be valid. Closed loop is obviously simpler in the fact it would require less other processing/input.

definition of closed loop or open loop needed. (Agree!)

Introduction of deposit system supports closed loop

Open loop is a minimum within the sector. But in most cases closed loop within product would probably be a better outcome. Not sure about within the company??

It much depends on the type of Entity. It can be single site or multixcte company. Hence, there are differences.

The closed-loop approach is compelling; however, the product must follow a structured and regulated process flow, one that is not necessarily the shortest route and not the resource efficient one.