

ASI Nature Working Group
Call #1 – Post Consultation
18 May 2026

Agenda points:

1. Welcome (5 min)
2. General feedback on the draft ASI Performance Standard (15 min)
3. Feedback on Nature Section (10 min)
4. Discussion topics (50 min)
 - NNL targets
 - Air quality
 - Critical habitats
 - Overall restructuring
 - Progressive rehabilitation

Participants

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Discussion Notes:

1. Welcome

- ASI welcomed the group and set the context for the Working Group as a Sounding Board on the standards revision. Klaudia Michalska of the ASI Secretariat has taken over the facilitation of the Working Group in Laura Brunello's temporary absence.
- ASI introduced the agenda for today's call and ran through the timeline for the revision and the work of the Working Group – there would be a virtual Standards Committee (SC) call on 21 May followed by an in-person SC meeting on 16- 18 June. The Working Group is expected to meet again in July. By September ASI expects to publish an overall analysis of the feedback with recommended actions and next steps.

- ASI provided an overview of the public consultation on the draft revised ASI Standards, which was open from 17 Feb to 30 April. In total more than 500 responses were received, including nearly 100 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 Rights.

2. General feedback on the draft ASI Performance Standard

- ASI explained some of the main themes from preliminary feedback analysis, including areas where stakeholders mainly agreed:
 - There had been broad support for structure and format; mixed views on the level of ambition compared to V3 and general support for Leading Practice as a concept, but adjustments needed.
 - Many were in support of streamlined certification for downstream Entities; those not in favour raised concerns that it could weaken credibility.
 - Some upstream respondents feel they carry the main certification burden, but don't see sufficient market incentives for ASI certification.
 - There had been many concerns raised on proposed climate requirements with industry feeling that proposals are not achievable and will not drive change, but little ground on alternatives.
 - The feedback from affected communities expressed strong support for the strengthened requirements on community impacts.
 - Some respondents wanted to see more consideration of regional differences.

3. Feedback on Nature Section

- Feedback presented on today's call reflected responses received through the online survey and ASI inbox. It did not yet include the targeted questionnaires distributed through the Indigenous Peoples Advisory Forum (IPAF), which are still being analysed, and only few examples from questionnaire feedback were presented.
- The highest numbers of comments within the Nature section was submitted for the biodiversity and ecosystem services criteria, mainly from Industry organisations, focusing on No Net Loss/Net Gain, Materiality, and Leading Practice.
- Overall, the Nature section had been well received, with no major red flags raised.
Feedback highlighted:
 - Appreciation for stronger focus on biodiversity governance, monitoring, disclosure, and the new section on ongoing rehabilitation

- Appreciation of stronger alignment with other standards (e.g. IFC Performance standard 6)
- Issues with structure, alignment between subsections, clarity of criteria, and applicability.
- Several respondents from industry suggested to replace public disclosure with sharing information only with affected communities, while civil society and affected communities stressed the importance of transparency and accessible public information. ASI responded that across the Performance Standard, feedback was divided on the role of public disclosure and agreed that more clarification on what is required for public disclosure would be useful.
- While the increased ambition was recognised positively, some respondents noted that Indigenous Peoples as rightsholders and stewards should be better integrated in the section.
- Some respondents – as with all sections – raised concerns about implementation challenges and the importance to balance ambition with feasibility.

4. Discussion topics

No net loss (NNL) targets

- ASI introduced proposed adjusted requirements around no net loss (NNL), (see slide 13)
 - strengthened commitment to No Net Loss (NNL)/Net gain,
 - references to the use of methodologies,
 - setting up biodiversity baselines and targets
 - timelines & implementation actions
 - Allocation of resources
 - Monitoring & long-term tracking outcomes
- Key points from the consultation feedback included:
 - one comment about the importance of linking an Entity's actions and the impacts that those actions resulted in – i.e. had it been a loss or gain for biodiversity
 - applicability – seeking clarification on NNL applying to new projects/major changes
 - implementation feasibility with different views on readiness/feasibility of implementation and potential move to a Leading Practice.
 - methodologies are still evolving and not sufficiently mature to be included as part of the minimum requirements in the standards.
- The Working Group discussed the proposals and the consultation feedback, and raised the following points:
 - For requirement 5.1.1 on biodiversity management plans- one participant thought that applicability was already specified (e.g. material risks to biodiversity), and therefore there is need to highlight specific sites or refer to high-biodiversity areas in terms of when no net loss (NNL) targets are required. The view was also expressed that despite challenges in measuring gains/losses e.g. in pollution or a specific species, the concept of NNL is sufficiently mature in the sector, especially when referring to land use impacts.

- Another participant agreed and commented that while companies are developing methodologies and working on NNL targets, the lack of standardisation or agreed approaches might make companies less confident to share what they are doing.
- ASI explained that in the proposed changes, elements such as 2020 baseline year would move to guidance (recommended). The aim is not to be prescriptive on methodology for NNL, but to require transparency (disclosure) on the method used. There was general agreement within the working group to proceed with this approach and to acknowledge the challenges around measuring and the methodologies.
- ASI would update the draft to reflect the discussion in this section and circulate for further comments.

Air quality

- ASI shared an overview of the revised air quality requirements for V4 (see slide 17) and discussed the key points of consultation feedback for this section, which centred on:
 - The importance of focusing on material air quality risks relevant to aluminium operations, noting that emissions such as fluorides may be more material than nuisance dust
 - Some comments noted that proposed dust requirement could overlap with existing regulations, be challenging to audit, or should instead be moved to guidance
 - Some comments called for limiting the granularity of public disclosure and aligning requirements with existing frameworks
- ASI presented an adjusted criteria around air quality which merged dust under the general air quality management plan, and asked the Working Group for advice on how best to address key types of air emissions:
 - **Option 1** – including a specific sub-requirement under 5.3.1.1 which calls out these specific emissions sources with additional management requirements (e.g. *regular monitoring of the impact of emissions on receptor communities and environments*)
 - **Option 2** – via a guidance table e.g. showing main emissions by type of activity, but leaving the normative requirements on management plans flexible
- The Working Group discussed how best to address key emission sources such as fluorides, sulfur dioxides and/or others.
 - One participant expressed preference for the outlined option 2 – clear guidance on the expectations and a pointer for what auditors should be looking for.
 - It was recommended to consult the EU guidance (*Best Available Techniques (BAT) Reference Document for the Non-Ferrous Metals Industries*) as a comprehensive reference in terms of the aluminium value chain on emissions to air.
 - One participant noted it was important not to confuse air quality with pollution the two issues should be separated out in the guidance.
 - One participant asked whether dust in transport would be captured here or elsewhere? ASI confirmed that it would be captured in this section although might

also be raised through the Community Rights section e.g. via consultation with affected communities

- Next steps: ASI will draft a guidance table with examples of key air emissions for supply chain activities, including use of and reference to the EU *Best Available Techniques (BAT) Reference Document for the Non-Ferrous Metals Industries*

Critical habitats

- ASI shared an overview of the revised air quality requirements for V4 (see slide 19)
- Although some respondents in the public consultation were in favour of including critical habitats, a couple of respondents had asked for the criteria to be simplified or adjusted
- The Working Group discussed the consultation feedback and the need for potential adjustments to the criteria. The following observations were shared:
 - While simplification is positive and the negative framing of the current criteria may be confusing, it is seen as valuable to align with IFC requirements around critical habitats and to maintain the level of specificity
 - One participant highlighted the need to understand implications for this criterion
 - One participant recommended to align sub-criterion 5.5.4.1.c with exact wording under the equivalent requirement under IFC PS 6, around threatened species. The Secretariat will consider this in the next update to the draft.

Progressive rehabilitation

- ASI informed the Group that, following a request from stakeholders, a new Working Group will be formed to focus on Mine Closure and progressive rehabilitation, expected to hold 3-4 meetings in June – November 2026. Working Group members were invited to express their interest in joining that group.

Proposed consolidation/streamlining

- The ASI Secretariat explained that following feedback on structure and duplication, several criteria under the Nature section had been streamlined to reduce duplication especially with the Environmental Management System criteria and risk assessment under Section 2. This reduced the total number of criteria notably but should not affect performance expectations – this will be outlined in the updated draft to be shared with the Working Group after the Standards Committee.

5. Next steps / AOB

- One participant asked for the definition of Protected Areas to be shared back for a future Working Group discussion
- Comments from the consultation and the Working Group will be shared with the ASI Standards Committee and discussed further in June during their in-person meeting
- The Working Group will next meet in July – doodle poll to follow.
- Summary of the feedback will be published in September.