Routing Around Documented Gaps: No Orbital ESG Standard & Thin-Record Segments

Pillar: Dead-Rule Cleanup & Hygiene | **Basis:** Batch 3, Batch 8 & Batch 9 Gap Records | **Primary Source:** GHG Protocol / ISSB / FCC / FAA / NASA | **As Of:** 2026-11-16

Where the corpus documents an absence—no space-specific Scope 3 or ESG standard, no orbital launch range in Washington, thin public records for orbital data centers, and undisclosed private carrier routes—readiness routes directly to the binding instruments that actually govern operations.

Readiness Checklist & Corpus Traceability

• **Orbital Scope 3 / ESG Gap:** Do not invent orbital carbon-accounting rules; cite No Space-Specific Scope 3 / ESG Standard and route orbital compliance to FCC 5-Year Disposal and NASA ODAR.

• **No WA Orbital Launch Range:** Route WA-built launch vehicles to out-of-state range licensing under No Orbital Launch Range in WA and FAA Part 450.

• **Orbital Data Centers (Thin-Record):** Ground facility siting in WA utility and thermal reality per Orbital Data Centers Overview rather than unverified orbital compute claims.

• **Private Freight Routes:** Build internal carrier SOPs where public records stop per Private Carrier Routes Boundary.

Documented Gap Routing Table

Documented Gap	What Not to Do	Binding Route & Corpus Source
No Orbital ESG Standard	Do not invent Scope 3 orbital KPIs	Route to FCC 25.283(e) & ODAR; #2364
No WA Orbital Range	Do not model coastal WA orbital launch	Route to FL/TX range + FAA 450; #2288
Thin Orbital Data Ctr	Do not extrapolate unverified compute	Use WA power/Starcloud/Cowboy record; #1689
Private Carrier Routes	Do not assume public route schedules	Lock carrier SLAs in-house; #2197

Operator Execution & Boundary Notes

• In prime RFPs or investor diligence, stating a documented regulatory gap with its exact primary citation builds more credibility than padding a compliance matrix.

• Keep Reentry Ablation & Atmospheric Impact on watch as a science/measurement topic rather than an enacted Scope 3 rule.

• Re-check GHG Protocol and ISSB IFRS S2 updates annually for any future aerospace/orbital sector guidance.

Corpus Source Pieces & Primary Authorities

• **No Space-Specific Scope 3 / ESG Standard:** https://bcesg.org/wa-space-orbital-no-scope-3-esg-standard-gap/

• **No Orbital Launch Range in WA:** https://bcesg.org/wa-space-fight-no-orbital-launch-range-physics/

• **Orbital Data Centers Overview:** https://bcesg.org/wa-orbital-data-centers-segment-overview/

• **Private Carrier Routes Boundary:** https://bcesg.org/wa-space-hardware-not-in-our-data-private-routes/

• **Reentry Ablation & Atmospheric Impact:** https://bcesg.org/wa-space-orbital-reentry-ablation-atmosphere/

• **GHG Protocol Scope 3 Standard:** https://ghgprotocol.org/corporate-value-chain-scope-3-standard

• **47 CFR 25.283 (eCFR):** https://www.ecfr.gov/current/title-47/chapter-I/subchapter-B/part-25/subpart-D/section-25.283

Provenance Note: Synthesized from BC ESG Batch 3 (#1689), Batch 7 (#2197), Batch 8 (#2288), and Batch 9 (#2361, #2364).