



Environmental Series: *Clearing the Air on the Clean Air Act*



EPA Extends GHGRP Reporting Deadline Again While Broader Reconsideration Remains Pending

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Companies subject to the U.S. Environmental Protection Agency's ("EPA") [Greenhouse Gas Reporting Program](#) ("GHGRP") have received additional time to submit their reporting year 2025 annual GHG reports, but the program's future remains uncertain. On October 14, 2026, EPA published an [Interim Final Rule](#) extending the reporting year 2025 deadline from October 30, 2026, to March 10, 2027. The rule became effective immediately on October 14, 2026, and EPA is accepting post-promulgation comments on the deadline extension through November 30, 2026. The Interim Final Rule changes only the reporting deadline for reporting year 2025 and makes no other changes to the GHGRP. EPA is still evaluating proposed changes that could substantially reduce or eliminate reporting obligations for many source categories.

As discussed in our [prior alert](#), EPA's [September 2025 Proposed Rule](#) would permanently remove GHGRP reporting obligations for 46 source categories after reporting year 2024. For [Subpart W](#) (Petroleum and Natural Gas Systems), EPA separately proposed to eliminate reporting for the natural gas distribution segment after reporting year 2024 and suspend reporting for the remaining nine segments until reporting year 2034. However, EPA has not finalized those proposed changes.

The Latest Extension of the Greenhouse Gas Reporting Program Deadline

EPA has now twice extended the reporting deadline for reporting year 2025. EPA first moved the deadline from March 31, 2026, to October 30, 2026, and has now extended it again to March 10, 2027. According to EPA, the latest extension provides the agency with additional time to consider the more than 50,000 comments received on its GHGRP reconsideration proposal and to take any final action before the March 10, 2027, deadline. EPA explained that it could not have the electronic Greenhouse Gas Reporting Tool ("e-GGRT") ready for the October 30 deadline. EPA noted that it typically releases e-GGRT approximately six weeks before a reporting deadline.

What This Extension Means for Industry

Although this extension delays the deadline for submitting 2025 reports, it does not itself eliminate or otherwise modify existing GHGRP requirements. The existing regulatory framework therefore remains in place while EPA considers whether to finalize its proposed rescissions and revisions. Regulated entities should treat the extension as additional compliance preparation time, not as confirmation that reporting requirements will be eliminated.

What Operators Should Be Doing Now

- Determine which facilities are currently subject to applicable GHGRP requirements under 40 C.F.R. Part 98. Note, the Interim Final Rule includes [Table 1](#) identifying a non-exhaustive list of regulated categories and entities.
- Continue collecting and preserving data, calculations, and supporting documentation required under applicable GHGRP provisions.
- Maintain existing GHGRP compliance and reporting programs.
- Monitor EPA's GHGRP reconsideration rulemaking and announcements closely.
- Plan for the current reporting year 2025 deadline of March 10, 2027.
- Consider submitting comments on the Interim Final Rule by November 30, 2026.
- Consult legal counsel and technical consultants as appropriate regarding GHGRP applicability and compliance.

Key Takeaways

EPA's latest action provides additional time, but the GHGRP's future remains uncertain. EPA's second extension reinforces that significant changes to the GHGRP may still be forthcoming; however, those changes remain proposals rather than binding regulations. Until EPA takes final action altering existing requirements, regulated entities should continue to evaluate and prepare for compliance with existing requirements, subject to the new reporting deadline of March 10, 2027.



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