Compliance Lead Desk Brief: Separating Live Mandates from Dead & Enjoined Rules

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Role: Compliance Lead | **Top Live Mandate:** DFARS 7012, CA SB 253 (Customer Flow-Down), CMMC Ph. 1 & TSCA PFAS | **Dead Rule to Ignore:** FAR 2021-015, DoD 2025-O0004, SEC Climate, SB 261, OMB M-22-18 | **Next Deadline:** Nov 10, 2026 (SB 253 S1+2) / Jul 31, 2027 (PFAS)

Desk Summary: The Compliance Lead at a 20–500-person WA space firm prevents wasted spend on dead federal/state climate rules while keeping DFARS 7012, customer-driven ESG portals, and TSCA PFAS reporting audit-ready.



Rule / Mandate	Status	Key Date	Primary Instrument
CA SB 253 Scope 1+2 (>$1B CA)	LIVE	Nov 10, 2026 (assurance 2027)	Cal. H&S Code § 38532
CA SB 253 Scope 3	PARTIAL	Jan 9, 2026 Oral Arg. / 2027 Target	9th Cir. No. 25-5327
EU CSRD Omnibus I	PARTIAL	Mar 18, 2026 (>1,000 emp / >€450M)	Directive (EU) 2026/470
CMMC 2.0 Rollout	PARTIAL	Ph. 1 Nov 10, 2025 / Ph. 2 Paused Jul 2026	32 CFR Part 170
DFARS 252.204-7012	LIVE	Continuous (72-hr incident report)	48 CFR 252.204-7012
EPA TSCA PFAS Part 705	LIVE	Jan 31, 2027 open / Jul 31, 2027 due	40 CFR Part 705

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

As BC ESG risk governance guidance emphasizes, mid-market compliance teams fail when they treat every prime questionnaire as a federal mandate. On the WA space cluster desk, live compliance obligations split into three tracks: (1)

defense cyber (DFARS 252.204-7012 and CMMC 2.0 Phase 1); (2) commercial customer portals (EcoVadis, CDP, and CA SB 253 Scope 1+2); and (3) chemical/product reporting (EPA TSCA PFAS Part 705).

2. What Is Dead or Enjoined and Can Be Ignored

Batch 5 documents six dead or enjoined rules that must be stripped from active compliance roadmaps: FAR Case 2021-015 (withdrawn Jan 13, 2025, 90 FR 2663), DoD Class Deviation 2025-O0004 (Mar 7, 2025), SEC Climate Rule (abandoned Mar 27, 2025; rescission proposed May 29, 2026), CA SB 261 (enjoined Nov 18, 2025), Federal Scope 3 Mandate claims, and OMB M-22-18 blanket software self-attestation (rescinded Jan 2026 by OMB M-26-05).

3. What Carries a Date (Deadlines & Instruments)

Note the Batch 4/5 precision flag on CA SB 253 Scope 3: while Batch 4 summarized Scope 3 as 'delayed to 2027,' Batch 5 documents the active Ninth Circuit constitutional/severability posture (Jan 9, 2026 oral argument in *No. 25-5327*):

Corpus References & Cross-Role Links

- Compliance Duty: ESG Portals & SB 253: https://bcesg.org/wa-space-role-compliance-esg-portals-sb253/
- Compliance Duty: DFARS 7012 & CMMC: https://bcesg.org/wa-space-role-compliance-dfars-7012-cmmc/
- Risk Management & Compliance Governance: https://bcesg.org/risk-management-esg-compliance-governance/
- FAR Case 2021-015 Withdrawn (DEAD): https://bcesg.org/wa-space-rule-far-case-2021-015-withdrawn/
- CA SB 261 Enjoined (ENJOINED): https://bcesg.org/wa-space-rule-ca-sb-261-enjoined/
- CA SB 253 Scope 3 (PARTIAL): https://bcesg.org/wa-space-rule-ca-sb-253-scope-3-partial/