

ASI Standards Revision 2025-2027 - First Public Consultation Survey

Introduction and personal details

Welcome to the first of two public consultations on the draft ASI Performance Standard V4 (*PS V4*) and Chain of Custody Standard V3 (*CoC V3*). This survey is designed to gather stakeholder feedback on the drafts and should be used together with:

- **Public consultation drafts** (PDFs): Includes the PS V4 (main document and 3 modular sections) as well as the CoC V3 consultation draft
- **PS V4 Mapping Tool** (Excel): Maps PS V4 requirements to PS V3 and allows users to filter PS V4 by applicability (based on supply chain activity, e.g. mining). This allows users to view only those requirements that apply for a given Entity
- **PS V4 Summary of Changes** (PPT): Summarizes key structural changes and content revisions for each section of the consultation draft, compared to the current PS V3

All Consultation Drafts and supporting resources can be found on the [Consultation Webpage](#). You can also download a PDF of all the survey questions before you get started. [LINK](#)

Almost all questions are optional (except those marked with *), and the survey can be completed anonymously. Note that this survey includes questions where ASI is particularly looking for feedback, but you can also provide general comments. If you have comments that relate to specific criteria or requirements, we suggest using the [Feedback Form \(Excel\)](#) instead, which can be emailed back to consultation@aluminium-stewardship.org. If you are unable to use Excel, you can send a direct email to this address.

You can stop the survey and return later to finish or change your answers, even after you submit it.

The public consultation closes on **20 April 2026**. Additional background on the revision process is available on the [ASI Standards Revision Hub](#).

Use of information: ASI will use the information you provide in this survey only if needed to get in touch with you regarding the ASI Standards Revision. We will treat your information with respect. For more information about our privacy practices please visit our [website](#). *ASI will not publish the names of individuals or specific organisations that participated in the consultation. Comments will be aggregated in any published summary of feedback; comments will not be attributed to individuals or specific organisations.*

By responding to this survey, you acknowledge that your information will be transferred to Survey Monkey, [learn more](#) about Survey Monkey's privacy practices.

Personal details

1. Name and surname

2. E-mail address

* 3. Is your response on behalf of an organisation or individual?

- On behalf of an organisation
- Individual response

* 4. Which of the following best describes your organisation?

- Industry - upstream (mining, refining, smelting)
- Industry - midstream (recycling, remelting, semi-fabrication)
- Industry - downstream (fabrication of goods containing aluminium)
- Other (please specify, incl. academia, standards organisations, etc)
- Civil society/NGO
- Member of affected communities, including Indigenous Peoples
- Association
- Auditor/Auditing firm

5. Organisation name

6. Location

7. Gender

- Woman
- Man
- Non-binary
- Prefer not to say

* 8. Which of the ASI Standards would you like to provide feedback on? (please select all that apply).

The next sections include around 50 questions (all optional). You can select the specific standards / sections you are interested in and only the relevant questions will display. You can use the 'Previous' button at any time to return to this page and change your selection.

- Chain of Custody Standard
- Performance Standard

* 9. Which sections of the Performance Standard would you like to give feedback on?

- Overall feedback on the Performance Standard
- Cross-cutting sections (1. Governance, 2. Management Systems, 3. Responsible Sourcing and Due Diligence)
- Section 4: Climate
- Section 5: Nature
- Section 6: Circularity
- Section 7: Community Rights and Participation
- Section 8: Workers' Rights and Protections
- Modular Section 9: Mine Closure
- Modular Section 10: Bauxite Residue and Tailings Management
- Modular Section 11: Displacement and Resettlement

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Chain of Custody Standard V3

Three possible options have been developed for evolution of the current model, with input from the CoC and Claims Working Group. All options include significant streamlining compared to the current CoC, to reduce duplication with the Performance Standard and focus on essential material accounting requirements.

These options are presented for feedback during this consultation, with the aim that one will be prioritised for further development, based on stakeholder input (and under oversight of the Standards Committee).

OPTION 1: Maintain current Entity-level mass balance

OPTION 2: Maintain Entity-level mass balance as above, BUT with minimum sourcing requirements for sites within the certification scope

OPTION 3: Gradual (e.g. 5-year) transition to site level mass balance

10. Which of the proposed options would you prefer?

- Option 1
- Option 2
- Option 3

Why?

11. Would any additional benefits be delivered to you or your customers by:

	Yes	No
Option 2? (Entity-level mass balance with minimum sourcing)	<input type="radio"/>	<input type="radio"/>
Option 3? (Transition to site-level mass balance)	<input type="radio"/>	<input type="radio"/>

12. Compared to Option 1, would there be more effort required:

	Minor or no change	Moderate additional effort	Significant additional effort
For Option 2? (Entity level mass balance with minimum sourcing)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
For Option 3? (Transition to site-level mass balance)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

13. What would you need to justify this effort of implementation?

14. What would be an appropriate Option 2 minimum sourcing requirement (as a percentage of ASI material shipped from the site in a given material accounting period)?

- 10% 50% 100%
 Other (please specify)

15. Should ASI require non-CoC Certified ASI members that request CoC certification of their suppliers to make responsible sourcing commitments* related to their aluminium supply?

This would not require CoC certification of the customer, nor conformance with a requirement, but could further increase demand for ASI material (or other responsibly sourced aluminium). **For example, this could be as part of their Membership expectations. Responsible sourcing is not limited to ASI material, it could include, for example, recycled aluminium or material from other sustainability certifications*

- Yes No Not Sure

Please explain

16. CoC V3 Criterion 5.1.2 requires the use of conversion factors for ASI Material transformation processes, but does not specify a method.

In your view, what is the most appropriate way to define conversion factors so that they are applied without systematically over- or under-estimating ASI material outputs:

- Default factors (sector-wide conversion factors that apply regardless of the quality of feedstock or yield of a process)
- Prescribed ranges (Entity choice within a default range)
- Annual average Entity-specific factors, based on the yield of BOTH ASI and non-ASI material (*we believe that mass balance and risk of cherry picking prevents an ASI material specific factor - let us know your thoughts in the "other" field below*)
- Periodic (e.g. quarterly) Entity average factors, based on the above approach
- Entity average factors, based on some other metric that you might suggest

Other (please specify)

17. Use this space for any other general comments on the Chain of Custody Standard. If you have comments relating to specific criteria or requirements, please use the [Feedback Form \(Excel\)](#) instead.

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Overall feedback on the Performance Standard V4

Differentiation - Minimum vs Leading Practice Requirements

ASI Performance Standard V4 includes a new distinction between minimum requirements and 'leading practice'. Entities would need to comply with all minimum requirements, when applicable, for certification.

Leading practice requirements would be *optional*. Entities who wish to be recognized as 'leading practice' in a specific area (e.g. Climate) would need to meet a threshold (e.g. 70%) of applicable leading practices in that section. For more information on how this might work in practice, see the Introduction section of the PS V4 Consultation Draft.

18. If you are a certified Entity (or plan to become certified), how interested would you be in achieving 'Leading Practice' for at least some thematic areas?

- Not so interested Somewhat interested Very interested

Please explain your answer

19. If you are from an affected community, would you see any value if a certified Entity was achieving leading practice, for at least some thematic areas?

- Not valuable Somewhat valuable Very valuable

Please explain your answer (optional)

20. **Threshold to make a 'Leading Practice' claim:** the current proposal is that Entities would need to meet 70% of (applicable) leading practice requirements under a section to be recognized as leading practice. This would be verified during assessments.

Do you think this threshold should be adjusted?

- Yes, adjust down to 50% No, leave at 70% Yes, adjust up to 80%

Other (please specify)

21. **Differentiation at overall certification level:** ASI is also consulting on whether there is value in offering differentiation at the *Entity certification level*. For example, if an Entity meets leading practice in all thematic areas (Sections 4-8), they could make an additional claim such as 'ASI +' or 'Certified to the ASI Performance Standard - Leading Level.' This would also be reflected on the public certification.

Do you see value in offering differentiation at the *Entity certification level* (in addition to thematic areas)?

- Not valuable at all Somewhat valuable Very valuable

Please explain your answer

Downstream Certification Options

To maintain certification of key downstream Entities in the aluminium value chain, and to focus efforts where they drive the greatest system-level change, ASI is considering a **streamlined certification option** for downstream Entities. Under this approach, downstream (fabricating) Entities could be certified by meeting minimum requirements in three key material sections: Responsible Sourcing & Due Diligence, Climate, and Circularity. Downstream Entities would have the option to certify against other sections of the Performance Standard, but this would be voluntary.

This approach aims to improve the value and relevance of ASI certification for downstream Entities, who often handle other materials as well as aluminium. It would help focus their efforts on areas such as responsible sourcing and circularity, where ASI wants to encourage the downstream value chain to play a leadership role in driving sectoral change.

22. Do you support this streamlined certification options for downstream Entities?

- Do not support Somewhat support Strongly support

Please explain

Applicability for Small and Medium Enterprises (SMEs)

In the consultation draft, applicability for requirement 4.3.5.2 on emissions removals specifically excludes downstream SMEs (post-semi fabrication). The current proposal uses ASI Membership categories (small and micro) to exempt SMEs, but other options could be explored (e.g. Entity or parent company has <250 employees and < €50 million turnover.)

Currently, this is the only place in the consultation draft where requirements specifically do not apply for SMEs. In other cases, applicability is determined by other factors such as supply chain activity (as it aligns with material impacts).

23. In your view, are there other criteria or requirements that should not be applicable specifically for SMEs? What would be an appropriate way to identify eligible SMEs? Please explain.

24. **Requirements that could be removed or moved to guidance:** ASI is interested in your views on whether some requirements in PS V4 do not add value (for example, requiring excess documentation or focusing on issues that are not material).

In your view, are there specific criteria/ requirements that *do not add value or drive impact*, and which should be removed (or moved to guidance)?

Note - these can also be identified in feedback under each thematic section.

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Sections 1: Governance; 2: Management Systems; and 3: Responsible Sourcing and Due Diligence

25. **Section 2, Criterion 2.4.1: Human Rights Due Diligence (own operations).** Do you think there should be more or less alignment of this criterion (2.4.1) with specific steps of the United Nations Guiding Principles on Business and Human Rights (UNGPs)?

- Less Staying similar More

26. **Section 3: Responsible Sourcing and Due Diligence.** Do you support this section's alignment with the OECD Due Diligence Guidance for Responsible Business Conduct?

- Yes No Unsure

27. Use this space for any general comments on the cross-cutting sections (1. Governance, 2. Management Systems and 3. Responsible Sourcing and Due Diligence). If you have comments relating to specific criteria or requirements, please use the [Feedback Form \(Excel\)](#) instead.

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Section 4: Climate

Smelter Emissions thresholds (Sub-section 4.2)

A criterion related to aluminium smelter emissions intensity formed part of PS V2 and PS V3, overlain in PS V3 by forward-looking GHG Reduction Plan requirements for all parts of the value chain. As part of the first public consultation on PS V4, ASI is seeking input on a [preferred approach to smelter emissions thresholds](#). Two proposed options are set out below (with a common approach to system boundary and emissions accounting applied to both):

Option A: maintain a minimum requirement smelter emissions threshold (as per PS V3), while recognising the leading performance of lower emitting Entities (this is the direction broadly supported by the ASI Climate Working Group):

- *Pro:* Continues to exclude coal-intensive aluminium production from ASI Certification and thus helps protect the credibility of ASI
- *Con:* Creates a GHG emissions barrier to entry (based on legacy power source) to over 50% of global smelter capacity for implementation of wider ASI Performance Standard criteria. Under this option, high-emitting smelters are excluded from ASI certification even if they commit to emissions reduction and demonstrate high performance in other areas such as community rights. Conflicts with the sectoral decarbonisation approach of the ASI Method, which relies on convergence of the whole sector (not only lower emitting smelters) to a 2050 sectoral target.

Option B: smelter emissions thresholds form part of a leading practice approach only.

- *Pro:* Does not exclude high-emitting smelters from accessing ASI certification and the wider performance improvement benefits (including decarbonisation); widens the uptake of the ASI Method, increasing transparency in and recognition of emissions reduction performance.
- *Con:* Lack of minimum threshold may be perceived as an ASI credibility gap.

28. Do you prefer Option A (Minimum & Leading Performance thresholds), or Option B (Leading Performance threshold only)?

Please refer to Section 4.2.1 of the [PS V4 Consultation Draft](#) to see the corresponding requirement text for both options

- Option A Option B

29. In the consultation draft, the *minimum* requirement for smelter threshold is proposed at: **11 t CO₂e/t Al** measured at output of the reduction process (emissions intensity). *Leading practice* is proposed at: **5 t CO₂e/t Al** measured at output of the reduction process (see Criterion 4.2.1 for more detail)

Are the proposed thresholds set at appropriate levels? If not, why not?

Yes No

Please provide further feedback

Net Zero Alignment (Sub-section 4.3)

30. Do you support broadening evidence of 1.5 degree aligned targets beyond the ASI Method for non-smelting Entities (e.g. SBTi validated targets)?

Do not support Somewhat support Strongly support

31. Do you support the differentiated minimum performance levels articulated by baseline emissions intensity (upstream) and by place on the value chain (Up-, mid-, and downstream)?

Do not support Somewhat support Strongly support

32. Do you support the equivalence of minimum carbon removals requirements with the option recognition programme of the DRAFT v2 SBTi Corporate Net Zero Standard?

Do not support Somewhat support Strongly support

33. Use this space for any other comments on Section 4: Climate. If you have comments relating to specific criteria or requirements, please use the [Feedback Form \(Excel\)](#) instead.

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Section 5: Nature

34. **Criterion 5.1.5: Entities *without* material biodiversity impacts.** Do you support requiring minimum biodiversity actions for Entities that have *not* identified material biodiversity impacts (criterion 5.1.5)

Do not support Somewhat support Strongly support

Criterion 5.1.2: No net loss (NNL) targets

Under the current PS V3, Criterion 8.2 already requires Entities to have a biodiversity action plan ‘with an ambition to achieve no net loss’. The revised ASI PS V4 requires setting no net loss (NNL) or net gain targets and measuring progress against these (applies for mining, refining and other Entities with material risks related to biodiversity).

As part of this consultation, ASI is seeking feedback on the feasibility of NNL/ net gain targets and on credible methodologies or metrics that could be used to set and assess them (including auditability)

35. In your experience, are no net loss (NNL) or net gain targets currently being used (or planned) to address biodiversity impacts in the aluminium value chain?

- Yes, already used in my organisation/operations
- Not yet, but planned or under development
- Yes, used in projects/organisations I work with or assess
- No/not sure

If yes, or planned: what methodologies and/or metrics are used to set NNL/ net gain targets and measure progress?

36. **Use of credible offsets:** What additional requirements or guidance should ASI provide around the credible use of biodiversity offsets, as part of applying the mitigation hierarchy towards no net loss? (for example, minimum monitoring periods)

37. Use this space for any general comments on Section 5: Nature. If you have comments relating to specific criteria or requirements, please use the [Feedback Form \(Excel\)](#) instead.

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Section 6: Circularity

38. Criterion 6.2.1: Cradle-to-Grave LCAs (Downstream Entities)

See requirement 6.2.1.1 in the [PS V4 Consultation Draft](#).

Do you support the introduction of cradle-to-grave LCAs as a **leading practice** requirement for **downstream** (e.g. fabricating) Entities?

- Do not support
- Somewhat support
- Strongy support

Please explain

39. Use this space for any general comments on Section 6: Circularity. If you have comments relating to specific criteria or requirements, please use the [Feedback Form \(Excel\)](#) instead.

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Section 7: Community Rights and Participation

40. Materiality: The PS V4 introduces a stronger focus on materiality, where most Community Rights requirements now apply primarily to upstream (mining/refining/smelting) Entities. The applicability is indicated in the 'Notes' column in blue text, next to each requirement in the [PS V4 Consultation Draft](#)

Do you feel this approach appropriately focuses efforts where community impacts are most significant?

- Yes - this materiality focus is about right
- No - the materiality focus should be adjusted (please explain below)

Please explain

41. Community benefits - 'Community Agreement': PS V4 introduces the concept of a *community agreement* —a legally binding document which builds on the community benefits plan but establishes stronger accountability. The PSv4 draft refers to community agreements in three requirements:

- **2.6.2.3** (Specifically related to new projects or major changes with significant risks to affected communities): the Entity is required to begin a preliminary development plan with the *aim to establish a community agreement within 2 years (and in line with FPIC where relevant)*
- **7.4.1.2:** (For ongoing operations - applies only Upstream): Where there are affected Indigenous Peoples, the Entity is required to begin a preliminary development process with the *aim to establish a community agreement, through a mutually agreed process and timeframe, in line with FPIC.*
- **7.4.1.3 (LEADING PRACTICE - optional, applies only Upstream):** The Entity establishes a community agreement, in collaboration with affected communities

Do you support the inclusion of community agreements as proposed in the PS V4 Consultation Draft? If not, what changes would you propose?

- I support the proposed inclusion of community agreements as per the PS V4 draft
- I support the inclusion of community agreements, but with specific changes (see comment box)
- I do not support the inclusion of community agreements (please explain)

Please explain (e.g. "2 year timeframe for 2.6.2.3 will be too short")

42. Legacy Impacts: Criterion 7.9.1 includes two minimum requirements and one leading practice around addressing legacy impacts (pre-2022) in specific cases. Initial input from the Community Rights Working Group and CSO reviews suggests divided opinions on this topic - with civil society and affected communities pushing for strengthened requirements, and Industry members raising concerns about implementation and liability. The PS V4 consultation draft aims to find a compromise which strengthens requirements compared to PS V3 but also acknowledges the concerns heard so far.

Do you support the proposed requirements under 7.9.1? If not, what specific changes would you suggest, and why.

- Yes - I support the proposed requirements under 7.9.1
- I support the proposed requirements under 7.9.1 but with specific changes (see comment box)
- No, I do not support the proposed requirements under 7.9.1 (please explain)

Please explain

43. Use this space for any general comments on Section 7: Community Rights and Participation. If you have comments related to specific criteria or requirements, please use the [Feedback Form \(Excel\)](#) instead.

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Section 8: Worker's Rights and Protections

44. **Living wages:** Do you support having a minimum requirement to pay living wages for direct employees (see 8.2.1.1)?

- Do not support Somewhat support Strongly support

45. **Maximum working hours:** Initial input from stakeholders, including the ASI Workers' Rights Working Group has highlighted a range of views on whether PS V4 should include a requirement on maximum working hours (including overtime). the draft therefore includes [three potential options](#) for Requirement 8.2.2.5, for stakeholder input. Refer to **Criterion 8.2.2** and Table 3 under 8.2: Working hours and wages in the [PS V4 Consultation Draft](#) for more explanation of these options and exceptions (e.g. force majeure circumstances).

Which of the following is your preferred option related to maximum working hours?

- Option 1** (as per 8.2.2.5 in the PS V4 draft): Sets a clear maximum for working hours (60 hours/ week including overtime).
- Option 2:** 60 hours/ week maximum; but, for exceptional cases where this is not possible, the Entity must commit to a 3-year plan to reduce to this level
- Option 3:** No maximum for working hours; but requires a programme to manage overtime and measures to reduce structural overtime

Other (please specify)

46. Use this space for any general comments on Section 8: Workers' Rights and Protections. If you have comments relating to specific criteria or requirements, please use the [Feedback Form \(Excel\)](#) instead.

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Modular Section 9: Mine Closure

Mine Closure

47. Criterion 9.1.1. Minimum monitoring periods post-closure

Criterion 9.1.1 includes minimum monitoring periods for mine closure, which are set at **30 years** after decommissioning (for a minimum requirement) and at least **40 years** after decommissioning (for leading practice). See Requirements 9.1.1.4 and 9.1.1.5

Do you support the inclusion of minimum monitoring periods for mine closure, as proposed here?

- Do not support Somewhat support Strongly support

Please explain

48. FPIC for mine closure: Under PS V4 Criterion 9.2.1, where Indigenous Peoples are potentially impacted, Free, Prior and Informed Consent must be obtained for the Mine Closure Plan. This is in line with the approach under PS V3, which requires FPIC "prior to altering an existing Mine Rehabilitation and closure plan" (see PS V3, 9.4.b.ii).

Do you support the continued application of FPIC with respect to Mine Closure Plans?

- No - I do not support this (please explain)
 Yes - I support this

Please explain

49. Criterion 9.3.1 Circularity principles and recovery of materials

In the PS V4 consultation draft, requirement 9.3.1.3 (Leading Practice) requires that at least 80% of materials from decommissioned infrastructure are recovered (so they re-enter the supply chain for high-value reuse or recycling).

Where should the leading practice threshold be set for recovery of materials?

- At least 40% At least 60% At least 80% (current proposal)

Other, please specify

50. Use this space for any general comments on Section 9: Mine Closure. If you have comments relating to specific criteria or requirements, please use the [Feedback Form \(Excel\)](#) instead.

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Modular Section 10: Bauxite Residue and Tailings Management

51. ASI's longer term aim is to recognise certification against the Global Industry Standard on Tailings Management (GISTM) as equivalent for the tailings-related requirements under the PS V4. However, the [Global Tailings Management Institute \(GTMI\)](#) is still in the process of setting up its own certification approach.

During this interim period, ASI is considering recognising *third-party auditing against GISTM* as sufficient to meet the tailings related requirements in Section 10. This means Entities would not need to be re-audited against these sections during an ASI assessment, if the third-party audit shows the Entity is in conformance with GISTM.

Would you support this interim approach?

- Yes
- No

Please explain

52. Use this space for any general comments on Section 10: Bauxite Residue and Tailings Management. If you have comments relating to specific criteria or requirements, please use the [Feedback Form \(Excel\)](#) instead.

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Modular Section 11: Displacement and Resettlement

53. Use this space for any general comments on Section 11: Displacement and Resettlement. If you have comments relating to specific criteria or requirements, please use the [Feedback Form \(Excel\)](#) instead.

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Final feedback and thank you

54. Do you have any other comments or feedback related to the ASI Standards Revision?

Note: For comments that relate to specific criteria or requirements, please use the [Feedback Form \(Excel\)](#).

Thank you for taking the time to provide input during this first public consultation round, which closes on 20 April 2026.

All feedback will be carefully reviewed by the ASI team and Standards Committee, and a public summary of consultation input and responses will be published later in 2026. Please visit the [ASI Standards Revision Hub](#) to stay up-to-date with the revision project and next steps.