

November 3, 2025
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
EPA-HQ-OAR-2025-0186

RE: Opposition to Proposed Repeal of the Greenhouse Gas Reporting Program (90 Fed. Reg. 44591)

Dear Administrator Zeldin,

On behalf of the Health Equity and Environment Action League, the eight undersigned organizations, and the frontline communities we serve, we write in strong opposition to the Environmental Protection Agency's (EPA) proposed repeal of the Greenhouse Gas Reporting Program. Repeal of the Greenhouse Gas Reporting Program will leave millions of Americans more vulnerable to known public health harms from hazardous pollutants and climate change, and losing access to emissions data will render vital protective regulations, policies, and community health programs in jeopardy.

The Greenhouse Gas Reporting Program provides indispensable data on facility- and source-level emissions, enabling public health experts and advocates to assess pollution levels, create better climate and risk models, and analyze opportunities for progress and mitigation. Without transparent, robust emissions data, communities lose the ability to be proactive in responding to public health risks associated with greenhouse gas emissions. For the millions of Americans living near active oil and gas wells or refineries, repeal of the Greenhouse Gas Reporting Program eliminates transparency and elevates risk. Local data empowers residents and community groups to be firm advocates in holding facilities accountable and pushing elected officials to develop strong, protective standards. No efforts at state or local levels could sufficiently emulate the Greenhouse Gas Reporting Program's comprehensive reporting data at the same level of rigor or breadth.

The Greenhouse Gas Reporting Program's emissions data also equips healthcare providers with better knowledge of patients' exposure risks from nearby facilities. Many of the greenhouse gases tracked by the Greenhouse Gas Reporting Program are co-emitted with pollutants that cause known health harms. One potent example is the formation of ground-level ozone - or smog - which inflames lungs, exacerbates conditions like asthma, and contributes to cardiovascular and respiratory disease.¹ Headaches, unexplained illnesses, and reproductive and neurological harms are commonplace for residents near reporting facilities, which continue to be disproportionately near lower-income communities and Black or Latino neighborhoods. In times of emissions surges or equipment failures, these communities would be left in the dark under EPA's proposal. Losing this transparency and access will undermine critical efforts to identify risks, reduce health disparities, and protect environmental justice communities.

¹ <https://earthjustice.org/feature/soot-smog-air-map-united-states-county>

HEAL

Health Equity & Environment Action League

Repeal of the Greenhouse Gas Reporting Program will further endanger public health by shattering the ecosystem of state, local, and federal climate initiatives that depend on robust emissions data. Frontline communities cannot afford delayed action as we rebuild a national policy landscape without the Greenhouse Gas Reporting Rule; climate change is already devastating families and filling emergency rooms. Shifting weather patterns have increased the severity and frequency of storms, flash floods, wildfire, and hurricanes that threaten injury, displacement, and death. Longer summers and extreme heat on strained energy grids puts children, seniors, people with pre-existing conditions, and people who work outside at increased risk of heat-related illnesses and death. Insect-borne diseases and the availability of clean water remain growing threats with devastating, widespread consequences.

The climate crisis is a public health crisis, and EPA's proposed repeal of the Greenhouse Gas Reporting Program will exacerbate both. At a time when millions of Americans are losing access to healthcare and millions more are seeing polluting data centers and energy generators built in their backyards, it is imperative that EPA uphold its mission to protect human health and the environment.

As a coalition of environmental justice experts, health professionals, scientists, and community advocates, we demand a future where frontline communities are free from preventable disasters and illnesses from unregulated emissions. We strongly urge EPA to reverse this attack on public health, withdraw its proposal, and ensure the Greenhouse Gas Reporting Program remains a comprehensive tool for healthcare providers, environmental justice advocates, and government leaders alike to protect communities.

Sincerely,

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Children's Environmental Health Network
Deep South Center for Environmental Justice
Duwamish River Community Coalition
Earthjustice Action
NAACP
New Jersey Environmental Justice Alliance
WE ACT for Environmental Justice