



EPN Oral Testimony on EPA's Proposed Reconsideration of the Greenhouse Gas Reporting Program

October 1, 2025

Good morning. I'm Reid Harvey, former Division Director in EPA's Office of Atmospheric Protection. I'm representing the Environmental Protection Network, a non-partisan organization of over 700 former federal regulators, scientists, and political appointees. EPN will also submit written comments during the public comment period.

This proposal does not adequately consider the importance of investments of taxpayer resources that EPA has made in response to specific Congressional direction in past appropriations acts. Congress specifically earmarked appropriations to stand up this program in those acts and has continued to provide funding for the reporting program ever since. Indeed, Congress has built on its original direction by passing laws that have made the reporting program essential to successful implementation of other priorities, such as the American Innovation and Manufacturing (AIM) Act to reduce hydrofluorocarbons (HFCs). Data from the program also supports administration of tax credits enacted under the Inflation Reduction Act that remain in effect. EPA clearly has authority and direction to continue to use its annual appropriations to continue greenhouse gas (GHG) reporting.

Here are the five harms of this proposal: First, the public will lose access to reliable emissions information and won't be able to hold companies to the pledges that they have made to reduce emissions.

Second, Wall Street and investors will no longer have information about company emissions. Instead, they may have to rely on state and voluntary disclosure schemes, which may not be national in scope nor consistent. Without comprehensive data, companies claiming emissions reductions will lose credibility and public trust.

Third, policy makers won't have the data that they need to make informed decisions. Multiple states have GHG reporting programs or use federal data in lieu of running their own programs. Without federal leadership, they may have to revise their existing laws or establish new requirements, which may not be consistent with the national reporting program.

Fourth, private companies will be harmed in many ways:

- Losing existing investments in reporting infrastructure,
- Having to interact with potentially inconsistent state programs,
- Losing access to carbon capture and storage (CCS) and clean hydrogen tax credits, and
- Suffering international trade consequences, particularly in the natural gas sector, as well as for other goods exported to the EU, Asia, or other countries considering carbon border adjustments.

Fifth, this proposal harms US foreign policy interests. The US has now stopped the reporting program and the US national greenhouse gas inventory. The US will clearly be harmed when international measurement protocols are not shaped by EPA inventory experts in ways that are in our national interest.

The proposed rule is based on flawed estimates of the costs and benefits. Most of the avoided reporting costs are attributable to the Subpart W provisions and, had EPA extended the analytic period beyond 10 years, the benefits of the rule would be much lower. EPA also did not attempt to estimate any of the costs of the proposal to affected states, industry, or the public. Clearly EPA has not shown that the benefits outweigh the costs here.

In conclusion, this proposal runs counter to congressional intent, will harm multiple US interests, and is based on feeble analysis. The Administration has already decimated the EPA GHG reporting and inventory programs through its budget, personnel actions, and reorganization this year. These actions and this proposal will not outlast this Administration. EPA should not issue a final rule.