November 3, 2025

Administrator Lee Zeldin
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20004

Submitted electronically via regulations.gov
Re: Reconsideration of the Greenhouse Gas Reporting Program
Docket Number: EPA-HQ-OAR-2025-0186

Dear Administrator Zeldin,

These comments are provided by the League of Women Voters of the United States (The League), in response to the Environmental Protection Agency's (EPA's) proposal to amend the Greenhouse Gas Reporting Program (GHGRP) to eliminate greenhouse gas (GHG) reporting requirements for most source categories, including Natural Gas Distribution, and to suspend other Petroleum and Natural Gas Systems reporting requirements until reporting year 2034. [1]

We strongly oppose the proposed rule. Simply abandoning measurement of greenhouse gases won't make climate change go away. It will not save money. Rather it will leave Americans less informed and less able to efficiently adapt to climate change and have far-reaching negative economic consequences.

The League and Climate Change

The League is a 105-year-old nonpartisan, nonprofit organization committed to ensuring that everyone is represented in our democracy. We are a grassroots group of more than one million members and supporters across more than 800 local and state Leagues nationwide. The League focuses on advocacy, education, litigation, and organizing to empower voters and defend democracy.

The League believes government must protect citizens' right to know about dangers to health and the environment; that climate change is a serious threat facing our nation and planet; and that an interrelated approach to combating climate change is necessary to protect public health. The League also believes that the federal government should have a major role in setting standards for environmental protection and pollution control.

The League opposes EPA's proposal to effectively end the Greenhouse Gas Reporting Program for the following reasons.

[1] Reconsideration of the Greenhouse Gas Reporting Program. Federal Register, 90 (177), 44591-44618. https://www.federalregister.gov/documents/2025/09/16/2025-17923/reconsideration-of-the-greenhouse-gas-reporting-program

1. EPA overestimates the economic benefit of eliminating the GHGRP.

EPA estimates that if the GHGRP is eliminated, reporting entities will save $303 million per year.[2] The cost savings that EPA estimates assume that the entities reporting GHG emissions data do not have another reporting requirement or use for that same data. There is a global trend of nations requiring more GHG emissions reporting.[3] As most US companies operate in a global marketplace, many companies selling goods and products in the international market must still measure and collect the same data. For example, the European Union's Carbon Border Adjustment Mechanism (CBAM) program requires importers of goods to report the carbon emissions embedded in the CBAM-regulated products that they import.[4] Therefore, the cost savings for companies competing in the worldwide marketplace may be minimal, if any.

2. The economic loss of eliminating the GHGRP far exceeds any economic gain and worsens national security concerns.

Even if EPA's estimate that eliminating the GHGRP would save reporting entities $303 million per year were accurate, *this is less than one percent* of the more than $77 billion that the carbon capture and sequestration industries have invested in technology and implementation, which rely upon the GHGRP for these investments to translate into new jobs and economic benefits.[5] "EPA's GHGRP… serves as the regulatory backbone of the carbon management industry, underpinning the integrity, transparency, and accountability of the 45Q tax credit in the United States."[6] The elimination of the GHGRP would jeopardize these businesses and the jobs affiliated with them.

Elimination of the GHGRP would also have a negative economic impact through trade ramifications. China has a commanding lead in the manufacturing of wind and solar, electric vehicles, and electrification.[7] It also has control over global supply chains for lithium and rare earths through its dominance in refining and processing. The proposed rule could give China further advantage in a situation that is already threatening to national security.

3. Elimination of reporting data undermines the bipartisan *American Innovation and Manufacturing Act* (AIM).

As EPA acknowledges, data collected and published by the GHGRP is used for non-*Clean Air Act* statutory reasons, including implementation of the *American Innovation and Manufacturing* (AIM) *Act*. In 2020, then President Trump signed into law the bipartisan-led and supported AIM Act, which directs

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[2] Ibid. pg. 44596.

[3] Aiuto, Kayla, Huckins, Sarah, and Momblanco, Hannah. (March 7, 2024) "What Are Greenhouse Gas Accounting and Corporate Climate Disclosures? 6 Questions, Answered." World Resources Institute. https://www.wri.org/insights/ghg-accounting-corporate-climate-disclosures-explained#:~:text=The%20U.S.%20Securities%20and%20Exchange,about%20this%20rapidly%20evolving%20field:

[4] Cardamane, Daniel. (July 31, 2024). "CBAM Reporting for US Companies." Canopy Edge. https://canopyedge.com/2024/07/cbam-reporting-for-us-companies/

[5] Stolark, Jessie. (Sep 12, 2025). "EPA Proposes Damaging Repeal of the Greenhouse Gas Reporting Program, which Underpins Public Confidence in the 45Q Tax Credi." Carbon Coalition. https://carboncapturecoalition.org/epa-proposes-damaging-repeal-of-the-greenhouse-gas-reporting-program-which-underpins-public-confidence-in-the-45q-tax-credit/

[6] Ibid.

[7] Butler-Sloss, Sam & Kingsmill Bond. (May 3, 2023). "The Energy Transition in Five Charts and Not Too Many Numbers". Rocky Mountain Institute. https://rmi.org/the-energy-transition-in-five-charts-and-not-too-many-numbers/

EPA to phase down production and consumption of hydrofluorocarbons (HFC) in the US.[8] The GHGRP is an essential tool for this effort as it serves as both the reporting mechanism and the repository for HFC data. The AIM Act was applauded by industries and trade organizations because it was predicted to create tens of thousands of new jobs, increase direct manufacturing output by $12.5 billion, and increase the US share of the global heating, ventilation, air conditioning, and refrigeration (HVACR) export market by 25%, thereby reducing the US trade deficit in this growing industry.[9] The elimination of the GHGRP, and the resulting impediments to AIM Act implementation would have long-lasting impacts on the US economy, including on our trade deficit.

4. **By eliminating the GHGRP, EPA is defying a congressional directive and depriving American communities of vital information.**

As EPA says in the proposed rule, the 2008 *Consolidated Appropriations Act* directed EPA to require the mandatory reporting of GHG emissions across all sectors of the US economy, after which EPA issued the Mandatory Reporting of Greenhouse Gases Rule in 2009, whose implementation is the GHGRP.[10] By eliminating the GHGRP, EPA would be ignoring a congressional directive.

Through the GHGRP, a national database was developed containing emissions data from more than 8,000 facilities. These data, accounting for 85-90% of US GHG emissions, are used to identify community sources of GHG emissions, inform policy at the state and local levels, and monitor the effectiveness of emission control methods.[11] While some of the larger states may be able to develop their own GHG reporting programs, eliminating the GHGRP will deprive most communities of information required to efficiently adapt to and mitigate the impacts of climate change, with devastating health and economic ramifications.

Conclusion

Glaringly absent from EPA's proposal to end the GHGRP is the cost of not collecting GHG emissions data. Without this valuable data, the US will be less able and ready to respond to climate-related disasters, develop necessary infrastructure for increased heating and cooling needs, assist farmers in securing America's food supply, and more. Eliminating the GHGRP will not save Americans money as EPA claims, but rather, will result in the loss of billions of dollars in economic investment, tens of thousands of jobs, and America's place as a leader in innovation, leaving Americans wholly unprepared to meet the challenges of the twenty-first century.

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[8] 42 U.S.C. § 7675. American Innovation and Manufacturing Act of 2020.

[9] The Air-Conditioning, Heating, and Refrigeration Institute. (Jan. 8, 2020). "AHRI Applauds Introduction of HVACR Jobs Bill." AHRI Applauds Introduction of HVACR Jobs Bill | AHRI

[10] FY2008 Consolidated Appropriations Act (H.R. 2764; Public Law 110–161. (pg. 286).
US EPA. 2014. Greenhouse Gases Reporting Implementation. Fact Sheet.
https://www.epa.gov/sites/default/files/2014-09/documents/ghgfactsheet.pdf#:~:text=mandatory%20reporting%20of%20greenhouse%20gases%20(GHG)%20from,as%20the%20Greenhouse%20Gas%20Reporting%20Program%20(GHGRP).

[11] US EPA. 2025. Greenhouse Gas Reporting Program. Scope of Emissions Covered in GHGRP.
https://www.epa.gov/ghgreporting/what-ghgrp. Accessed 10/20/2025.