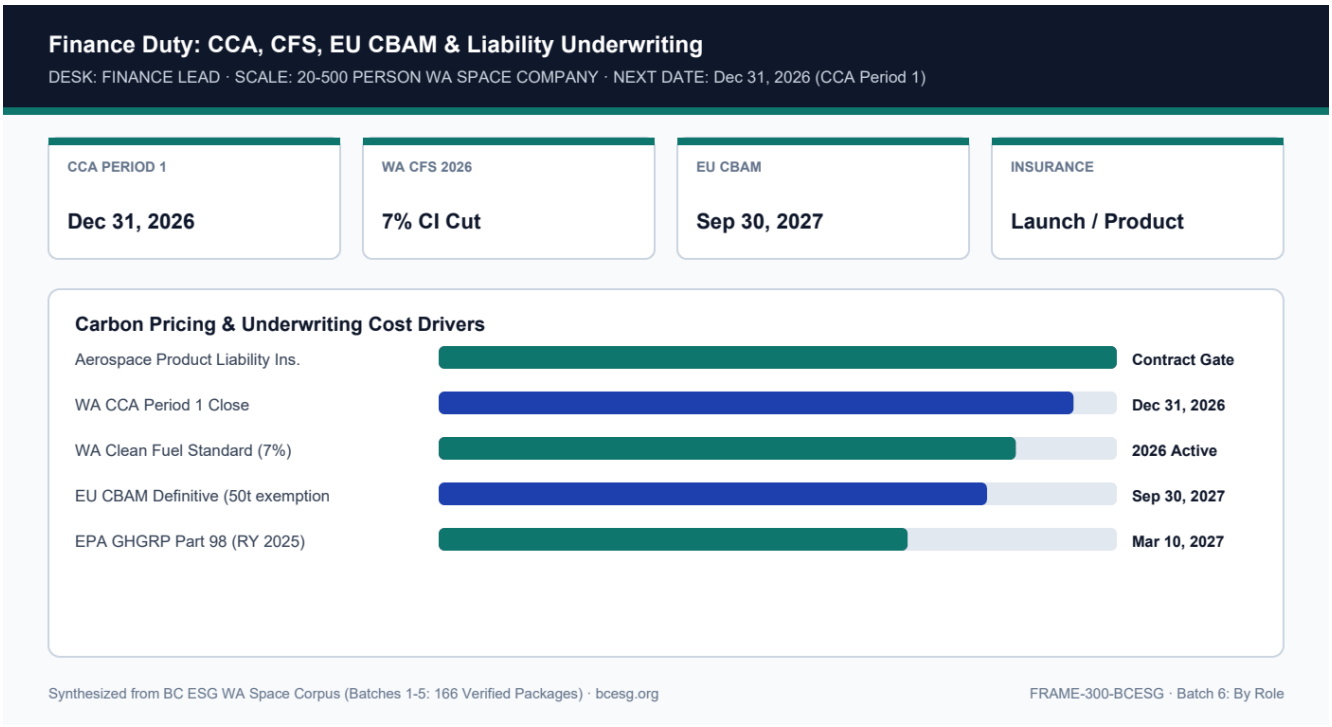
Finance Lead Duty: CCA Carbon-Cost Budgeting, EU CBAM & Aerospace Liability Insurance

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Role: Finance Lead | **Top Live Mandate:** WA CCA Period 1, WA CFS (7%), EU CBAM & Product Liability | **Dead Rule to Ignore:** CA SB 261 & Federal Scope 3 Financial Disclosures | **Next Deadline:** Dec 31, 2026 (CCA Period 1) / Sep 30, 2027 (CBAM)

Desk Summary: Beyond tax rates, Finance budgets for WA CCA Period 1 close (Dec 31, 2026) utility/fuel cost pass-throughs, WA CFS 7% fuel-intensity cuts, EU CBAM border certificates (Sep 30, 2027 surrender), and aerospace product liability underwriting.



Instrument	Status	Key Date	Source
WA CCA Cap-and-Invest	LIVE	Dec 31, 2026 Period 1 close	RCW 70A.65 / WAC 173-446
WA Clean Fuel Standard	LIVE	2026 (7% CI reduction)	RCW 70A.535 / WAC 173-424
EU CBAM Definitive	LIVE	Jan 1, 2026 start / Sep 30, 2027 surrender	Reg. (EU) 2025/2083
EPA GHGRP Part 98	PARTIAL	RY 2025 extended to Mar 10, 2027	91 FR 65112

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

Four cost-bearing rules sit on the Finance desk: WA CCA (Period 1 closes Dec 31, 2026; plus CCA Scope 1+2 energy data asks), WA Clean Fuel Standard (7% 2026 CI reduction), EU CBAM (definitive period started Jan 1, 2026; 50-tonne exemption; first surrender Sep 30, 2027), and Aerospace Product Liability Insurance.

2. What Is Dead or Enjoined and Can Be Ignored

Ignore CA SB 261 and federal Scope 3 mandates. Track EPA GHGRP Part 98 (RY 2025 extended to Mar 10, 2027) only if a propulsion/test site exceeds 25,000 MT CO2e.

3. What Carries a Date (Deadlines & Instruments)

Key carbon-cost and underwriting dates:

Corpus References & Cross-Role Links

- Finance Lead Desk Brief (Overview): https://bcesg.org/wa-space-role-finance-lead-desk-brief/
- WA Climate Commitment Act (LIVE): https://bcesg.org/wa-space-rule-wa-climate-commitment-act-live/
- WA Clean Fuel Standard (LIVE): https://bcesg.org/wa-space-rule-wa-clean-fuel-standard-live/
- EU CBAM Definitive (LIVE): https://bcesg.org/wa-space-rule-eu-cbam-definitive-live/
- Aerospace Product Liability Insurance: https://bcesg.org/wa-space-ask-aerospace-product-liability-insurance/