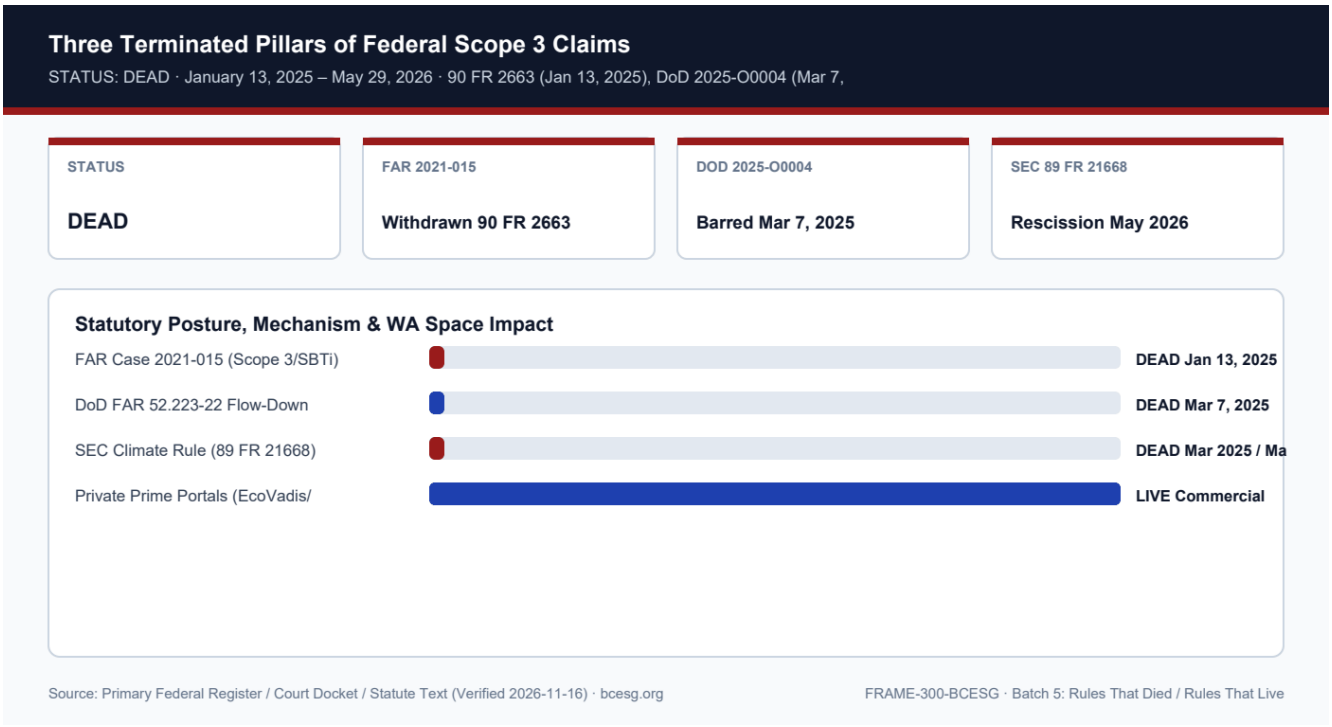
BC ESG · RULES THAT DIED / RULES THAT LIVE · STATUS: DEAD

The 'Federal Scope 3 Mandate Is Coming' Claim: DEAD — All Three Federal Pillars Terminated

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Rule: Federal Supplier & Issuer Scope 3 Mandate Claims (FAR 2021-015 / DoD / SEC) | **Status:** DEAD | **Instrument:** 90 FR 2663 (Jan 13, 2025), DoD 2025-O0004 (Mar 7, 2025), & SEC Rescission (May 29, 2026) | **Date:** January 13, 2025 – May 29, 2026

Verdict & Proof: Every claim that 'a federal Scope 3 mandate is coming' is DEAD. All three federal mechanisms that could have required Scope 3 reporting—FAR Case 2021-015 (withdrawn 90 FR 2663), DoD GHG deviations (barred 2025-O0004), and the SEC climate rule (omitted Scope 3 in 2024, defense dropped 2025, proposed for rescission May 2026)—have been terminated.



Federal Pillar	Deciding Instrument	Date	Status
FAR Case 2021-015	90 FR 2663 Withdrawal Notice	Jan 13, 2025	DEAD
DoD GHG Deviations	Class Deviation 2025-O0004	Mar 7, 2025	DEAD
SEC Climate Rule	SEC Vote + May 29, 2026 Rescission	Mar 27, 2025 / May 29, 2026	DEAD

Mechanism of Death: Zero Surviving Federal Statutory Hooks

Consultant decks sold to aerospace suppliers in 2023–2024 routinely warned that a federal Scope 3 mandate was imminent. Every federal pillar behind that claim is now dead: FAR Case 2021-015 was formally withdrawn on January 13, 2025 (90 FR 2663); DoD barred FAR 52.223-22 via Class Deviation 2025-O0004 on March 7, 2025 (backed by FY24 NDAA Sec. 318); and the SEC dropped its defense of 89 FR 21668 on March 27, 2025 before proposing full rescission on May 29, 2026.

There is no active federal rulemaking in OMB/OIRA or the Federal Register proposing a federal Scope 3 mandate for space or defense contractors.

What Replaced It: Commercial Primes & State/EU Spillover

While federal Scope 3 mandates are dead, commercial customers (Amazon Leo, Boeing commercial programs, European satellite buyers under EU CSRD) still request Scope 1+2 and product-level carbon data through EcoVadis or CDP to satisfy their own corporate targets or non-federal laws.

Verified Primary Sources & Internal Bridges

• Federal Register: FAR 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

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