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EPA Proposes Sweeping Rollback of Greenhouse Gas Reporting Program

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On September 12, 2025, EPA announced a proposal to effectively rescind the Greenhouse Gas Reporting Program (GHGRP), which EPA promulgated 15 years ago under its general Clean Air Act (CAA) authority. This federal program required 47 categories of large greenhouse gas emitters, fuel and industrial gas suppliers, and CO_2 injection sites to measure and report their annual emissions. Under EPA's new proposal, reporting obligations for 46 of the 47 covered source categories would be eliminated entirely, with 2024 as the final reporting year.

The GHGRP historically required annual emissions reporting from major industrial sources as well as manufacturers and production facilities whose annual emissions exceed 25,000 tons of CO_2 per year. Today, EPA receives data from more than 8,000 direct emitters and greenhouse gas suppliers spanning a wide range of industries. This information has been the gold standard of emissions reporting and is used in emissions inventories, policy development, trading programs, and tax credits. For example, the Treasury Department and Internal Revenue Service (IRS) use the annual data to produce regulations governing tax credits for carbon oxide sequestration and clean hydrogen production. The preamble to the proposed rule states that these purposes are ”not an adequate statutory basis for continuing to require collection and reporting of the data,” and that rescission of the program might require the Treasury Department and IRS to revise their regulations.

Under the proposed rule, the only source category that would remain subject to annual reporting requirements would be natural gas systems covered by the Waste Emissions Charge (WEC). However, the reporting requirements for this category would be delayed until 2034, pursuant to the One Big Beautiful Bill Act.

The proposed rule specifies that it will “remove the electronic capabilities to receive any reporting information” from sources no longer subject to the program. The proposed rule would also remove all recordkeeping obligations, which previously required sources to maintain three to five years of emissions data and make substantive corrections to past submissions when necessary.

This proposal follows a **March 2025** announcement that the agency was reconsidering the GHGRP as part of its broader environmental deregulation initiative. EPA Administrator Lee Zeldin justified this rollback by arguing that the GHGRP is costly, burdensome, and not essential to

fulfill the agency's statutory duties under the CAA. The agency predicts that rescinding the GHGRP will save regulated entities approximately $2.4 billion over ten years. EPA proposes to finalize this rule before the 2025 reporting deadline, which has been extended until June 10, 2026.

If finalized, this proposed rule would continue this Administration's withdrawal from regulation of greenhouse gases—moving away from a nationwide emissions reporting framework and placing greater responsibility on states and voluntary programs to fill the gap.

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