ILLINOIS · 104TH GENERAL ASSEMBLY HB 3673 WATCH

# Illinois Climate Disclosure Watch (HB 3673)

PENDING BILL (Rule 19(a) House Rules) — Sec. of State design vs. live NAIC & Chicago rules

## 1. Statutory Scope, Thresholds & Key Dates

| Measure / Mandate | Applies To | Legal Status (Nov 14, 2026) | Calendar Reality |
|---|---|---|---|
| IL HB 3673 (104th GA) | Entities >$1B doing business in IL | PENDING (House Rules Rule 19(a) Mar 2025) | Printed Jul 2026 / Jan 2027 dates NOT live law |
| NAIC Climate Risk Survey | IL-licensed insurers >=$100M countrywide DWP | LIVE Sectoral Mandate | Annual TCFD disclosure via CDI / IL DOI portal |
| Chicago Benchmarking | Covered Chicago buildings >=50,000 sq ft | LIVE Municipal Mandate | Annual June 1 Portfolio Manager + 3-yr data verif. |

## 2. Operational Requirements & Enforcement

- **Jan 1, 2027 Is NOT In Force:** Printed dates inside unpassed HB 3673 carry zero legal authority because the bill remained stalled in House Rules under Rule 19(a).
- **Unique Secretary of State Design:** Proposed IL law assigns corporate registry & enforcement support to the IL Secretary of State rather than Illinois EPA.
- **Verify Real Triggers Elsewhere:** Illinois firms >$1B may still owe CARB filings via California sales, while Chicago buildings (>=50k sq ft) and IL insurers (>=$100M DWP) hold live duties.



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# Illinois Compliance Separation & 2027 Readiness Checklist

Step-by-step workflow from utility data verification through filing & compliance proof

| Step | Owner / Team | Auditable Deliverable |
|---|---|---|
| 1. Purge False Deadline | Legal / Risk | Correct any internal tracker showing 'IL Jan 1, 2027 Scope 1/2' — cite 104th GA Rule 19(a) status. |
| 2. Test CA Nexus | Tax / Sustainability | Verify if IL enterprise >$1B revenue crosses $757k CA sales (triggering live CA SB 253 instead). |
| 3. Separate City/Insurer Duties | CRE / Insurance | Confirm Chicago >=50k sq ft building benchmarking & IL NAIC >=$100M insurer filings separately. |
| 4. 105th GA Monitor | Gov Affairs | Watch post-election 2027 Illinois session introductions for successor Climate Corporate bills. |

## Key Questions & Edge-Case Rules

- **Do companies in Illinois have to report Scope 1 and Scope 2 emissions starting January 1, 2027 under HB 3673?** No. Although the introduced text of Illinois HB 3673 listed a January 1, 2027 start date, the bill was re-referred to the House Rules Committee under Rule 19(a) on March 21, 2025 and never enacted into law.
- **Who would administer Illinois HB 3673 if a future bill passes?** HB 3673 designated the Illinois Secretary of State (in consultation with the Illinois Attorney General) to adopt rules and contract for a public corporate emissions registry, paired with research analysis by the University of Illinois or a national laboratory.
- **Are there any live climate reporting laws in Illinois right now?** Yes, within specific sectors and cities: Illinois participates in the annual NAIC Climate Risk Disclosure Survey for insurers writing >= $100M countrywide DWP, and the City of Chicago enforces annual June 1 benchmarking for covered buildings >= 50,000 sq ft.

## Primary Sources & Statutory Citations

- Illinois General Assembly — 104th GA HB 3673 Official Bill Status
- BC ESG — California SB 253, SB 261 & AB 1305 Playbook
- BC ESG — NAIC TCFD Climate Risk Disclosure Survey Guide

Canonical Guide: https://bcesg.org/illinois-climate-corporate-accountability-act-hb-3673-watch/

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