

ASI Circularity Working Group – Call 8

13:00 – 14.30 BST 14 July 2026

Participants:

John Reves (Independent)
Marcel Pfitzer (Mercedes-Benz)
David Waggar (ReMA)
Alison Lee (Novellis)
Marlen Bertram (IAI)

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Israel Abad (Alcoa)
Thomas Payer (Speira)
Samuel Stampfli (SERO)

ASI Secretariat:

Gabriel Carmona Aparicio, Chelsea Reinhardt

Agenda points:

- Welcome & context (15 min)
- Minimum requirements: what changed (25 min)
- Leading-practice calibration (40 min)
- AOB & Next steps (feasibility assessment) (20 min)

See attached presentation for further information.

Discussion Notes:

1 Welcome

- The ASI team (ASI) welcomed the group and introduced the agenda
- ASI provided an overview of the public consultation feedback on topics such as leading practices, streamlined option for downstream certification, and level of ambition.
- The ASI team summarized key discussion points from the June 2026 Standards Committee meeting, including:
 - Support for overall streamlining and consolidation
 - Agreement to maintain leading practices as an optional level, but to separate these into one list within each section, review and filter the leading practices within each content section, and to explore alternatives to the '70% threshold of applicable leading practices' approach.
- On timing: drafts have been updated based on consultation, the May working groups and the June Standards Committee, and are being shared with working groups. A feedback window runs from mid-July to end of August / early September, after which drafts are consolidated into one document in September. Outstanding substantive content disagreements will be handled as a separate process. A second public consultation is anticipated at the very start of 2027, with final versions targeted for approval and release in the second half of 2027.

2 Proposed changes on minimum requirements under Circularity

ASI explained proposed changes in the minimum requirements, including:

- Strategy and Performance:
 - Material flow assessment to flow into a circularity commitment and a resource outflow management plan (6.1.1.1 single criterion)
 - Waste management hierarchy from PS V3 restored as a minimum expectation. ASI noted the difference between the minimum plan and the leading-practice plan.
 - Third-party assessment for material outflows now only applies to those with material social or environmental risks
- LCA and Recycled content
 - LCA and RC now together in one sub-section 6.2, as both follow an assessment-then-disclosure structure and recycled content influences LCA results; they remain distinct criteria.
 - Minimum LCA categories reduced from the full set of ISO/ EN impacts to 4 indicators (6.2.1.1) as minimum: Climate change (global warming potential, GWP); Acidification (AP); Eutrophication (EP); and Abiotic resource depletion – fossil/energy (ADPF).
 - Requirement to state methodologies and boundaries where LCA or Recycled Content figures are communicated (publicly or B2B).
- Product design and end of life (6.5)
 - 6.3.1.1. Product design – proportionality via an Annex table has been recommended, which makes it clearer what Entities are likely to be able to control, based on their value chain position and output form
 - Process- system design: proposed already to be moved from minimum to a leading practice, might propose to remove altogether.
 - 6.5 End of life role – proportionality anchored to the Entity's own activities, proportionality via an Annex table, clarified this one to focus on major markets and to put more emphasis on the volumes of sales as an indicator of relevance
- 6.6 SPL and 6.7 Dross
 - 6.6.2.2/6.7.2.2 New minimum performance measurement indicator for SPL and dross recovery – establish, monitor, and review quantitative indicators. No fixed utilisation/ recovery-rate target. ASI noted the Standards Committee considered a control/influence-only basis too vague to audit, which is why the annex approach was developed.
 - 6.6/6.7 third party recovery – Outsourced recovery: Clarified that recovery achieved via qualified third-party processes counts towards conformance
 - Split out minimum requirements vs leading practices (general for section)
- ASI also noted 6.4 (aluminium process scrap) had no major changes beyond moving recycled content out to 6.2; it remains a single criterion, largely as consulted.
- ASI showed an example of the proposed Annex tables *“Circular product design: Expectations by role x form”* and *‘End of life: Expectations by role x form’*
 - It was discussed whether this Annex table would be considered as Guidance vs referenced as part of the mandatory criteria or requirements
 - It was discussed whether the ‘Lower’ category should be framed as optional, with auditors required to focus on Moderate/ Higher categories

- It was discussed whether the annex distinction between materiality and relevance is the right framing, i.e. whether the test should be "is this component relevant to be implemented and checked," and if so, "what does that relevance look like," rather than three levels of risk. It was noted three levels may not be the right approach
- It was discussed how the "Moderate" middle category would be applied in assessment, noting that a higher/lower split would be easier for companies to interpret.
- For semi-finished products, one participant questioned whether fabricating companies should also carry some lower or moderate expectation, as fabricators often steer material grades and component expectations. An example is to be shared in the draft comments.
- The general reception of the annex was positive; noted as a useful level of granularity for auditors and companies beyond the requirement alone.

3. Discussion on proposed changes to minimum requirements

- The WG discussed the adjusted minimum requirements under Circularity:
 - Regarding the minimum requirements around LCA categories, ASI explained the pushback against the full set: entities would need to rebuild the models they currently use, at cost in time and resources, for limited added value.
 - It was asked whether there is still a requirement to have a clear methodology for LCA? Yes, this needs to be aligned with ISO 14040/44, but this still allows some flexibility on the detail of the methodology. A participant emphasized that retaining this methodology requirement matters, given earlier concern that the previous LCIA wording allowed too much scope
 - A participant raised a question about end-of-life requirements, for example if products are sold into markets where the Entity doesn't have strong control or influence, what is the expectation for them? ASI clarified that the wording currently under 6.5 End of life is fairly high-level and through guidance should be able to consider these cases, but Working Group participants are invited to share further suggestions on wording
- One participant asked for clarification on how percentages are calculated for SPL/ Dross. ASI confirmed these are mass-based percentages of recovery.
- One participant asked if there was a position on the cut-off approach and whether we need disaggregation between pre- and post-consumer scrap in recycled content calculations. ASI team clarified that so far, the ASI Standard does not require a specific approach in terms of allocation or recycled content calculations approach. the chosen approach (including cut-off) should be communicated as part of methodological choices and assumptions.
 - Where content can't be distinguished between pre- and post-consumer it can be counted as pre-consumer.
 - ASI opened the question of whether pre/post-consumer disaggregation should be mandatory (in the requirements) or remain guidance. It was clarified that content in explanatory notes / guidance sits as an expectation behind the requirement – entities are expected to apply it and explain any deviation, but a non-conformance cannot be raised against notes alone; anything intended to be mandatory for all entities must sit in the requirement text, not the notes. Does the working group have views on whether this needs to be mandatory (part of requirements) vs guidance? No comments shared but WG will review this in more detail afterwards as part of the draft review.

4. Leading Practices Review:

- The ASI team shared the set of current Leading Practices within the Circularity section and indicated which ones are proposed to remove, based on feedback so far. The Working Group discussed the set of leading practices and feedback, raising the following points:
- One participant recommended that LP 1 (circularity action plan) could potentially encompass a number of other LPs which are proposed to be deleted; the phrasing 'more comprehensive' plan was preferred (to distinguish from the minimum requirement under 6.1)
- Circularity rate (LP2) is not as common for upstream Entities as for downstream. ASI clarified it is an organisational-level indicator (distinct from product-level recycled content), applicable across the value chain including upstream, as it accounts for the share of circular inputs into the organisation, and is defined under ISO 59020 and GRI 301 (Materials). It was confirmed the pre/post-consumer distinction does not arise here, as the rate concerns secondary vs. primary inputs at organisational level, not product recycled content.
- LP3 (use LCA results to inform product design etc) – agreed this is not likely to drive specific change or improvement. Using an assessment to inform decisions is common sense, and design/process improvements are typically driven by cost and efficiency rather than the LCA.
- LP4 (cradle to grave LCAs) – More clarification is needed on wording e.g. meaningful influence. What types of companies would have control over the products final use and end-of-life? Perhaps companies that are leasing products e.g. cars. No other examples mentioned from the Working Group, but this is something ASI will see further feedback on
- LP5 (third party verification of LCAs) – wording should be updated to clarify that it is the LCA data, methodology, and results that are third-party verified (not the format which is verified). A participant noted the importance of not implying that rigour (methodology, assurance) only appears at leading-practice level; ASI confirmed the minimum requires methodology, boundaries and assumptions to be stated where claims are made, and the leading practice adds third-party verification of the claim.
- LP 6 (contribute verified LCI data) – it drew negative consultation feedback on confidentiality, effort without clear value, and potential legal sensitivity. It was also noted that contributing data is relatively straightforward and lower-impact compared with practices such as closed-loop recycling, and that entities may already have data obligations to their industry associations
- LP 10 (closed-loop arrangements for process scrap): new, added in response to consultation and the Standards Committee. In discussion. ASI clarified it is intended to cover both the entity's own process scrap routed upstream and customers'/downstream scrap returning to the entity. It was noted that downstream collection/sorting already exists as a minimum requirement, but LP 10 is specifically about the closed loop.
- LPs 8, 9, 11 proposed for deletion. LP 8 (integrate end-of-life recovery data into product/system design) – difficult to audit, and circular design is influenced by other factors. LP 9 (circularity in new/significantly modified process design) – as it is unclear whether circularity – rather than financial or other efficiency drivers – is what triggers these decisions. LP 11 (quantify/disclose end-of-life contribution): it could be captured by LP 12, and could also be one way of demonstrating LP 1.
- LP 12, 13 and 14 (post-consumer scrap; SPL recovery; dross recovery) – to be retained. LP 12 and 13 are reworked; LP 14 was clarified further.

5. Next Steps

- Working Group members are asked to do a more detailed review of the draft and provide comments, including focusing on the filtering of leading practices
- Industry members are also asked to please complete the short 'feasibility Excel template' – each working Group will be providing this feedback for their particular section. It was noted that a balance of views from upstream/ midstream/ downstream is important on feasibility – ASI will monitor this and reach out specifically to Members to support if there is missing representation. Civil-society organisations and industry-association participants are also welcome to complete the form.
- Both the review and feasibility assessment are requested by 31 August 2026
- The next Working Group call will be on 29th September 2026 12:00 – 13:30 BST.