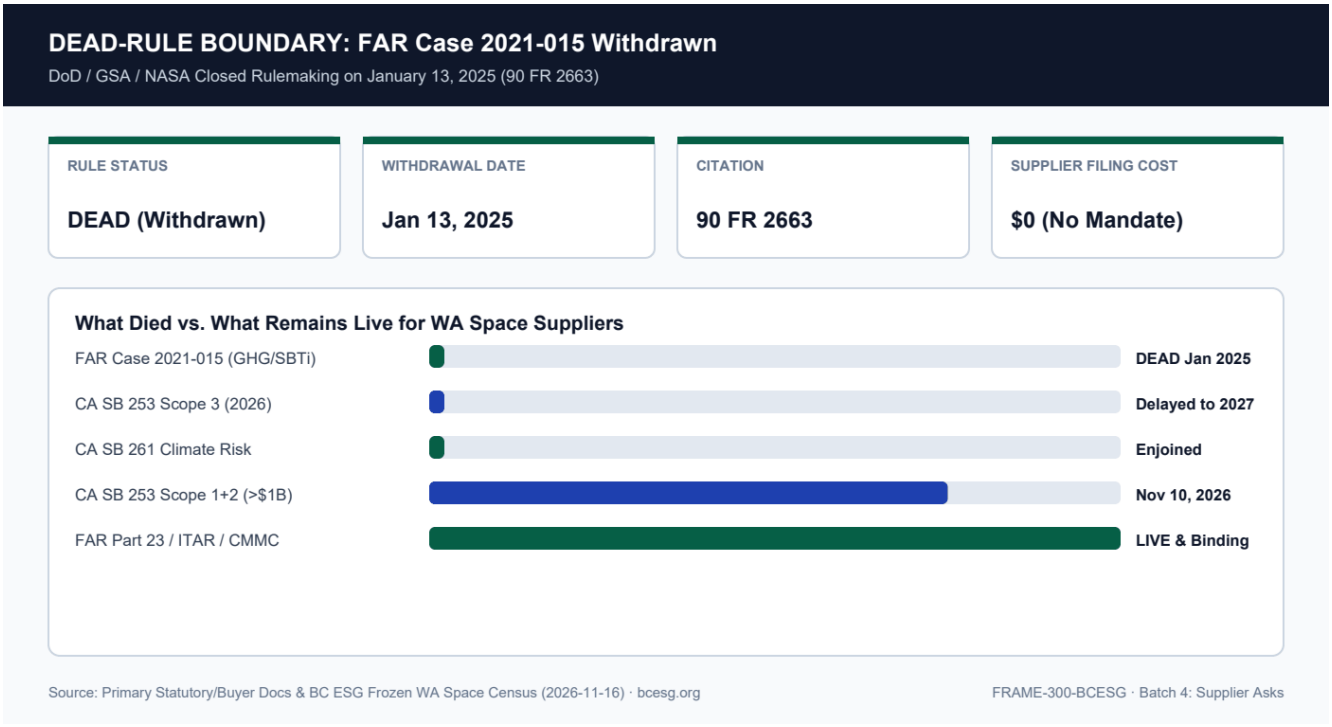
The Dead FAR Climate Rule (FAR Case 2021-015): What Died in Jan 2025

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Verification & Authority Baseline: DEAD RULE: On January 13, 2025, DoD, GSA, and NASA formally withdrew FAR Case 2021-015 (90 FR 2663) and closed the rulemaking. There is zero sweeping FAR or DoD/NASA mandate requiring space contractors to disclose Scope 1/2/3 GHG emissions or set SBTi targets.



Climate / ESG Rule	Current Status (Nov 2026)	Impact on WA Space Suppliers
FAR Case 2021-015 (Federal GHG/SBTi)	DEAD — Withdrawn Jan 13, 2025 (90 FR 2663)	$0 federal mandate; reject false 'FAR GHG' claims
CA SB 253 Scope 1 & 2	LIVE for >$1B CA entities (Nov 10, 2026)	No direct duty on <$1B WA firms
CA SB 253 Scope 3	Not required in 2026 (starts 2027)	No 2026 statutory Scope 3 flow-down
CA SB 261	Enjoined (see BC ESG Post #916)	Not enforced while injunction stands

What Died on January 13, 2025 (And Why Suppliers Still Hear About It)

In November 2022 (87 FR 68312), the FAR Council proposed **FAR Case 2021-015** (*Disclosure of Greenhouse Gas Emissions and Climate-Related Financial Risk*), which would have forced major federal contractors to publish Scope 1, 2, and 3 GHG inventories, disclose climate-financial risks, and set science-based reduction targets (SBTi).

That rule is dead. On **January 13, 2025 (**90 FR 2663**)**, DoD, GSA, and NASA formally **withdrew FAR Case 2021-015** and closed the case, citing insufficient time and a shifting regulatory landscape. Any outdated questionnaire, consultant pitch, or legacy RFP template claiming a 'federal FAR Scope 3 mandate' is citing a **withdrawn, non-existent rule**.

Evidence Required & Effort Cost Today

Zero. Because FAR Case 2021-015 was withdrawn before finalization, there is no federal FAR GHG disclosure clause, no DoD climate-disclosure deviation in force, and no federal requirement to register SBTi targets. Effort cost to satisfy a dead rule is **$0**.

If a prime contractor still asks for carbon data, it is doing so **voluntarily** (e.g., IAEG/EcoVadis or CDP) or to prepare for **California SB 253** (Scope 1 & 2 due Nov 10, 2026 for >$1B CA entities; Scope 3 delayed to 2027).

WA Space Cluster Segments & Companies Affected

This dead-rule boundary protects every WA space supplier across Launch, Satellite Manufacturing, Propulsion, Components & Suppliers, and Software & Mission Services from misallocating compliance budgets to defunct federal GHG mandates.

Verified Primary Sources & Internal Bridges

• Federal Register — Original Proposed FAR Case 2021-015 (Withdrawn Jan 2025): https://www.federalregister.gov/documents/2022/11/14/2022-24569/federal-acquisition-regulation-disclosure-of-greenhouse-gas-emissions-and-climate-related-financial

• CARB — California Air Resources Board: https://ww2.arb.ca.gov/