TAXPAYERS *for* COMMON SENSE

Comments of Taxpayers for Common Sense
Hearing Regarding the Proposed Rule
"Reconsideration of the Greenhouse Gas Reporting Program"
October 1, 2025

Hello. My name is Tyler Work, and I'm here on behalf of Taxpayers for Common Sense, a nonpartisan budget watchdog that has been working since 1995 to make sure federal policy serves the public, not special interests. We target subsidies for polluting industries, weapons systems that don't work, and policies that increase taxpayer and environmental risks.

That's why we are deeply concerned with EPA's proposal to permanently remove greenhouse gas reporting obligations for non-subpart W categories and suspend subpart W reporting until 2034. This rule would undermine transparency, obscure the true costs of methane waste, and weaken oversight of federal programs and subsidies like the 45Q carbon capture credit and the 45V hydrogen credit.

Methane is 80 times more potent than carbon dioxide over 20 years. Suspending reporting means taxpayers and communities lose the ability to track emissions from the oil and gas sector—one of the largest industrial sources of methane in the U.S.

Gas waste isn't just an environmental issue; it's a financial one. In 2021 alone, the industry wasted 403 billion cubic feet of methane through venting, flaring, and leaks. That's enough to power 4.3 million households for a year and represented nearly $900 million in lost product. On federal lands, taxpayers are deprived valuable royalty revenue. Between 2012 and 2021, 300 billion cubic feet of gas was wasted, depriving taxpayers of $76 million in royalties. And these estimates are conservative. In 2019, satellites showed losses of 163 billion cubic feet on federal and tribal lands—gas worth over half a billion dollars and royalty losses of $64 million.

The FY2025 reconciliation already delayed the methane waste fee projected to raise $7.2 billion over the next decade. Now EPA's proposal would mean taxpayers also lose the data needed to even measure the scale of the waste.

Between 2018 and 2022, taxpayers spent an average of $62 billion a year responding to climate impacts—up 35 percent from the previous five years. The emissions of private companies directly impact on taxpayers and the federal budget. Private companies may receive public funds through federal subsidies and contracts, or create financial liabilities that may strain public finances. Taxpayers have a right to know how their dollars may be subsidizing operations that worsen climate liabilities.

This program is the only national, facility-level greenhouse gas database. States use it to build inventories. Local governments use it to track polluters. Without it, the public loses access to basic information about how industries contribute to taxpayer costs and climate risk. Transparency is the foundation of accountability.

The reporting program also underpins energy tax credits. The IRS relies on it to implement the 45Q carbon capture and 45V hydrogen credits. Weak reporting invites abuse: Treasury's inspector general has already flagged nearly $900 million in improper 45Q claims. If reporting is suspended, billions more could be lost to fraud or mismanagement—with no way to confirm carbon is being stored or hydrogen is truly clean.

Taxpayers for Common Sense strongly opposes this rule. It strips away transparency, undermines fiscal responsibility, and weakens oversight of programs that cost billions. Publicly accessible emissions data are essential for holding industry accountable and protecting taxpayers from mounting climate costs. We urge EPA to withdraw this proposal.

Thank you.