The Honest Gap: Why No Space-Specific Scope 3 or ESG Standard Exists for Orbital Operations

Pillar: Measurement & ESG Gap | **Basis:** GHG Protocol / ISSB / CSRD / SB 253 Audit | **Primary Source:** GHG Protocol / ISSB / CARB | **As Of:** Verified Gap as of Nov 2026

No space-specific Scope 3 or ESG reporting standard exists for orbital operations in the GHG Protocol, ISSB IFRS S1/S2, EU CSRD, or California SB 253 as of November 2026—terrestrial emissions use generic corporate standards while orbital debris is governed by FCC/FAA/NASA licensing.

Documented Instrument & Engineering Record

• Documented gap: Nowhere in the GHG Protocol Corporate/Scope 3 Standards, ISSB IFRS S1/S2, EU CSRD Omnibus I, or California SB 253 is there a space-specific Scope 3 or orbital ESG standard.

• What *does* apply to WA space firms: Ground facilities, cleanrooms, static-fire propellant combustion, and purchased titanium/aluminum fall under generic terrestrial GHG Protocol Scope 1, 2, and 3 categories (e.g., Cat 1 Purchased Goods, Cat 12 End-of-Life).

• What does *not* have an ESG standard: Orbital debris generation, conjunction-avoidance performance, stratospheric reentry ablation, and spectrum/slot stewardship have no standardized ESG scoring or Scope 3 methodology.

• Why this matters for buyers and compliance leads: Do not mistake voluntary space-sustainability pledges or rating-agency questionnaires for a binding ESG standard; real orbital obligations live in 47 CFR § 25.283(e), 14 CFR Part 450, 15 CFR Part 960, and NASA-STD-8719.14C.

Framework Audit: Space-Specific Orbital Standard Check (Nov 2026)

Framework / Instrument	Covers Terrestrial Space Mfg?	Space-Specific Orbital ESG Standard?
GHG Protocol (Scope 1–3)	Yes (generic corporate rules)	No space-specific orbital standard
ISSB IFRS S1 / S2	Yes (material climate/Scope 3)	No space-specific orbital standard
CA SB 253 (Scope 1+2 / 3)	Yes (if >$1B & doing biz in CA)	No space-specific orbital standard
FCC / FAA / NASA ODAR	Launch/spacecraft licensing	Technical/safety rules (not ESG reporting)

Mission Designer, Compliance Lead & Founder Takeaways

• Sustainability leads asked for 'orbital Scope 3' metrics should report terrestrial Scope 1–3 under GHG Protocol and attach FCC ODMP / NASA ODAR compliance separately.

• Never fabricate or imply a mandatory 'Space ESG' framework where none exists in law or standard-setting.

• Cross-reference Batch 5's SB 253 Scope 3 (PARTIAL) and CSRD Omnibus (PARTIAL) verdicts for terrestrial corporate-disclosure thresholds.

Cross-Cluster Links & Primary Sources

• **Batch 5 Verdict: CA SB 253 Scope 3 (PARTIAL):** https://bcesg.org/wa-space-rule-ca-sb-253-scope-3-partial/

• **Batch 5 Verdict: ISSB IFRS S1/S2 (PARTIAL):** https://bcesg.org/wa-space-rule-issb-ifrs-s1-s2-live/

• **Batch 5 Verdict: EU CSRD Omnibus (PARTIAL):** https://bcesg.org/wa-space-rule-eu-csrd-omnibus-partial/

• **GHG Protocol Corporate Value Chain (Scope 3) Standard:** https://ghgprotocol.org/corporate-value-chain-scope-3-standard

• **IFRS S2 Climate-Related Disclosures:**
https://www.ifrs.org/issued-standards/ifrs-sustainability-standards-navigator/ifrs-s2-climate-related-disclosures/

Provenance Note: Honest gap verified against GHG Protocol, ISSB IFRS S2, and Batch 5 regulatory records as of 2026-11-16.