

California Corporate Greenhouse Gas Reporting Program: Scope 1 and Scope 2 Emissions Draft Reporting Template

Posted October 10, 2025

The Climate Corporate Data Accountability Act authorized by Senate Bill (SB) 253 (Wiener, Stats. 2023, Ch. 382; Health and Safety Code § 38532) applies to U.S. companies that do business in California with annual revenues in excess of \$1 billion. The California Air Resources Board (CARB) is seeking feedback from the public on draft reporting templates for Scope 1 and Scope 2 greenhouse gas (GHG) emissions, published along with this document.

The template is intended to streamline reporting, especially for entities disclosing GHG emissions for the very first time. Reporting entities are not currently required to use the template; its use is voluntary for the 2026 reporting cycle.¹ CARB will provide guidance on later reporting cycles as part of its regulatory process. CARB is seeking input on this draft template to help CARB further refine the template.

CARB invites reporting entities and other stakeholders to review the draft template and provide feedback on its structure, substance, and alignment with SB 253's overarching objectives.

The template is organized into the following sections:

- Organization Information
- Third-Party Verification
- Inventory Boundary
- Scope 1 and Scope 2 Disclosure
- Methodology

¹ *Disclaimer:* The Template is provided to assist entities in submission of information. The template does not modify, replace, or supersede the statutes and does not impose requirements on anyone. It does not constitute legal advice and does not define any legal relationships, is not a policy, and does not create, expand, limit, waive, or interpret any legal rights or obligations. It is the regulated entity's responsibility to understand and comply with the legal requirements. The definitions are provided as courtesy to help guide regulated entities but do not have the force of law. CARB reserves the right to revise this template at any time.

- De Minimis / Minor Sources
- California MRR Fields (if applicable)
- Emission Reductions (if applicable)

The template also includes optional fields for future reporting years as CARB further develops the program. These optional fields include base year emissions to support intraorganizational comparison, providing more transparency to investors and stakeholders.

The template includes the following decision-useful fields for reporting entities and users:

- **Intensity/Efficiency Ratio:** The template includes fields for reporting entities to provide at least one intensity metric (e.g., emissions per million dollars in revenue). Intensity measures help stakeholders compare performance across firms of different sizes, especially across industries where absolute emissions alone may not be comparable.
- **Industry Classification:** The template allows the classification of GHG emissions by sector by using the North American Industry Classification System (NAICS) at the 2-digit level.
- **Transparency in Methods:** The template includes fields for the source and year of Global Warming Potential (GWP) values and emission factors. Reporting entities may report the calculation approach that is used (e.g., activity data x emission factor).
- **Alignment with California MRR:** The template includes a field for California Mandatory Reporting Regulation (MRR) facility identification (ID) numbers. This helps align reported data with other regulatory databases at CARB.

Highlights for Stakeholder Feedback

CARB is particularly interested in stakeholder input on the following elements:

1. Disclosure by Source vs. by Gas

The template proposes Scope 1 and Scope 2 emissions disclosure by emission source (e.g., electricity, fuel use, refrigerants), with fields for disclosure by types of GHGs, if data is available.

2. Organizational Boundaries

The template asks reporting entities to specify whether they use the equity share, financial control, or operational control approach to define organizational boundaries. These three approaches reflect guidance in the Greenhouse Gas Protocol. However, there may be value in choosing one approach to support public transparency and improve comparability across entities. CARB is evaluating whether to limit the approach to identify organizational boundaries for all reporting entities or retain flexibility to accommodate diverse corporate structures.

3. Emissions Reduction Initiatives

At the August 2025 workshop, staff discussed including an option for reporting entities to include other actions that reduce GHG emissions. The draft template includes a field for emission reductions associated with direct contracts for renewable electricity and renewable gas. Staff are seeking public input on this field and other types of emission reduction initiatives or targets that should be included in the Scope 1 and 2 reporting template.

CARB welcomes written comments on the draft template and this public memo. Please submit your feedback to our public docket, which will remain open through October 27, 2025, or via the climatedisclosure@arb.ca.gov email.