California SB 253 Scope 1 & 2 Requests Reaching WA Space Suppliers

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Verification & Authority Baseline: CA SB 253 binds US entities doing business in California with >$1B annual revenue. CARB set the Scope 1+2 deadline at November 10, 2026 (with 'good faith' enforcement) and pushed Scope 3 to 2027. WA suppliers <$1B have zero direct SB 253 duty; CA customers cannot cite SB 253 as a 2026 Scope 3 mandate.



SB 253 Component	CARB 2026 Rule State	Effect on <$1B WA Supplier
Scope 1 & 2	Due Nov 10, 2026 for >$1B CA entities; good-faith enforcement	Zero direct filing duty on <$1B WA firms
Scope 3 (Supply Chain)	NOT required in 2026; slated for 2027	Any 2026 request is voluntary / early prep
3rd-Party Assurance	Not required for 2026 Scope 1+2; limited assurance starts 2027	No audit cost on WA suppliers in 2026

Who Issues This Ask, Authority, and Binding Status

California's **SB 253** (Climate Corporate Data Accountability Act, overseen by CARB) binds **only** US-organized entities doing business in California with total annual revenues **exceeding $1 billion**. Large California aerospace customers (e.g., SpaceX HQ/Hawthorne, Relativity HQ/Long Beach, K2 Space HQ/Torrance, Viasat HQ/Carlsbad, Northrop/Lockheed CA units) are subject to SB 253 if they meet those thresholds.

Dead-rule & timeline boundary: CARB adjusted the inaugural **Scope 1 and Scope 2** reporting deadline to **November 10, 2026**, under a first-year 'good faith' ('give what you have') enforcement posture with no third-party assurance required in 2026. Crucially, **Scope 3 (value-chain) reporting is NOT required in 2026**—it is slated to begin in **2027**. Meanwhile, **SB 261** remains enjoined (see BC ESG Post #916). Thus, a <$1B WA supplier has **zero direct SB 253 filing duty**, and any 2026 supplier survey claiming SB 253 requires Scope 3 today is premature.

Evidence Required & Small-Supplier Effort Cost

When a CA >$1B prime asks a WA supplier for utility-level data ahead of 2027 Scope 3 readiness, a simple **Scope 1 (natural gas/propane/diesel) and Scope 2 (electricity kWh)** summary from 12 months of Puget Sound Energy / Snohomish PUD / Seattle City Light bills satisfies the ask.

Software or consultant fees are unnecessary for basic utility rollups; internal admin effort is **not in our data** (typically a few hours of utility-bill aggregation for a single-facility shop).

WA Space Cluster Segments & Companies Affected

CA customer ties exist across Launch (Relativity Space Kent), Satellite Manufacturing (K2 Space Bellevue, SpaceX Redmond), and Ground Systems & SATCOM (Viasat Seattle).

Verified Primary Sources & Internal Bridges

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

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