



# USEPA Announces Proposal to End Greenhouse Gas Reporting Program

## Client Advisories

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On September 12, 2025, the United States Environmental Protection Agency (USEPA) formally announced a proposed rule to end the Greenhouse Gas Reporting Program (GHGRP). The GHGRP applies to 47 source categories and covers approximately 8,000 facilities throughout the United States, requiring power plants, refineries, chemical plants, fossil fuel and industrial gas suppliers, and carbon dioxide injection sites to report greenhouse gas emission data on an annual basis.

The original Greenhouse Gas Reporting Rule was mandated by Congress in 2008 and was promulgated under Section 114(a) of the Clean Air Act. In 2009, USEPA released a final rule that implemented the program—data collection began in 2010.

According to USEPA, it reviewed the GHGRP and determined that there is no requirement under Section 114(a) of the Clean Air Act to collect greenhouse gas emissions data for 46 of those source categories. The proposal to end the GHGRP would not eliminate emissions reporting requirements for certain oil and gas facilities such as pipelines that transport natural gas. Instead, the proposal would allow specific oil and gas facilities to postpone emissions reporting until 2034.

The proposed rule comes six months to the day after USEPA Administrator Lee Zeldin announced that the agency was reconsidering the GHGRP. The proposed rule also comes on the heels of USEPA's proposal to rescind the 2009 Endangerment Finding.

The proposed rule was published in the Federal Register on September 16, 2025, and public comments must be received by USEPA on or before November 3, 2025. Additionally, USEPA will hold a virtual public hearing on October 1, 2025.

For questions on USEPA's proposal to end the GHGRP, please contact [Charles Dennen](mailto:cdennen@archerlaw.com) at [cdennen@archerlaw.com](mailto:cdennen@archerlaw.com) or 856-673-3932.

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