

ASI Standards Committee Virtual Meeting – Discussion Notes

2 October 2025 (Virtual)

Attendance ([Standards Committee](#)):

Bruce Han
Francesca Fairbairn
Nikolas Kelling
Olivier Neel
Marcel Pfitzer
Patrick Brading

Penny Laurance
Piet Wit
Soumah Ibrahima Dominique
Vishwas Kamble
Yuri Herder

Apologies:

Abiba Diallo
Abu Karimu
Jason Koevoet
Louis Biswane
Margriet Biswane
Marina Wangurra
Jose Rubio

Nicholas Barla
Guilbert Ebune
Michael Danielson
Vincent Ekka
Gesa Jauke
Hao Wu
Sankon Mohamed

ASI Secretariat Participants

Chelsea Reinhardt, *Standards Director*
Chris Bayliss, *Climate Change & Decarb'n Director*
Marika Van de Mij, *Director of Partnerships*
Gabriel Carmona Aparicio, *Circularity Research Manager*
Klaudia Michalska, *Supply Chain Analyst*

Thomas Robertson, *Assurance and Risks Manager*
Lia Vacheret, *Standards Manager*
Laura Brunello, *Standards Co-ordinator*

Agenda Overview:

1. Welcome and agenda
2. Responsible Sourcing
3. Circularity
4. Bauxite Residue and Tailings Management
5. CoC and Claims
6. Next steps

1. Welcome and agenda

- The Secretariat went through the agenda for today's call and recapped the previous call on 30 September – meeting notes had been circulated.

2. Responsible Sourcing

- The Secretariat gave an update on the main proposed changes in this section:

- All supply chain due diligence obligations were now consolidated under Responsible Sourcing section (rather than distributed across thematic sections)
- Alignment of requirements with OECD Due Diligence Guidance for Responsible Business Conduct
- Current responsible sourcing and human rights legal due diligence criteria were together
- A New Step 4 minimum requirement for communicating impacts had been added
- There were new requirements for due diligence on externally sourced waste
- There was a new criterion on supply chain information sharing (supported by COC working group and public webinar)
- A participant questioned whether OECD alignment strengthens or weakens the standards. ASI clarified that it strengthened it – it added a globally accepted framework versus currently only requiring a policy to be in place. A participant stated that using the OECD Guidelines laid a strong foundation.
- There was support for the current structure (separation of requirements between own operations and supply chain) and support for the new requirements on passing origin information to customers (this will be very helpful for downstream Entities, to support due diligence)
- A question was raised about stakeholder engagement not being explicitly mentioned as a part of the due diligence process. **Action:** [ASI to look at including stakeholder engagement in the guidance around due diligence and risk assessments](#)
- There was some discussion around the Criterion (3.2) due diligence on scrap procurement, it seemed to duplicate other requirements. **Action:** [Consolidate this with broader due diligence requirement and keep the references specifically to scrap in guidance](#) [post meeting note – Secretariat to also ensure scrap is referenced along with primary, in the requirement itself around scope of due diligence]
- A participant asked whether the new standards adequately replaced CoC Section 7 around eligibility for mixing requirements – ASI clarified that this content has largely been covered under due diligence in the PS, but this point would be addressed under the CoC agenda item.
- There was discussion about differentiation – was the goal to have a specific proportion of leading practice requirements? What was expected in terms of feedback from consultation on criteria at minimum vs leading practice – was critical feedback expected on raising the bar? ASI clarified that there was no specific goal for the number of leading practice requirements; and that the feasibility review had been used to gauge whether leading practice was at the right level. The approach taken would be to consult at a higher bar and adjust down if feedback suggested it was going to be too challenging to implement.

3. Circularity

- ASI gave some background – the intent of this section was to enable entities to demonstrate maturity levels in implementing circularity through differentiated requirements. By implementing minimum requirements, the entities would be measuring baselines with intention to improve, while at leading practice they will be able to show progress in a circularity strategy beyond organisational boundaries, with technological improvements, by expanding the scope of implementation, and through procurements process and stakeholder communications (with customers and end consumers).
- Discussion focused on Life Cycle Assessments (LCA). A participant noted that there were two main purposes of doing LCAs – assessing viability of/making decisions on project and responding to customer demands (carbon footprinting/recycled content). It wasn't clear whether LCAs drove change. A participant said that LCA requirements may create barriers for SMEs who only have access to general data from professional associations (e.g. IAI) and may only have limited resources to conduct full LCAs. In addition, for Social LCAs the methodology was not sufficiently developed and should remain voluntary. Instead, maintaining focus on human rights due diligence might be more effective to drive change.

- ASI agreed on concerns of the maturity of methodology and that responsible sourcing standards were better positioned to drive social change. **Action: Remove leading practice requirement on social LCAs.** On Environmental LCAs a two-tier approach was proposed for SMEs – at a minimum they must clarify the methodology used and inform stakeholders of any assumptions used; at leading practice verification should be done. This aligned with ISO 14044. The main purpose was to provide comprehensive environmental assessments (beyond carbon) and demonstrate the value of aluminium in terms of reducing environmental impacts through recycled content.
- One participant raised concerns about the frequency of LCAs – LCAs were sometimes based on data updated only every 5 years and there was confusion when methodologies changed outside the cycle of the data being updated. This needed to be taken into consideration when setting review frequency requirements. There were also issues around minimum requirements for legacy processes – guidance for auditors was needed. ASI noted these concerns, adding that many circular requirements applied to new processes/changes and were not necessarily requiring retrofitting with legacy operations.
- It was noted by one participant that the Circularity section seemed very detailed; ASI said that work would be done to bring consistency of language and try to ensure the right balance across the different sections. In the Circularity section 30% of the original proposals had been filtered out based on early consultations and many requirements were only applicable to specific sections of the value chain (mainly downstream). On guidance – ASI would be working on limiting guidance in the drafts to only *essential notes which are needed to contextualise the criteria/requirements for consultation*. The remainder of guidance would be logged separately to form a separate, more comprehensive and detailed guidance document.
- From the perspective of a SC member who was also engaged in the Circularity working group, it was noted that the development process was robust, the right issues were identified as focus points coming into consultation, but it is likely we will receive significant input from Members on some of the proposed changes. The Committee generally agreed that further substantive changes are not needed in the draft – focus now is on asking the right questions for consultation.

4. Bauxite Residue and Tailings Management

- ASI provided some background – this section was a modular section with new criteria outside the core Performance Standard only applicable as relevant. The aim was to align with GISTM (Global Industry Standard for Tailings Management) around tailings facilities/ impoundment risks, while maintaining and expanding on existing Bauxite Residue specific requirements.
- ASI had sought specific feedback from 9 ASI members; 6 had provided feedback. All had supported the introduction of residue requirements, 4 supported GISTM alignment. 3 options on requirements had been discussed – 1. Requiring only disclosure of how an entity was meeting GISTM standards; 2. GISTM certification pathway – requirements that would lead to GISTM certification; and 3. Requiring compliance with a specific set of requirements. Most had supported option 2 as per the current draft.
- There was support from the Committee for this proposed approach. One participant said that this reflected the right materiality approach and was consistent with GISTM, which needed to mature further, so we shouldn't create something new/different. The approach would allow entities to start the journey even if they weren't ready for full certification. There was a question on whether it was applicable to mines with tailings facilities, as well as refineries – ASI clarified that it was. ASI clarified that prioritisation was based on the 'consequence category' of an entity based on risk assessment (set by GISTM). ASI added that there had been discussion with IRMA on these issues and planned to also reach out to CMSI in future to discuss opportunities for alignment around auditing (e.g. potential overlap around areas such as community consultation)

5. Chain of Custody (CoC) and Claims

- The Secretariat gave an overview of the work on revision of CoC standards – there were 4 workstreams:
 - Evolution of existing CoC standard (mass balance and related claims)
 - Performance related claims
 - Supply chain due diligence/information/mapping
 - Allocated environmental claims, e.g. Product carbon footprint
- ASI explained that through the CoC and Claims working group process, Members from across the value chain had carried out useful discussions to highlight some of the differing demands and limitations around Chain of Custody models. This process led to three main agreements:
 - Although there is demand from downstream Members for segregated CoC models (*no mixing*), this is not possible at scale for (continuous) aluminium production processes
 - Some Members seek to retain the current group mass balance CoC – those which:
 - Are using the ASI logo on consumer packaging (cans, aerosols & flexibles; few but committed)
 - See intrinsic value (to ASI credibility) in some sort of ASI CoC offering
 - Some Members see additional value in a site level mass balance model, however the balance between added benefits and increased complexity/cost of implementation needs further exploration
- The CoC working group had also explored alternate models such as controlled blending, but determined these do not add additional value, while imposing additional costs. It was discussed that while some downstream Entities want to make claims such as ‘forced labour free’ these are not possible to substantiate through the ASI certification system – even with a more rigorous CoC model. But, some of the proposed requirements on passing origin information through the supply chain could partially help meet these needs.
- Next steps on the CoC draft: As part of the evolution of the current mass balance standard, ASI has significantly streamlined the existing requirements and introduced an optional site level mass balance approach. It was clarified that Entities could still choose group mass balance.
 - One challenge is that for site level mass balance to deliver the additional value that downstream Entities want, it likely will require the full supply chain to implement CoC at site level – which could be burdensome
 - This will be further discussed with the CoC/ Claims working group in October
- On Allocated Environmental claims – ASI has consulted significantly with Members on this, related to both Product Carbon Footprint and Product Category Rules. The general feedback is that this should not be a priority for ASI to take on in the short term, as there are many initiatives and groups already working on defining common approaches
- At the beginning of the next workshop (6 October) ASI will recap this discussion on CoC and give a chance for further input from the Working Group.

6. Next Steps

- Next workshop - Monday 6 October 1600 – 1800 (CEST).