October 30, 2025
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
EPA-HQ-OAR-2025-0186

RE: Opposition to Proposed Repeal of the Greenhouse Gas Reporting Program (90 Fed. Reg. 44591)

Dear Administrator Zeldin,

On behalf of the undersigned organizations, we write to express our strong and unequivocal opposition to EPA's proposed repeal of the Greenhouse Gas Reporting Program and suspension of Subpart W. The Reporting Program is foundational to our nation's ability to effectively address climate change, providing transparent, reliable, and comprehensive data on climate pollution across major economic sectors. Its repeal would undermine decades of progress, erode public trust, harm American competitiveness, and jeopardize our ability to confront the climate crisis. We urge EPA to withdraw its proposal and maintain the Reporting Program in its entirety.

Our letter details (1) the Reporting Program's legal foundation rooted in clear Congressional directives, (2) the breadth of stakeholders who depend on the data for a multitude of critical purposes, and (3) the serious consequences a repeal would entail for the public and private stakeholders alike.

1. Legal Basis and History of the Greenhouse Gas Reporting Program

The Reporting Program was established by EPA in response to clear congressional directives and under robust statutory authority. In 2008 and 2009, Congress provided dedicated funding and explicit direction for EPA to develop and implement a mandatory, economy-wide greenhouse gas reporting rule. The Consolidated Appropriations Acts of 2008 and 2009 required EPA to use its Clean Air Act authority to ensure reporting of greenhouse gas emissions above specified thresholds across all sectors of the U.S. economy. These directives were designed to generate long-term, comprehensive data to serve both public and policymaking needs, and underscore Congress's expectation that EPA would maintain the Reporting Program over time.

The Clean Air Act, Section 114, provides EPA with clear and broad authority to require entities to monitor and report emissions data on a continuous basis. This section also requires that emissions data be made publicly available, and EPA has consistently fulfilled this legal mandate by publishing Reporting Program data on its FLIGHT website. EPA's newly proposed interpretation of Section 114 is inconsistent with the plain text and the Agency's long-held understanding of that authority.

Congress's commitment to ongoing greenhouse gas reporting has been reaffirmed in subsequent legislation. For instance, the Methane Emissions Reduction Program explicitly references and relies upon Subpart W for methane emissions from oil and gas. The American Innovation and Manufacturing Act is likewise implemented in reliance on the Reporting Program. These subsequent acts of Congress not only reaffirm the importance of the Reporting Program but also demonstrate legislative intent for a robust, enduring, and continually updated reporting framework.

Since its adoption, the Reporting Program has been integral to EPA's fulfilment of its statutory duties, its regulatory decision-making, and the implementation of non-regulatory and technical assistance programs. The data has been foundational to the U.S. Greenhouse Gas Inventory and has directly supported the development and implementation of Clean Air Act standards for power plants, oil and gas facilities, landfills, and other sectors.

2. A Multitude of Stakeholders Rely on the Reporting Program

The Reporting Program's value extends far beyond EPA's regulatory needs; it is a critical resource for a wide spectrum of stakeholders, all of whom would be harmed by EPA's proposed action.

Federal Agencies. The Treasury Department, Department of Energy, and other agencies rely on Reporting Program data and methodologies to administer major public investments, including the Section 45Q Carbon Sequestration Tax Credit, the Section 45V Clean Hydrogen Tax Credit, and the Section 45Y Clean Electricity Tax Credit. Billions of dollars in tax credits and incentives for clean energy and carbon management may be awarded based on the accuracy and credibility of Reporting Program data. Eliminating this data risks granting significant public subsidies wastefully and inaccurately at the expense of American taxpayers.

State and Local Governments. State and local policies, emissions inventories, and reporting programs often depend on EPA's methods and data for consistency, comparability, and to reduce regulatory burdens. Rolling back the Reporting Program would force state and local governments to develop or rely upon independent programs, needlessly expending additional resources and potentially leading to a fragmented landscape of inconsistent or incompatible reporting schemes, or risk losing this critical data entirely. This would increase costs, undermine regulatory stability, and weaken these governments' ability to address significant sources of emissions at the state and local scales.

Communities and the Public. The Reporting Program and its associated tools, such as the FLIGHT database, provide communities with transparent access to emissions data from nearby facilities. This empowers residents, public interest groups, and academics to hold companies accountable, advocate for pollution reductions, and identify opportunities to protect public health. Eliminating this data source would undermine accountability efforts and public trust in progress to cut emissions.

Businesses and Investors. Transparent, standardized emissions data is essential for companies and investors to benchmark performance, assess risks and opportunities, and demonstrate progress toward sustainability goals. The credibility of U.S. companies' climate commitments and their ability to compete in carbon-sensitive export markets depend on reliable Reporting Program data. Investors similarly use the data to make informed decisions and support portfolios aligned with their objectives. Losing this centralized data would undermine significant investments and American competitiveness.

Scientists and Academics. Researchers rely on the Reporting Program's granular, facility-level and source-level data to study emissions trends, analyze mitigation potential, validate emerging measurement technologies, and improve the accuracy of climate models. The Reporting Program's comprehensive coverage and methodological rigor make it a unique and irreplaceable resource for scientific efforts. Repealing the Reporting Program would harm scientific progress and stifle innovation.

3. Consequences of Repealing the Greenhouse Gas Reporting Program

Repealing the Reporting Program would have far-reaching and damaging consequences across the climate, economic, and public health landscapes.

Undermining Climate Policy and Regulatory Efficiency. Eliminating the Reporting Program would deprive EPA and other agencies of data that is foundational to developing and implementing critical climate and air quality standards. The Reporting Program's data is foundational to numerous Clean Air Act regulations as well as to voluntary programs and other approaches. Without this data, EPA's ability to design, evaluate, and enforce effective policies would be severely hampered, rendering future action more burdensome, less efficient, and less transparent. Eliminating this critical data source would likewise undermine Congress's ability to evaluate climate progress and legislative approaches.

Weakening Public Health Protections. Robust, transparent emissions reporting empowers communities to understand and address pollution in their neighborhoods. Many of the emissions tracked by the Reporting Program are co-emitted with pollution linked to respiratory illnesses, heart disease, and other health harms, especially in low-income areas and communities of color that already bear disproportionate burdens from industrial pollution. Repealing the Reporting Program would obscure pollution from public view, undermining efforts to reduce health disparities and protect vulnerable populations.

Jeopardizing Federal Investments and Economic Competitiveness. The Reporting Program is critical for the administration of major federal tax credits and incentives that drive investment in carbon capture, hydrogen, and other forms of energy. Repeal would throw these programs into uncertainty, disrupt billions of dollars in planned investments, and risk wasting taxpayer dollars.

Disrupting State Policy and International Obligations. States that have modeled their own standards on the Reporting Program or rely on its methodologies would face significant disruption, inefficiency, and increased costs. Internationally, the U.S. would risk our companies being unable to meet international standards. Reliable Reporting Program data is essential for meeting the requirements of international trade mechanisms, like carbon border adjustments, which increasingly demand verified emissions data for exports.

Loss of Public Trust and Accountability. Perhaps most critically, repealing the Reporting Program would erode public trust in our nation's ability to confront the climate crisis. The transparency and credibility provided by the Reporting Program are vital for holding polluters accountable, guiding public investments, and ensuring that climate action is based on sound evidence. The absence of reliable, comprehensive data would obscure progress to reduce emissions and erode public trust.

* * *

The Greenhouse Gas Reporting Program is an indispensable tool for developing effective policies, protecting public health, supporting economic growth, and maintaining transparency and public accountability. EPA has a clear obligation to maintain the Reporting Program and to ensure that it continues to serve the needs of the countless stakeholders that rely on it. The consequences of EPA's proposed repeal would be severe and far-reaching. We respectfully urge the Agency to withdraw its proposal and reaffirm its commitment to maintaining a robust, transparent, and comprehensive Greenhouse Gas Reporting Program.

Respectfully submitted,

198 Methods
350 Colorado
350 Deschutes
350 Salem Oregon
Alaska Community Action on Toxics
California Communities Against Toxics
Carbon180
Center for Biological Diversity

Center for Earth Energy & Democracy (CEED)
Change the Chamber
Citizens Caring for the Future
Clean Air Council
Clean Air Task Force
Clean Water Action
Climate Action Campaign
Climate Mayors
Climate Protection and Restoration Initiative
Climate Science, Awareness and Solutions, Inc.
Commission Shift
Conservation Voters New Mexico
Consolidated Oregon Indivisible Network (COIN) and its Climate, Energy and Environment Team
Dakota Resource Council
Dayenu: A Jewish Call to Climate Action
Earthjustice
Earthworks
Eco-Cycle
Ecumenical Ministries of Oregon
Environment Texas Research and Policy Center
Environmental Defense Fund
Environmental Health Project
Environmental Law & Policy Center
FreshWater Accountability Project
Green America
GreenLatinos
GreenLatinos (Texas Programs)
Healthy Air and Water Colorado (HAWC)
Hip Hop Caucus
Hispanic Access Foundation
Jewish Earth Alliance - PA
League of Conservation Voters
Liveable Arlington
Mi Familia en Acción
Micah Six Eight Mission
Moms Clean Air Force
Mormon Environmental Stewardship Alliance
NAEVA
National Parks Conservation Association
National Wildlife Federation
Natural Resources Defense Council
Oilfield Witness
Oregon Environmental Council

PennEnvironment
Physicians for Social Responsibility Pennsylvania
Protect Penn-Trafford
Sierra Club
Sierra Club Rio Grande Chapter (NM and West TX)
Southern Environmental Law Center
Southern Oregon Climate Action Now
Texas Impact
U.S. Climate Action Network
Union for Reform Judaism
Union of Concerned Scientists
Waterkeeper Alliance
Western Environmental Law Center
Western Leaders Network
Wyoming Outdoor Council
Young, Gifted & Green