# Procurement Duty: Buy American (DFARS 7001), Specialty Metals, Trafficking & HB 1282

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**Role:** Supply-Chain & Procurement | **Top Live Mandate:** DFARS 7001/7009, FAR 52.222-50, HB 1282 & EU CBAM | **Dead Rule to Ignore:** FAR 2021-015 & DoD GHG Deviations | **Next Deadline:** Jul 1, 2025 (HB 1282 Active) / Sep 30, 2027 (CBAM)

**Desk Summary:** Domestic-origin and trade-border rules—DFARS 7001 Buy American, DFARS 7009 Specialty Metals, FAR 52.222-50 anti-trafficking, WA HB 1282 Buy Clean, and EU CBAM—require pre-PO verification.




| Rule | Status | Effective / Deadline | Instrument |
|---|---|---|---|
| WA HB 1282 Buy Clean | LIVE | Jul 1, 2025 mandatory reporting | RCW Ch. 39.116 |
| EU CBAM Definitive | LIVE | Jan 1, 2026 start / Sep 30, 2027 surrender | Reg. (EU) 2025/2083 |
| DFARS 7001 / 7009 | LIVE | Continuous per PO | 48 CFR 252.225-7001 / -7009 |
| FAR 52.222-50 Trafficking | LIVE | Continuous (>=$550k non-US cert) | 48 CFR 52.222-50 |

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

Procurement teams enforce origin and labor clauses on every sub-tier purchase: DFARS 252.225-7001 (Buy American), DFARS 252.225-7009 (Specialty Metals), FAR 52.222-50 (Combating Trafficking in Persons), and FAR 52.223 Sustainable Procurement. For WA public-works facility builds and European metal/component trade, WA HB 1282 (Buy Clean, Buy Fair) and EU CBAM (50-tonne exemption, definitive period started Jan 1, 2026) are live.

## 2. What Is Dead or Enjoined and Can Be Ignored

While FAR 52.223 sustainable-product clauses remain active, FAR Case 2021-015 and DoD 2025-O0004 confirm that federal GHG/SBTi supplier mandates are dead.

## 3. What Carries a Date (Deadlines & Instruments)

Active origin, labor, and border instruments:

## Corpus References & Cross-Role Links

- Procurement Lead Desk Brief (Overview): https://bcesg.org/wa-space-role-procurement-lead-desk-brief/
- DFARS 252.225-7001 Buy American: https://bcesg.org/wa-space-ask-dfars-252-225-7001-buy-american-baa/
- FAR 52.222-50 Combating Trafficking: https://bcesg.org/wa-space-ask-far-52-222-50-combating-trafficking/
- WA HB 1282 Buy Clean (LIVE): https://bcesg.org/wa-space-rule-wa-hb-1282-buy-clean-buy-fair-live/
- EU CBAM Definitive (LIVE): https://bcesg.org/wa-space-rule-eu-cbam-definitive-live/