

ASI Nature Working Group – Call 3– Meeting Notes

26 June 2025

Agenda points:

1. Welcome and introductions
2. Summary of feedback received on the draft
3. Breakout groups: water management and leading practices, and water recycling and outcomes-based criteria
4. Breakout groups shareback
5. Public disclosure
6. Structure of pollution/water quality sections
7. Amendments to Biodiversity/Ecosystem services
8. Close and next steps

Participants

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Discussion Notes:

1. **Welcome and introductions**
2. **Summary of feedback received on the draft**
 - One participant suggested that focusing only on areas of high water stress is not sufficient; criteria should be relevant for all Entities with freshwater impacts. This comment was included as a question for the breakout group discussions to

address, and will also be maintained as a comment in the working draft for other WG members to comment on.

- On the definition of ‘materiality’- One participant noted that the GRI definition should be amended to remove ‘most’ (from “most significant impacts”). A couple of participants recommended having Entities identify material topics themselves, but with some supporting tools (or materiality matrices) that could be used as reference points by Entities and auditors.

4. Break-out group ‘share-backs’

The Working group divided into 4 breakouts to discuss 2 topics in parallel (2 groups per topic): Water management + leading practices, and water recycling and outcomes-based requirements.

1. Water management + leading practices
 - Understanding of water availability should be for Entity as well as others in the catchment.
 - Need to emphasize having a good water management plan; ASI could provide some guidance or tools around what goes into that (i.e. template/outline)
 - There needs to be more clarification around how detailed a site level assessment should be.
 - It is important to consider the following: informing local communities on what the water-related impacts , and management of overland water flows.
2. Water recycling and outcomes-based requirements
 - Feasibility would be quite difficult to achieve for a number of reasons: getting a good quality baseline might be difficult in some parts of the world, and it would be difficult to sustain on the long term: easy to show when first implementing water saving initiatives, but once achieved, hard to demonstrate ongoing reductions when site might already be high performing.
 - It may be difficult to apply a particular criterion across a multi-site certification with different baselines depending on their region/country.
 - Recycling opportunities in parts of the world can be quite seasonal (wet/dry season), but also cyclical (i.e. El Nino/La Nina cycles)
 - Water recycling can potentially result in greater concentration of contaminants (this is a trade-off).
 - Management of on-site water at large retention facilities for the purposes of maximising recycling and efficiency is now harder to achieve with GISTM requirements re. On-site storage of process water/tailings/red mud etc.
 - **Action:** ASI will adjust the draft as per recommendations from the breakout group (the below two proposals) in the draft and share that for feedback.
 - Suggestion to change the requirement ‘demonstrated improvements in water efficiency or intensity (water use per unit of production) over 3-year period’ by ‘demonstrate progress against the KPIs or targets as set out in the water management plan’.

- It was noted on concentration of key pollutants, that legal limits for discharge will be different everywhere. Suggestion to replace with: demonstrate that for a defined period of time, an Entity has had no breaches of that threshold

5. Public Disclosure

The Working Group was asked to provide input on the public disclosure elements related to water stewardship (public disclosure of material discharges to water, and water withdrawal and use by source and type)

- There was general agreement to keep those disclosures, but would need to clarify what level of aggregation is required (site-based vs corporate-based), as well as format for disclosure (website), to make sure that those disclosures are relevant and valuable for the company itself and the other water users in the catchment.
- With regards to affected communities, public disclosure is very important. There also needs to be a better process for educating, informing and building capacity of people's ability to understand what the water management activities are.

6. Structure of pollution/water quality sections

The Working Group was presented with two options to restructure the draft with the aim to reduce duplication between Water/ Air Quality and the contamination criterion under Pollution. The group discussed the options and noted the following points:

- There is value in keeping water quality under the general water stewardship section, as this concept is broader than just contaminants (also includes for example the temperature of water discharges)
- The preference is to maintain a section called 'Pollution' but to remove the duplicative criterion and include instead clear cross-references to Water Quality and Air Quality sections.

7. Amendments to Biodiversity/Ecosystem services

ASI presented a proposed amendment to the applicability of criterion 1.1 (Biodiversity and Ecosystem Services – high impact criterion) for Entities operating in or near 'natural habitats' as per IFC PS6 definition/

- Natural habitats is largely used around non-conversion, and its applicability to semi-industrial sites would need to be discussed.
- Any Entity should be doing a risk assessment and look for potential risks to natural/critical habitats. The management system should handle the basic risk assessment, and where a material risk is identified is when this criterion would be applicable.

- It was noted that whilst natural habitats is useful in a policy setting, protected areas are a lot easier and concrete (IUCN WDPA being the global reference) to identify.
- **Action:** ASI will put in a proposal in the next version of the draft. It is also an area where ASI can seek technical expert input over the summer.

8. Next steps and close

- The notes, recording, and updated draft following discussions will be shared with the Working Group.
- Next call will be on 29th of July and will focus on Land Stewardship and Mine Rehabilitation.