Dead-Rule Cleanup Audit: What WA Space Suppliers Can Stop Preparing For

Pillar: Dead-Rule Cleanup & Hygiene | **Basis:** Batch 5 Rules That Died Verdicts | **Primary Source:** FAR Council (90 FR 2663) / SEC / 9th Cir. | **As Of:** 2026-11-16

Readiness includes knowing what to stop doing. Five high-profile federal and state climate-disclosure proposals are dead, withdrawn, or enjoined in Batch 5—freeing WA space suppliers from preparing statutory filings that no longer exist.

Readiness Checklist & Corpus Traceability

• **Stop Preparing FAR Case 2021-015:** Withdrawn Jan 13, 2025 (90 FR 2663); see FAR Case 2021-015 Withdrawn (DEAD) and Dead FAR Climate Rule.

• **Stop Preparing DoD GHG Class Deviations:** Expired/dead alongside the withdrawn FAR rule per DoD GHG Class Deviations (DEAD).

• **Stop Preparing SEC Climate Rule Filings:** Rescission proposed May 2026; see SEC Climate Disclosure Rule (DEAD).

• **Pause CA SB 261 Statutory Filings:** Enjoined by the 9th Circuit Nov 18, 2025 per California SB 261 (ENJOINED).

• **Stop Citing Federal Scope 3 or OMB M-22-18:** Both are documented dead per Federal Scope 3 Mandate (DEAD) and OMB M-22-18 (DEAD).

Dead-Rule Cleanup Audit Table (Batch 5 Verdicts)

Rule / Proposal	Verified Status	Cleanup Action & Source
FAR Case 2021-015	DEAD (90 FR 2663, Jan 2025)	Remove federal GHG/SBTi bid gate; #1927
DoD GHG Deviations	DEAD	Drop DoD climate-clause prep; #1930
SEC Climate Rule	DEAD (May 2026 rescission)	Halt Reg S-K climate-footnote spend; #1933
CA SB 261	ENJOINED (9th Cir. Nov 18, 2025)	Hold statutory SB 261 report; #1936
Federal Scope 3	DEAD	Separate prime commercial asks from law; #1942

Operator Execution & Boundary Notes

• Do **not** confuse dead federal mandates with live commercial portal asks—Boeing and Amazon Leo still request voluntary/contractual disclosures (Boeing Code).

• Keep CA SB 253 Scope 1+2 and WA CBPS active on the compliance calendar; neither was withdrawn or enjoined.

• Audit external consultants' proposals against Batch 5 verdicts before approving any 2027 compliance retainer.

Corpus Source Pieces & Primary Authorities

• **FAR Case 2021-015 Withdrawn (DEAD):** https://bcesg.org/wa-space-rule-far-case-2021-015-withdrawn/

• **SEC Climate Disclosure Rule (DEAD):** https://bcesg.org/wa-space-rule-sec-climate-disclosure-dead/

• **California SB 261 (ENJOINED):** https://bcesg.org/wa-space-rule-ca-sb-261-enjoined/

• **Federal Scope 3 Mandate (DEAD):** https://bcesg.org/wa-space-rule-federal-scope-3-mandate-dead/

• **Compliance Lead Desk Brief:** https://bcesg.org/wa-space-role-compliance-lead-desk-brief/

• **90 FR 2663 Withdrawal (Federal Register):** https://www.federalregister.gov/documents/2025/01/13/2024-30621/federal-acquisition-regulation-disclosure-of-greenhouse-gas-emissions-and-climate-related-financial

Provenance Note: Synthesized strictly from BC ESG Batch 5 (#1927–#1945) and Batch 4 (#1810). Statuses match Batch 5 verdicts exactly.