

ASI Circularity Working Group – Call 1 13.00 – 14.30 BST 27 May 2025

Participants:

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Ranjan Kumar Jena (Hindalco Industries) Mohammed Abdulaziz Al-Ahmari (Ma'aden) Marcel Pfitzer (Mercedes-Benz) Jon Weiler (Meridian Lightweight Technologies) Nikoleta Gkelestathi (Metlen Energy & Metals S.A.) Fatma Maatar (Nemak) Lyndsey Vipond (Novelis) David Wagger (Recycled Materials Association – ReMA) Adrian Mullins (Rio Tinto) Samuel Stämpfli (SEREO / IGORA) Thomas Payer (Speira) Daniil Ukhanov (UC Rusal)

ASI Secretariat:

Gabriel Carmona Aparicio Chris Bayliss

Agenda points:

- 1. Welcome and Standards Revision Overview (15 min)
- 2. High Level Proposed Changes Structure and Content (including Circularity) (30 min)
- 3. Materiality Circularity Topics (30 min)
- 4. New Criteria (10 min)
- 5. Next Steps and Actions (5 min)

For further context, refer to the attached presentation.



Discussion Notes:

1 Welcome and Standards Revision Overview

- The Secretariat opened the session with an overview of the ASI Standards Revision 2025–2027 process, noting this Circularity Working Group (WG) will operate from May to December 2025 and contribute to the development of consultation drafts for the revised Performance Standard.
- Participants were reminded of the use of Chatham House Rule, and that meeting recordings and working documents will be shared only within the WG.
- It was noted that previous ASI standards mention "circular economy" only once, indicating the need for broader and more structured integration in the revised standard. Emphasis was placed on considering circularity as a systemic issue. It was clarified that the circularity scope in this standard excludes energy, water, and land to avoid overlap with other themes.
- WG participants were reminded that this is a closed group, and substitutions should be communicated in advance.
- A poll during the session showed that participants represented a range of stakeholder, with the highest participation from associations (5) and midstream production and transformation (5), followed by upstream production and transformation (4), industrial users (2), audit firms/consultants (1), downstream/general supporters (1), and other categories (2). For reference: All the Mentimeter poll results referenced in these notes are included in the attached meeting presentation slides.

2 High-Level Proposed Changes – Structure and Content (including Circularity)

- The proposed structural revision introduces five thematic areas (including Circularity) and three cross-cutting themes (Governance, Due Diligence, Management Systems).
- A differentiation approach is proposed:
 - Minimum requirements (all to be met for certification)
 - Leading practices (voluntary; threshold-based recognition still under discussion)
- The intention is to develop outcome-based criteria where possible, in addition to management systems and policies.
- Six proposed circularity-related criteria:
 - o Circularity Strategy and Performance
 - Lifecycle Assessment
 - Product and Process Design
 - Reducing Process Scrap
 - Extended Producer Responsibility
 - High Impact Resources (e.g. bauxite residue, SPL, dross)
 - Circularity is also embedded into related themes (e.g. mine closure, tailings, responsible sourcing of recycled aluminium).

2.1 Comments from participants:

• One participant stressed the need to ensure auditability of criteria, particularly where performance differentiation is introduced. They noted that while it is easy to identify the best and worst performers, it is more difficult to distinguish those in the middle. ASI was urged to clearly define what constitutes "leading" versus "minimum" practices, so that auditors can make consistent determinations.



- A comment was raised regarding the level of performance expected from facilities versus their wider supply chains. It was asked whether the criteria would apply solely to the certification scope or also include upstream and downstream actors. The Secretariat clarified that minimum requirements will apply within the scope of the certified entity, while leading practices may involve broader supply chain action or influence.
- One participant highlighted the importance of defining data expectations upfront. For some areas—particularly those involving suppliers or post-consumer flows—data may not currently be accessible. The suggestion was made to calibrate the level of data intensity in the criteria based on what is realistically available, while still pushing for improved transparency.
- Another comment focused on the role of collaboration across the value chain. It was noted that several circularity topics, particularly product design and end-of-life recovery, require sectoral coordination and cross-entity engagement to be effective. Participants encouraged ASI to embed this perspective into the criteria—especially under the proposed "leading practices".
- A concern was raised that current systems for managing and reporting on circularity do not always align with certification audit cycles or formats. It was suggested that ASI consider how reporting expectations under the new criteria would be integrated into assurance processes and whether guidance would be provided.
- The Secretariat acknowledged all points and noted that auditability, supply chain boundaries, and collaboration will be addressed through ongoing WG discussions, assurance framework revisions, and cross-WG alignment.

2.2 Mentimeter Discussion – Critical Aspects of Circularity to Prioritise

- Participants were asked to score the relative importance of six proposed circularity areas on a scale of 1 (not a priority) to 5 (strongly prioritised).
- Top-ranked areas:
 - o Circularity Strategy and Performance average rating: 3.7
 - Product and Process Design average rating: 3.7
 - Responsible Sourcing of Recycled Aluminium following closely
- Lower-ranked areas:
 - Reducing Process Scrap
 - Mine Closure and Rehabilitation
- These results suggest participants see strategic integration of circularity and design-stage interventions as offering the highest leverage. There was also interest in stronger supply chain connections, particularly related to the use of recycled aluminium.

2.3 Mentimeter Discussion – Value Chain Stage with Highest Opportunity for Circularity

- Participants were asked to assess five value chain stages for their potential to improve circularity. Casting and remelting, as well as end-of-life stages were ranked as having the greatest opportunity.
- One participant noted that end-of-life (EoL) recovery was not explicitly listed as a stage in the poll and suggested it should be recognised as a distinct intervention point. The Secretariat clarified that EoL recovery is not currently a certifiable stage under the ASI system, but it will be addressed through responsible sourcing requirements and extended producer responsibility provisions in the revised criteria.
- The Secretariat elaborated on this by saying that casting and remelting are already efficient and do not represent the core circularity challenge. Instead, emphasis should be placed on



getting material back into the system and retaining quality, particularly at product end-oflife.

• Another participant asked whether a higher minimum threshold should apply in areas like remelting, where good performance (e.g. 85% reuse) is already common. They suggested that falling below that level may indicate underperformance, even if the process appears circular.

3 Materiality – Circularity Topics

- ASI presented a materiality assessment covering six categories and 39 circularity-related topics, focused on outward impacts to society and the environment. These were rated based on likelihood and severity, providing a sector-wide lens (not Entity-specific).
- Resource flows were disaggregated into input and output categories across aluminium, mineral, and non-mineral streams. Social aspects (e.g. waste workers) were also included.
- Participants were invited to provide feedback on what may be missing or underrepresented, where challenges in applying the criteria may arise, and what aspects should be prioritised based on the materiality findings.
- Key findings:
 - High relevance of circularity practices across all stages
 - Downstream design and take-back stages hold high circularity potential
 - o High materiality in non-mineral output flows from smelting

3.1 Mentimeter Discussion - On what is missing or underrepresented in the materiality:

Participants inputs include:

- Collaboration efforts and collaborative engagement highlighting the role of coordination across supply chain actors and sectors.
- **Primary data availability, technology availability** and **technical possibilities** constraints that may influence the implementation of circularity practices.
- **Business case** referenced multiple times, suggesting including the economic rationale for circularity actions.
- Current achievements and current best practice recognising where other has already made progress.

3.2 Mentimeter Discussion – On challenges in applying circularity criteria:

Participants ranked the following main challenges as more critical:

- Variation in circularity potential across regions/products (13)
- Data gaps (e.g. scrap tracking, recycled content) (11)
- Commercial sensitivity or competitiveness concerns (7)
- Lack of control over product design or end-of-life (6)
- Criteria are too ambitious for some value chain stages (5)
- Additional challenges highlighted by participants:
 - Auditability was highlighted as a challenge due to the complexity and cross-cutting nature of circularity.
 - Technological gaps were noted, particularly around scrap quality and alloy sorting.
 - Limited availability of recycled material and renewable energy were raised as regional constraints.



- Infrastructural gaps and lack of local markets were seen as barriers to waste processing and reuse in some areas.
- 3.3 Mentimeter Discussion On what should be prioritised based on materiality assessment: Top-rated requirements (>3):
 - End-of-life recovery and extended producer responsibility (3.9)
 - Product and process design for circularity (3.7)
 - Recycled content and circular procurement (3.4)
 - High-impact resources (e.g. SPL, bauxite residue, dross) (3.1)

Lower-rated requirements (<3):

- Inclusive recycling and informal sector engagement (2.9)
- Scrap reduction and process efficiency (2.7)

Additional inputs related to the "Other" category include:

- One participant emphasised that end-of-life (EOL) recovery should be treated as distinct from extended producer responsibility (EPR), as certain aluminium products already exhibit high recovery rates even without EPR frameworks.
- Another participant supported this distinction, suggesting that EPR and EOL recovery are complementary rather than interchangeable, depending on context.

4 New Criteria

- A draft structure for the new circularity criteria was introduced. Each criterion is expected to include sub-criteria (intended outcomes), along with associated minimum requirements and leading practice levels.
- Participants were encouraged to provide input on issues related to practical implementation and auditability.

5 Next Steps and Actions

- Upcoming calls:
 - o 24 June 2025 Strategy & Performance, LCA, Product & Process Design
 - 22 July 2025 Process Scrap, Extended Producer Responsibility, Responsible Recycling
 - Topics for later sessions include high impact resources, pre-consultation feedback, and consultation draft review.
- Summary of Actions:

ASI Secretariat to share:

• Meeting notes, slides, materiality matrix and recording via the SharePoint site WG members to:

- Review the meeting outputs, presentation and materiality matrix
- Review and share comments on Strawmodel draft Circularity (Slide 35)
- Prepare input and questions for the next session (24 June)