ENVIRONMENTAL HEALTH PROJECT
DEFENDING PUBLIC HEALTH SINCE 2012
environmentalhealthproject.org

October 1, 2025

Virtual Public Hearing, 8:00 a.m. – 6:00 p.m. (EDT)

Environmental Health Project's Testimony on the U.S. Environmental Protection Agency (EPA)'s proposed rule to end the federal Greenhouse Gas Reporting Program (GHGRP)

EPA-HQ-OAR-2025-0186

Talor Musil, Field Manager, Environmental Health Project

Remarks

Good morning. My name is Talor Musil, and I am the Field Manager of the Environmental Health Project, a Pittsburgh-based, nonpartisan, nonprofit that defends public health in the face of oil and gas development. Our organization supports communities who are experiencing the health impacts of shale gas pollution, including climate-induced harms and health symptoms from exposure to toxic pollutants. I am here today to express opposition and grave concern about the EPA's proposal to stop greenhouse gas reporting for the most significant sources of air pollution in this country, oil and gas facilities among them.

Collecting and publicly sharing air pollution data is necessary for designing well-informed, public health protective policies. The last 15 years of data from the GHGRP have allowed federal and state agencies, industry, non-profit organizations, and others to assess pollution trends, including progress, accurately. Dismantling this national framework will require government and stakeholders to piece together disparate information, which is likely to increase administrative burden and decrease the accuracy of their assessments.

The EPA's rationale for this repeal cites the agency's lack of intention to develop any further greenhouse gas emission regulations. Federal goals to reduce greenhouse gas emissions are far from met, and further regulatory intervention is required to continue to reduce emissions. Measuring changes in greenhouse gas emissions on an annual basis is central to assessing progress, or failure, on these goals. In Pennsylvania, recent decisions to expand hyperscale data centers, petrochemical facilities, and oil and gas extraction are likely to increase greenhouse gas emissions in the coming years. By allowing existing and proposed facilities to emit greenhouse gases without oversight, the EPA is refusing to measure or communicate impacts on health and the climate.

As a public health organization, EHP is concerned about the ramifications that this decision to stop reporting emissions will have on the health of Americans. Greenhouse gas emissions result in climate–change–induced health harms,[1] such as insect-borne diseases, heat-related illnesses,[2] as well as injuries and deaths from storms, floods, and wildfires. One of these pollutants, methane, is 80 times more powerful at warming the climate than carbon dioxide within the first 20 years, and nearly two-thirds of the warming the world is experiencing today is due to methane emissions from human activities.[3] Methane co-pollutants also contribute to the formation of ground-level ozone, or smog, another significant greenhouse gas that intensifies climate change. Ozone directly impacts the health of community members by inflaming the lungs, which can lead to asthma attacks, cardiovascular disease, and respiratory problems.[4]

Halting the Greenhouse Gas Reporting Program would set the United States back in its ability to make data-informed decisions about reducing industrial emissions. Ending this reporting would also remove the public's ability to access accurate information about national emissions trends. I urge the EPA to keep the Greenhouse Gas Reporting Program intact to protect public health.

Thank you for the opportunity to provide remarks today.

Talor Musil, MSW
Field Manager
Environmental Health Project
4165 Blair Street, Pittsburgh, PA, 15207
Tmusil@environmentalhealthproject.org

---

[1] Center for Disease Control. (2024). Effects of climate change on health. https://www.cdc.gov/climate-health/php/effects/index.html

[2] Environmental Protection Agency and National Oceanic and Atmospheric Administration. (2024). Climate Change indicators: heat waves. https://www.epa.gov/climate-indicators/climate-change-indicators-heat-waves, and
Pan American Health Organization and World Health Organization. (2024). Extreme meteorological events: heat waves. https://www.paho.org/en/campaigns/extreme-meteorological-events#olas-calor

[3] Jackson, R. B., Saunois, M., Martinez, A., Canadell, J. G., Yu, X., Li, M., Poulter, B., Raymond, P. A., Regnier, P., Ciais, P., Davis, S. J., Patra, P. K. (2024). Human activities now fuel two-thirds of global methane emissions. *Environmental Research Letters, 19*(10), 101002. https://iopscience.iop.org/article/10.1088/1748-9326/ad6463

[4] United State Environmental Protection Agency. (2025). Health effects of ozone pollution. https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution