



November 3, 2025

Lee Zeldin, Administrator
U.S. Environmental Protection Agency
William J. Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Comments on EPA's Greenhouse Gas Reporting Program Reconsideration– Docket ID No. EPA-HQ-OAR-2025-0186

The undersigned national health and medical organizations strongly urge EPA to maintain the Greenhouse Gas Reporting Program (GHGRP). Repealing the GHGRP would dismantle one of the most basic tools the nation has to track, understand and address climate pollution. Eliminating reporting requirements would conceal critical emissions data from the public and hinder the development and implementation of effective climate and health protections.

Congress mandated the creation of the Greenhouse Gas Reporting Program under Clean Air Act authority.

For more than a decade, the GHGRP has provided transparent, reliable and publicly available data that informs decisions on resource allocation, helps agencies target policies and helps stakeholders understand consumer choice. In the Consolidated Appropriations

Act of 2008, Congress funded EPA to develop and publish a rule that would “require mandatory reporting of greenhouse gas emissions above appropriate thresholds in all sectors of the economy of the United States,” citing existing authority under the Clean Air Act.¹ Currently, the program requires appropriate monitoring, verification and record-keeping from more than 8,000 direct emitters of greenhouse gas emissions (GHGs) and covers 46 source categories. Sources that are covered under the rule range from electric generating facilities, aluminum, iron and steel and glass production to ammonia, paper and electronics manufacturing to municipal solid waste landfills and more. The breadth of the program reflects the urgency of understanding and addressing climate pollution from all contributing sources.

The program also includes specific provisions under Subpart W requiring oil and gas operators to monitor and annually report their emissions. These reporting requirements provide essential data to identify major sources of emissions and guide effective mitigation strategies. EPA finalized updates to Subpart W of the GHGRP in 2024 to strengthen methods for detecting and quantifying methane emissions from the oil and gas sector. EPA falsely claims in its factsheet accompanying the proposed rule that the proposal to delay reporting requirements for Subpart W is due to the passage of H.R. 1, which delayed the implementation of the Waste Emissions Charge until 2034. H.R. 1 did not instruct EPA to delay the reporting requirements for facilities covered under Subpart W and therefore the statutory authority and requirements to report emissions under the Subpart W remain in effect.

The reporting, tracking and monitoring of emissions is critical to addressing the health emergency that is climate change.

The overwhelming scientific consensus is that greenhouse gas emissions are contributing to climate change, and that climate change is having both immediate and long-term impacts on communities across the country and globe. As detailed in a recent report from the National Academies of Science, Engineering and Medicine, "Continued emissions of greenhouse gases from human activities will lead to more climate changes in the United States, with the severity of expected change increasing with every ton of greenhouse gases emitted."²

¹ Congress.gov. H.R.2764 - 110th Congress. Consolidated Appropriations Act, 2008. [Text - H.R.2764 - 110th Congress \(2007-2008\): Consolidated Appropriations Act, 2008 | Congress.gov | Library of Congress](#)

² National Academies of Science, Engineering and Medicine. National Academies Publish New Report Reviewing Evidence for Greenhouse Gas Emissions and U.S. Climate, Health, and Welfare. September 2025. [National Academies Publish New Report Reviewing Evidence for Greenhouse Gas Emissions and U.S. Climate, Health, and Welfare | National Academies](#)

Climate change is already harming the health of Americans across the country. It drives worsening air pollution, increases extreme heat, fuels wildfires and contributes to more frequent and severe disasters. Each of these impacts has serious health consequences ranging from asthma attacks and heart disease to heat stroke, mental health distress and premature death. In order to effectively address the problem, federal, state and local officials have to know the sources of the problem. Without strong emissions data to inform mitigation and preparedness for these risks, the health harms of climate change will only increase.

Methane is a potent greenhouse gas more than 80 times more damaging than carbon dioxide in the short term and is responsible for about one-third of the warming the world currently experiences. Methane leaks also release other dangerous pollutants like smog-forming volatile organic compounds and cancer-causing air pollutants. Reducing methane pollution is among the most effective ways to slow near-term climate change and protect public health, which is why the GHGRP has a subpart specifically regulating oil and gas operations. Unfortunately, this proposal would permanently remove obligations for methane “natural” gas distributors to report and would delay requirements for the remaining segments covered under Subpart W.

Eliminating the reporting of emissions doesn’t eliminate the emissions – it just makes the problem bigger and harder to track.

Without accurate, transparent data, policymakers and stakeholders at every level – including public health professionals – cannot effectively design or implement mitigation strategies. Hiding this information from the public obscures the problem and delays solutions, making future action more difficult and costly.

In 2023, the GHGRP program collected direct emissions data from over 7,500 facilities in nine industry sectors. Those facilities reported direct emissions totaling 2.58 billion metric tons of carbon dioxide equivalent.³ With access to the data, policymakers and regulators can make data-driven decisions on how to reduce emissions and allocate resources to achieve the best, most cost-effective solutions. Ignoring billions of tons of greenhouse gas emissions is dangerous and puts the health and livelihood of families now and in the future at risk by concealing the real, urgent challenges that the nation is facing.

Businesses rely on their ability to publicly display their sustainability efforts and earn consumer trust and global recognition.

³ United States Environmental Protection Agency. Greenhouse Gas Reporting Program. GHGRP Reported Data. March 2025. [GHGRP Reported Data | US EPA](#)

Businesses are increasingly taking more meaningful steps to reduce their climate impact because of data that shows consumers are increasingly taking sustainability efforts into consideration with their purchasing power.⁴ The GHGRP allows companies to track their progress and publicly demonstrate their leadership. Eliminating the program undermines confidence in both public and private climate commitments and removes a key incentive for continued corporate transparency. Companies may ultimately need to invest more to continue tracking in the absence of the GHGRP.

Data collected under the GHGRP is not only beneficial to inform consumer choice in the U.S., it also is a way for companies to display their commitments to help them compete on a global stage. Several states and hundreds of other countries require GHG emissions reporting. The International Energy Agency publishes annual reports detailing the GHG emissions of all world countries.⁵ If the U.S. reporting of GHG emissions is eliminated, delayed or tampered with, it could harm the competitiveness of U.S. businesses among audiences that track these reports.

Companies, business and industrial sources have already spent more than a decade investing resources into complying with the law, and infrastructure, technology and processes are already in place. Weakening it now would undermine years of investment and progress by both government and industry.

Conclusion

We urge EPA to withdraw this dangerous and unlawful proposal. Maintaining a strong Greenhouse Gas Reporting Program is essential to protecting public health, ensuring transparency and enabling effective climate action. The American people deserve full and accurate information about the sources and types of emissions polluting our air and threatening our health, communities and future. Since its creation, EPA has existed to protect human health and the environment and works to ensure that Americans have access to clean air. This, and other recent proposals, are at odds with both the law and with EPA's core mission. We urge you to follow the science, the law and the mission of the agency and rescind this proposal.

Signed,

⁴ Harvard Business Review. Business and Society. Research: Consumers' Sustainability Demands are Rising. September 2023. [Research: Consumers' Sustainability Demands Are Rising](#)

⁵ Crippa, M., Guizzardi, D., Pagani, F., Banja, M., Muntean, M. et al., GHG emissions of all world countries - 2025 Report, Publications Office of the European Union, Luxembourg, 2025, [doi:10.2760/9816914](#), JRC143227.

Alliance of Nurses for Healthy Environments
American Academy of Pediatrics
American College of Chest Physicians
American College of Obstetricians & Gynecologists
American College of Physicians
American Lung Association
American Psychological Association Services
American Public Health Association
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