

Comments from Emily Thompson

American Lung Association

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Reconsideration of the Greenhouse Gas Reporting Program

As prepared for delivery to

Environmental Protection Agency

Hello, my name is Emily Thompson and I'm the Manager of Nationwide Policy for Clean Outdoor Air at the American Lung Association. Thank you for the opportunity to speak at this hearing today, and I urge EPA to provide more time for written comments to ensure the public has adequate time to participate.

I am here to strongly oppose EPA's proposed reconsideration of the Greenhouse Gas Reporting Program. This proposal would broadly eliminate reporting requirements for nearly every sector and delay methane reporting for the oil and gas sector by ten years. If finalized, it would effectively dismantle the reporting program that has been in place for over a decade.

Congress has explicitly directed EPA to update Subpart W methane reporting for the oil and gas sector to ensure that it is accurate, empirically based and reflective of real-world emissions. That directive remains the law, it has not been repealed or amended by Congress. Yet, EPA now proposes to delay this reporting on the grounds that Congress temporarily delayed a separate methane fee requirement. These are distinct statutory provisions, Congress did not direct EPA to halt or weaken reporting.

EPA's proposal represents an extreme and unjustified step that would obscure vital pollution data from the public, undermine climate action and shield the true scope of our nation's biggest polluters from accountability.

For communities and families across the country, as well as companies and organizations, this data is not just numbers on a spreadsheet. Without strong, reliable emissions data, we cannot effectively design mitigation strategies or prepare for the increasingly severe health impacts of climate change, from worsening asthma and heart disease to heat-related illness and extreme disasters. Methane gas is over 80 times more warming than carbon in the short term, and responsible for about one third of the warming we currently experience. Ignoring this problem will not make it go away but will only make it harder and more expensive to deal with in the future.

For these reasons, I urge EPA to withdraw this dangerous proposal and uphold the Greenhouse Gas Reporting Program. Americans deserve transparency and accountability when it comes to the emissions that are shaping our health, our communities and our future.

Thank you.