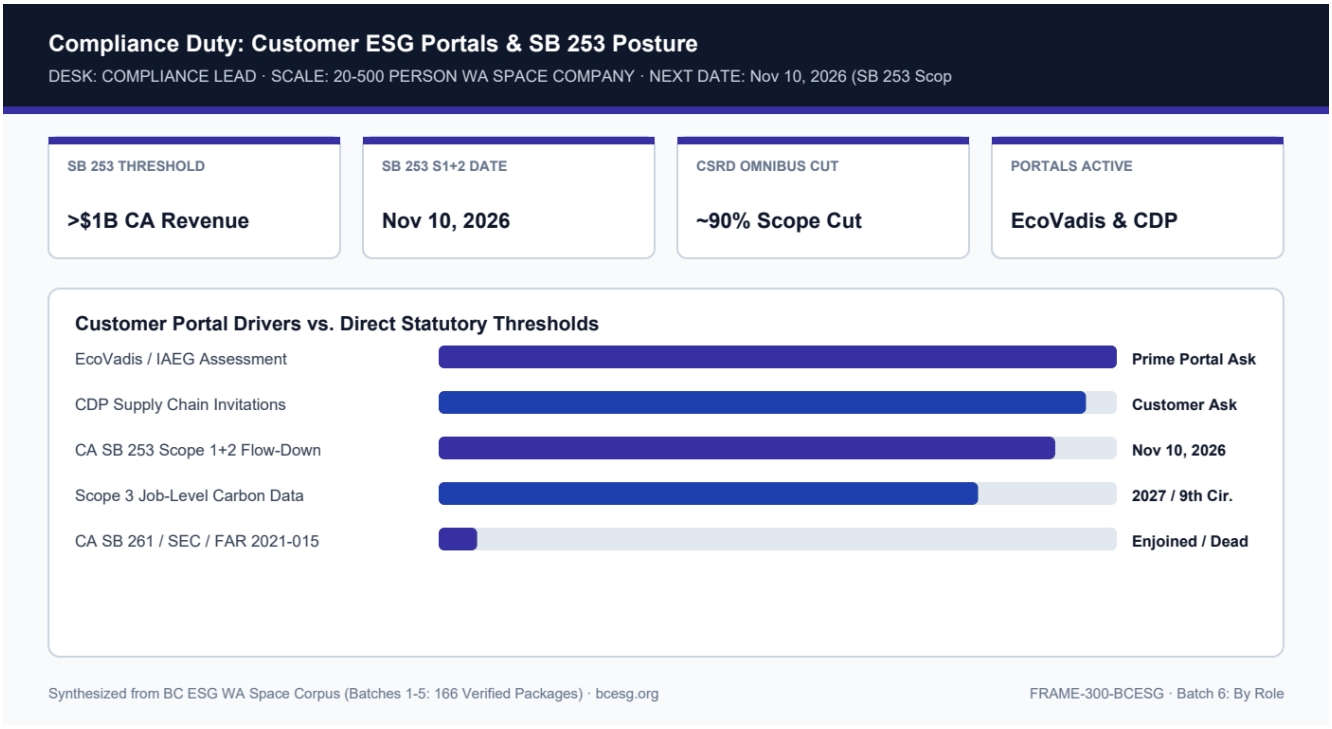
Compliance Lead Duty: Handling EcoVadis, CDP & SB 253 Asks Without Chasing Dead Rules

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Role: Compliance Lead | **Top Live Mandate:** EcoVadis / IAEG, CDP & SB 253 Scope 1+2 Flow-Downs | **Dead Rule to Ignore:** FAR 2021-015, SEC Climate & CA SB 261 | **Next Deadline:** Nov 10, 2026 (SB 253 Scope 1+2)

Desk Summary: Even though a 20–500-person WA supplier sits below CA SB 253 ($1B) and EU CSRD Omnibus I (>1,000 emp) thresholds, primes still send EcoVadis, CDP, and job-level carbon asks—requiring clean Scope 1+2 data without dead-rule bloat.



Instrument	Status	Date / Threshold	Source
CA SB 253 Scope 1+2	LIVE	Nov 10, 2026 (>$1B CA entities)	Cal. H&S Code § 38532
CA SB 253 Scope 3	PARTIAL	Jan 9, 2026 Oral Arg. / 2027 Target	9th Cir. No. 25-5327
CA SB 261	ENJOINED	Enjoined Nov 18, 2025	9th Cir. No. 25-5327
EU CSRD Omnibus I	PARTIAL	Mar 18, 2026 (>1,000 emp / >€450M)	Directive (EU) 2026/470
ISSB IFRS S1/S2	PARTIAL	2025–2026 (~20 non-US jurisdictions)	IFRS Foundation

1. What Arrives on This Desk (Live Asks & Rules)

Customer-driven ESG asks arrive via EcoVadis & IAEG assessments, CDP Supply Chain invitations, CA SB 253 Scope 1+2 requests from >$1B California customers, and Scope 3 job-level carbon data requests. Meanwhile, EU CSRD Omnibus I ((EU) 2026/470, in force Mar 18, 2026) cut EU scope by ~90% to >1,000 employees and >€450M turnover, and ISSB IFRS S1/S2 remains un-adopted in the US.

2. What Is Dead or Enjoined and Can Be Ignored

Do not confuse customer portal requests with dead federal/state mandates: FAR Case 2021-015 is withdrawn, SEC Climate Rule is abandoned, and CA SB 261 is enjoined. On CA SB 253 Scope 3, flag the Batch 4 vs. Batch 5 distinction: CARB targets 2027, but the Ninth Circuit heard oral argument on January 9, 2026 (*No. 25-5327*) on First Amendment and severability.

3. What Carries a Date (Deadlines & Instruments)

Key portal and disclosure dates:

Corpus References & Cross-Role Links

- Compliance Lead Desk Brief (Overview): https://bcesg.org/wa-space-role-compliance-lead-desk-brief/
- EcoVadis & IAEG Assessment: https://bcesg.org/wa-space-ask-ecovadis-iaeg-assessment/
- CDP Supply Chain Invitations: https://bcesg.org/wa-space-ask-cdp-supply-chain-invitations/
- CA SB 253 Scope 1+2 (LIVE): https://bcesg.org/wa-space-rule-ca-sb-253-scope-1-2-live/
- CA SB 253 Scope 3 (PARTIAL): https://bcesg.org/wa-space-rule-ca-sb-253-scope-3-partial/
- EU CSRD Omnibus I (PARTIAL): https://bcesg.org/wa-space-rule-eu-csrd-omnibus-partial/