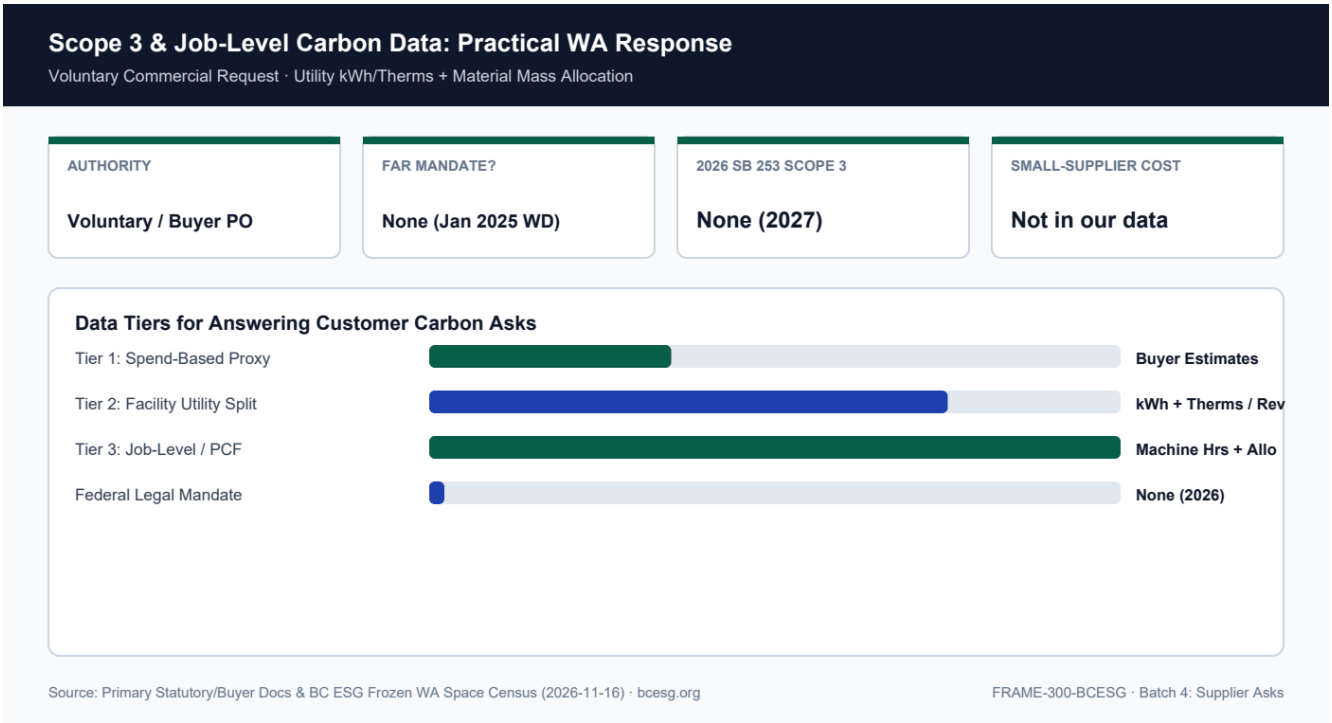
Customer Scope 3 & Product Carbon Footprint (PCF) Asks for WA Suppliers

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Verification & Authority Baseline: Voluntary/commercial customer requests for Scope 3 or Product Carbon Footprint (PCF) data. Zero federal FAR mandate (FAR Case 2021-015 withdrawn Jan 2025) and zero 2026 CA SB 253 Scope 3 mandate. Adapts BC ESG's Vendor Carbon Report framework (Post #920, Pages #144-#145) to WA space suppliers.



Approach	Data Inputs	When to Use
Utility-Bill Allocation	12-mo kWh + therms + revenue/hours share	Best default for <50-person WA machine/fab shops
Job-Level / PCF	Alloy mass (kg) + mill cert + machine kWh	Only if required by a high-value commercial PO
Spend-Based (Buyer)	Invoice $ only (EEIO factor)	Buyer calculates; $0 supplier effort

Who Issues This Ask, Authority, and Binding Status

Product Carbon Footprint (PCF) and Scope 3 supplier data requests come from sustainability teams at commercial satellite operators, cloud ground primes, or European-linked aerospace OEMs (such as Airbus/Safran/EU CSRD filers—see BC ESG Post #22).

In the US, **no federal law or FAR clause mandates Scope 3 reporting** (FAR `Case 2021-015` died January 13, 2025), and **CA SB 253 Scope 3 does not start until 2027**. Thus, these asks are **voluntary** unless written into a commercial contract.

Evidence Required & Small-Supplier Effort Cost

Adapting BC ESG's Scope 3 Field Guide (Post #920) and Vendor Carbon Report Template (Page #145), a small WA shop can answer cleanly using a 1-page **Facility Utility Allocation** (annual electricity kWh from Puget Sound Energy/Seattle

City Light + natural gas therms, divided by total shop revenue or machine-hours) rather than hiring an LCA consultant.

Exact consultant or LCA-software costs are **not in our data**; an in-house utility-allocation sheet requires only utility bills and basic spreadsheet math.

WA Space Cluster Segments & Companies Affected

Applies selectively to suppliers with EU CSRD or commercial ESG buyers across Components & Suppliers, Satellite Manufacturing, and Ground Systems & SATCOM.

Verified Primary Sources & Internal Bridges

• Federal Register — Withdrawn FAR Climate Rule (Jan 2025):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

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