

## ASI Circularity Working Group – Call 5

12.30 – 14.00 BST 14 October 2025

### Participants:

Fernando Antonanzas (Alcoa)  
Mickaël Faliu (Ball Corporation)  
Piet Wit (CHIMBO Foundation)  
Olivier Néel (Constellium)  
Line Høydal (DNV)  
Lucinda Kuys (DQS)  
Karin Schiøtz (Hydro)

John Reves (Independent)  
Marcel Pfitzer (Mercedes-Benz)  
Fatma Maatar (Nemak)  
Alison Lee (Novelis)  
Adrian Mullins (Rio Tinto)  
Thomas Payer (Speira)  
Daniil Ukhanov (UC Rusal)

### ASI Secretariat:

Gabriel Carmona Aparicio  
Chelsea Reinhardt

### Agenda points:

1. Welcome & Project Update (10 mins)
2. Discussion on recent comments on Circularity draft (70 min)
3. Next steps (10 min)

### Discussion Notes:

#### 1 Welcome & Project Update

- ASI opened the meeting with an update on the revision process, including highlights from the Standards Committee's recent review of the Circularity draft.
- The Standards Committee recommended to remove the social LCA leading practice requirement, as the approach was considered insufficiently mature enough to include in the standard. Instead, the focus should continue to be on human rights due diligence and other key areas.
- The Standards Committee also discussed the LCA requirements, raising questions about the effort of implementation and whether these requirements would drive impact.
- ASI reiterated that a key aim of the Circularity section is to present a maturity model across process, project, and product levels, with minimum requirements reflecting foundational performance, and leading practices designed to encourage wider value chain engagement and outcome-focused actions.

#### 2 Discussion on recent comments on latest Circularity Draft

The group reviewed and discussed selected comments and proposals from the most recent draft. The following themes emerged:

## 2.1 Circularity Strategy

- ASI clarified terminology shifts in the draft (e.g. “by-product/waste” replaced with “recoverable/non-recoverable resources”) to align with ISO 59000.
- On 6.1.1.5 – Guidance should clarify that the distinction between this reference to due diligence here and the OECD-aligned due diligence as required under Responsible Sourcing section.

## 2.2 Life Cycle Assessment (LCAs)

- One participant explained that there are three main purposes for LCAs: 1) To inform product design (mostly downstream); 2) to communicate information to customers; and 3) to promote products based on environmental attributes. However, for this third purpose, companies are already commercially incentivised to do this anyway for commercial reasons so it is less important to include in the standard.
- It was agreed that while LCAs can help identify sustainability hotspots, in the aluminium sector these are already generally well known (based on data from IAI and others), and requiring LCA may add burden without driving new insights.
- It was noted that smaller entities may lack the capacity to conduct LCA, and may rely on sectoral datasets (e.g. from IAI or European Aluminium).
- For some companies, e.g. those producing automotive components, it’s important to consider the full lifecycle perspective, including recovery. But, conducting full ISO-aligned LCAs is not feasible. ASI clarified that the current approach offers flexibility; but they need to be at least cradle-to-gate.
- It was discussed whether cradle to grave LCAs should be introduced for some parts of the value chain (e.g. downstream) at least at leading practice. ASI explained that this had been part of the earlier draft and had been removed but can be reconsidered.
- One participant noted that if there is no commercial cost/ benefit incentive to LCAs, then they may drop off. ASI should consider whether LCA is a benefit to the aluminium sector in general.
- Based on these points raised, it was debated amongst the working group whether requirement 6.2.1.1 (carrying out LCAs for major aluminium product lines) is required in the draft, or whether this could be seen as foundational for the remaining LCA requirements.
- A couple of participants suggested that the current ASI approach is too open and recommended to clarify the methodological approach, e.g. cut-off vs avoided burden.
- It was recommended that ASI consider including a leading practice requirement around contributing to global surveys on LCA data, since the data sets can only get more accurate if we have as many companies as possible contributing. [Action: ASI to draft this as a leading practice.](#)
- One participant noted that the requirement to provide LCAs for customers on request is eroding their ability to create low carbon products; furthermore, if restricted to only cradle to gate LCAs do not demonstrate the benefits of aluminium compared to other materials. More work is needed to better reflect aluminium’s end-of-life recovery advantages.
- It was noted that EPDs are becoming more commonly used. ASI does not need to define the system boundaries as EPDs will do this through Product Category Rules for aluminium. EPDs can integrate use phase and end of life phase.
  - At the same time, EPDs do not require cradle to grave and ASI should look at differentiating by value chain position – don’t require upstream to do cradle to grave.
- There was general agreement that LCAs should not be included merely as a box-ticking exercise. It was recommended to avoid defining specific methodologies (e.g. cut-off vs. avoided burden), but promote transparency around boundaries, assumptions, and verification status.
- On verification of LCAs – it was suggested to align with ISO 14040/ 14041 rather than 14071 which has additional verification requirements and has very limited uptake. It was explained that under

ISO 14040/ 41 for verified LCAs if the company is making statements around the LCA, the information already needs to be available

- The Working Group discussed the proposal to remove 6.2.2.1 around communicating LCAs to customers when requested. It was agreed that this could be seen as similar to customer data requests – companies will meet these requests from commercial incentive already, and it may not drive impacts to include in the ASI standard.
  - [Action: ASI to remove this requirement from the current draft and revise 6.2.2.2 to cover all forms of LCA communication \(not limited to public disclosure\).](#)

## 2.3 Process Design

- A question was raised about applicability of the process design requirements to upstream actors (e.g. mining, refining).
  - ASI clarified that the intent is to encourage incorporating circularity into process redesign, when such redesigns occur. If no change occurs, no further action is expected.
  - Guidance will provide examples to support upstream actors.

## 2.4 End-of-Life recovery of aluminium containing products

- On monitoring collection and recycling rates (6.5.1.2) – it was clarified that this does not apply only to governments. ASI clarified that this is already in V3, however it may not be consistently implemented or understood, and could potentially be repositioned as a leading practice.
- On 6.5.1.3, it was discussed that monitoring and measuring aluminium recovery outcomes is typically not conducted directly by companies; and, if companies all carry this out there could be duplication of effort.
  - [Action: ASI to update 6.5.1.3 to focus on quantifying the contribution to recycling and collection programmes \(second part of the requirement\) and consider merging with 6.5.1.2](#)

## 2.5 SPL

- It was clarified that the standard only prevents landfilling of untreated SPL, but allows treated SPL to be landfilled under appropriate conditions.
- It was discussed that the reference to recovery of chemicals in 6.6.2.1 is less prevalent than carbon and refractory materials and could potentially be adjusted to a leading practice or moved elsewhere.
  - [Action: ASI to consider whether to adjust the framing to better reflect the relevance and differences in recovery pathways for each material type.](#)

## 3 AOB & Next Steps

- Call 6 (18-Nov-25 12:30 – 14:00): Final comments on consultation draft and questions for consultation
- Participants are encouraged to review the Circularity draft by 21st October and to provide comments directly in SharePoint.
- The draft will next be reviewed by the Standards Committee, with feedback from that process informing any final adjustments. Any questions or clarifications will be shared ahead of the next session to help guide focused discussion.