

Comments William Barrett
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Docket Id. No. EPA-HQ-OAR-2025-0186,
Reconsideration of the Greenhouse Gas Reporting Program

Good morning, my name is Will Barrett. I am the Assistant Vice President for Nationwide Clean Air Policy with the American Lung Association. The Lung Association is calling for EPA to strike this proposal to eliminate greenhouse gas reporting by major polluters. This action will hide critical data about major emitters' responsibility to curb climate pollution from the public, policymakers and researchers.

Following the close of the comment period on the Endangerment Finding, it is clear that the public, state and local governments, academics, health professionals and others disagree with EPA's efforts to sideline science and the law when it comes to protecting Americans from climate change. This latest EPA effort to disregard the law, the science and extensively considered policies follows a deeply concerning pattern.

The Consolidated Appropriations Act of 2008 provided funding specifically for EPA to develop a rule to "require mandatory reporting of greenhouse gas emissions ... in all sectors of the economy of the United States." Taking this still-guiding direction, EPA then established the rule in 2009 and has since implemented an effective program.

This data reporting is crucial to understanding risk, planning for mitigation and broader information related to sources of climate pollution. Given the urgency of the climate crisis, the data collection should be expanded, not eliminated, to better inform mitigation.

By contrast, the proposal to shield thousands of industrial polluters from disclosing their contributions to climate change, and delay to Section W reporting requirements for petroleum and natural gas systems for a decade represents a direct threat to public health.

This proposal will not help EPA accomplish its mission to ensure all Americans have clean air.

What this will accomplish is adding yet another layer of uncertainty to American industry as state-level and international reporting requirements will remain in place. Companies that use the EPA reporting program to ensure their own alignment with grant programs and for other uses will be compelled to invest in additional reporting systems to verify emissions and prevent waste.

In addition to corporate uses of GHG reporting data, it is used by researchers to demonstrate the potential benefits of cleaner technologies that can be deployed to advance innovation and efficiency in manufacturing and other sectors.

The Lung Association's recent report on industrial process heat utilized a variety of data sets, including the EPA reporting program – ultimately finding that the transition to heat pumps in certain industrial sectors could generate hundreds of billions in global climate benefits as manufacturing processes modernize with efficient, cleaner technologies.

If this proposal moves forward, this data – and opportunities it provides to protect health - will be lost while our climate crisis and associated health emergencies accelerate, making mitigation more costly and.

There is no justification for this latest EPA proposal to undermine public health, climate science and the law. EPA must retract this proposal.

Thank you for considering our perspectives, and thank you to the panelists for your attention.