

## *ASI Chain of Custody and Claims Working Group – Call 5 Meeting Notes*

*17 September 2025*

### **Agenda**

1. Welcome (10 min)
2. Streamlined CoC Standard
  - Walkthrough: Draft Streamlined CoC Standard (5 min)
  - Site-level mass balance scenarios – WG Discussion (60 min)
3. Eligible Scrap and Wastes (10 min)
4. Close and next steps (5 min)

### **Participants**

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## Discussion Notes:

### 1. Welcome and introduction

- ASI team updated the Working Group on the overall standards revision project and process, with drafts expected to be shared with the ASI Standards Committee for discussion in October.
- ASI reminded the Working Group of key points of agreement already reached by the WG, including the limitations of continuous processing (upstream) and the fact that segregation (non-mixing) CoC models were thus not yet feasible to implement at scale in the aluminium sector.
- ASI noted that following previous WG discussions, the ASI team has put together an overview of controlled blending vs mass balance CoC models, for review and input, which is available in the WG SharePoint folder: [Site level vs Controlled blending .docx](#)

### 2. Streamlined CoC Standard - DRAFT

- The main discussion focused on the updated Streamlined ASI Chain of Custody Standard draft, which seeks to
  - remove duplicative and unnecessary requirements from the current CoC standard to focus on the core elements: material accounting.
  - introduce a voluntary option for site-level mass balance (in addition to group-level mass balance), which enables both options to co-exist within a singular CoC Standard.

### 3. Site-level mass balance scenarios

#### 1. Site-level certification

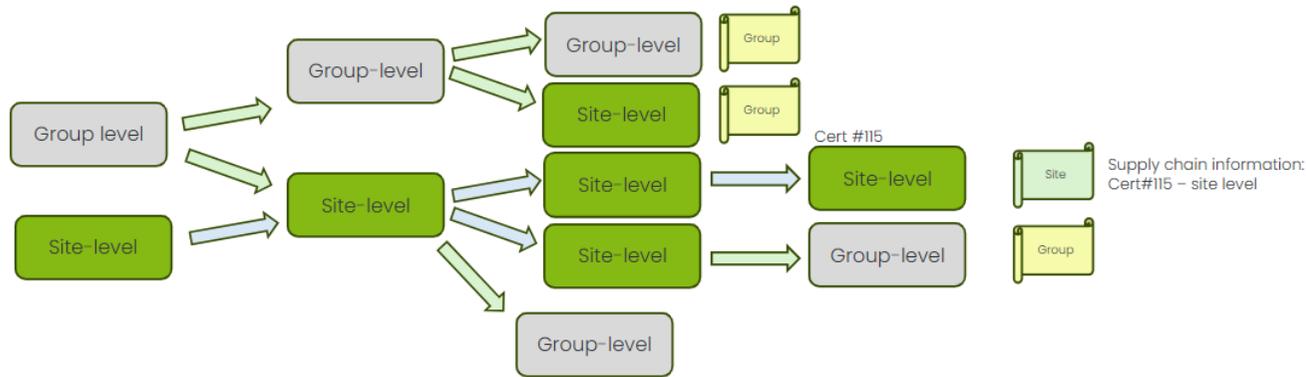
Each participating site becomes its own Certified CoC Entity, with material accounting rules applied at the site-level. Documentation distinguishes whether ASI Aluminium flows through site (S) or group (G).

#### 2. Group-level Certification with site-level Material Accounting System

Certification stays at the group-level but specific sites are nominated and run their own material accounting. New rules apply when sites are defined as sub-Entities, with documentation indicating S or G flows.

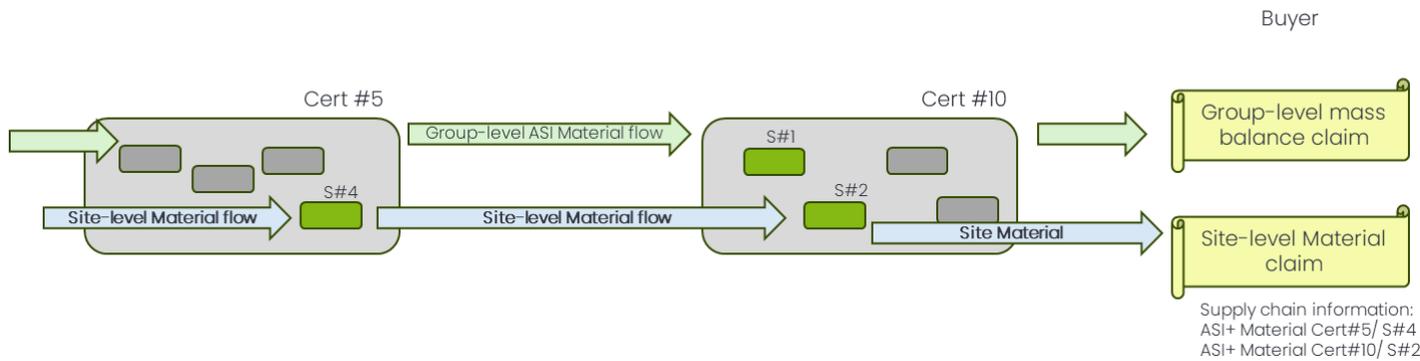
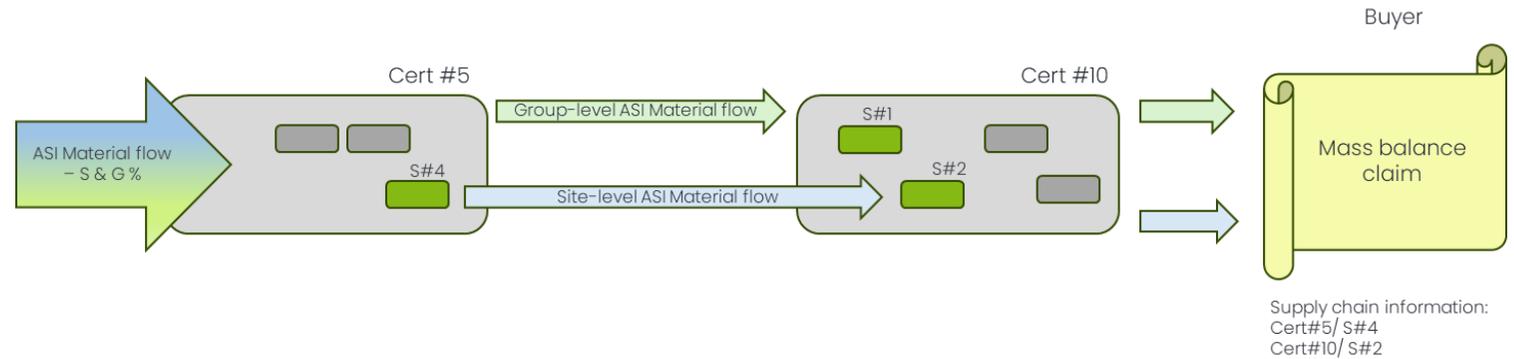
#### 3. Site-level chain of custody maintained through a new material quality, differentiated from (unmixed with) group-level

Certification is at the group-level, but site-level accounting creates a separate subset of ASI Aluminium. Groups can operate as sites, but sites cannot expand back to group-level, requiring distinct CoC documentation.



**Scenario 1 – Site-level Certification**

**Scenario 2 - Group-level Certification with site-level Material Accounting System**



**Scenario 3 – site-level chain of custody maintained through a new material quality, differentiated from (unmixed with) group-level**

Adding an optional tier of site-level mass balance raises a number of important issues and questions, which the WG was invited to weigh in on. The following points were discussed:

- For systems integrity, all sites under a group CoC certification need to have a unique site identification number. Sites can move in and out of group certificates, for example due to selling or buying new facilities.
- All sites under one CoC certificate would need to implement the CoC standard at the same scope (e.g. site-level or group-level mass balance).
- It was noted that site-level mass balance has limitations for companies where not all sites get equal access to ASI Material (or scrap). Under a site-level mass balance, these Entities could not ‘transfer’ ASI Material from one site to another, unless this also was accompanied by a physical transfer of material.
  - It was clarified that the group-level mass balance would remain an option, for reasons like this.
- Downstream Entities reiterated that their primary desire is to know where their aluminium comes from and to have a guarantee of no forced labour. ASI clarified that even with more stringent CoC models, we are not likely to be in a position to make claims of ‘forced labour free’.
- Based on data from CRU, many Entities can already map their high-level aluminium flows.
- From a due diligence perspective, Entities are already required to map their supply chains and in theory should know the origin of material – however in practice ASI has heard from Members this is not always the case
  - ASI noted that as per earlier WG discussions, we are proposing to include a specific requirement in the Performance Standard about sharing origin information with customers, upon request. However, this is likely to receive some pushback during consultation.
  
- WG members were asked to give further information about what they saw as the perceived additional value of site-level mass balance (vs group-level)

Mentimeter

What specific information (over and above Tier 1 visibility) do you want to access under site-level mass balance?

Forced labour	Origins	forced labor, human rights abuses in general, responsible mining	Provenance - back to mine - is critical. Also, there must be a logical, physical unbroken chain of coc back to mine (even if there is no guarantee, there is at least the chance that it can be).
ESG rating	If the supplier is certified by ASI	physical traceability	Origins

Mentimeter

What specific information (over and above Tier 1 visibility) do you want to access under site-level mass balance?

Origin of product I am buying and associated metrics of that facility to help with Digital Product Passport

Kabouter rights, endangered biodiversiteit, culturele awareness

Assurance that there is no forced Labour & other HR violations in the Value chain. If that is not possible, Info of mining, refining, smelting sites(location) in the product received

Forced labour, traceability, source ASI certification

Sorry labour instead of kabouters



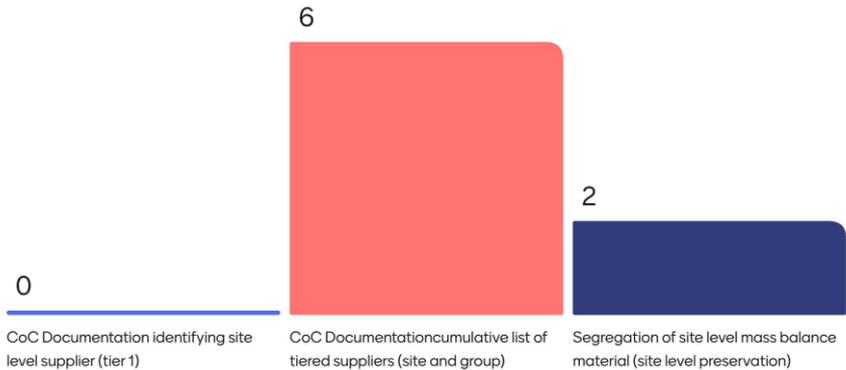
Mentimeter

CoC unit of certification preference:



Mentimeter

How should site-level material be identified to ensure integrity and practicality?



**ACTION**

WG to provide feedback on the Draft Streamlined CoC Standard

[DRAFT\\_Streamlined\\_CoC\\_Standard\\_V3.docx](#)