

ASI Circularity Working Group – Call 7

13:00 – 14.30 BST 20 May 2026

Participants:

Karin Schiotz (Hydro)

John Reves (Independent)

Marcel Pfitzer (Mercedes-Benz)

Piet Wit (Chimbo Foundation)

Lucinda Kuys (DQS)

Carl Firman (IAI)

Patrick Brading (Hydro)

Adrian Mullins (Rio Tinto)

Fion Cheung (SNT0)

Daniil UKhanov (UC Rusal)

ASI Secretariat:

Gabriel Carmona Aparicio

Chelsea Reinhardt

Chris Bayliss

Agenda points:

1. Welcome (5 min)
2. Overview of public consultation feedback (10 mins)
3. Circularity feedback (20 mins)
4. Key issues for discussion (45 mins)
 - Circularity accounting and performance
 - LCA scope, impact categories and disclosure
 - Product design and end-of-life influence
 - Scrap and recycled content readiness
5. Post-consultation timeline (5 mins)
6. Close (5 mins)

Discussion Notes:

1 Welcome

- ASI welcomed the group and introduced the agenda
- ASI provided an overview of the public consultation process on the draft revised ASI Standards, which was open from 17 Feb to 30 April 2026. In total more than 500 responses were received, including nearly 100 submissions via online survey or consultation inbox. Another 400+ responses were from members of affected communities, who were engaged through IPAF led sessions and completed targeted questionnaires on priority issues affecting communities

- More than 1500 individual qualitative comments were received via the consultation inbox and online survey (with additional comments from affected communities still to be added) – the Climate section received the most comments, followed by Nature, overall comments on the Performance Standard and then Community.
- ASI provided a summary of main themes from consultation input on the Performance Standard, which included general support for structural changes, mixed feedback on the level of ambition, and general support for the concept of leading practice, but with refinement on how this was integrated into the standard. General themes also included some upstream respondents citing an unfair burden of certification along with limited market incentives, and significant concerns about revised proposals under the Climate section.

2 Consultation feedback specifically on Circularity Section

- ASI provided an overview of key themes from consultation specifically on the Circularity section.
- Overall, most comments were neutral in tone or cautious/ questioning, for example supporting the intent of a revised requirement but suggesting a change or adjustment in scope, wording, guidance or evidence expectations.
- Four main areas where respondents supported the revised draft were identified:
 - Stronger circularity ambition is welcomed
 - Cradle-to-grave LCA was generally supported as Leading Practice
 - Transparency and comparability are valued
 - Outcome-focused circularity is encouraged
- Respondents also asked for improvements or further adjustment in the following areas:
 - Proportionality and level of control by supply chain activities – Requirements should reflect each Entity's level of control or influence.
 - LCA scope and feasibility – Concerns around LCA expectations, including clear boundaries, impact categories, data quality & confidentiality
 - Recycled content – Definitions and calculation methods need to be harmonised before disclosure is comparable.
 - End of life – Obligations should recognise limited influence of upstream, midstream and component suppliers.
 - Dross and SPL – Requirements should be more outcome-based, with practical recovery metrics and flexibility
 - Auditability, definitions, and burden – More definitions, evidence expectations and materiality thresholds are needed
- ASI summarized key points from consultation input on each topic under Section 6:
 - 6.1 – Circularity Strategy and Performance – respondents generally supported the direction but want to see clearer boundaries and materiality thresholds for:
 - Resource inflow and outflows quantification

- Verification of third-party management of the Entity's recoverable and non-recoverable resource outflows
- Leading practices KPIs
- ASI noted that the draft uses the concept of "resources" rather than "waste" to reflect the aim of retaining or adding value in material flows, but this shift may need more explanation in guidance.
- 6.2 LCA – support for strengthened LCA expectations – especially at Leading Practice, but want clearer decisions on LCA scope, minimum methodology expectations, data disclosure, confidentiality and auditability.
 - ASI noted that ISO 14040/14044 provide the methodological basis, but consultation feedback suggests ASI may need to clarify that carbon footprint or GWP-only studies should not be treated as full LCAs.
 - ASI also noted that some concerns about confidentiality may have come from stakeholders interpreting the LCA communication requirement together with the separate Leading Practice on contributing to LCI databases.
- 6.3 Product and Process Design – Respondents want more clarity and raised concerns about how this applies to entities with different levels of control over product design, customer specifications, end-of-life information and process design. Feedback also asked what evidence would show that circularity was considered in new or modified manufacturing and processing systems.
- 6.4 Aluminium Process scrap – Several concerns were raised about recycled content, noting that the concept is not consistently defined, may generate non-comparable or misleading claims, and could create inappropriate contractual or disclosure burdens between suppliers and customers. ASI explained that the draft did not prescribe a single recycled-content methodology, but instead aimed to require transparency on methodology and system boundaries.
- 6.5 End-of-life – *some support for end-of-life recovery, but respondents question whether 6.5 is feasible for Entities that do not control final product design, collection systems, customer behaviour, scrap availability or recycling infrastructure.*
- 6.6 SPL and 6.7 Dross – *respondents want to see more outcome-based (beyond process requirements), but there are real challenges based on wide variety of contexts and access to technologies.*
- 6.8. Other High Impact Resources – *comments included concerns about whether continuous improvement is possible for high performers, and recommendation that legacy impacts apply only where the Entity has control.*
- The Working Group discussed the summary of feedback on Circularity, noting:

- Appreciation to ASI for the well-presented summary of comments, with a lot of content to digest.
- Comments generally echoed the feedback that some Working Group participants had submitted to the consultation; where comments differed in their perspective, the reasons were generally clear
- On concerns about communicating LCA methodologies, one participant queried the reasons for this concern, since the PS V4 requirements do not require Entities to share information unless they are already making a public disclosure. ASI explained this might have been stakeholders misinterpreting the draft or looking at the leading practice instead.
- One participant asked to see further analysis broken down by stakeholder category, including whether comments came from ASI Members or non-members. This breakdown had not been included in the presentation but could be considered for selected areas. A practical approach would be to provide stakeholder-type and value-chain-position analysis only for selected substantive concerns, rather than for every comment, to avoid overloading the process and to protect anonymity.
- One participant asked about the requirements on legacy impacts and whether affected communities had provided input, e.g. due to legacy landfills and impacts. ASI clarified that legacy impacts are covered more generally under Section 7. Feedback from affected communities is still being processed, but legacy impacts have been raised through that engagement.

3 Discussion topics for the Working Group

- ASI explained that the discussion would focus mainly on minimum requirements under Sections 6.1 to 6.5. Leading Practices were not the main focus, as ASI expects to review Leading Practices across the full Standard separately.
- ASI also explained that the purpose of the discussion was to test possible directions and identify what ASI may have missed, rather than to make final decisions.

- **6.5 End of life** – the Working Group discussed ASI’s proposal to further revise 6.5.1.2, in order to keep this globally applicable but to vary evidence expectations by product category and level of influence. This might include stronger expectations for packaging/ final-product producers where influence over systems is clearer; more limited expectations for semi-finished products, component suppliers and raw material suppliers.
- The WG discussed this and raised the following points –
 - This is an existing requirement under PS V3 but already challenging for many Entities and can be cause for minor non-conformances. Products are exported to many markets where they may not be end of life regulation or systems in place. One example was given of an OEM selling cars into regulated markets such as Europe, where end-of-life vehicle rules are clearer, but where used vehicles may later be exported to markets where end-of-life regulatory systems are less developed. It was noted that an OEM may engage directly or indirectly with regional initiatives or associations working on end-of-life systems, but may not be active in every country where products eventually end up. The group discussed that this is even harder for component suppliers. For example, suppliers of oil pans or wheels may supply a component to an OEM but have no visibility or control over where the final vehicle or part will end up. Recommends having a broader category view at least in guidance.
 - Further conformance guidance would be helpful, e.g. is it enough to be a member of an association working on this. ASI clarified that development of assurance / conformance guidance will be a priority along with the revision of the Standard.
 - Current wording ‘in their respective markets’ might imply all markets, which may not be feasible for companies. Consider adding a qualifier e.g. in major markets? or similar wording would better reflect feasibility.
 - One participant noted that the issue has been discussed before in the history of the Standard, particularly in relation to differences between packaging and automotive value chains. Historically the development of the requirement was designed to be flexible enough to allow for collaborative action e.g. automobile companies engaging in regional efforts. Much harder for component manufacturers to have any engagement over end of life. Supportive of the principle to maintain this requirement.
- **6.4 Aluminium Process Scrap – Recycled Content**
- The WG discussed the question: What practical, methodological or commercial issues do we need to resolve or clarify? Are these concerns valid?
 - Clarity is important especially if we are looking at any outcome-based requirements e.g. improvement overtime. Having an ASI-endorsed methodology is one option or can allow different methodologies as long as there is transparency (but this will limit comparability)

- Need more clarity on how to implement this for aluminium-containing products, e.g. automotives where aluminium is just one component in many different parts of the car. Example of OEM where this is currently reported for the whole car not only aluminium-containing components, may not yet be available at component, alloy or material-specific level.
- One participant noted that different companies and associations currently use different methodologies, which can lead to different recycled-content percentages. This creates a comparability issue because people tend to compare numbers. It was noted that there is not yet consensus at European Aluminium level on a single methodology.
- One participant agreed with the third comment about the fact that methodologies of recycled content may be a contractual topic between suppliers and customers. Therefore, this might be provided through commercial avenues.
- Yes, this is still important, the key point perhaps is about the system boundaries and making sure there is transparency when this information is requested.
- One participant noted that for primary aluminium producers, the recycled content of major product lines may be zero or very low, and asked whether this would meet the requirement.
- The group discussed whether providing recycled-content information to commercial partners “upon request” could imply free or unrestricted access to information.
- It was noted that recycled-content information may be part of a commercial product or customer agreement, and may involve cost, verification and assurance work.
- Participants suggested that “upon request” should not be interpreted as a freedom-of-information type obligation. Information may be provided through commercial channels.
- One participant noted that if a company makes a high recycled-content claim, the value of the requirement is that it supports transparency on methodology and system boundaries.
- The group discussed that the focus of 6.4.2.2 may be less about forcing disclosure and more about ensuring that where recycled-content information is shared, it is accompanied by methodology and system boundaries.
- One participant suggested that, for a complex product such as a car, if the public claim is about recycled content at whole-product level, then the aluminium-containing product may be considered the whole car. However, the explanatory notes may need to address how this works for complex multi-material products. It was also noted that further guidance may be needed on how to clarify pre-consumer and post-consumer content in complex products.

- **6.3.1 Product design**
 - Key question – Should product-design and development requirements apply only where the Entity has control or meaningful influence over product design?
 - The Working Group mentioned that although this is already covered in the guidance (Explanatory notes) they are not opposed to move this into the requirement text to make it more clear
- **6.3.3.1 Circularity principles in new or significantly modified manufacturing or processing systems**
 - Key question – What would make this requirement clear and auditable in practice? The Working Group discussed this proposal:
 - One participant noted that, in smelters or refineries, a major process change is not undertaken lightly and is usually driven by economics, process efficiency, or operational need rather than being explicitly framed as “circularity”.
 - It was noted that a project may reduce waste or improve material efficiency as part of an economic or operational case, but this may not be described as a circularity objective in the project documentation.
 - A potline example was discussed. A new pot design may extend pot life, reduce relining frequency, and therefore reduce SPL generation. However, this may be presented as an economic or performance benefit rather than as a circularity objective.
 - The group discussed whether the outcome is enough, even if circularity is not explicitly named in the design documentation.
 - It was noted that for some changes, such as energy-efficiency upgrades or heat recovery projects, the benefits may relate more to climate or energy rather than circularity.
 - Don’t disagree with the intent but will be challenging to demonstrate conformance and to audit it. Participants asked what evidence would be required to show conformance.
 - ASI suggested that if circularity benefits are already likely to happen due to economic or process-efficiency drivers, this may not be the intended focus of the requirement.
 - It was also suggested that ASI could consider whether this requirement should move to Leading Practice, with a more specific focus on integration of circularity principles from the design phase beyond basic cost or process-efficiency initiatives.

- ASI noted that there were additional discussion questions planned, including: LCA impact categories, LCA communication and confidentiality, resource inflows/outflows accounting, third-party management of outflows. These were not discussed in detail due to time.
 - One participant noted before the close that LCA remains one of the topics that should still be discussed further.
 - ASI invited participants to send written comments by email, especially on the LCA proposals related to impact categories and confidentiality.

4 Next steps

- Meeting notes will be shared with the Working Group
- Another Working Group call will be scheduled for 14 July, after the ASI Standards Committee discussions in mid-June.
- The revised draft will be shared with the Working Group ahead of the next call, but after the Standards Committee meeting.