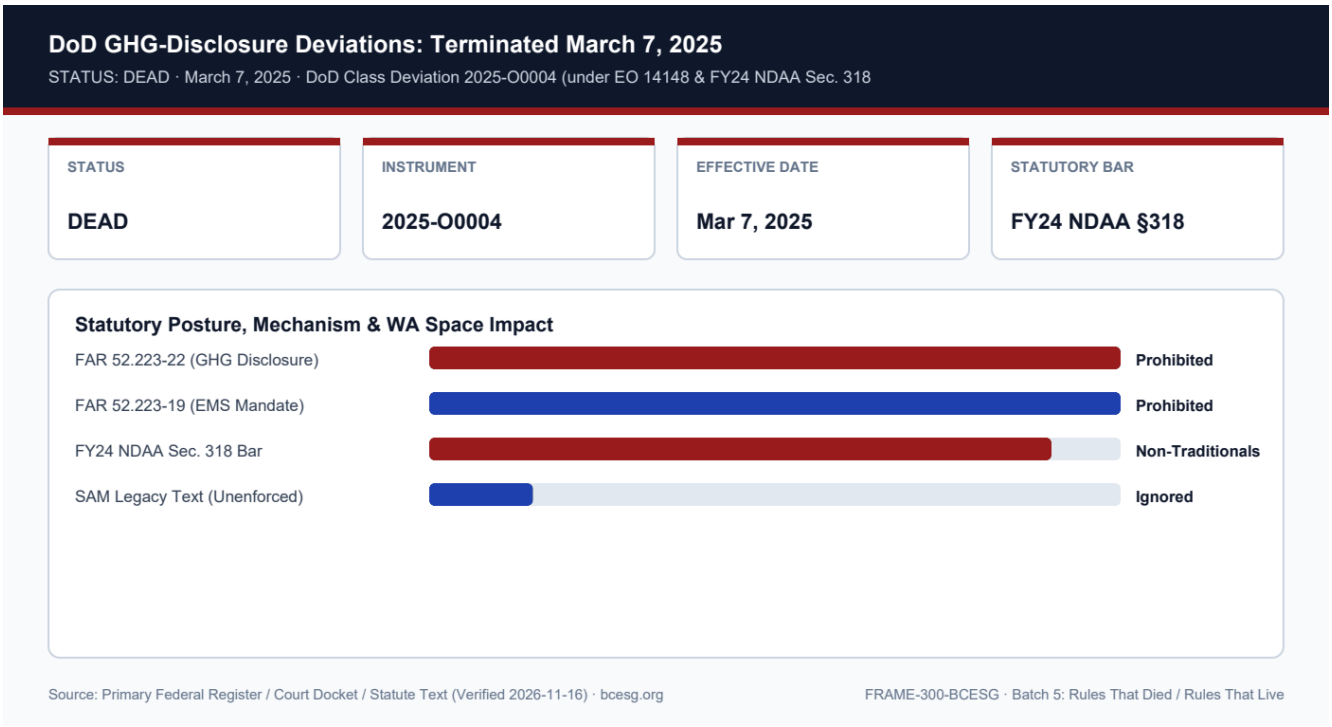
DoD GHG-Disclosure Deviations: DEAD — Barred by Class Deviation 2025-O0004 (Mar 7, 2025)

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Rule: DoD Greenhouse Gas Disclosure & EMS Contract Deviations (FAR 52.223-22 / 52.223-19) | **Status:** DEAD | **Instrument:** DoD Class Deviation 2025-O0004 (under EO 14148 & FY24 NDAA Sec. 318) | **Date:** March 7, 2025

Verdict & Proof: DoD GHG-disclosure mandates are DEAD. On March 7, 2025, OUSD(A&S) issued Class Deviation 2025-O0004 prohibiting DoD contracting officers from using FAR 52.223-22 (GHG Disclosure) and FAR 52.223-19 (EMS) in solicitations and contracts.



DoD Clause / Deviation	Pre-2025 Posture	Post-March 7, 2025 Posture
FAR 52.223-22 (GHG Representation)	Included in covered DoD solicitations	DEAD — Barred by Class Deviation 2025-O0004
FAR 52.223-19 (EMS Compliance)	Included for covered facilities	DEAD — Barred by Class Deviation 2025-O0004
NDAA FY24 Sec. 318 / 2024-O0009	Shielded non-traditional contractors	LIVE — Statutory bar remains in force
DFARS 252.204-7012 / ITAR	Mandatory CUI & export controls	LIVE — Unchanged and strictly enforced

Mechanism of Death: Class Deviation 2025-O0004 & FY24 NDAA Sec. 318

Following Executive Order 14148 (which revoked EO 14057), the Office of the Under Secretary of Defense for Acquisition and Sustainment (DPCAP) issued Class Deviation 2025-O0004 on March 7, 2025. The deviation directs all DoD components (Army, Navy, Air Force, Space Force, and defense agencies) to stop including FAR 52.223-22 (Public Disclosure of Greenhouse Gas Emissions and Reduction Goals—Representation) and FAR 52.223-19 (Compliance with Environmental Management Systems) in new solicitations and contracts.

Even prior to 2025-O0004, Section 318 of the FY 2024 NDAA (implemented via Class Deviation 2024-O0009) statutorily barred DoD from requiring non-traditional defense contractors to disclose GHG inventories as a condition of award.

Together, the statutory bar and Class Deviation 2025-O0004 render DoD GHG-disclosure flow-downs moot.

What Replaced It: Quality, Export & Cyber Flow-Downs Remain Mandatory

Nothing replaced FAR 52.223-22 in defense space procurement. However, defense-space primes in Washington (such as Aerojet Rocketdyne/L3Harris in Redmond, Boeing, and Northrop Grumman) continue to enforce non-climate statutory mandates: ITAR (22 CFR 120-130), DFARS 252.204-7012 (NIST SP 800-171), DFARS 252.225-7009 (Specialty Metals), and AS9100D quality gates.

Verified Primary Sources & Internal Bridges

• DoD DPCAP Class Deviations Portal: https://www.acq.osd.mil/dpap/dars/class_deviations.html

• FAR Case 2021-015 Withdrawal (90 FR 2663): https://www.federalregister.gov/documents/2025/01/13/2025-00592/federal-acquisition-regulation-disclosure-of-greenhouse-gas-emissions-and-climate-related-financial