

Congress of the United States

Washington, DC 20515

November 3, 2025

Attention: Docket ID No. [EPA-HQ-OAR-2025-0186; FRL-12720-01-OAR]

The Honorable Lee Zeldin
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20460

Re: Comments on Proposed Rule; Reconsideration of the Greenhouse Gas Reporting Program,
90 Fed. Reg. 44591

Dear Administrator Zeldin,

The proposed action of the Trump Administration's Environmental Protection Agency (EPA) to suspend the Greenhouse Gas Reporting Program (GHGRP) is a direct attack on America's public health, environment, scientific integrity, and economic growth. Repealing the GHGRP would undermine decades of progress to ensure the EPA is collecting and publicly disclosing data to effectively address climate change and ensure American global competitiveness. As Members of Congress, we urge EPA to preserve and strengthen the GHGRP knowing the important role it plays to protect hardworking American families and the value it has for businesses and investors.

The GHGRP is a longstanding and successful program that EPA adopted in response to clear Congressional direction. It provides up-to-date information that EPA needs to fulfill its mission of protecting human health and the environment. The GHGRP requires reporting of greenhouse gas (GHG) data and other relevant information from large GHG emission sources, fuel and industrial gas suppliers, and CO₂ injection sites across the United States. This data is an invaluable resource that is relied on by federal agencies, state and local governments, businesses, the financial industry, and community-based organizations. Stakeholders and the public have a right to this transparent and updated information, which is used to increase efficiency and save money, develop common sense climate policies, and find opportunities to cut pollution and improve our country's public health. All families deserve a safe environment, clean air, and the opportunity to thrive.

The effects of climate change have been felt in every corner of our country due to rising global temperatures. Over the last 12 months alone, the United States has dealt with massive wildfires in Southern California, deadly floods in Central Texas, and dangerous, life-threatening heat waves that affect 255 million Americans. GHG emissions, such as carbon dioxide, methane, and nitrous oxide, have been the leading contributors to the increase in the Earth's temperature, which is driving climate change.¹ The GHGRP has been successful in capturing reporting of

¹ Intergovernmental Panel on Climate Change. (2023). Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change (Core Writing Team, H. Lee and J. Romero, Eds.). IPCC. <https://doi.org/10.59327/IPCC/AR6-9789291691647>

about 3 billion metric tons of CO₂e emissions from over 8,000 industrial facilities. This accounts for about 50 percent of total U.S. GHG emissions.² The rollback of the GHGRP will eliminate the foundational data needed by agencies to develop standards and rules to address climate change.

The GHGRP has likewise been successful in providing transparent, publicly available pollution data from emitting facilities. This is crucial for frontline communities to understand pollution trends and develop strategies to support pollution limits. For example, community advocates can readily access pollution data from nearby facilities using EPA's Facility Level Information on Greenhouse Gases Tool (FLIGHT).³ The GHGRP tracks emissions that have been linked to serious health harms and will increase the health disparities for frontline communities.⁴ Frontline communities often report the highest cancer rates, asthma, and heart disease.⁵ The elimination of this data will reduce vital protections to Americans' public health.

The GHGRP provides businesses and investors with transparent and standardized emissions data for risk assessment, sustainability goals, and competitiveness in carbon-sensitive export markets. Repealing the program would undermine the credibility of climate commitments and investment decisions. Businesses use this data to demonstrate success in sustainability goals with investors. In addition, this rollback would harm successful federal programs that help fund billions of dollars into planned investments that will improve our environment and increase affordability for hardworking Americans. These disruptions will only destabilize vital energy investments, eliminate good-paying jobs, and increase costs for all families.

As Members of Congress, it is our responsibility to protect public health, preserve our environment, and strengthen the economy of our country and our communities. The Trump Administration's proposed rollback of GHGRP would set our country back decades and expose American families to the harmful environmental, health, and economic impacts of climate change. We demand that the EPA withdraw its proposal and strengthen and maintain a transparent and comprehensive reporting program.

Sincerely,

² U.S. Environmental Protection Agency. (2025, August 14). What is the GHGRP? Greenhouse Gas Reporting Program (GHGRP). Retrieved from <https://www.epa.gov/ghgreporting/what-ghgrp#Scope-Emissions>.

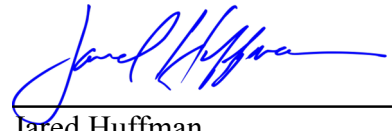
³ EPA, FLIGHT, <https://ghgdata.epa.gov/ghgp/main.do>.

⁴ For example, methane released from oil and gas operations and reported under Subpart W of the GHGRP is co-emitted alongside hazardous and health harming air pollutants like benzene. See PSE Healthy Energy, *Exposing the Health Risks of Methane: The Links Between Methane Emissions and Hazardous Air Pollutants*, <https://www.psehealthyenergy.org/exposing-health-risks-methane/>.

⁵ See, e.g., Vohra et al., *The health burden and racial-ethnic disparities of air pollution from the major oil and gas lifecycle stages in the United States*, Sci. Advances (2025), <https://doi.org/10.1126/sciadv.adu2241>; CATF & NAACP, *Fumes Across the Fence-Line: The Health Impacts of Air Pollution from Oil & Gas Facilities on African American Communities* (2017), <https://www.catf.us/resource/fumes-across-the-fence-line/>.



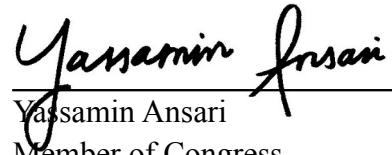
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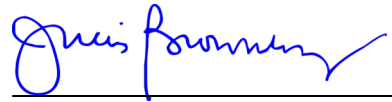
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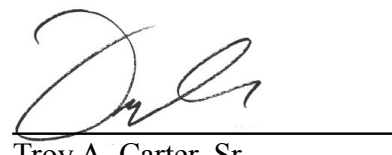
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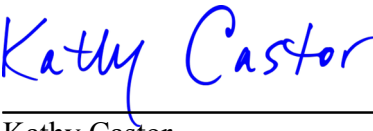
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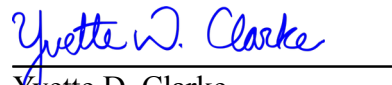
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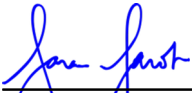
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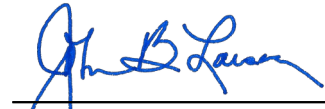
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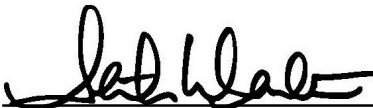
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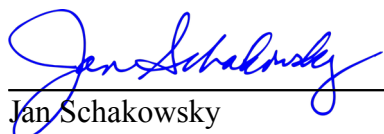
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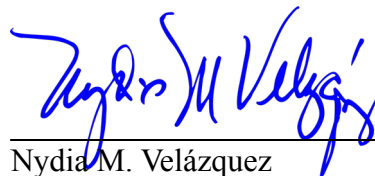
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