

Regulatory Compliance Updates

ARTICLE

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As we continually monitor the shifting regulatory landscape, you'll find compliance updates all in one place—right here. Information on this page relates to greenhouse gas emissions reporting requirements and other sustainability-related legislation.

**Readers take note that this information, which is for informational purposes only and seeks to provide factual summaries of legislative and judicial developments, should not be interpreted as or relied upon as legal advice.*

Latest Requirement Updates

- [Seven U.S. States Implement EPR Laws, Expanding Producer Responsibility for Packaging Waste – Apr. 21](#)
- [CARB Holds Virtual Public Workshop on SB-253 Rollout – Mar. 23](#)
- [Senate Bill S9072A – Climate Corporate Data Accountability Act \(CCDAA\) – Feb. 10](#)
- [California's SB-261 and SB-253 Acts – Jan. 09](#)
- [6 NYCRR Part 253 – Mandatory Greenhouse Gas Reporting Program – Dec. 01](#)

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[Weekly Energy Market Watch](#)[Smarter Rate Optimization in Dynamic Energy Markets](#)[ENGIE Impact and NFL Green Bolster Recycling and Waste Operations at Super Bowl LX](#)

Seven U.S. States Implement EPR Laws, Expanding Producer Responsibility for Packaging Waste

The states of California, Colorado, Oregon, Maine, Minnesota, Maryland, and Washington have enacted Extended Producer Responsibility (EPR) laws which relate to packaging, which are expanding across the country. Additional states are actively evaluating similar legislation.

EPR laws shift responsibility for the end-of-life management of packaging—from municipalities and taxpayers to the companies that place packaged products on the market. Under these laws, obligated companies (designated as “producers”) are generally required to:

- Register with state-designated Producer Responsibility Organizations (PROs).
- Report packaging data.
- Pay fees that fund recycling and waste management systems.

Who Will Be Impacted?

EPR laws generally apply to companies that do business in states with EPR programs in place, regardless of the company's or employees' physical presence. Applicability is typically determined based on:

- Selling packaged products into an EPR-regulated state.
- Meeting state-specific definitions of a producer (often the brand owner or trademark holder, with obligations potentially shifting to importers or distributors).
- Revenue-based exemptions and packaging weight thresholds.

Affected organizations may include manufacturers of packaged goods, retailers with private label products, distributors, and ecommerce or direct-to-consumer sellers.

How Should Affected Organizations Prepare?

As EPR programs move toward enforcement, organizations must understand potential compliance obligations and cost exposure. Consult with your internal legal department to see how EPR laws apply to your organization.

Action Steps

1. Assess EPR applicability and producer responsibilities by state.
2. Prepare packaging data to support reporting and fee calculations.
3. Monitor state timelines and PRO guidance as requirements evolve.

ENGIE Impact's experts navigate evolving state requirements and build compliance roadmaps aligned with broader sustainability and waste strategies. Talk to an expert to see how we can support your company as you prepare to comply with EPR laws.

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CARB Provides Key Updates on SB-253 Greenhouse Gas Reporting Program in Public Workshop

the California Corporate Greenhouse Gas Reporting Program authorized by [Senate Bill 253](#) (SB-253), and titled the California Climate Corporate Data Accountability Act (CCDAA).

During the workshop, CARB staff provided additional information on the Scope 1 and 2 emissions reporting deadlines and discussed preliminary 2027–2030 Scope 3 requirements. CARB staff provided an overview of the staff’s approach to economic analysis as well as a solicitation for alternative approaches.

Key Takeaways

SB-253 requires all U.S.-based companies [doing business in California](#) and with an annual revenue greater than \$1B to report their Scope 1 and Scope 2 emissions by **Aug. 10, 2026**. Companies are not required to use CARB’s proposed reporting template in 2026, as CARB plans to seek additional feedback via public comment this summer to standardize the reporting format for 2027. CARB will later announce more details on the submission process and accepted reporting formats for 2026.

The workshop primarily focused on Scope 3 topics and definitions relating to GHG reporting in 2027 and beyond. SB-253 states that entities must initially report their Scope 1, 2, and 3 emissions in 2027, and annually thereafter, as well as secure limited assurance (third-party evaluation to ensure the data is accurate) for Scope 1 and 2. However, CARB is currently seeking feedback on topics such as accepted organizational boundaries, GHG accounting methods, emission factor data sets, assurance standards, and their economic analysis.

In addition, CARB is gathering feedback on three different pathways for rolling out Scope 3 in 2027.

- **Option 1: Broad Applicability** – Requires all reporting entities to report on all Scope 3 categories starting in 2027, with flexibility to exclude categories considered insignificant to appropriate explanation.
- **Option 2: Sectoral Phase-In** – Requires only the transportation and industrial sectors to report Scope 3 in 2027, which aligns with The California Scoping Plan by prioritizing sectors responsible for the largest share of statewide emissions that are subject to the greatest transition risk.
- **Option 3: Category Phase-In** – Requires only the most reported Scope 3 categories (1, 3, 5, 6, and 7) from all entities to be reported in 2027 with plans to expand to less-reported categories over time.

Crucial Dates to Watch

- **April 13, 2026:** [Submit your public comment](#) on CARB’s regulatory proposal by this date. See [CARB’s provided slides](#) and [watch the recording](#) for more information.
- **August 10, 2026:** Scope 1 and Scope 2 emissions disclosure due.

What Does This Mean for My Organization?

CARB recommends taking the following actions if your company meets the defined criteria and needs to submit:

- **Classify emissions** into Scope 1, 2, and 3 and identify data sources.
- **Calculate emissions** and document your Inventory Management Plan.
- **Obtain limited assurance** for Scope 1 and 2 (optional in 2026 but recommended).

Next Steps

The Scope 1 and 2 deadline is just months away, while Scope 3 will be rolled out in 2027. Consult with your company’s legal team to determine what action is needed.

ENGIE Impact helps clients navigate these evolving mandates through comprehensive Scope 1, 2, and 3 inventories that ensure long-term regulatory compliance and business resilience.

- Learn more about our highly [experienced carbon experts](#).
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New York Greenlights State Bill Requiring Organizations Doing Business in NY to Disclose Emissions – Senate Bill S9072A – Climate Corporate Data Accountability Act (CCDAA) – Feb. 10

On February 10, 2026, the New York State Senate passed state bill S9072A, the [Corporate Climate Data Accountability Act](#) (CCDAA), which requires large companies doing business in New York to disclose their carbon emissions. Businesses must publicly and annually disclose their Scope 1 and Scope 2 emissions for the prior fiscal year starting in 2028 (for reporting year 2027), as well as their Scope 3 emissions starting in 2029 (for reporting year 2028).

The Act mirrors California's SB-253, which requires all companies doing business in California with an annual revenue greater than \$1 billion to report their Scope 1 and Scope 2 emissions.

Who Will Be Impacted?

S9072A affects large companies with the following criteria:

- Doing business in New York
- More than \$1 billion in annual global revenue

S9072A includes exceptions for out-of-state companies that meet the criteria in [section 1301 \(b\) of the New York Business Corporation Law](#). If you have questions regarding the criteria, contact one of our experts.

How Should Affected Organizations Prepare?

Though exact reporting deadlines are to be determined, organizations should prepare to report when deadlines are announced. Action Steps Ensure you're calculating your Scope 1 and Scope 2 emissions. Establish your inventory management plan. ENGIE Impact's carbon experts are here to support your Scope 1, Scope 2, and Scope 3 emissions reporting in preparation for future deadlines.

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California's SB-261 Currently Subject to Temporary Injunction While SB-253 Moves Forward – Jan. 09

On January 9, 2026, the [Ninth Circuit heard oral arguments](#)—*Chamber of Commerce vs. Sanchez*—regarding state bills 261 (Climate-Related Financial Risk Act) and 253 (Climate Corporate Data Accountability Act) governed by the California Air Resources Board (CARB).

As described in our [experts' guide to navigating the California Climate Accountability Package](#), SB-261 requires all companies doing business in California with an annual revenue greater than \$500 million to report at least one climate-related financial risk, as well as measures to reduce and adapt to identified risks every other year—TCFD-aligned reports (or the equivalent) must be public and uploaded to CARB's docket. SB-253 requires all companies doing business in California with an annual revenue greater than \$1 billion to report their Scope 1 and Scope 2 emissions (these disclosures are due by Apr-

greater than \$1 billion to report their Scope 1 and Scope 2 emissions (these disclosures are due by **Aug 10, 2026**)

SB 261: Climate-Related Financial Risk Disclosure – Temporary Injunction in Effect

The Plaintiff, the U.S. Chamber of Commerce, challenged SB-261 on the principle that the climate disclosure statutes compel speech. While the final ruling remains pending, the court is expected to finalize its decision within the next six months. During the injunction period, companies are temporarily relieved of compliance requirements. However, while the final ruling is pending, we advise clients to be prepared to disclose in the event that the injunction is lifted. What does this mean for my organization? ENGIE Impact's experts are monitoring updates as they come, and our [carbon solutions](#) help you remain compliant even as the regulatory landscape evolves.

SB 253: GHG Emissions Reporting – Active: Action Required

[All companies doing business in California](#) with an annual revenue of \$1 billion must report their Scope 1 and 2 by **August 10, 2026**. Although no longer required for 2026 data reporting, submitting emissions that have undergone third-party assurance is recommended.

What does this mean for my organization? As companies prepare for [emissions reporting](#), ENGIE Impact can help you create an inventory management plan that focuses on Scope 1 and 2 location-based inventory—while Scope 2 market-based inventories are not required, this step may provide insight into carbon reduction opportunities

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New York Finalizes Mandatory Reporting Requirements – 6 NYCRR Part 253 – Mandatory Greenhouse Gas Reporting Program – Dec. 01

On December 1, 2025, the New York State Department of Environmental Conservation (DEC) finalized regulations establishing a mandatory greenhouse gas (GHG) reporting program. DEC issued the Mandatory Greenhouse Gas Reporting Program under 6 NYCRR 253, requiring certain entities in New York to report their GHG emissions via the New York State Greenhouse Gas Reporting tool. Beginning **January 1, 2026**, covered entities in New York are required to track emissions data in preparation for the first reporting deadline on **June 1, 2027**.

Who Will Be Impacted?

Affected entities include facility operators and owners—if CO₂e emissions meet or exceed 10,000 MT per facility per year or if the facility is a Budget Source under Part 242; waste haulers and transporters; electric power entities; agricultural lime and fertilizer suppliers; anaerobic digestion and liquid waste storage; and natural gas, liquid fuel and petroleum product, compressed natural gas and liquefied natural gas, and coal suppliers.

This program's finalization marks a shift from voluntary disclosures to regulated, auditable emissions reporting for many organizations, making early preparation critical. See the Department of Environmental Conservation's [Fact Sheet](#) and [FAQ](#) to see if your business meets the requirements and other helpful information.

How Should Affected Organizations Prepare?

Organizations should identify which reporting requirements are applicable to them, then if needed,

assess their emissions footprint and establish reliable data collection and management processes to ensure compliance.

Crucial Dates to Watch

- **September 1, 2026:** Emissions Monitoring and Measurement Plan for applicable reporters.
- **December 31, 2026:** Submit Large Emission Source's GHG Monitoring Plan to the Department of Environmental Conservation.
- **June 1, 2027:** Submit your first Emissions Data Report to the Department of Environmental Conservation.
- **December 1, 2027:** Submit Verification Statements for the previous emissions year.

See the Department of Environmental Conservation's [Mandatory Greenhouse Gas Reporting](#) page and [Air Pollution Regulatory Revisions](#) page for more details.

If you still have questions about what this change means for you, ENGIE Impact's [reporting solutions](#) can help support you along the way.

Next Steps

Now is the time to assess your emissions profile, set up tracking systems, and ready your team for compliance to get ahead of the curve. Schedule a meeting with our experts for support on your [compliance journey](#).

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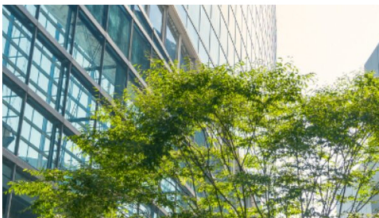
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Upcoming Energy Performance Requirements: CO, WA, and MD

Colorado, Maryland, and Washington have enacted statewide Building Performance Standards (BPS). Large buildings must meet strict EUI and GHG reduction targets by 2030 and beyond or face significant fines.

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ENGIE Impact's Perspective On The PPA Market

In this interview, ENGIE Impact discusses best practices for VPPA cash flow management, policy uncertainty, and the challenges of 24/7 carbon-free energy goals.

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Veritiv Corporation Streamlines GHG Emissions Recalculation Following Major Acquisition

Veritiv Corporation successfully recalculated GHG emissions after a major acquisition, reporting a 42% reduction in legacy operations with help from ENGIE Impact's Ellipse platform.

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