

Early Impressions

New York Mandatory Greenhouse Gas Reporting Program (Part 253)



Executive Summary

Climate regulation is progressing in New York State with finalization of its Mandatory Greenhouse Gas Reporting Program. This new rule reflects a broader shift toward enforceable, data-driven climate policy grounded in standardized emissions information.

This program establishes a reporting program designed to provide data that regulators need to design, implement, and enforce future climate measures under the Climate Leadership and Community Protection Act. For companies operating in or supplying into New York, Part 253 introduces a clear compliance baseline that demands rigor in emissions measurement, governance, and documentation well before any pricing or reduction mechanisms take effect.

For obligated entities, this program serves as a test of organizational readiness. Mandatory reporting regimes such as Part 253 may expose weaknesses in data systems, internal controls, and accountability that voluntary disclosures often mask. However, entities that respond proactively by strengthening methodologies, governance, and systems, will be far better positioned as climate regulation continues to mature.

This publication is intended to help organizations understand what the program requires, why it matters, and how to prepare strategically for what comes next. We sincerely hope you find the enclosed publication informative and would be happy to participate in any discussions required to provide clarifications on our views captured in the pages that follow. We look forward to hearing from you.



Anu Chaudhary
*Partner, Global Head of
Sustainability & Climate
Consulting*



Matt Berner
*Managing Director,
Sustainability & Climate
Consulting*

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Issuing Authority: On December 1, 2025, the New York State Department of Environmental Conservation (DEC) finalized the Mandatory GHG Reporting Program under 6 NYCRR Part 253.

Obligated Entities: Under the program, entities with significant greenhouse gas (GHG) emissions and operating in New York State must report emissions monitoring plans and emissions figures annually. These entities include:

- **Owners/operators of facilities** emitting at least 10,000 metric tons of CO₂e annually (e.g., industrial operations, landfills, waste-to-energy facilities).
- **Fuel suppliers** delivering any natural gas, liquid fuels, CNG/LNG, coal, and petroleum products to end users in New York State.
- **Waste haulers and transporters** whose transported waste generates at least 10,000 metric tons of CO₂e annually, including out of state.
- **Electric power entities**, including those importing any energy or emitting any GHG in the state.
- **Agricultural lime and fertilizer suppliers** emitting at least 10,000 metric tons of CO₂e annually.
- **Certain waste processing facilities** (e.g., anaerobic digestion, wastewater) whose imported wastes generate at least 10,000 metric tons of CO₂e annually.

Entities Requiring Verification: Large Emission Sources will also require third-party verification by DEC-accredited verifiers. These include:

- **Owners/operators of facilities** emitting at least 25,000 metric tons of CO₂e.
- **Fuel suppliers** delivering at least 15 million cubic feet of natural gas, CNG, or LNG; 100,000 gallons of liquid fuels or petroleum products; or 500 short tons of coal to end users in New York annually.
- **Waste haulers and transporters** whose transported waste generates at least 25,000 metric tons of CO₂e annually, including out of state.

What

The rule establishes a mandatory GHG emissions reporting regime to collect data on sources of climate pollution across New York. The regime does not impose direct emissions reduction mandates or cap-and-trade compliance by itself. Key reporting requirements include:

- Measurement and calculation of annual GHG emissions in metric tons of CO₂e.
- Submission through DEC's online reporting platform (NYS e-GGRT) once available.
- Maintenance of a GHG Monitoring Plan detailing how emissions are quantified and verified.

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The rule applies to entities located or operating in New York State, including in-state facilities and suppliers whose products are used in New York (e.g., fuels). For waste haulers and transporters, waste transported out of state can trigger reporting if associated emissions exceed thresholds.

In-scope entities will need to report emissions via the New York State Greenhouse Gas Reporting Tool (NYS e-GGRT) every year. While the NYS e-GGRT electronic reporting platform is currently being developed, it is expected to be similar to the federal U.S. EPA e-GGRT system.

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The rule was finalized on **December 1, 2025** and becomes effective after publication in the State Register.

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Entities that operate anaerobic digesters, handle liquid wastes, or are solid waste management facilities and are subject to the program's reporting requirements must submit a separate Emissions Monitoring and Measurement Plan (EMMP) addressing methane emissions to the DEC for approval by **September 1, 2026**. Large Emission Source reporting entities must also report GHG Monitoring Plans to the DEC by **December 31, 2026**.

What

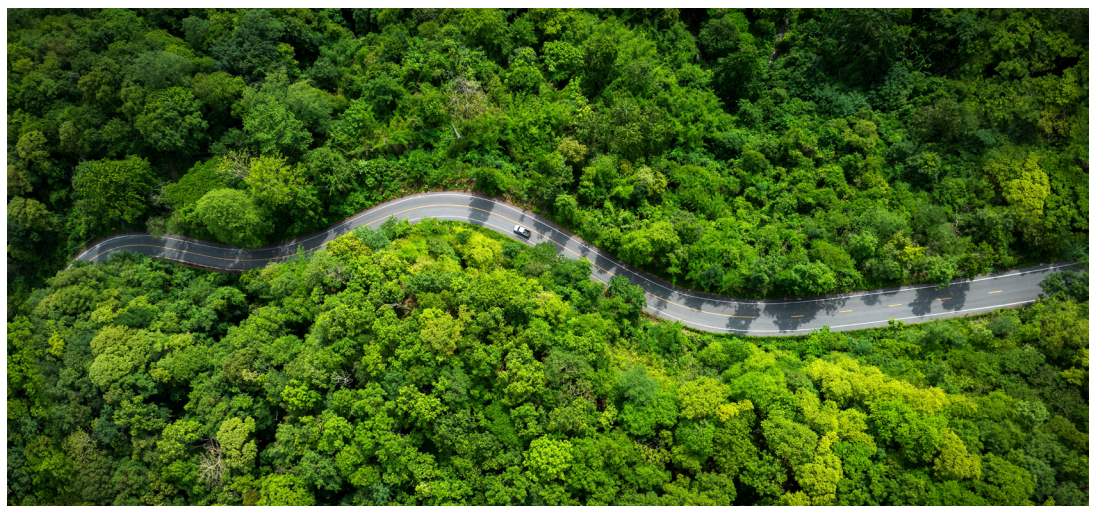
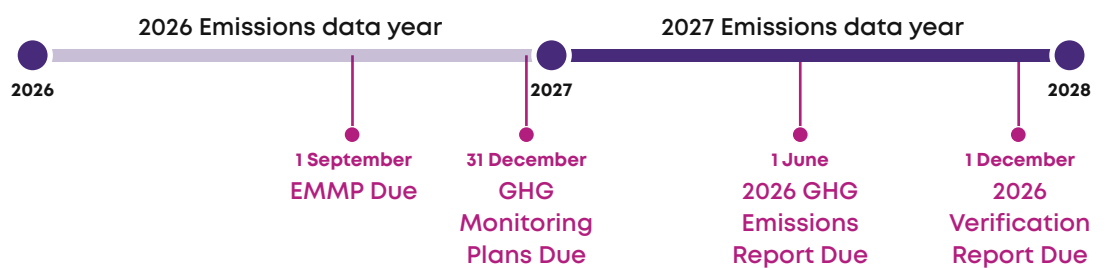
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For the first year of GHG emissions reporting, entities must report 2026 emissions with an initial submission deadline of **June 1, 2027**, and annual updates thereafter. Verification deadlines will be extended in the early years to provide compliance flexibility, with the first verification reports for 2026 emissions due **December 1, 2027**.



Uniquis POV

Why

New York's Mandatory GHG Reporting Program will close an important data gap in the State's climate governance. While New York has some of the most ambitious statutory climate targets in the country under the Climate Leadership and Community Protection Act (CLCPA), policymakers have lacked consistent, economy-wide data on where emissions are generated, by whom, and in what quantities. Part 253 establishes a standardized, auditable emissions baseline across major emitting sectors, creating the foundation needed to design, implement, and enforce future climate policies.

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1 Data transparency

The reporting regime will improve understanding of GHG emissions sources across high-emitting sectors in New York State for regulators and investors.

2 Policy foundation

The rule will create a comprehensive emissions dataset to support development of future climate policies, including potential cap-and-invest frameworks required by the Climate Leadership and Community Protection Act (CLCPA) passed in 2019.

3 Public health and environmental planning

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4 Federal backstop

New York's laws will ensure critical emissions data remain available amid potential rollbacks or gaps in federal reporting requirements.



How Uniquis Can Help

Companies anticipating or subject to the NYS GHG Reporting Program will face complex data, systems, compliance, and governance challenges. By operationalizing NYS GHG reporting obligations efficiently and accurately, Uniquis helps clients reduce regulatory risk while positioning their sustainability programs for future regulatory and investor expectations. Uniquis Consultech offers tailored support across core areas:

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Regulatory Analysis & Strategy

Interpret NYSDEC Part 253 requirements and map them to your operational footprint. Assess implications compared to federal (e.g., EPA GHGRP) and other state programs.

Emissions Inventory & Reporting Design

Build or refine GHG emissions inventories aligned with regulatory thresholds. Develop standardized processes for capturing combustion, process, fugitive, and supply-chain emissions.

Data Systems & Tooling

Implement data platforms (including integration with NYS e-GGRT) to automate collection, calculation, and QA/QC of emissions data. Deploy cloud-based solutions that ensure auditability and traceability.

Verification Readiness

Prepare your organization for third-party verification, including documentation, control frameworks, and internal reviews.

Training & Governance

Enable internal teams with hands-on training on Part 253 compliance workflows. Establish governance structures for ongoing compliance, risk monitoring, and policy tracking.

ESG Integration & Reporting

Embed mandatory reporting outputs into broader ESG disclosures (e.g., sustainability reports, investor requests).

About Uniquis Consultech:

Uniquis Consultech is a global tech-enabled consulting company that specializes in Accounting & Reporting, Governance, Risk & Compliance, Sustainability & Climate Consulting, and Tech Consulting. The Company is co-founded by consulting veterans Jamil Khatri and Sandip Khetan and backed by marquee investors such as Nexus Venture Partners, Sorin Investments, and UST. Anu Chaudhary, a global sustainability and climate specialist with over 25 years of experience, serves as the Global Head of Sustainability & Climate Consulting.

Uniquis has a global team of 700+ professionals led by 75+ Partners & Directors across eleven offices in the USA, the Middle East, and India. The company serves more than 400 clients, including marquee names in each of the markets it operates in.

Uniquis is committed to leveraging technology and an integrated global delivery model to provide best-in-class consulting services to its clients.

About Our Sustainability & Climate Consulting Services:

Our Sustainability & Climate Consulting practice provides end-to-end services in the areas of climate risk and adaptation, decarbonization, corporate sustainability and ESG.

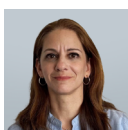
Given the growing importance of disclosures, significant data integrity requirements, and varied and disaggregated data sources, enabling the sustainability journey through technology is essential. With a unique blend of strong sustainability and climate domain capabilities and technology, we are well-placed to assist organizations in achieving their long-term sustainability goals.

We endeavor to guide sustainable transformation in business and society at large, with the vision to shape a more balanced planet for the coming generations

A Team You Can Trust to Deliver



Anu Chaudhary
Partner, Global Head of Sustainability & Climate Consulting



Dr. Elena Primikiri
Partner, Sustainability & Climate Consulting



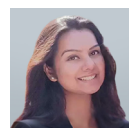
Dr. Rajesh Nair
Partner, Sustainability & Climate Consulting



Ashish Ranjan
Partner, Sustainability & Climate Consulting



Matt Berner
Managing Director, Sustainability & Climate Consulting



Akanksha Sinha
Director, Sustainability & Climate Consulting



Mugdha Raut
Director, Sustainability & Climate Consulting



Nachiketa Das
Director, Sustainability & Climate Consulting

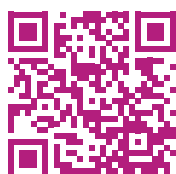


Vaibhav Gupta
Director, Sustainability & Climate Consulting

Tiphaine Delepine, Manager, Sustainability & Climate Consulting

Ryan Kim, Consultant, Sustainability & Climate Consulting

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