SCOPE 3 QUICK CARD: SPECIALTY-TRADES CARBON ACCOUNTING

Operational Core: Eliminating spend-based proxies for emergency restoration and reactive trades. Scope 3 represents ~75% of average corporate emissions (CDP). Spend-based EEIO proxies price the invoice, not the work. This card governs data capture, organizational boundaries, and assurance compliance.

1. WHY PROXIES FAIL & THE 3 REGULATORY PRESSURES

The Spend-Based Fiction (EEIO)

Multiplies dollars paid by industry-average factors. Blind to operational reality: cannot distinguish old vs. new Tier 4 equipment, 100% landfilled debris vs. 50% recycled materials, or clean grid power vs. diesel generators. Emergency work is procured under duress, invoiced in lump sums, and buried in spend factors.

The Primary Data Mandate

Captures actual physical activity: machine runtime hours by kW rating, generator fuel gallons, transport mileage, and certified disposal weights. Converts reactive emergency jobs into auditable carbon data ready for financial-grade ESG assurance.

Regulatory / Standard Body	Scope 3 Requirement & Timeline	Impact on Specialty Trades & Emergency Work
California SB 253 (Climate Corporate Data Accountability)	Mandatory Scope 1, 2, and 3 for companies >$1B revenue doing business in CA. Scope 3 phases in from **2027** under CARB schedule.	Specialty-trade emissions concentrate in **Category 1** (Purchased Goods & Services) and **Category 5** (Waste Generated in Operations). Systems must exist prior to 2027 reporting year.
EU CSRD / ESRS E1 (Corporate Sustainability Reporting)	Mandatory value-chain disclosure under double materiality. Estimates permitted initially where primary data requires unreasonable effort.	Assurance expectations ratchet from limited to reasonable. Unverified spend proxies will be challenged by third-party assurers. Activity-based supplier data required.
GHG Protocol Scope 3 Revision (Phase 1 Progress Update March 2026)	First revision since 2011. Mandates disclosing share of primary vs. spend-based data; **≥95% reportable coverage rule**; restricts company allocations.	Consolidated draft expected in 2027. Prohibits allocating diversified company-wide footprints. Requires granular, job-level supplier activity payloads.

2. ORGANIZATIONAL BOUNDARIES: OCCUPIER VS. PROPERTY OWNER

Allocation strictly follows **operational control**: the corporate occupier (tenant) contracts the service, defines the scope, approves the invoice, and controls access to the leased space.

Reporting Entity	Governing Frameworks	Applicable Scopes	Operational Inclusions (What Falls Inside)
Corporate Occupier (Commercial Tenant)	GHG Protocol, SB 253, EU CSRD / ESRS E1	**Scope 3 Category 1** (Services) **Scope 3 Category 5** (Waste in Ops)	Specialty-trade labor, emergency water/fire restoration, tenant suite repairs, job-site equipment fuel, demolished drywall/flooring debris.
Property Owner / Asset Mgr (Landlord / Real Estate Fund)	GRESB, ENERGY STAR, NYC LL97, DC BEPS	**Scope 1 & 2** (Base Building) **Scope 3 Category 13** (Downstream Leased)	Central plant (chillers/boilers), common area heating/cooling, shared core utilities, structural capital building renovations.

The Power-Source Boundary Rule (Preventing Scope 2 Double-Counting)

When emergency restoration equipment (air scrubbers, commercial desiccant dehumidifiers, axial air movers) plugs into **tenant-metered wall power**, that electricity is already captured in the occupier's **Scope 2 utility ledger**. The restoration contractor's billable service sits in **Scope 3 Category 1**. To prevent double-counting or omissions, the field intake schema must record both *equipment runtime hours* and *primary power source (grid vs. generator)*.

A 12-FIELD JOB-LEVEL INTAKE SCHEMA AT A GLANCE

Field Architecture: A standardized 12-field payload captured by dispatchers or crew leads at job completion from 3 physical artifacts: the work order, fuel log, and waste ticket. Designed for the 2 a.m. emergency crew.

#	Field Name	Required Format & Units	GHG Protocol Mapping	Field Purpose & Assurance Function
1	**Work order ID**	Alphanumeric string (e.g., WO-2026-9041)	Administrative matching	Primary key linking CMMS dispatch, contractor invoice, and carbon payload.
2	**Facility / location ID**	Asset ID or GIS reference (e.g., FAC-NYC-04)	Facility allocation boundary	Maps emissions to exact leased asset, floor plate, and regional eGRID subregion.
3	**Equipment runtime hours**	Operating hours, by power rating (kW)	Cat 1 (service); Occupier Scope 2 if metered	Tracks run-time of dehumidifiers, air movers, scrubbers. Multiplied by kW for kWh.
4	**Primary fuel source**	Grid / Diesel / Propane	Category 1 (direct fuel combustion)	Identifies combustion source. Triggers Scope 2 exclusion flag if grid-tied.
5	**Vehicle transport mileage**	Total miles or kilometres	Category 1 (upstream transportation)	Round-trip distance from contractor yard to facility for crew and haulage trucks.
6	**Chemical consumables**	Gallons or litres	Category 1 (purchased goods)	Volume of biocides, antimicrobials, encapsulants, and cleaning agents applied.
7	**Debris / waste volume**	Tons or cubic yards	Category 5 (waste in operations)	Bulk volume or weighed mass of demolished structural material removed from site.
8	**Waste stream classification**	C&D / Hazardous / Landfill-bound	Category 5	Categorizes material stream to apply correct landfill/incineration emission factor.
9	**Disposal facility type**	Recycling / Incineration / Landfill	Category 5	Certified destination facility. Determines EPA WARM recycling diversion credits.
10	**Demolished material mass**	Weight (lbs/tons) or area (sq ft)	Category 5 (embodied carbon loss)	Quantifies embodied carbon lost from demolished drywall, carpet, ceiling tiles.
11	**Replacement material mass**	Weight/area + % recycled content	Category 1 (embodied carbon replacement)	Captures virgin vs. circular replacement materials installed during restoration build-back.
12	**Data quality flag**	Primary (measured) / Secondary (est.)	Assurance & revision-readiness	Flags verified meter/scale records vs. crew estimates. Essential for GHG Protocol revision.

Field 12: Future-Proofing Assurance

The GHG Protocol revision explicitly mandates reporting the exact percentage of primary activity vs. spend-based data. Capturing Field 12 at the work-order level converts an expensive annual assurance scramble into an instantaneous database query.

The 15-Day Contractual Mechanism

Voluntary surveys fail during emergencies. Insert the MSA Data Rider into vendor contracts: submission of the 12-field payload within **15 business days** of job completion is a strict condition precedent to invoice approval and disbursement.

Three-Phase Rollout Roadmap

Phase 1 (Pre-qualification): Register specialty vendors in CMMS; capture fleet baseline & equipment kW ratings once; execute MSA rider. • **Phase 2 (Dispatch & Execution):** Pre-populate 12 fields on work orders; mobile capture on job notes. • **Phase 3 (Reconciliation & Invoicing):** Reconcile logged runtime against billed labor hours (the two move together); export validated payloads to eGRID and EPA WARM emission factors.