Founder & CEO Duty: Prime Contract Acceptance, Insurance & No-Code Boundaries

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Role: Founder / CEO | **Top Live Mandate:** Prime Contract Terms, Insurance & Export/Cyber Clauses | **Dead Rule to Ignore:** FAR Case 2021-015 & DoD GHG Class Deviations | **Next Deadline:** Continuous (At Contract Signature & Renewal)

Desk Summary: Founders must separate primes with formal supplier ESG codes (Boeing, Amazon Leo, L3Harris) from no-code primes (SpaceX, Blue Origin) while sizing aerospace product liability insurance and rejecting dead GHG clauses.



Contract Gate	Status	Effective / Cutoff Date	Instrument
SpaceX / Blue Origin Supplier ESG Code	NONE	Verified Nov 2026	No standalone code published
DFARS 252.204-7012 (NIST 800-171)	LIVE	Active (72-hr incident report)	48 CFR 252.204-7012
CMMC 2.0 Phase 1 vs. Phase 2	PARTIAL	Phase 1 Nov 10, 2025 / Phase 2 Paused Jul 2026	32 CFR Part 170 / DFARS 7021
FAR Case 2021-015 GHG Clause	DEAD	Withdrawn Jan 13, 2025	90 FR 2663
Aerospace Product Liability Coverage	LIVE	Contractual / Annual Renewal	Prime MSA & Launch Underwriting

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

When a commercial or defense prime sends a master supply agreement to a Launch or Satellite Manufacturing supplier in Washington, the Founder/CEO evaluates two distinct contract postures. SpaceX and Blue Origin publish no standalone supplier ESG code—their expectations ride inside technical specifications, ITAR flow-downs, and workmanship/quality clauses.

By contrast, Boeing, Amazon Leo, and L3Harris, Lockheed Martin, and Northrop Grumman issue formal supplier codes and portal onboarding requirements (Prime Onboarding Portals). Simultaneously, prime contracts require Aerospace Product Liability Insurance and active DFARS 252.204-7012 cyber representations.

2. What Is Dead or Enjoined and Can Be Ignored

If a prime's boilerplate still references proposed federal GHG disclosure or SBTi validation under FAR Case 2021-015, flag it as withdrawn (90 FR 2663, Jan 13, 2025). On DoD subcontracts, DoD Class Deviation 2025-O0004 (Mar 7, 2025) actively prohibits FAR 52.223-22 and 52.223-19.

3. What Carries a Date (Deadlines & Instruments)

Key contract-gate instruments and dates verified in Batches 4 and 5:

Corpus References & Cross-Role Links

- Founder & CEO Desk Brief (Overview): https://bcesg.org/wa-space-role-founder-ceo-desk-brief/
- SpaceX & Blue Origin No-Code Boundary: https://bcesg.org/wa-space-ask-spacex-blue-origin-no-esg-code/
- Boeing Supplier Code of Conduct: https://bcesg.org/wa-space-ask-boeing-supplier-code-of-conduct/
- Aerospace Product Liability Insurance: https://bcesg.org/wa-space-ask-aerospace-product-liability-insurance/
- DFARS 7012 / NIST 800-171 (LIVE): https://bcesg.org/wa-space-rule-dfars-7012-nist-800-171-live/
- CMMC 2.0 Phase 2 Pause (PARTIAL): https://bcesg.org/wa-space-rule-cmmc-2-0-phase-2-partial/