

ASI Workers' Rights and Health & Safety Working Group – Call 2 – Meeting Notes

28 May 2025

Agenda points:

1. Welcome and introductions (5 min)
2. Plenary discussion – risk assessment and management systems (10 min)
3. Introduce breakout group exercise and questions (10 min)
4. Breakout groups: Child labour, forced labour, FoA/CB (20 min)
5. Shareback and discussion (30 min)
6. Health & Safety – introduction of proposals, early thoughts (10 min)
7. Next steps – next 2 calls – end June, July (5 min)

Participants

Ali Ahmad (Qatar Aluminium (Qatalum))
Mohamed Khalil E. Alsaeed, Aluminium Bahrain (Alba)
George Efthimiou (IPTO SA. IPTO is the Power Transition Operator in Greece)
Jørgen Hanson (Norsk Hydro ASA)
Vishwas M. Kamble (Hindalco Industries Limited)
Ashley Magowan (Constellium)
Andrew Mathewson (ERM-CVS)
Daniele Paulino (Hydro) David Pfidze (Rio Tinto Aluminium)
David Pfidze (Rio Tinto)
Lineke Roberts (Nespresso SA)
Andree Treffenfeld (Treffenfeld & Co. GmbH)
Thomas van Haaren (DNV)
Christina Widmann (GF Casting Solutions AG)
Piet Wit (Chimbo Foundation)

ASI Secretariat – Chelsea Reinhardt, Chris Bayliss, Lia Vacheret

Discussion Notes:

Plenary discussion – risk assessment and management systems

- ASI presented the proposed revised criteria on social management system, which would sit in a cross-cutting section of the Standard (Management System). Participants were asked whether this clarified the requirements.
- There was general agreement that this made things clearer. One participant thought it was good to separate out social issues from health and safety but asked whether there would be a requirement under management system for

governance management and recommended to consider alignment with ISO standards around governance.

- There was a question about public disclosure of sustainability and HR targets. ASI explained that it was for the Working Group to consider. As part of the Revision process all public disclosure requirements were being reconsidered (what, if any value do they add?).
- One participant asked about 'Area of influence' – will be important to clarify this concept. ASI noted that this will be added to a working glossary of terms to be shared with the Working Groups as drafts develop
- On reporting and data requirements one participant asked about level of aggregation – what data would be required at corporate vs. plant level? It was recommended that if corporate data included all plants within the unit of certification, that should be sufficient. ASI noted this is an area for input from the Working Group as to whether we need to be more specific about minimum expectations at site level (for example, impact assessments for water may be required at site level).

Breakout groups

- The Working Group was split up to discuss different issues/questions, followed by shareback and discussion in plenary format.

Child Labour – groups 1 and 2

Risk based approach

- **Do you agree that Entities should be able to determine 'high risk' contexts for child labour (with guidance referring to some credible data sources?)**
 - Agree . Consistent with other standards elsewhere. OECD criteria etc . Potential of under-reporting. Guidance would be useful. Based on monitoring by reputable third parties if they exist.
- **Proposed new specific requirement on child/forced labour for 'contract workers': calling out contractors to ensure adequate focus on these areas. Do you agree with this approach?**
 - Agree. companies can hide behind supply chain reality. Perhaps at a minimum require training of the contractors to ensure similar standards are applied/similar values. Responsible sourcing policy that the entity has can be used for monitoring.
 - It was noted that scheduled audits are not effective to identify significant labour violations e.g. child/forced labour – may need to consider unannounced audits. ASI said that this could be considered as part of assurance reviews, but the main emphasis was a monitoring approach in higher risk contexts – to emphasise the monitoring required by Entities (in between audits) – e.g. consulting various local stakeholders, carrying out

internal audits, checking up with contractors, etc. Auditors would then check this system primarily (and cross check with worker interviews) at the time of the audit.

- One participant suggested requiring that entities/auditors looked at incident reporting as part of verification process, noting that internal grievance mechanisms were not always fully trusted. It was recommended to consider signposting to third party whistleblowing hotlines where possible (e.g. labour rights hotline).

- **Do you have suggestions on labour risk frameworks or data sets that could be referenced?**

- OECD. A number of frameworks used. What is missing is what to do when you discover a labour risk? Situations where a person has paid for recruitment fees - what to do then. No substantiation/no documents. Potential for the entity to be complicit in this as well.

- **Are there any gaps?**

- There is a need for mandatory training for executives/senior managers (child labour, modern slavery). They are often the ones that are approached with concerns. Their actions or lack therefore can make a significant difference.

Forced Labour – groups 3 and 4

- **Do you agree that Entities should be able to determine ‘high risk’ contexts for Forced labour (with guidance referring to some credible data sources?)**

- Risk assessment – there is a concern that many companies may score themselves low risk, so they won’t need to do additional requirements. But, how are they checking this (who is responsible for monitoring this? how often are risks assessed?)
- For high-risk contexts, a mitigation plan is important. ASI needs to determine what the minimum requirements are (if cases are detected, what would you do?)
- Yes, this needs to be ensured --> documented process available, proof should be accepted on corporate level

- **Proposed new specific requirement on child/forced labour for ‘contract workers’: calling out contractors to ensure adequate focus on these areas. Do you agree with this approach?**

- Forced Labour risks are often highest with contract workers e.g. cleaning crews, foodservice etc. At a minimum an auditor can check contracts, which should prohibit recruitment fees and mimic the requirements in 7.1 around risks of forced labour.

- Can consider externals audit for contractors or internal assessments for contract workers (although less common in practice)
- Also consider access to grievance mechanism of the certified Entity
- On recruitment fees - if a worker did pay them, should the standard require the Entity to reimburse?
- One suggestion that a country level risk lens should still be applied
- **Do you have suggestions on labour risk frameworks or data sets that could be referenced?**
 - BSI 25700 (as a standard), TPCPI, UNICEF, ILO indicators of forced labour, global business network on labour → ASI should list accepted formats/sources
- **Are any of these requirements not implementable for your Entity? Why not?**
 - 9.4 - very difficult to audit (how to assess what is sufficient)
 - 9.2 - monitoring system, what is being looked at?

Freedom of Association and Collective Bargaining – group 5

- **Do you have recommendations on what 'leading practice' for Freedom of Association/Collective Bargaining might look like?**
 - Leading practices could include the Entity;
 - a) publicly supporting Freedom of Association, even in countries where unionisation is restricted, and clearly outlining alternative mechanisms to enable worker voice,
 - b) auditing high-risk suppliers on FoA and working with them to address compliance gaps
 - Leading practice - what does "Entity identifies" encompass? Issues raised by Labour unions? or only those "recognised" by the Entity?
 - Strengthening participation by promoting communication
 - Leading practice: activities in promoting change to Applicable Law to relax restrictions on FoA/CB
 - Informing and engaging all workers not just unionised workers.
- **In regions where trade unions are not permitted by law, do you have advice on what 'alternative/ equivalent' structures might look like? (take note of the draft guidance and suggest any changes)**
 - Alternative/Equivalent structures for Trade Unions could include:
 - a) Worker Committee or Council (e.g. Employee Representative Board)
 - b) Joint Worker/Management Committee
 - c) Effective Grievance Mechanism in place (with Worker oversight)

- Language under 11.1 – is the decision to join a Union or other always made by the (individual) worker? How to ensure this? Are there labour bodies where such a decision is already a collective (though not Entity-led endeavour)? – language change? “the worker” to WORKERS
- Extroverted behaviour and the prominence of electoral processes in local society
- Annually scheduled open meetings with workers. Open invitation to everyone.
- **Are there any gaps?**
 - 11.4 this may be part of the “key elements” guidance development , but also communication on periodicity of review of agreement and timely disclosure of changes to such agreement

6. Occupational Health and Safety

- ASI presented early thoughts on Occupational Health and Safety requirements – to have a criteria in the Standard which would reference a separate table with more detail around specific OHS risks and practices. Members of the Working Group were asked if they are interested to focus specifically on this issue in a smaller/parallel group.
- One participant noted that there are many health and safety laws and standards; it is important for ASI not to duplicate. Another participant expressed that this was an opportunity to focus on OHS impacts specific to the aluminium sector.
- One participant noted that noise and ergonomics had the largest impact on workers over time and that Disability Adjusted Life Years (DALYs) could be used as a measure.
- One participant noted that health and safety interacts with working time and asked how this was linked in the ASI-system. ASI noted and would make sure the links were made in the Standard.

8. Next steps

- Scheduling for calls 3 (Monday 30 June, 1400) and 4 (Monday 28 July, 1400) covering Occupational Health and Safety/working hours and wages.
- Comments, feedback, discussion would be reflected in the latest draft, which would be circulated to the WG along with the meeting notes.