ASI Chain of Custody and Claims Working Group – Call 6 Meeting Notes

20 October 2025

Agenda

- Welcome (5 min)
- Adding site-level mass balance – complexities and considerations (40 min)
- Additional controls: Scoping of group CoC Certificates, controls on Non-ASI Material (20 min)
- Eligible Scrap (20 min)
- Close and next steps (5 min)

Participants

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Discussion Notes:

1. **Welcome and introduction**
   - ASI introduced the agenda for the call, which will focus on:
     - Adding site-level mass balance – complexities and considerations
     - Additional controls: Scoping of group CoC Certificates, controls on Non-ASI Material
     - Eligible Scrap
   - ASI provided a recap on key points established through the CoC and Claims WG process so far:
     1. Although there is demand from downstream Members for segregated CoC models (*no mixing*), this is not possible at scale for (continuous) aluminium production processes.
     2. Some Members seek to retain the current option for 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.
     3. Some Members perceive additional value in differentiating a site-level mass balance model, however the balance between added benefits and increased complexity/cost of implementation needs further exploration.
   - ASI clarified that currently some Entities are already implementing the mass balance CoC Standard at site-level, while others are implementing it across complex group certification scopes. However, currently there are no different requirements or recognitions for this site-level implementation.

2. **Considerations of Site vs group-level mass balance model**
   - ASI explained some of the key differences between site and group-level mass balance (*see slide 6).* One key difference is that under site-level, every site needs to source some ASI Material in the material accounting period in order to sell material as ASI certified. However, it is still a mass balance system so there is still mixing of certified and non-certified material, and no segregation nor guarantee of physical connectivity.
   - ASI explained that as we start to build technical offerings around site-level mass balance, it is clear that different stakeholders have different opinions on what is possible or not possible.
   - The Working Group discussed the potential benefits of site vs group mass balance and raised the following points:
     - There was some support for the proposed definition of site, which includes collocated activities and processes.
     - Several downstream participants explained that in their view, site-level offers the benefit of a strengthened connection to flows of ASI certified material, since every site must source at least some ASI Material during the material accounting period. The perception remains even though, in practice, the system is still mass balance and there is still mixing of certified and non-certified material, and no segregation – a fact participants also acknowledged.
     - Additionally, downstream participants expressed a concern with the current highly flexible group model and the fact it allows sites that never source ASI Material (and may be in completely different regions from sites with physical ASI Material) to sell products onward as ASI certified.

- This opened a discussion around how much ASI Material input is considered 'enough'? More than zero – so each site would need to source some ASI Material in order to sell ASI outputs.
- At the same time, upstream participants expressed that the flexibility to fulfil customer orders for ASI Material from specific sites (without having the environmental impacts of shipping physical products) is a commercial, and environmental, benefit of the current flexible group model.
- It was discussed that for site-level mass balance to add any additional value, it would need to be implemented across the full supply chain. This could be done over an evolution e.g. five-year period to transfer to a site-level model.

- One participant raised a concern that there is not enough ASI Material available downstream and a shift towards site-level mass balance might further constrain this. It was then discussed whether the limited availability of ASI Material now is because downstream doesn't see the additional value in sourcing ASI Material under the current, highly flexible group CoC model.
- It was clarified by ASI that the shift towards site-level mass balance would not necessarily increase CoC certification or audit costs – as potentially one certification scope could be maintained, with separate site-level accounting systems under it.

ASI has incorporated the above feedback into options for mass balance accounting in the Draft CoC Standard ahead of public consultation.

3. Role of Chain of Custody in promoting due diligence

- It was discussed that if downstream are really looking for supply chain transparency, neither site nor group-level mass balance will deliver this. ASI clarified that through previous Working Group discussions, it has been established that segregation or traceability models for CoC are not under discussion for this revision, because of the nature of continuous processing upstream and the fact these models cannot (yet) be implemented at scale in the sector.
- If many downstream companies see value in ASI Certification mainly coming from the due diligence requirements, this is a core component of the ASI Performance Standard (not CoC). However, the CoC Standard and the sourcing of ASI Material plays an important role in promoting uptake of the Performance Standard across the supply chain (not only direct suppliers).

4. ASI Material – eligibility of scrap

- ASI reviewed the current and proposed requirements around ASI Material, which includes both pre- and post-consumer scrap. Post-consumer scrap has been increasing recently in the mix of ASI Material; however, this comes with risks around sourcing.
- It was discussed whether post-consumer scrap should be more limited in future CoC revisions – the input from several Working Group members was strongly in favour of retaining post-consumer scrap as part of eligible ASI Material, as this supports overall sectoral objectives around circularity.