

ASI Circularity Working Group – Call 4

12.30 – 14.00 BST 23 September 2025

Participants:

Fernando Antonanzas (Alcoa)
Mickaël Faliu (Ball Corporation)
Evelin Andrade dos Santos (CBA – Companhia Brasileira de Alumínio)
Piet Wit (CHIMBO Foundation)
Olivier Néel (Constellium)
Line Høydal (DNV)
Lucinda Kuys (DQS)
Karin Schiøtz (Hydro)
Carolina Bueno (Hydro Extrusion Brasil S/A)

Carl Firman (International Aluminium Institute)
John Revess (Independent)
Marcel Pfitzer (Mercedes-Benz)
Fatma Maatar (Nemak)
Stephane Poirier (Rio Tinto)
Samuel Stämpfli (SEREO / IGORA)
Thomas Payer (Speira)
Daniil Ukhanov (UC Rusal)

ASI Secretariat:

Gabriel Carmona Aparicio
Chelsea Reinhardt

Chris Bayliss
Laura Brunello

Agenda points:

1. Welcome and Introductions
2. Updates from Pre-Consultation Exercises
3. General Discussion: High-Impact Resources (SPL, Dross, BR)
4. Next Steps and Any Other Business (AOB)

For further context, refer to the attached presentation.

Discussion Notes:

1. Welcome and Introductions

The Secretariat welcomed participants and introduced the agenda for the meeting. It was noted that all discussions would be held in plenary rather than breakout sessions. A reminder was given that Chatham House Rule applies and that the meeting was being recorded for note-taking purposes only.

2. Updates from Pre-Consultation Exercises

The ASI Secretariat provided an update on the revised draft Circularity criteria and requirements, incorporating feedback from feasibility, auditability, and China interviews.

- A general concern was raised about the cumulative growth in requirements across the Performance Standard, and the impact this may have on both certified entities and auditors. There were calls for clearer prioritization and simplification, while maintaining alignment with materiality and intended outcomes.

- In terms of feasibility and audit burden:
 - There is a risk that the growing number of requirements could diminish the value proposition of ASI certification for companies already subject to other standards.
 - The audit process could become more time-consuming and expensive, particularly for auditors constrained by tight schedules and client budgets.
 - It was suggested that ASI should ensure new or expanded requirements directly target high-risk or high-impact areas.
 - ASI clarified that requirements are increasingly stratified by supply chain tier, with a concentration of new content in downstream processes with regards to circularity.
 - ASI also clarified that the number of circularity-related requirements has been reduced from 53 to 41, as a result of the CWG work and pre-consultation process. The aim of the revisions is to align new requirements more clearly with areas of material impact.
- In terms of LCA:
 - Mixed views were presented. Some participants saw LCA as a useful tool to inform product development and drive innovation. Others questioned whether requiring LCAs universally would meaningfully drive change, and whether the associated cost and complexity were justified.
 - Reservations were expressed about the inclusion of Social LCA as a requirement at this stage, due to the lack of methodological maturity and the potential auditability challenges. It was suggested that the focus should remain on human rights and labour rights due diligence, which are more established and operationally relevant.
- There was also a call to prioritise clarity and consolidation, with one participant asking if some new requirements could instead be absorbed into existing systems (e.g. management systems or due diligence sections).
 - ASI confirmed that additional guidance and cross-referencing will help clarify linkages and reduce duplication where feasible.
- General comments on leading practices:
 - Several participants highlighted the need for additional guidance to ensure consistency in how outcome-based leading practices are evaluated.
 - It was noted that regional context (e.g. regulation, infrastructure) will influence the feasibility of achieving certain leading practices.
 - Acknowledgement that no entity will be able to achieve all leading practices, and that differentiation is acceptable and expected.

3. General Discussion: High-Impact Resources

3.1 SPL

- Discussion focused on terminology and scope:
 - Request to evaluate the phrase “prohibition of landfilling of untreated SPL”.
 - Participants asked for clearer definitions (e.g. what counts as “untreated”).
 - Clarification was requested on whether legacy SPL is included in the requirement.

- ASI confirmed that the minimum requirement relates to new SPL only, with leading practice focused on increasing recovery.
- A suggestion was made to differentiate expectations for first-cut and second-cut SPL, as the treatment and recovery pathways may differ.

3.2 Dross

- No major concerns were raised regarding minimum requirements.
- It was noted that some requirements could be difficult to verify if framed as “100%” recovery. Suggested rephrasing: “close to 100%” or “aiming towards full recovery”.
- Clarification was requested on how internal vs. external recycling should be reflected in audit outcomes.
- Participants agreed that the focus should be on enabling efficient recovery regardless of whether it is carried out in-house or externally.

3.3 Bauxite Residue (Circularity)

- Some participants questioned whether targets related to reuse or reduction could be equitably applied, due to differences in local regulatory environments and proximity to reuse markets.
- ASI noted that press filtration is currently considered a leading practice, but emphasized that over time, expectations may evolve.
- It was recommended to distinguish more clearly between process optimization efforts and external factors such as ore quality (e.g. declining alumina content).
- There was also a call to avoid unintended consequences, such as penalizing entities unable to reduce volumes due to declining raw material quality.

3.4 High-Impact Byproducts (Other Than Aluminium)

- ASI proposed the inclusion of a new leading practice that would allow entities to demonstrate circularity improvements in other significant byproducts beyond aluminium, such as oxalate, bath residues, wood, salt slag, or spent tyres.
- Clarification was requested to distinguish this from existing criteria on aluminium scrap and recycled content.
- One suggestion was to simplify language by referring more generally to “waste minimization” instead of “byproducts”, as the term byproduct implies marketable value.
- ASI noted that guidance and terminology will be reviewed to ensure clarity and consistency with circular economy frameworks.

4. Next Steps and Any Other Business (AOB)

- The next CWG meeting will be held on 14 October 2025, to discuss updates following the Standards Committee session.
- A tentative meeting is scheduled for 18 November 2025, which may be used to discuss guidance for outcome-based indicators, pending discussion in October.