



Greenplaces

SUSTAINABILITY SERIES

SB 253 / SB 261 readiness checklist

A practical checklist for assessing readiness and streamlining compliance with California's SB 253 and SB 261 climate disclosure requirements.

The information contained within this document was created using The California Air Resources Board (CARB)'s Climate Related Financial Risk Report Checklist. By aligning with CARB's guidelines, the checklist ensures compliance with SB 261's requirements and facilitates transparent, consistent, and decision-useful climate-related financial risk disclosures for companies operating in California.





#1 - Confirm applicability

REQUIREMENTS:

Check whether your consolidated revenue meets \$1B (SB 253) or \$500M (SB 261) and whether you are doing business in California (sales, payroll, property, or other presence).

#2 - Organize who reports (parent vs. subsidiaries)

LEGAL ENTITIES:

Map and decide whether to consolidate at the parent to avoid duplicate filings.

HSC § 38533:

Subsidiaries should consult to determine if they qualify as a covered entity. If so, the subsidiary is not required to prepare a separate climate-related financial risk report (if the parent company is reporting on its behalf).

#3 - Stand up emissions accounting (Scopes 1, 2, 3)

DATA COLLECTION:

Use Greenplaces' platform to streamline data intake from utility bills, fuel, travel, spend, and suppliers.

METHODOLOGY:

Calculations align to the GHG Protocol.
The My Footprint experience gives YOY trends, hotspot analysis, and export-ready data.

SUPPLIER ENGAGEMENT:

Prioritize high-impact vendors and track progress toward Scope 3 coverage.

#4 - Prepare public-facing disclosure

PUBLIC SUSTAINABILITY PAGE

(emissions, progress, certifications):

Once published, share with customers, RFPs, and investors — then link it for CARB/public-disclosure needs.

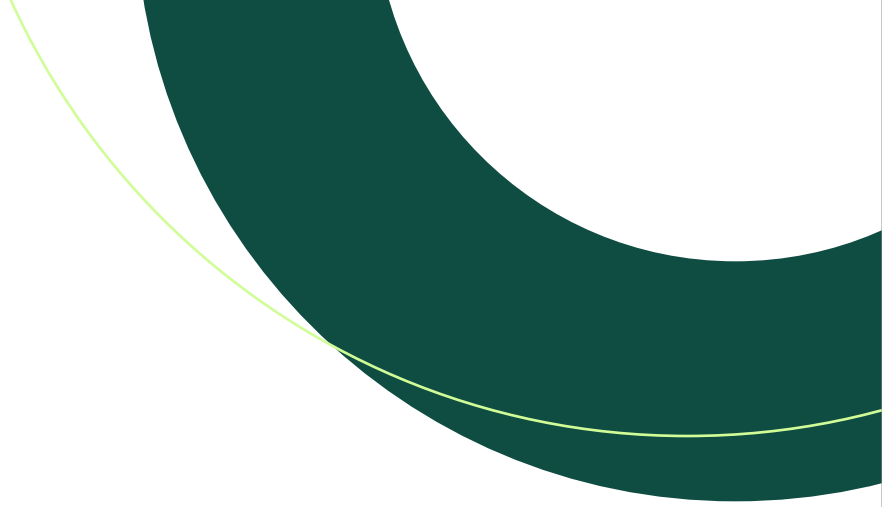
DATA VISUALIZATION:

Export charts and underlying tables from Greenplaces' My Footprint dashboard to support your SB 253 disclosure narrative.

#5 - Plan third-party assurance (SB 253)

COORDINATION:

Greenplaces structures emission factors, activity data, and audit trails to prepare you for limited/ reasonable assurance. We coordinate with your selected assurance provider and supply evidence packages, without performing assurance ourselves.



#6 - Build your SB 261 climate-risk report

RELEVANT LANGUAGE:

Include language in your disclosure that confirms the reporting framework (TCFD, IFRS S2, or equivalent) selected. Include a short statement of alignment noting which disclosures are covered, which are omitted, and rationale for omissions or future plans.

RISK & SCENARIOS:

Outline your process for identifying, assessing, and managing climate-related risks, and explain how these processes integrate with broader risk management frameworks.

- Our team supports scenario analysis and risk mapping (transition, physical, regulatory) and provides editable narrative templates aligned to market practice (TCFD-style).

GOVERNANCE:

Capture board/management oversight, mitigation plans, and metrics/targets inside the reporting workspace for a repeatable, biennial process.

- Describe governance structures for climate-related risk management, including:
 - Roles of management and any Board oversight;
 - How oversight and accountability are embedded into risk and strategy discussions.

STRATEGY:

- Identify short-, medium-, and long-term climate-related risks and opportunities;
 - Describe their impacts on operations, strategy, and financial planning.
 - Discuss the resilience of your strategy considering qualitative or quantitative scenario analysis.

METRICS & TARGETS:

- Disclose metrics used to assess and manage climate-related risks and opportunities, not just GHG data.
 - While emissions metrics (Scopes 1-3) may be optional initially, qualitative or quantitative performance metrics (e.g., % assets exposed to physical risk, % revenue aligned to mitigation opportunities, etc.) should be noted.
 - Publish your SB 261 report on your website and submit the link to CARB's public docket between Dec 1, 2025 and July 1, 2026.

#7 - Keep a single source of truth

CONTROLS & VERSIONING:

Maintain documentation, comments, and change logs in the platform; export evidence packs for reviewers and assurance partners.

#8 - Stay current as rules evolve

CONTENT & UPDATES:

Greenplaces publishes SB 253/261 explainers, CARB FAQ summaries, and deadlines, and our specialists brief customers on material changes that affect timelines or scope.





STEP 1

Confirm applicability



STEP 2

Organize who reports



STEP 3

Stand up emissions accounting (Scopes 1, 2, 3)



STEP 4

Prepare public-facing disclosure



STEP 5

Plan third-party assurance (SB 253)



STEP 6

Build your SB 261 climate-risk report



STEP 7

Keep a single source of truth



STEP 8

Stay current as rules evolve

For more information visit
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