

## ASI Circularity Working Group – Call 6

1230 – 14.00 GMT 18 November 2025

### Participants:

Fernando Antononzas (Alcoa)  
Mickaël Faliu (Ball Corporation)  
Olivier Néel (Constellium)  
Line Høydal (DNV)  
Karin Schiotz (Hydro)  
John Reves (Independent)  
Donna Kopecky (Kaiser Aluminum Corporation)  
Marcel Pfitzer (Mercedes-Benz)

Fatma Maatar (Nemak)  
Alison Lee (Novelis)  
David Waggoner (ReMA)  
Adrian Mullins (Rio Tinto)  
Samuel Stämpfli (SERO / IGORA)  
Thomas Payer (Speira)  
Fion Cheung (SNTO)  
Daniil Ukhanov (UC Rusal)

### ASI Secretariat:

Gabriel Carmona Aparicio  
Chelsea Reinhardt  
Chris Bayliss

### 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 & Framing

- The ASI team provided a summary of the latest revisions and changes on the draft based on the latest Working group meeting and reviews by the Standards Committee.
- These include:
  - For minimum requirements: Promote transparency across all forms of LCA-related communication, not limited to public ones; refined SPL disposal requirements to allow risk-based exceptions, recognising current regional constraints on recoverability.
  - At leading practice: Public disclosure of circularity performance outcomes (previously minimum requirement- now adjusted); Quantification of contributions to aluminium collection and recycling programmes; recovery of chemical SPL
  - In addition, social LCA and communicating LCA information to customers have been removed from the draft, with further consultation questions to focus more on the value of LCA requirements and level of verification required.

## 2 Discussion on the draft and open comments

### Section 6.1: Circularity Strategy and Performance

- On 6.1.1.5 – the Working Group agreed with the proposed wording changes to replace ‘oversee’ with ‘Evaluate and periodically verify’

### Section 6.2: Life Cycle Assessment (LCA)

- The Working Group did not express a strong position about adjusting 6.2.2.3 to minimum requirement vs leading practice. ASI Secretariat proposes to **maintain** the current formulation pending any further comments from the Standards Committee.

### Section 6.3: Product and Process Design

- The Working Group discussed and **agreed** the proposed addition of guidance on 6.3.1.1. to help clarify the definition of where ‘aluminium is a significant component’ and to link this to guidance under 6.2.1.1 (LCA – major product lines). Guidance should consider examples for mixed-material products and entities with complex portfolios.

### Section 6.4: Process Scrap:

- The Working Group raised a question of whether the current requirement **6.4.1.4** (*Leading practice: Develop and implement timebound targets to reduce aluminium process scrap generation, showing continuous improvement.*) should either remain as is, be removed from the draft, or be replaced with a different leading practice. The following points were raised:
    - Reducing process scrap / improving yield is already a key target for companies based on financial, not sustainability principles. Thus it is not clear whether this requirement will drive positive impact.
    - Process scrap depends a lot on the portfolio and product lines.
    - Consideration from a lifecycle perspective is important – in some cases a company might be ok with increased process scrap if the product itself has a much longer lifetime of use or improved environmental footprint.
    - Current wording is not clear and auditable (‘timebound’ and ‘continuous improvement’ require more specific and auditable explanations). ASI team suggested that if retained it can be aligned with language in other sections around average improvements over preceding 3-year period.
    - Although yield would be another way of approaching the concept (maximise yield vs minimise process scrap), this was initially included in the draft criteria but was removed due to concerns from the working group around confidentiality.
    - Focus at leading practice should be on better sorting and recovery/ recycling of scrap, rather than reducing process scrap
  - Next steps: ASI to remove current leading practice as worded now and circulate for final comments an alternative which focuses on demonstrated improvements against targets related to on recovery, segregation, and internal reuse systems.
  - On requirement 6.4.2.1 *Measure the recycled content of the major aluminium-containing product lines*, the Working Group discussed the current draft and raised the following points:
    - **Agreed** to change wording from ‘measure’ to ‘assess’ to more accurately reflect the intent
    - Discussed whether the concept of recycled content calculations can be linked to the mass balance chain of custody model. ASI clarified that currently the certification scope for Coc is very broad (flexible, entity level); this is something that could change in the future if other models such as site level mass balance are considered.
-

- Importance of making sure that LCA boundaries are consistent so that everything 'adds up' and there is no double counting. This is a big topic of discussion in other sectors e.g. plastics.
  - If this requirement is made leading practice, then global consistency becomes more important (less key at minimum requirement).
  - Every requirement in that needs to be audited, so having clear and auditable requirements is really important.
  - Although there is some desire to see more accurate measurement of recycled content at batch level, this is most feasible for upstream primary producers. Downstream entities may be less focused on batch level recycled content measurements and looking at this across thousands of batches on a periodic average basis
- No further changes were proposed in the current section 6.4.2. The group supported retaining the current approach, with further feedback to be gathered during public consultation.

### **3 Next steps**

- Meeting notes will be shared with the Working Group
- This completes Phase 1 of the Working Group process; participants were thanked for all of their time and input into the draft over the last 8 months. The group will reconvene for a shorter 'Phase 2' in 2026 to discuss consultation feedback received and adjustments in the draft
- Draft consultation questions and final draft text will be reviewed by the Standards Committee in December.
- Participants were asked to please complete a short feedback survey on the overall Working Group Process, to help ASI improve in future.