

ASI Standards Committee In-Person Meeting – Discussion Notes

6–8 May 2025 (Hybrid Meeting: France/ Remote)

Attendance ([Standards Committee](#)):

Abiba Diallo (<i>remote</i>)	Marina Wangurra
Abu Karimu (<i>remote</i>)	Michael Danielson
Francesca Fairbairn	Nicholas Barla (<i>remote</i>)
Gesa Jauck	Olivier Néel
Guilbert Ebune	Penny Laurance
Jason Koevoet	Piet Wit
Jørgen Hanson (<i>alt. Patrick Brading</i>)	Sankon Mohamed (<i>remote</i>)
Jose Rubio	Soumah Dominique (<i>remote</i>)
Lachlan Wright (<i>alt. Wenjuan Liu</i>)	Vincent Ekka (<i>remote</i>)
Louis Biswane	Vishwas Kamble
Martin Alles (<i>alt. Judith Pietschmann</i>)	Yuri Herder
Marcel Pfitzer	

Apologies:

Steven Bater
Wenjuan Liu (alternate attended)
Judith Pietschmann (alternate attended)

ASI Secretariat Participants

Cameron Jones, <i>Director of Risk and Assurance</i>	Jessica Pereira, <i>Human Rights Specialist</i>
Chelsea Reinhardt, <i>Standards Director</i>	Klaudia Michalska, <i>Supply Chain Analyst</i>
Chris Bayliss, <i>Climate Change & Decarb'n Director</i>	Laura Brunello, <i>Standards Coordinator</i>
Gabriel Carmona Aparicio, <i>Circularity Manager</i>	Lia Vacheret, <i>Standards Manager</i>
Fiona Solomon, <i>CEO</i>	Thomas Robertson, <i>Assurance & Risk Manager</i>
Marieke van der Mijn, <i>Director of Partnerships</i>	Vicky Tran, <i>Claims and Assurance Manager</i>
Mark Annandale, <i>Director of Research/ IPAF</i>	

Agenda Overview:

Tuesday 6 May 2025	
13:00 – 14:15	Item 1: Welcome and opening
14:15 – 15:45	Item 2: Sub-group work session (<i>Thematic content development</i>)
15:45 – 17:15	Item 3: Subgroup Shareback
17:15 – 17:30	Item 4: Close Day 1
Wednesday 7 May 2025	
8:45 – 11:15	Item 6: Rotation Feedback to Subgroups and Plenary debrief
11:15–12:20	Item 9 Part I – Standards Structure (<i>adjusted from original agenda order</i>)
13:20 – 14:30	Item 7: IPAF Priorities and Input

14:30 – 15:30	Item 8: Chain of Custody and Claims (plenary)
15:45 – 17:15	Item 9 Part 2: Standards Structure Working Session (plenary)
17:15 – 17:30	Item 10: Close Day 2
Thursday 8 May 2025	
8:30 – 8:40	Item 11: Opening and warm up
8:40 – 9:30	Item 13: Assurance discussion (<i>adjusted from original agenda order</i>)
9:30 – 10:15	Item 12: Crosscutting topics (plenary + table discussions) <ul style="list-style-type: none"> • Due diligence + claims and supporting frameworks • Mine closure/rehabilitation
13:00 – 13:20	Item 14: Minor updates/ approvals
13:20 – 13:50	Item 15: Next Steps and Work Planning
13:50 – 14:45	Item 16: Parking lot
14:45- 15:00	Item 17: Reflections and close

Item 1: Opening and Welcome

- **Approval of minutes:** Minutes from the 11 February 2025 meeting were **approved without changes**.
- **Meeting structure and objectives:** The ASI team explained that work of the SC this week will be focused on two levels:
 - Bottom-up content development in thematic subgroups (Climate, Workers' Rights, etc.)
 - Top-down strategic review of the emerging standard architecture – for example, how do we handle different performance levels? How do we approach materiality, etc?
- **Objectives for the Standard Revision:** The SC was reminded of the agreed objectives for the revision, which should serve as guidelines to ensure we remain on the right track as discussions get into the detail. The agreed objectives are to:
 1. Enable greater differentiation; recognising different performance levels and creating pathways for continuous improvement
 2. Further strengthen credibility of the standards and related assurance
 3. Improve the relevance of criteria, focusing effort on the most critical areas
 4. Strengthen focus on priorities for Indigenous People and other traditional communities
 5. Enhance the value to ASI Members through certification
 6. Improve alignment with other standards
 7. Renew focus on impact
- **Financial and membership update:** ASI provided an update on Membership growth and organisational matters:
 - ASI Membership currently at around 390; with more recent slowing of new member growth
 - As a result, operating budgets are tighter than in previous years, with travel restricted
 - Focus areas for future growth include high impact regions: India, Guinea, Indonesia, and Brazil
 - Key impacts for the Standards Committee are to be aware of how technical discussions (e.g. raising ambitions and complexity of the Standard) may impact our overall theory of change and uptake in the sector. For example, very ambitious standard might mean less of the sector can achieve certification.
- **Structure of the revised performance standard and cross-cutting topics:**

- ASI presented an overview of the revised structure for the Performance Standard, which includes three cross-cutting areas: Governance; Responsible Sourcing & Due Diligence; Management Systems
 - Thematic content is grouped under these, with proposed modular sections covering content that is applicable only in specific contexts (such as FPIC or Mine closure)
 - Social management systems now proposed as a distinct element (separated from Health, Safety, and Environmental Management Systems)
 - The SC was asked for views on whether these cross-cutting areas should also include differentiation, or just one level of expectation for all
 - The SC was asked to comment on how important it would be for ASI standards to be recognised by LME as equivalent to ISO 14001/ 45001 (noting that ASI already recognises these two ISO standards as equivalent to specific criteria within the PS)
- The SC discussed the proposed changes and noted the following:
 - There is currently confusion from Entities and auditors on what is expected under a social management system; practical examples are needed. General support to combine HSE management systems and separate out the concept of social management system
 - Adding more complexity into the management system sections (for example to make these equivalent to ISO 45001) will be challenging, especially for SMEs
 - ASI Members may need ISO certification to meet customer requirements. Many entities already have 14001 and would likely retain it. ISO 45001 is less widely adopted, so 45001 equivalence through LME may be more useful.
 - More consultation with ASI Members would be helpful to understand the level of demand for LME to recognise ASI as equivalent; also need to consult on whether downstream customers would also accept this.
 - Consider developing any additional requirements for ISO equivalence as an optional module (or level 2), so not applicable to all
 - Consider whether public disclosures / transparency could also be a cross-cutting topic area
- The SC reached **agreement** on the following:
 - For Management Systems, a single level of expectation is likely appropriate, while for Governance and Responsible Sourcing, differentiation may still be considered as drafts develop
 - Any potential future ISO 45001/ 14001 equivalence (with expanded requirements) would be an optional additional module, not mandatory for all Entities. Further consultation needed to understand the demand for this (see below)
 - Continue with the proposal to merge Health, Safety and Environment management system and separate out social management systems - with more clarity and detail provided
- **Action: ASI Secretariat to consult further with Members on:**
 - The potential value to Members of including expanded requirements to support LME recognition of ASI as 'equivalent' to ISO 45001/ 14001
 - Whether Entities (especially downstream customers) would accept LME recognition (via ASI certification) in place of separate ISO certifications
- **Reflections on early content development**
 - The ASI team shared that as thematic content develops, more requirements and increased ambition plus differentiation are already leading to scope creep and complexity
 - It was discussed that this is normal for this stage of the process, and there is value in 'getting everything on the table for discussion first, before reducing or removing things'. However, some deprioritisation will be critical as the project progresses – otherwise cost/ effort of certification will increase too much

- It was noted that Small or Medium Enterprises (SMEs) may have additional implementation challenges – more work is needed to filter for applicability to SMEs
- Transparency and public disclosure are recurring across thematic areas; to be discussed as part of cross cutting themes (consider folding up into cross cutting sections?)

Item 3 – 6: Subgroup Working Session and Shareback

Note: Detailed comments and changes raised during the subgroup work and rotation feedback (Items 3-6) have been incorporated directly into the working drafts. The notes in this section represent higher level discussion themes or points of agreement/ actions

Climate Subgroup

- The Climate subgroup discussed the following:
 - Whether proposed level 1 (scenario ambition) should be changed (i.e. beyond 2 degrees): The subgroup advised that in their view, the 1.5-degree ambition should be maintained
 - The importance of keeping the need for the Entity to demonstrate it has a plan to decrease emissions, though perhaps not necessarily along a defined slope:
 - This could mean asking auditors to check that the plan is credible
 - Potential to explore absolute emissions budgets per Entity, allowing self-definition of a slope, maintaining “in budget” performance
 - Potential to explore (auditor disclosed) expenditure on emissions reduction technologies, aligned with future reductions (under budget)
 - Public disclosure could be considered a commitment to short term abatement targets which makes things more difficult for many Entities (depending on their structure – e.g. private equity firms)
 - Entities may be much more open to disclose to Auditors, in which case Auditors need to be well trained to distinguish sound action plans - a question of credibility
 - Removing the current smelter emissions intensity threshold. Work on clarifying this ongoing - could exclude new coal-based smelters via other mechanisms (such as Membership requirements) and remove the threshold (which pre-date and are at odds with the ASI Method) criterion from the Standard
 - Whether there was multistakeholder support to incorporate requirements on Avoidance and if so, how this could be done in a way that is credible but not overly complex nor challenging to audit.

Nature Subgroup

- The sub-group discussed the current draft and input received from technical experts and was in favour of removing the distinction between high impact Entities/mine/refineries/smelter/those operating in critical habitat vs ‘all other Entities’ (2 different requirements), to have ONE set of requirements applicable to all (a material impact is material regardless of where you operate). The applicability would be decided following a set of conditions (a decision tree was proposed to that effect).
- It was discussed that Entities should follow the IFC Performance Standard 6; however, there was then discussion amongst the Standards Committee that IFC PS6 is setting the bar too high, especially for SMEs, so alignment may not be feasible for all Entities
- On biodiversity baselining, it was discussed whether 2020 could be an appropriate baseline. This would align with the ICMM Nature Position Statement and the post-2020 Global Biodiversity Framework; however, it was also an unusual year due to COVID. More discussion is needed.
- The Mitigation Hierarchy was discussed; noting that this is a complex concept. Some companies can ‘game the system,’ so it is important to demonstrate additionality (rather than just avoidance) close to the operation site, and perpetuity also needs to be considered.

- It was discussed that ‘No-Go’ areas in the Standard need to be called out more explicitly, especially for World Heritage sites.

Separating out Biodiversity and Ecosystem Services: the idea of splitting the Biodiversity requirements from Ecosystem Services was supported by the sub-group and the Standards Committee more broadly. The link to community rights for provisioning services was seen as especially important to highlight.

Circularity Subgroup

- The Circularity subgroup (CSG) broadly supported consolidating previously siloed topics (e.g. waste management, material stewardship) under a unified circularity framework, structured via: 1) Material Flow Analysis (MFA) model: input, process, output (but allowing flexibility depending on a company’s position in the value chain); and. 2) Alignment with ISO 59000 and upcoming Global Circularity Protocol. Focus will remain on non-energy materials.
- Significant resources are needed to track/map process/waste outflows. If this became a requirement would be very difficult to be certified. CSG suggested narrow the scope of resources to aluminium and key input materials (e.g., caustic soda, lime) relevant to a facility’s operations, to improve clarity and feasibility.
- Targets: these would be challenging to measure at this stage. Initial data collection would be needed and then matrices to track progress. E.g. How much did an entity invest in circularity initiatives? How much integration of circularity was there in their risk management?
- Concerns were raised around the auditability, fairness, and practical comparability of percentage-based targets (e.g. for recycled content, scrap reduction). Alternatives proposed included:
 - Maturity models (e.g. RADAR framework: Results, Approach, Deployment, Assessment/Review)
 - Return on Resource Efficiency (RRE) thresholds for investment in circularity projects
 - Sector-specific baselines and metrics.
- **Agreement of the subgroup: emphasis should be on value retention, investment in circularity, and systemic change, not only percentages.**
- **Action: Reassess and potentially restructure outcome-based performance levels using RRE-style criteria.**
- Recognition that performance levels must balance step-change improvements (“the delta”) with recognition for entities already operating at high maturity. A dual recognition model was proposed to account for both types of progress.
- Acknowledged complexity in multi-product entities (e.g. door frames vs. structural parts), and supplier constraints from customer specifications.
- **Agreement of the subgroup: Integrate “Responsible Recycling” within a broader due diligence framework, rather than as a standalone criterion.**
 - Reasoning: Responsible recycling is better understood as a risk to be assessed and managed under existing due diligence processes, particularly concerning waste worker rights and informal sector impacts. Emphasis placed on avoiding duplication during audits and ensuring coherence across due diligence types (primary and recycled materials).
- The subgroup reviewed five proposed disclosure requirements under circularity (e.g. circularity mapping and rates, EPR measures, bauxite residue volumes, dross management).
 - General support for transparency in end-of-life pathways (e.g. EPR), aligning with existing regulations and practices
 - Caution expressed about disclosing input volumes and flows, which could reveal sensitive cost structures or proprietary supply chain data
 - Preference for aggregated or optional disclosure models, especially where central corporate sustainability reports lack entity-level resolution
- **Action: Redraft disclosure requirements: Make inflow-related metrics optionally reportable or aggregated. Ensure outflow-related disclosures (e.g. dross, bauxite residue) align with existing tailings guidance and clarify scope.**

- Agreement that current practice of mixing minerals and non-minerals in disclosure undermines data utility and should be improved.
- Recognition of product design as a major determinant of process scrap and circularity outcomes. CSG emphasized the need to clarify ownership and influence over product specifications.
- **Action:** Secretariat to revise product design criteria to clarify responsibility, especially under “build-to-spec” arrangements.
- Scrap should be evaluated via design vs. process separation, acknowledging different technologies (casting, forging, extrusion) and business models.

Workers’ Rights/ Health and Safety Subgroup

- The Workers’ Rights subgroup discussed and agreed the following changes to the draft:
 - Move risk assessment and policy criteria under Management Systems – social management system to cover all fundamental rights at work (H&S under HSE Management System)
 - Supply chain related requirements to eventually move under due diligence/ supply chain
 - Merge action plan and procedure-related requirements under Child Labour and Forced Labour
- The group also discussed whether leading practice should be applicable where risks are not material, e.g. child labour. In this case, risks are likely still prevalent in supply chain, so Entities can work on leading practice around due diligence/ responsible sourcing.
- Feedback from IPAF representatives (India) indicated that labour risks related to women and children can be prevalent, so important to keep additional emphasis on these risks
- The group further noted that in some cases, what is normal practice for large companies (e.g. workplace culture study) may be less feasible for SMEs. More input on feasibility of requirements to be gathered during the July- August ‘pre-consultation’ feedback periods.
- It was discussed that more input is needed from the Working Group and H&S specialists to develop specific OH&S risks and leading practices related to aluminium, but this is an important area to focus on in the revision process
- On living wage requirements, although this may be challenging to implement, in some countries such as Norway this is already a legal requirement for companies and should be further explored/ consulted on.

Community Rights Subgroup

The Community Rights subgroup discussed the following points:

- Community consultation/impact. Community mapping process - how can this process be independent? Could be considered conflict of interest if only entity does this. Should be done in collaboration with the communities, accessible and transparent.
- Important that traditional decision-making processes are respected but need to still recognise that they can be patriarchal. How to still ensure diversity and involvement of women? How to balance this?
- Public disclosure - public consultation documents need to be made public in an accessible way, with sensitivities considered.
- Companies need to ensure people engaging indigenous communities have cultural competency and a mandate to take decisions.
- Auditing approach will be very important, consider cultural competence of staff – auditing will need to shift from paper-based assessment towards deeper understanding from the perspective of the communities
- Accessibility and language is important
- In terms of the structure of the Standard:
 - Materiality needs to be integrated into this topic
 - Public disclosure and communication - may not be appropriate - so need some flexibility on how to address this.

- Discussions on different requirements depending on where the entity is in the supply chain/size of company.
- In terms of IPAF input - focus has been how to put communities on an equal footing, making it more collaborative. Not about making requirements harder or more complicated, but to make it truly a collaborative effort.

Item 7: IPAF Priorities and Input

- The IPAF Standards Committee representatives highlighted the diverse range of areas that are priorities for IPAF within the Standard. This includes (but not limited to): FPIC, Circularity, Nature, Site Rehabilitation and Closure, Grievance mechanisms, Displacement and Resettlement, Risk and Impact assessments, Due Diligence and Climate Change.
- There are many areas of the Standard that overlap and impact each other and Indigenous Peoples rights and needs. For example, good quality Risk and Impact assessments affect New Projects and Major Changes; Emissions and Effluents impact Biodiversity, Land and Water use; Displacement and Resettlement topics require strong Grievance Mechanism structures. *See presentation slides for an overview of priority topic areas from IPAF perspective.*
- IPAF presented the Mine Rehabilitation and Closure project, which is a 'train the trainer' initiative that took place in Australia at the only Indigenous Bauxite mine in the world. The project aims to increase the involvement of Indigenous Peoples and Land-connected communities in the mine closure and rehabilitation process, by building their capacity and knowledge in the technical and regulatory requirements of bauxite mine rehabilitation and the livelihood opportunities that come with it.
 - The project is now in its second phase, with activities happening in Ghana, Suriname, India, Australia and Guinea, where those who were trained in Australia are now hosting trainings. The program and methodologies are being shared with Indigenous communities so that their capacity is built and they can go on to share this knowledge with others.
 - Alongside this, IPAF members are also hosting workshops to raise awareness in communities about their socio-economic rights, FPIC, as well as the ASI Performance Standard. The learnings from this project have been directly incorporated into the Site Closure and Rehabilitation draft criteria. Link to explainer video: <https://www.youtube.com/watch?v=MmJ5fZP2dX8>
- IPAF representatives emphasized the importance of strong Site Closure and Rehabilitation criteria and shared an example of the impacts of poor closure and rehabilitation in Suriname. Despite the mine being closed a long time ago, the effects are still felt today as nature never fully recovered, impacting the communities' daily life.
- Another IPAF representative presented on 'FPIC and Traditional Knowledge: Good Business Sense' which covered the business case for implementing FPIC and traditional knowledge to improve project certainty, reduce risks and build good a reputation and relationships with local communities. The presentation highlighted that proper FPIC processes result in avoiding delays or disruptions and incorporating traditional knowledge results in increased sustainability e.g. enhance biodiversity, strengthened relationships with Indigenous communities etc.
- It was discussed that the Community Rights and Participation Criteria may see some of the most significant changes to the current standard
- Moving forward, additional participants will be sought to join the (informal) working group on site closure and rehabilitation

Item 8: Chain of Custody/ Claims

- The ASI team summarised outcomes from the previous in-person SC meeting in Amsterdam in September 2024, including limited demand for ASI (CoC) material, significant CoC audit burdens, and limited interest in on-product labelling for ASI material

- Since September, further outreach with ASI Members has been carried out and four main categories of claims/ information flow are being explored:
 1. ASI aluminium (CoC material) claims – supported by current mass balance CoC or similar version
 2. Performance claims (such as those related to the 1.5-degree pathway, or emissions reductions)
 3. Supply chain information/ due diligence information (such as passing information on related to potential regions of origin)
 4. Allocated (environmental quality) claims – such as product carbon footprint, which would be tied to specific material/ shipments
- For Area 1: ASI Members continue to see some value in product -related claims around material sourcing and on-product labelling. ASI proposes to develop a streamlined version of the current CoC Standard based on the group mass balance CoC accounting model.
 - Streamlining would reduce the number of sections from 11 in the current CoC down to 5 by consolidating related content, removing duplication with supply chain elements already covered in ASI PS, and putting key focus on the material accounting requirements (ASI material inputs vs outputs)
- For Area 4: Early work on exploring the potential for PCF related claims indicates that:
 - Member demand for a potential ASI developed claim is limited (many Members feel current LCA-based PCF is sufficient)
 - the level of uncertainty of underlying emissions data is high (>20%) which means potential PCF claims would likely not be able to be specific to decimal points, and
 - Complexity is higher than anticipated to develop a material accounting system that can pass emissions data along the supply chain to enable verified PCF claims along the chain
- The SC discussed the proposals around new categories of claims and highlighted the following points:
 - Streamlined CoC could reduce audit costs and burden e.g. through online audits
 - Upstream companies may not designate all eligible material they have available for sale as ‘ASI aluminium’ – they typically expect to sell the material, and customers may not be willing to pay any additional for ASI designation. As a result, there is limited commercial incentive for upstream suppliers to apply the label to all eligible material.
 - Stronger customer demand for ASI material downstream could help support investment in ASI (and sourcing of ASI aluminium) upstream
 - Under a mass balance system, claims become relatively weak – worth exploring what additional types of claims ASI could develop that would be more useful (*Note: ASI response that this is the driver for the consultation on potential Product Carbon Footprint, or PCF, claims over the last 6 months*)
 - Based on early input from Member consultations, value in ASI developing PCF claims seems to be less strong than originally expected. However, may still be some value in ASI playing a role to ensure that companies don’t over-allocate total emissions– this could help to build trust
 - Work by IAI on regional datasets could be linked with identification of sourcing smelter locations (for other purposes such as due diligence support) to allow generic emission factors for primary aluminium
- The SC reached **agreement** on the following points:
 - ASI to progress further on Area 1: streamlined CoC development
 - ASI team to explore Area 2 (performance claims) further
 - Support for the proposed way forward shared by the ASI team, which includes consulting first with the CoC/ Claims Working Group in May/ June and then with a broader set of Members in July to validate the level (or lack) of demand around proposed claims, including PCF claims – the Committee will be updated in several months on outcomes of those consultations and recommendations

[Note that Area 3, supply chain related information, was discussed separately on Thursday 8 May; see notes from Section 13]

Item 9: Standards Structure (part 1)

- ASI gave an overview of the proposed new format for criteria: separating out criteria vs 'requirements'. Overall conformity would still be assessed at criteria level, but this would be based on the auditors checking all requirements consistently
- The proposal to have modular sections sitting as an 'add-on' to the PS and applicable only in certain contexts was introduced, along with the concept of differentiation/performance levels within the Standard (see slides).
- There was general support for clearly distinguishing criteria from requirements, and this was seen as helpful in improving clarity and auditability. In terms of how this could be applied to multi-site Entities, it was discussed that either a reporting template can have additional tabs or columns for each site, or auditors could summarize into one template. This can be further developed as assurance tools are built in future
- On modular 'add-on' sections, there was support for the idea, enabling the Standard to be more applicable for different Entities. It was noted that public disclosure is often scattered throughout the Standard, and there was some support in pulling disclosure requirements into another cross-cutting section (or alternately, leaving them in thematic areas but creating a clear cross-reference table).
- On differentiation/performance levels, ASI presented a summary of thinking so far – which would allow Entities to achieve 'leading practice' level under specific thematic areas (e.g. Climate) based on meeting a certain threshold of Level 2 (leading) requirements
 - Current thinking is that Entities would need to meet all Level 1 (basic compliance) requirements, but Level 2 requirements would be flexible and additive, so they would only need to meet for example 50% of applicable requirements to be considered 'leading practice'
- The SC raised the following points/ suggestions around differentiation:
 - Calibration is important to try to ensure that leading practice is roughly equivalent across thematic areas
 - Important to recognize Entities at different points of maturity – e.g. those who already achieved performance improvements vs those who are currently improving
- The Standards Committee **agreed to the current proposal from the Secretariat to explore differentiation by thematic areas, and to generally work on developing minimum (Level 1) requirements and another tier of 'leading practice' (Level 2).**
- **Action:** ASI will work on this over the coming few months with input from Working Group, and share an update with the SC later in the year as the drafts come back together again in July/ September

Item 9: Standards Structure (part 2)

- *On materiality:* ASI gave an overview of how Materiality and relevance are already incorporated into crosscutting and thematic areas in the Performance Standard (PS) revised structure
- The SC discussed how to further embed materiality into the PS and raised the following points:
 - It is important to align with existing materiality frameworks such as GRI and CSRD dual materiality. However, these materiality assessments may be done at a very high level (e.g. corporate level), so material topics may be very general (e.g. community impacts) and thus not helpful to determine applicability of specific criteria within the standard
 - Concerns were raised about allowing companies too much freedom to define materiality, and potential risks of inconsistent interpretation
 - While there is strong support for more materiality, there will also be exception cases where a requirement may not apply (e.g. case of smelters in Iceland with very little biodiversity impact).

ASI team clarified that we would need to look at developing a structured derogation process for these cases, which is common for most standard schemes

- There was strong support for building risk profiles as part of pre-audit processes and audit planning, and there was a proposal that self-assessments be conditional on prior submission of risk/materiality profiles—improving audit efficiency
- It was discussed that ASI could have a default sector-specific matrices combining supply chain activities and geography (and other contextual factors) for Entities to use to understand their risk profile as a basis, though an Entity would need to describe how they went about assessing their risk
- *On outcomes-based criteria:* ASI presented a brief update on the status of drafting for outcomes-based criteria – in many cases, there are difficult to incorporate as some stakeholders may see them as not relevant, data may not be available, they may not fit all local contexts, etc.
- The SC agreed that while challenging, outcome-based criteria are still seen as important for credibility and ensuring focus on impacts, especially e.g. in areas such as mine rehabilitation
- The SC discussed the example of including data on fatalities, which may not be a good indicator of the effectiveness of H&S management systems. But perhaps this could be grouped together with other indicators
- **Agreement:** The SC agreed to continue collecting information on relevance/ applicability of criteria ‘bottoms up’ for the next couple of months through the working group process; these will then be aggregated for review by the SC later in the process to determine if they can be further aggregated (e.g. by supply chain activity)
- **Actions:**
 - ASI to include another column in the ‘pre-consultation’ feedback proposed for July/ August to collect information on relevance of draft criteria from ASI Members
 - ASI to explore feasibility of developing materiality matrices for other content areas, building on the example done already for Nature and the work done by the SC last September
 - ASI to continue pushing for development of outcomes-based criteria through working groups

Item 12: Assurance

- The ASI team provided a broad update on the assurance system, including oversight trends, audit planning, and ongoing improvement initiatives.
- Witness assessments remain a key tool for quality assurance and are selected based on auditor performance, stakeholder concerns, profile of the audit (e.g. first-time audits, high-risk operations), and Secretariat availability. Examples include MRN Brazil (following media attention), and high-profile audits in Guinea. Health and safety considerations may prevent attendance (e.g. Egypt, Guinea).
- ASI does not conduct witness assessments remotely, as in-person presence is necessary to observe auditor behaviour, engagement, and context.
- North America (USA and Canada) has not yet had a witness assessment, but there is intent to prioritise one when a suitable audit arises.
- Oversight is seen as valuable in: Ensuring quality and accuracy of public audit reports; clarifying ambiguous findings, catching gaps missed by auditors; and supporting consistency in reporting for external stakeholders.
- There is growing discussion around proportionality of oversight. Some SC members questioned whether oversight effort could be reduced for high-performing auditors or repeat audits at mature sites. Others reinforced that current rigor is a key factor in ASI’s credibility and should not be compromised.

- The Assurance Manual was widely acknowledged as an essential tool, but now overly long dense, and difficult to navigate. ASI confirmed that they plan to work on a revision and restructuring of the Assurance Manual ahead of the revised standards
- Sampling methodology, especially for multi-site audits, was discussed as an area needing improvement. Current employee-number-based approach is seen as too crude. ASI intends to shift toward a more risk-based and rotational sampling model. Audit firms are generally engaging well with ASI on site selection.
- There was discussion of combining ASI audits with other assurance activities (e.g. ISO 14001 or 45001). ASI supports this in principle and in practice many Entities can already do this; however, some choose not to in order to maintain clear focus on ASI certification vs other standards.
- The conformity tables being piloted by ASI to support consistent audit interpretation were positively received. These provide practical examples of major and minor non-conformities. Stakeholders supported eventual broader access and inclusion in audit reports for transparency and internal learning.
- Witness assessments increasingly involve ASI Registered Specialists and IPAF members. Their regional knowledge and language skills (e.g. in Guinea and India) improve audit team effectiveness and stakeholder engagement.
- The Secretariat highlighted the need for certification bodies to maintain their own internal oversight processes. There is a risk that ASI's thoroughness might create reliance or weaken internal review by the firms.
- A key improvement focus is aligning assurance tool development with the ongoing standards revision process. The assurance team and working groups will ensure that new criteria are auditable from the outset, reducing subjectivity and implementation delays.

Actions:

- ASI team to continue planned work to revise Assurance Manual for greater usability, possibly segmented by user type and converted into more modular formats.
- ASI to continue piloting and expanding use of conformity tables, with plans for broader accessibility.

Item 13: Breakout discussion on Mine Closure and Rehabilitation

- The breakout group discussed the draft approach to revising criteria around closure and rehabilitation, with the following comments made:
 - Closure and rehabilitation should be applicable to all sites along the supply chain.
 - FPIC should be the baseline expectation and applied to the whole criterion – this means that the plan should be signed off by indigenous/local peoples. Level 2 could be involving IPS and land-connected communities as equal partners, with Level 3 considering them as equal partners.
 - For this to be efficient, the planning for closure should start even before the operations commence: this includes impact assessment and baseline data collection as early as possible.
 - It was discussed that it was very important that both Biodiversity and Ecosystem Services are maintained both in the mining lease area and adjacent areas not directly impacted by mining as well.
 - It was noted by one participant that the aspect of Biodiversity got a bit 'lost in the weeds', and suggested to make it more explicit. It was discussed that in some countries, regulators require environmental values to be put back in, but most regulators don't follow up on that, so it would be valuable to re-emphasise.
 - The distinction between rehabilitation and restoration was emphasised: it will be important to provide a very specific definition of rehabilitation (vs restoration) and how that would count when calculating the loss you need to offset. Restoration should be included as part of the requirement, including very specific metrics and quantifiable targets.

- IPAF members from Suriname and India shared their experiences where the mining companies had not rehabilitated to a satisfactory standard or had ‘re-vegetated’ improperly, based on what the Entity thinks it should be like, without consultation or consideration of local communities.
- It was discussed that it would be necessary for an Entity to submit a mine closure plan (with a mechanism of financial assurance to ensure long-term commitment and accountability) which should be publicly disclosed or at least disclosed to impacted stakeholders. Expecting communities to monitor mine closure is also a good expectation.

Item 13: Breakout discussion on Due Diligence/ Supporting Claims and Information Flow

This breakout group discussed two related topics:

- Topic 1: Options on how to structure due diligence requirements in the revised Performance Standard (PS),
 - a. Option 1 – merge together UNGPs/ Human Rights due diligence and OECD Guidelines, and keep separate section on CAHRAs (as per current criteria 9.8)
 - b. Option 2 – maintain three separate sections on HR Due diligence, OECD guidelines, and CAHRAs. While more duplicative, this would give more visibility for alignment with these key frameworks
- Topic 2: Information flow/ supply chain transparency that could support ASI Members with carrying out due diligence
- On Topic 1, options for structuring due diligence requirements in the PS, the breakout group raised a number of points:
 - It is important to clarify if due diligence covers own operations (e.g. if you are carrying out your own mining) or not. Officially, OECD due diligence and UNGP frameworks will cover own operations as well as supply chain; however, in most companies these are managed differently; for example, a team for social, team for environmental, and a team for responsible sourcing (covering both social and environmental in the supply chain)
 - For the ASI Standards, we can make it clearer that Entities could cover the ‘own operations’ due diligence through the management systems criteria
 - Under current PS criteria 9.8 on CAHRAs, due to LME alignment, it will be very difficult to change wording or merge with other due diligence expectations – thus ASI proposes to keep this section separate and maintain current wording
 - Environmental due diligence is less mature than Human Rights, but increasing in importance and ASI should be ambitious here, especially given interconnected issues (e.g. impacts on water affecting local communities and right to clean water ...)
 - The SC discussed the trade-offs between options:
 - Option 1: less duplication, recognises that 5 stages of due diligence are the same for HR and environmental, and is better aligned with how companies manage their internal processes)
 - Option 2: more duplication, but may ensure more visibility for both UNGP and OECD alignment, which can be important for credibility of the ASI standards (e.g. in external reviews)
 - The SC agreed for ASI team to further develop both options, consult with IHRB colleague (Vicky Bowman) who is a specialist in this area, and come back to the SC with a recommendation in a couple of months

- On Topic 2, supply chain information flow, the group discussed the types of supply chain information or data that could help ASI Members better meet due diligence expectations. The group noted a number of points:
 - Most helpful information would be for companies to know the **country + state or province (sub-country level)** for aluminium sourcing locations, e.g. smelters or bauxite mines
 - i. OECD CAHRA list includes some province/ state breakdowns already for other commodities – country level is not enough in all cases due to variation in risks within a country
 - Recognising that this information would not be attached to specific products (aluminium material), batches or portfolios, but rather would be for a potential pool of supply locations feeding into the supply chain
 - Some ASI Members are satisfied that PS certification of their suppliers and audit reports (including through review of criteria 9.8 findings on CAHRA due diligence) gives assurance that there is compliance with due diligence by their (Tier 1) suppliers (and thus whole supply chain)
 - In some cases, downstream companies do not get full supply chain information from their suppliers, especially traders
 - Third-party data sets, such as CRU and IAI mass flow data, can already be used to estimate regional aluminium flows e.g. from smelter back to mines; but requires some analysis of the data
 - It is not clear how potential requirements on passing on origin information would apply to scrap material [to be discussed separately] (Note this is outside the scope of 9.8 / OECD DDG)
- It was discussed whether ASI could include a requirement in the revised ASI Standards for Entities to pass on to customers this information on the pool of countries/ regions of origin when requested
 - Yes, it would be possible, already should be covered under the 9.8 requirements on CAHRA due diligence for upstream to smelter, but does not mandate the sharing of information downstream
 - Potentially should sit in the Performance Standard for maximum uptake (instead of CoC standard)
- It was **agreed** that ASI should further progress in developing options for two key areas, to be shared back with the SC in a few months:
 - Introducing a new requirement into the PS that would require Entities to pass information to customers, when asked, on the country and region of origin for aluminium and precursor materials (at general sourcing level, not tied to specific products), and/or (because problem will be the access to and flow of reliable information to support this)
 - Exploring options to refine, tailor and package third party (e.g. CRU) data on aluminium flows and supplier relationships, which could be provided as a value-add to ASI Members to help estimate their sourcing regions (as well as an opportunity to link with ASI regional activities such as Beyond Certification projects).

Item 14: Minor updates/approvals

- ASI presented minor updates to the *Assurance Manual* regarding claims, clarification of provision on Conflict of Interest, and minor updates to the PS Guidance regarding Overtime hours.
- The SC discussed the overall approach to managing conflict of interest for auditors, including where audit teams may include contract auditors

- One SC member raised a question about long or overnight shifts and potential impacts on worker health and safety; although it was noted that some workers prefer 12-hour shifts and this is incorporated into collective bargaining agreements. It was agreed that potential thresholds for shift work and overtime hours would be considered in the next revision of the Performance Standard
- It was agreed for the Secretariat to explore area 3 (slide 40), on supply chain information/due diligence support to enable PCF claims
- **Approval:** The Standards Committee **approved** the proposed minor changes to the Assurance Manual and PS Guidance

Item 15: Next Steps and Work Planning

- ASI gave an overview of the *timeline for upcoming meetings and workstreams*, and asked the SC what modes of engagement worked for them
- **Agreed:**
 - Sub-groups can reconvene on an ad hoc basis.
 - Individuals should indicate interest in each Working Group and can be added by each thematic lead.
- **Actions:** The Secretariat will share a schedule of upcoming WG calls and a list for SC members to sign up to any WGs of interest
- **Scheduling:**
 - Next virtual SC meetings: **19 June and 17 July, 1:00 PM CEST**

Item 16: Parking Lot Items

- ASI discussed the opportunity with the Standards Revision to re-look at the current criteria 5.2 on smelter emissions thresholds and consider whether this position should be adjusted with the revision.
- The SC debated this topic, raising the following considerations:
 - The current emissions threshold effectively excludes any predominantly coal fired smelters (either new – post 2020 – or pre-existing), although this is not explicit in the wording; leading to exclusion of around 50% of production (by aluminium output) and up to 80% of the sector's emissions (and emissions reduction potential)
 - This may be positive for perception of credibility of the ASI standards, but also limits the ability to engage these smelters to drive improvements (not only on emissions, but also related to other ESG areas)
 - The current threshold pre-dates and is at odds with the Entity specific GHG Pathways articulated via the ASI Method, reflecting industry average performance rather than the diverse baselines of smelters (themselves broadly a reflection of legacy access to power sources).
 - It might be possible to adjust this approach without too much impact on credibility if coal fired smelters demonstrate measurable improvements in emission reductions. However, there is concern about whether this is achievable given the challenges of performance along the 1.5-degree pathway for existing certified Entities
 - ASI could consider different options in the revision – for example, whether these smelters could be brought in at Level 1 but not eligible for leading practice (Level 2), or whether there could be stronger safeguards to ensure measurable progress over time
 - A request from some quarters for the criterion threshold to be relaxed for v3 to allow on-ramp of the currently excluded cohort
- The SC reached **agreement** on the following points/ actions:

- Continue to explore for v4, with WG and through consultation, the removal of a single threshold; potentially replaced by levels of performance – if Entities can credibly demonstrate action to reduce emissions.
- For (re)certifications against current PS Version 3, the 5.2 threshold should remain, with no relaxation of levels, regardless of any changes to v4.