Issue 8: California Climate Disclosure Laws & Urban Mining

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For IntelliTAD's week ending September 30, 2025, we're focusing on two of the most consequential developments shaping the industry today: California's sweeping new climate disclosure regime and Aurubis's launch of an $800 million recycling facility in Richmond, Georgia. While the week was generally quiet, these events are structural signals that will define how IT asset disposition, resource recovery, and corporate sustainability are organized for years to come. To make sense of them, we're drawing on two new pieces of research we've just published at Compliance Standards, and we'll also share a preview of our upcoming third report.

Let's begin with California. Our recently released report, California's Climate Disclosure Laws: The New Compliance Baseline breaks down the impact of Senate Bills 253 and 261. More than four thousand corporations, including Fortune 500 leaders and foreign multinationals, now face mandatory reporting of climate risk and greenhouse gas emissions-Scopes 1, 2, and, most importantly, Scope 3. For CIOs and sustainability officers, this changes the calculus. Your suppliers' emissions data is now officially required by law, enforceable through the California Air Resources Board. For ITAD CEOs, these laws will push your compliance requirements even further. Chain-of-custody documentation, traceable recovery rates, and, of course, auditable carbon metrics have now become compliance deliverables your customers must collect if they want to keep operating in California. So because of that, ITAD is no longer your classic ITAD operations. In fact, these laws turn ITAD into a compliance-critical service function, deeply tied to how enterprises meet their new legal obligations.

Client Access:
California Sets the Pace for Climate Regulation: Can Suppliers, Vendors and Contractors Meet Rising Client Demands?

Now let's go to Richmond, Georgia where German firm Aurubis AG has begun production at its first U.S. multimetal recycling facility, a project we flagged in our report IT Hardware: The New Era of Resource Recovery and Critical Material Access. Built at a cost of roughly

$800 million, Richmond is capable of processing 180,000 metric tons of scrap annually, recovering copper, nickel, tin, and precious metals from complex streams like circuit boards and cables.

If you are in the business of material recovery and mining, so-called urban mining, this development is evidence that secondary supply has moved front and center to meet America's rising demand for industrial metals. U.S. copper demand alone is expected to increase by 30 percent in the next five years, and Richmond positions Aurubis as a structural player in that equation. For ITAD operators, the facility represents a potential new downstream option-one that could eventually provide stable, compliant, domestic refining capacity for high-value streams. At present, there are no public contracts linking Aurubis to ITAD providers, as far I am aware, but strategically, those who can position themselves as reliable suppliers to Richmond or similar facilities will strengthen both their margins and their sustainability narative.

New Smelting and Refining Capacity in the U.S. Strategic Metals Market

Research Report: IT Hardware, The New Era of Resource Recovery and Critical Material Access

Taken together, California's disclosure regime and Aurubis's new U.S. site highlight the same theme: ITAD Version 3.0 is graduating to become an integral component of the regulatory compliance and industrial supply chains. As such, the sector's leaders should recognize that their value proposition now extends into legal risk management for clients. Mining and metals recovery businesses must also accept that ITAD feedstock is rather a strategic input. And if you are a CIO or a sustainability officer in a large corporation, you will have to elevate ITAD partners into core compliance discussions rather than treating them as transactional vendors.

Looking ahead, we will expand on this shift in our next research release, titled Active Capital in Sustainability and ITAD: From Passive Finance to Operational Ownership. Scheduled for publication this month of October, this study explores how private equity and infrastructure investors are shifting from being passive financiers to active participants. Closed Loop Partners, EQT, Ancor, Brookfield, and others are embedding themselves directly into operations, reshaping the companies they're buying into infrastructure-grade platforms. For executives across the sector, that means equity partners will not remain sidelined and content to sit in the background. They will expect to help design compliance

frameworks, professionalize management, and drive growth strategies. We are seeing growing interest in the sector and it you are an ITAD CEO looking for investors, the general emerging capital landscape is that valuation will follow operational execution, not necessarily just resale margins or regional footprint.

So the events of this past week and the research we are conducting, all point to long-term forces that are reshaping the ground beneath us: California embedding sustainability compliance into law, Aurubis bringing global-scale refining capacity onto U.S. soil, and investors preparing to run ITAD firms as infrastructure businesses. Whether you are running an ITAD, operating a smelter, or managing enterprise IT, you need to absorb the implications quickly. Compliance, resource recovery, and capital discipline are converging into a single operating environment. The question that you and your team must ask how soon you will adapt to these changes.

And on that note, I want to extend an invitation. On October 16th, 2025, I'll be hosting a live executive briefing titled Unlocking Opportunity Amid Disruption:. This 60-minute Zoom session will dig deeper into the themes I've discussed today. If you already have an account on our website, you can log in to register directly. If not, although seats are limited, registration is free and open for now, just follow this link for the details. I look forward to seeing many of you there as we continue to chart the path toward ITAD 3.0 and the future of circular IT

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