

CARB Publishes Preliminary List of SB 253 and SB 261 Covered Entities

September 26, 2025

On September 24, 2025, the California Air Resources Board (“CARB”) published a preliminary list of covered entities under the Climate Corporate Data Accountability Act (SB 253) and the Climate-Related Financial Risk Act (SB 261).

Background. SB 253 and SB 261 were enacted in October 2023 and, together with SB 219, form the California Climate Disclosure Laws. SB 253 requires companies with more than \$1 billion in revenue that do business in California to report Scopes 1 and 2 greenhouse gas (“GHG”) emissions annually beginning in 2026 for the 2025 fiscal year, and Scope 3 GHG emissions beginning in 2027 for the 2026 fiscal year. SB 261 establishes separate requirements for biennial disclosure of climate-related financial risks and measures adopted to mitigate those risks. CARB is developing implementing regulations for both laws.

Covered Entity List. CARB published a [preliminary list of SB 253 and SB 261 covered entities](#) on its website. The preliminary list was pulled from a California Secretary of State (“SoS”) database and is comprised of United States-based entities doing business in California who meet SB 261’s annual revenue threshold of at least \$500 million. The SoS dataset only lists active filers through March 2022 and does not reflect all potential reporting exemptions. CARB’s intention in publishing the preliminary list is to support the development of the fee regulation associated with upcoming reporting requirements. Although the list may be helpful for entities seeking to determine whether they are subject to SB 253 or SB 261’s reporting requirements, the list may not include all covered entities. As noted by CARB, each potentially regulated entity remains responsible for compliance with statutory requirements, regardless of its inclusion in CARB’s preliminary list or outreach.

CARB encourages potentially regulated entities to conduct an independent assessment regarding their compliance requirements. CARB further encourages entities that believe they are subject to these requirements, or believe they qualify for an exemption, to complete [CARB’s preliminary list feedback survey](#).

For more information on CARB's decision to establish the preliminary list and its definition of the threshold reporting requirements, please refer to CARB's [August workshop recording and presentation slides](#) and our [Debevoise Update](#) summarizing the workshop.

LINKS:

[Preliminary List of Reporting/Covered Entities](#) (published September 24, 2025)

[Preliminary List Stakeholder Survey](#) (published September 24, 2025)



Eric T. Juergens
Partner, New York
+1 212 909 6301
etjuergens@debevoise.com



Ulysses Smith
ESG Senior Advisor, New York
+1 212 909 6038
usmith@debevoise.com



Emily Espinel
Associate, New York
+1 212 909 6355
eaespinel@debevoise.com



Erin Munro
Associate, New York
+1 212 909 6854
ekmunro@debevoise.com



Amy Pereira
Associate, New York
+1 212 909 6413
apereira@debevoise.com



Tess Kim
Law Clerk, New York
+1 212 909 6807
tjkim1@debevoise.com