

Comments from Liz Scott
American Lung Association
Docket Id. No. EPA-HQ-OAR-2025-0186,
Reconsideration of the Greenhouse Gas Reporting Program
As prepared for delivery To
Environmental Protection Agency

My name is Liz Scott and I'm the Director of Federal Clean Air Advocacy at the American Lung Association. Thank you for holding this hearing today. Before I begin, I want to express disappointment that there is only one day allotted for this public hearing. This proposal coming on the heels of another hugely consequential proposed repeal means that the public and affected stakeholders have not been given ample time to react to and review the onslaught of rollbacks. I urge EPA to provide more time for written comments.

The American Lung Association is strongly opposed to the proposed reconsideration of the Greenhouse Gas Reporting Program. We joined hundreds of advocates just a few weeks ago speaking in front of EPA officials on the overwhelming scientific consensus that greenhouse gas emissions are causing climate change and endangering health, and that EPA has a responsibility and the authority to address it. The 2023 report from the Greenhouse Gas Reporting Program calculated 2.6 billion metric tons of carbon dioxide equivalent. With this proposed reconsideration, EPA is sending a message of "out of sight, out of mind." Unfortunately, eliminating the reporting of the problem does not eliminate the problem, it just makes things worse.

Many other speakers today will dig deeper into the ramifications for families and communities if the reporting program is eliminated, leaving us all in the dark as to how much pollution is entering the atmosphere. I'd like to focus the remainder of my comments on why this reconsideration could actually harm companies. Climate risks impact their bottom lines, and the business community is continuing to take steps to reduce their contributions to emissions. For example, the Ceres Company Network represents 50 companies, most of whom are Fortune 500 companies, to support them improving sustainability. The healthcare sector itself is also working to clean up its emissions. 18 health systems representing more than 500 hospitals are members of the Health Care Climate Council, which works to improve sustainability in the healthcare sector.

The current reporting system allows companies to demonstrate the results of their sustainability efforts based on real data that can be publicly reported through the Greenhouse Gas Reporting Program. Eliminating the reporting program undermines public

confidence in the progress to reduce emissions, including claims made by specific companies about their emissions performance.

The program is also an important component of ensuring waste emissions are reported, including methane gas. Emissions can be wasted through venting, flaring and leaks. That is wasted gas that costs states, the American taxpayer and companies. Without reporting emissions, those unnecessary leaks will go unchecked. The Greenhouse Gas Reporting Program has been around for decades, meaning companies have already invested in the technology and resources to comply with emissions reporting.

Addressing the crisis that is climate change driven by greenhouse gas emissions requires bold, strategic and smart investment of resources. There is nothing smart about eliminating the data that helps inform those decisions. I urge the EPA to abandon this reconsideration and ensure that the Greenhouse Gas Reporting Program still captures the full set of data it was mandated by Congress to collect.