



American Carbon Alliance Response to EPA's Reconsideration of the Greenhouse Gas Reporting Program

TO: Environmental Protection Agency

DATE: November 2, 2025

RE: EPA-HQ-OAR-2025-0186, Reconsideration of the Greenhouse Gas Reporting Program (40 CFR Part 98)

FROM: Tom Buis, CEO, American Carbon Alliance

The American Carbon Alliance appreciates the opportunity to respond to EPA-HQ-OAR-2025-0186 regarding the Reconsideration of the Greenhouse Gas Reporting Program (GHGRP). With a broad membership across the United States, ACA is an organization dedicated to advancing carbon management technologies and policies. ACA brings together industry leaders, innovators, and stakeholders to promote effective, market-driven solutions that advance low carbon fuels. With a focus on carbon capture, utilization, and storage (CCUS), ACA is committed to supporting systems that enhance transparency, innovation, and global competitiveness.

The EPA's GHGRP is a proven and effective emissions tracking infrastructure that enhances data transparency, supports U.S. competitiveness, and advances trade objectives. ACA strongly supports the GHGRP in its current form because it works reliably and is particularly vital in international trade contexts. Businesses across sectors have long relied on this system to conduct their affairs, including compliance, strategic planning, and market positioning. Moreover, the GHGRP is validated through rigorous federal oversight and is consistently recognized internationally as a credible standard for emissions reporting.

The United States government has a compelling interest in bolstering American industrial competitiveness and trade interests. Amid increasing efforts by key global trade partners to implement emissions-based border measures, scaling back the GHGRP risks elevating costs for U.S. exporters and hindering their ability to deliver energy and other products to international markets.

U.S. companies that want to prove how low-carbon their products are when selling them abroad can rely on the GHGRP. It provides a strong, uniform way to report emissions from individual facilities, with the backing of the federal government to make it trustworthy. This information helps businesses figure out the carbon footprint of their products, giving the U.S. a big edge in global competition. Tracking and reporting emissions like this are key parts of Carbon Border Adjustment Mechanisms (CBAMs), which are already rolling out in the European Union and the United Kingdom and are also being discussed across Asia.

A substantial rollback of the GHGRP would create significant complications for U.S. tax policy implementation. Many American companies involved in carbon capture, utilization, and storage that are seeking the carbon oxide sequestration tax credit under section 45Q, as well as those pursuing the clean hydrogen production tax credit under section 45V, currently rely heavily on the GHGRP's reporting mechanisms to provide verifiable evidence of the amount of CO₂ they have successfully sequestered or prevented from being emitted through their projects. This data is essential for demonstrating eligibility and accurately calculating the value of these tax incentives. In the absence of GHGRP, these companies would need to develop and implement their own independent monitoring, reporting, and verification systems to submit the necessary information directly to the Internal Revenue Service (IRS). That said, without the official validation and endorsement from the EPA that comes through the GHGRP process, businesses would face heightened risks during audits, along with potential financial challenges stemming from disputes over data accuracy, delays in credit approvals, or even the need for costly revisions to their reporting methods. Furthermore, if GHGRP is repealed, most investors and lenders would cease deploying capital into new CCUS projects until a replacement reporting mechanism is established. Without certainty on how to measure, report, and verify emissions reductions under section 45Q, the CCUS industry will be paralyzed, jeopardizing the administration's energy dominance priorities.

ACA urges the EPA to maintain the integrity of the GHGRP to preserve its proven benefits for domestic industries and international trade. We stand ready to engage further in this process and provide additional insights as needed.