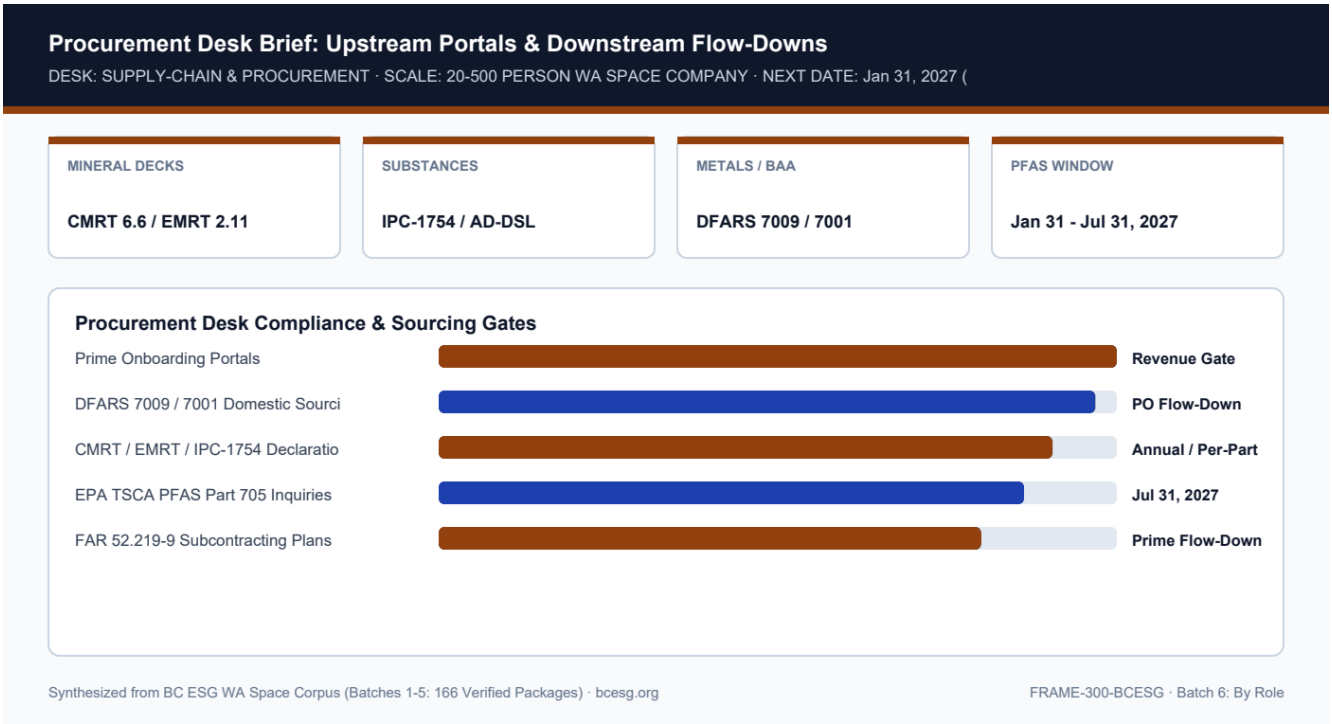
Supply-Chain & Procurement Desk Brief: Portals, Flow-Downs & Material Declarations

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Role: Supply-Chain & Procurement | **Top Live Mandate:** Prime Portals, CMRT/EMRT/IPC-1754, Buy American & Specialty Metals | **Dead Rule to Ignore:** FAR Case 2021-015 & Federal Scope 3 Mandates | **Next Deadline:** Jan 31, 2027 (TSCA PFAS Window) / Sep 30, 2027 (EU CBAM)

Desk Summary: At a 20–500-person WA space supplier, Procurement manages both directions of the supply chain: answering prime onboarding portals upstream while flowing down ITAR, DFARS Specialty Metals, Buy American, and substance declarations downstream.



Procurement Rule / Ask	Status	Key Date	Instrument
EPA TSCA PFAS Part 705	LIVE	Jan 31, 2027 open / Jul 31, 2027 due	40 CFR Part 705
EU CBAM Definitive Period	LIVE	Jan 1, 2026 start / Sep 30, 2027 surrender	Reg. (EU) 2025/2083
WA HB 1282 Buy Clean	LIVE	Jul 1, 2025 mandatory reporting	RCW Ch. 39.116
DFARS 7009 Specialty Metals & 7001 BAA	LIVE	Continuous (every PO & mill cert)	48 CFR 252.225-7009 / -7001
FAR Case 2021-015 Climate Clause	DEAD	Withdrawn Jan 13, 2025	90 FR 2663

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

Every PO from Boeing, Amazon Leo, Aerojet Rocketdyne / L3Harris, Blue Origin, or SpaceX routes through Prime Supplier Onboarding Portals.

The asks landing on the Procurement desk fall into three operational buckets: (1) material and chemical declarations (CMRT 6.6, EMRT 2.11 & AMRT 1.32, IPC-1754, IAEG AD-DSL, EU REACH/RoHS, and EPA TSCA PFAS Part 705); (2) statutory

sourcing flow-downs (DFARS 7001 Buy American, DFARS 7009 Specialty Metals, FAR 52.222-50, FAR 52.223, and FAR 52.219-9); and (3) Washington public-works HB 1282 Buy Clean and EU CBAM border data.

2. What Is Dead or Enjoined and Can Be Ignored

Do not add proposed GHG disclosure or SBTi clauses from FAR Case 2021-015 (withdrawn Jan 13, 2025, 90 FR 2663) or DoD 2025-O0004 into sub-tier PO templates. Keep supplier questionnaires focused on live chemical, mineral, and domestic-sourcing clauses.

3. What Carries a Date (Deadlines & Instruments)

Key procurement-desk dates and instruments:

Corpus References & Cross-Role Links

• Procurement Duty: Material Declarations: https://bcesg.org/wa-space-role-procurement-material-declarations/

• Procurement Duty: Buy American, Metals & HB 1282: https://bcesg.org/wa-space-role-procurement-buy-american-metals-hb1282/

• Prime Supplier Onboarding Portals: https://bcesg.org/wa-space-ask-prime-supplier-onboarding-portals/

• EPA TSCA PFAS Part 705 (LIVE): https://bcesg.org/wa-space-rule-epa-tsca-pfas-part-705-live/

• FAR Case 2021-015 Withdrawal: https://bcesg.org/wa-space-ask-far-climate-rule-withdrawal/