

To: All members, warehouse companies and their London agents and other interested parties

Ref: 25/065

Classification: Brands

Date: 02 April 2025

Subject: **2025 UPDATE ON RESPONSIBLE SOURCING TRANSPARENCY FOR LME-LISTED BRANDS**

Summary

1. This notice provides an update on the next phase of transparency for the LME's responsible sourcing programme.

Background

2. In October 2019, the LME published its [Policy on Responsible Sourcing of LME-Listed Brands](#) (the "Policy"), requiring brands to demonstrate ongoing implementation of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance") through one of four compliance tracks set out by the LME. Additionally, brands must maintain a valid ISO 14001 and ISO 45001 certification (or equivalent) in respect of environmental management and health and safety management systems at their production sites.
3. Fulfilling the requirements of Tracks A, B and C demonstrates implementation of the OECD Guidance, with all four tracks having elements of public disclosure, as follows:
 - (a) Brands following Track A must meet the OECD Step 5 transparency requirements of their chosen Track A standard;
 - (b) Brands following Track B must publicly disclose the audit report, ensuring that this includes the requirements of OECD Step 5 reporting;
 - (c) Brands following Track C must publicly disclose the Red Flag Assessment ("RFA") templates in line with the LME's phased transparency approach (see paragraph 5); and
 - (d) Brands following Track D self-attest to 100% secondary material sourcing, and this is publicly reported on LMEpassport.
4. The LME has been publishing the Track B audit reports and self-attestations from brands following Track D on [LMEpassport](#) since 2021. Currently many producers voluntarily disclose their Track A audit reports and ISO certifications on LMEpassport as well.
5. For Track C, the transparency of information involves three phases, with the transparency requirements increasing over time (as described in the Policy):
 - (i) For the 2021 and 2022 reporting periods, the LME published summary statistics on all RFAs. These can be found at [LME responsible sourcing – reporting](#) on the LME website.
 - (ii) For the 2023 and 2024 reporting periods, the LME will publish anonymised versions of each brands' RFA (noting that it is the responsibility of the brand producers to undertake this anonymisation, should they so prefer).
 - (iii) From 2025 onwards, the LME will publish attributed versions of RFAs.
6. This notice marks the transition from phase one to phase two for the transparency of Track C information and provides information on additional responsible sourcing data which will be available on LMEpassport, as outlined in paragraph 7 below.



Transparency advancement and simplified submissions

7. Following the discussion paper and outcomes described in the [LME Sustainability – CBAM Decision Notice 24/007](#), the LME is publishing data relating to the compliance of LME-listed brands with the responsible sourcing requirements on LMEpassport, reflecting market feedback received in response to the discussion paper requesting that this information should be easily accessible. As of the date of this notice, the chosen track, the related public disclosures referred to in paragraph 3 above, and the ISO 14001 and ISO 45001 (or equivalent) certification for each LME-listed brand will be available on [LMEpassport](#).
8. Specifically for Track C, the anonymised RFAs are published at [LME responsible sourcing – reporting](#) on the LME website. Brands following Track C which voluntarily choose to disclose their attributed versions of the RFAs ahead of the deadline for phase three will also have their attributed RFAs shown on LMEpassport.
9. To simplify the process for responsible sourcing submissions, producers may submit their Track A standard audit reports and ISO certifications directly on LMEpassport. Since Tracks B, C, and D require a different review process, submissions for these tracks will continue to be accepted via email at responsiblesourcing@lme.com.

Conclusion

10. The LME believes the increased visibility into brand responsible sourcing information helps build market confidence, encourages robust due diligence practices, and allows industry participants to learn from best practices.
11. Comprehensive details on the LME's responsible sourcing programme, including requirements, guidance notes, and other relevant reporting, can be found on the [responsible sourcing page](#) of the LME website. The LME continually seeks to enhance its sustainability initiatives, and the Exchange welcomes feedback at responsiblesourcing@lme.com.

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cc: Board directors
All committees