

September 22, 2025

EPA Docket Center
WJC West Building, Room 3334
1301 Constitution Avenue NW
Washington, DC 20004

To Whom It May Concern:

Climate Science Legal Defense Fund and the Jacobs Institute of Women’s Health submit these comments in response to the proposed Environmental Protection Agency (EPA) rule “Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards” (90 FR 36288, EPA-HQ-OAR-2025-0194, RIN 2060-AW71).

The Proposed Rule would repeal prior findings in 2009 that greenhouse gas emissions contribute to air pollution that may endanger public health or welfare. To justify this repeal, the Proposed Rule relies on claims from a draft Department of Energy (DOE) report that resulted from a rushed, opaque, biased, and unlawful process and ignored and mischaracterized high-quality evidence on the sources and impacts of climate change. The process behind this report and Proposed Rule is sharply at odds with the principles set forth in Executive Order (EO) 14303, “Restoring Gold Standard Science,” as well as the core tenets of scientific integrity, and it reflects an alarming pattern of sidelining experts and ignoring evidence. The Proposed Rule makes a mockery of informed rulemaking by twisting science and the scientific method to serve a dangerous deregulatory agenda. Contrary to the disingenuous and unscientific claims in the Proposed Rule, the “evidence for current and future harm to human health and welfare created by human-caused [greenhouse gas emissions] is *beyond scientific dispute*” (emphasis added).¹ For these reasons, we oppose the Proposed Rule and urge EPA to withdraw it.

I. The Proposed Rule Violates Principles of Scientific Integrity and Executive Order 14303

¹ National Academies of Sciences, Engineering, and Medicine; National Research Council Executive Office; Division on Earth and Life Studies; Health and Medicine Division; Board on Atmospheric Sciences and Climate; Board on Health Sciences Policy; Committee on Anthropogenic Greenhouse Gases and U.S. Climate: Evidence and Impacts; Climate Crossroads. (2025). *Effects of Human-Caused Greenhouse Gas Emissions on U.S. Climate, Health, and Welfare*. <https://nap.nationalacademies.org/read/29239/chapter/2#2>

At its core, science is a methodology, not a set of conclusions or objective truths. This methodology is underpinned by principles of scientific integrity, which seek to ensure that science is open, honest, and reproducible.² To be ethical and accurate, science must be conducted without political interference or dishonesty. Without integrity, research becomes merely an unscientific tool for advancing particular ideas or points of view.

The White House recently acknowledged the importance of these principles in Executive Order 14303: “Restoring Gold Standard Science.”³ The order states that science must be conducted in a manner that is “reproducible; transparent; communicative of error and uncertainty; collaborative and interdisciplinary; skeptical of its findings and assumptions; structured for falsifiability of hypotheses; subject to unbiased peer review; accepting of negative results as positive outcomes; and without conflicts of interest.” The order requires all federal agencies, including EPA and DOE, to adhere to these standards in conducting, interpreting, and applying scientific research. The order further clarifies that agencies should apply a “weight of scientific evidence” approach, which means evaluating “each piece of relevant information . . . based on its quality and relevance, and then transparently [integrating this information] with other relevant information . . . prior to making a judgment about the scientific evaluation. Quality and relevance determinations, at a minimum, should include consideration of study design, fitness for purpose, replicability, peer review, and transparency and reliability of data.” The order also states that agencies must make public the “data, analyses, and conclusions” associated with scientific information “produced or used” by the agency (except as prohibited by law, and consistent with relevant policies that protect national security or sensitive personal or confidential business information).

A. The Proposed Rule Relies on a Biased, Inaccurate, and Misleading Report

The Proposed Rule violates basic principles of scientific integrity and nearly every requirement in EO 14303. The Proposed Rule states that in reaching its conclusions, EPA

² National Research Council (US) and Institute of Medicine (US) Committee on Assessing Integrity in Research Environments. (2002). *Integrity in Scientific Research: Creating an Environment That Promotes Responsible Conduct*. <https://www.ncbi.nlm.nih.gov/books/NBK208718/> and National Academies of Sciences, Engineering, and Medicine; Policy and Global Affairs; Committee on Science, Engineering, Medicine, and Public Policy; Committee on Responsible Science. (2017). *Fostering Integrity in Research*. <https://nap.nationalacademies.org/read/21896/chapter/8>

³ Executive Office of the President. (2025). Restoring Gold Standard Science: Executive Order 14303 of May 23, 2025. *Federal Register*, 90 FR 22601, May 29, 2025.

considered the 2025 Climate Working Group (CWG) Draft Report, the three most recent National Climate Assessments (NCAs), and the two most recent assessment reports of the Intergovernmental Panel on Climate Change (IPCC). To the extent that EPA relied on other scientific information, the agency failed its legal obligation to identify this information in the Proposed Rule.

The scientific conclusions of the Proposed Rule—that greenhouse gas pollution does not clearly pose a threat to human health and welfare—rest *exclusively* on the CWG Draft Report and reject the conclusions of recent IPCC and NCA reports. This hardly resembles a “weight of scientific evidence” approach as required by EO 14303. The CWG Draft Report was written in approximately four months by *five scientists* who generally share a perspective at odds with the scientific consensus on climate change.⁴ The IPCC and NCA reports, by contrast, were prepared over the span of many years by *thousands of scientists*. The CWG Draft Report is merely 140 pages long. The Fifth NCA is 1,800 pages long, while the latest IPCC report is over 10,000 pages long. Notably, these are synthesis reports that rely on thousands of individual studies conducted by various scientists around the world. It is simply implausible that the CWG Draft Report effectively refutes all the evidence that undergirds the conclusions in the NCA and IPCC reports.

EO 14303 recognizes the importance of peer review, but this proposal plainly disregards its importance. While the NCA and IPCC are peer-reviewed publications, the CWG Draft Report is not. In the absence of a robust agency-sponsored peer review process, a thorough review of the CWG Draft Report was conducted by over 85 independent scientists—including scientists whose own research was cited by the CWG Draft Report—and found that:

*[The CWG Draft Report’s] key assertions—including claims of no trends in extreme weather and the supposed broad benefits of carbon dioxide—are either misleading or fundamentally incorrect. The authors reached these flawed conclusions through selective filtering of evidence ('cherry picking'), overemphasis of uncertainties, misquoting peer-reviewed research, and a general dismissal of the vast majority of decades of peer-reviewed research.*⁵

⁴ Parenteau, P. (2025). Pseudo-Science and Bad Law: The Trump Administration’s Proposed Repeal of the Endangerment Finding. *Vermont Journal of Environmental Law, EcoPerspectives Blog*. https://vjel.vermontlaw.edu/news/2025/09/pseudo-science-and-bad-law/#_ftnref32

⁵ DOE Report Response. (2025). Climate Experts’ Review of the DOE Climate Working Group Report. <https://sites.google.com/tamu.edu/doeresponse/home>

Likewise, a separate group of fact-checkers at Carbon Brief contacted authors of works cited in the CWG Draft Report and identified more than 100 “false or misleading statements” in the Report.⁶

For example, in downplaying the risk from heatwaves, the CWG Draft Report cites a study by Gasparrini and colleagues that found deaths from cold to far outnumber those from heat. When contacted, Gasparrini pointed out that this “says little about the impact of climate change on temperature-related deaths” because the report’s claims should rest on the respective *change* in temperature-related deaths, not the absolute values. The fact that there are more cold-related deaths does not undercut the scientific consensus that climate change is causing more heat-related deaths by increasing the frequency and intensity of extreme heat events. Gasparrini, a biostatistician and epidemiologist, points to a more recent study he and his colleagues conducted on deaths related to cold and heat in 854 European urban areas, which estimates that under a scenario with low mitigation of greenhouse gases and minimal adaptation, the net death burden due to climate change will increase by 50% and cause more than 2 million climate change-related deaths between 2015 and 2099.⁷

Similarly, the CWG Draft Report misrepresents the 2023 Oregon climate assessment by saying that it “concluded the [2021 Pacific Northwest] heat dome would have formed even without climate change” and that there was no evidence the unusual “weather features that drove the heat dome were made more likely by climate change.” While the Oregon assessment did reach these conclusions with respect to a specific weather event, the full passage⁸ of the assessment observes that the Pacific Northwest heatwave discussed in the assessment was about 2 degrees Fahrenheit warmer than it would have been without human influence on the climate,⁹ and that similarly high temperatures will begin to recur approximately once in six years by the end of this century if

⁶ Tandon, A., L. Hickman, C. Keating, and R. McSweeney. (2025). Factcheck: Trump’s climate report includes more than 100 false or misleading claims. Carbon Brief. <https://interactive.carbonbrief.org/doe-factcheck/index.html>

⁷ Masselot, P., M.N. Mistry, S. Rao, V. Huber, A. Monteiro, E. Samoli, M. Stafoggia, F. de’Donato, D. Garcia-Leon, J. Ciscar, L. Feye, A. Schneider, K. Katsouyanni, A.M. Vicedo-Cabrera, K. Aunan, and A. Gasparrini. (2025). Estimating future heat-related and cold-related mortality under climate change, demographic and adaptation scenarios in 854 European cities. *Nature Medicine*, 31(4):1294-1302. <https://pmc.ncbi.nlm.nih.gov/articles/PMC12003192/>

⁸ Fleishman, E., editor. (2023). Sixth Oregon Climate Assessment. Oregon Climate Change Research Institute, Oregon State University, Corvallis, Oregon.

https://ir.library.oregonstate.edu/challenge?dest=/concern/technical_reports/gt54kw197

⁹ Bercos-Hickey, E., T.A. O’Brien, M.F. Wehner, L. Zhang, C.M. Patricola, H. Huang, and M.D. Risser. 2022. Anthropogenic contributions to the 2021 Pacific Northwest heatwave. *Geophysical Research Letters* 49:e2022GL099396. DOI: 10.1029/2022GL099396.

greenhouse gas concentrations do not decrease.¹⁰ In other words, the CWG Draft Report selectively and misleadingly cited certain limited findings in the Oregon assessment, while omitting the conclusions that directly conflict with those of the CWG Draft Report. This represents a blatant manipulation of the scientific process. Honest and transparent scientists present information even if it conflicts with their views. Not only do the CWG authors fail to do this, but they actually take advantage of other scientists' integrity by selectively citing admissions of mixed findings.

Furthermore, the CWG Draft Report was not prepared in a "transparent" manner, as required by EO 14303 and the Federal Advisory Committee Act (FACA). This law requires transparency in the establishment and operation of committees, like the CWG,¹¹ that provide advice or recommendations to the federal government. Specifically, it requires that any committee's formation be promptly disclosed and that its records, including emails and meeting notes, be open to the public. FACA also requires that "committees have a balanced membership"¹² reflecting various points of view. Yet DOE secretly convened the CWG in April 2025¹³ by hand-picking five scientists with a shared viewpoint. (One member of the CWG, Roy Spencer, openly acknowledged that the group consisted of a "red team" of scientists with a shared viewpoint.¹⁴) DOE kept the CWG secret until July 29, 2025, the same day the CWG Draft Report was released and published to the Federal Register.¹⁵ Thereafter, it was promptly disbanded.¹⁶ During CWG's existence, not a single record or meeting was disclosed to the public. The hasty dissolution of the CWG suggests an attempt to shield the group from scrutiny.

¹⁰ Thompson, V., A.T. Kennedy-Asser, Y.T.E. Lo, C. Huntingford, O. Andrews, M. Collins, G.C. Hegerl, and D. Mitchell. 2022. The 2021 western North America heat wave among the most extreme events ever recorded globally. *Science Advances*, 8:eabm6860. DOI: 10.1126/sciadv.abm6860.

¹¹ The District Court of Massachusetts held that the CWG was covered by FACA. See *Environmental Defense Fund v. Wright*, No. 25-CV-12249 (D. Mass. Sept. 17, 2025) https://library.edf.org/AssetLink/8370p07edad78e7677ihu64w2oulc41l.pdf?_gl=1*1x0rozd*_gcl_au*MjEzODAxMzg5MC4xNzUzMjc4ODU5*_ga*MTM5NzkwOTIwLjE3NTMyNzg4NTk.*_ga_2B3856Y9QW*czE3NTgxMzE1NzAkczYkZzEkdDE3NTgxMzI0MDYkajUyJGwwJGgw

¹² Marchsteiner, K.E. & Stuessy, M.M. (2024). *The Federal Advisory Committee Act (FACA): Overview and Considerations for Congress*. Congressional Research Service R47984. <https://www.congress.gov/crs-product/R47984>

¹³ Curry, J. New Climate Assessment Report from US DOE. Climate Etc. <https://judithcurry.com/2025/07/29/new-climate-assessment-report-from-us-doe/> (an admission from CWG contributor Judith Curry on her personal blog).

¹⁴ Spencer, R.W. (2025). Some Thoughts on Our DOE Report Regarding CO2 Impacts on the U.S. Climate. Roy Spencer, Ph.D. <https://www.drroyspencer.com/2025/07/some-thoughts-on-our-doe-report-regarding-co2-impacts-on-the-u-s-climate/>

¹⁵ Colman, Z. (2025). DOE says it dissolved research group that wrote its controversial climate report. *Politico Pro*, September 9, 2025. <https://subscriber.politicopro.com/article/2025/09/doe-dissolved-climate-working-group-agency-said-in-court-filing-00553419>

¹⁶ *Id.*

As a result of this opaque and biased process, the CWG Draft Report was not collaborative, nor was it skeptical of the authors' shared viewpoint, as EO 14303 requires. The authors failed to collaborate or, it appears, even communicate with any of the scientists whose research they critique or mischaracterize. By cherry-picking evidence to support the conclusions of the report, the authors demonstrated no openness to opposing viewpoints or skepticism of their own research and preconceptions.

The CWG authors were also not without conflicts of interest. The CWG committee was convened by Energy Secretary Chris Wright, who previously served as the CEO of a fossil fuel company. Steven Koonin, one of the CWG authors, previously worked as the top scientist for British Petroleum, one of the largest fossil fuel companies in the world.¹⁷ The other four CWG authors—John Christy, Roy Spencer, Judith Curry, and Ross McKittrick—all have ties to organizations that have received substantial funding from fossil fuel companies.¹⁸ These ties should raise substantial concern, especially given that the conclusions of the CWG Draft Report would benefit the fossil fuel industry more than any other industry. At their core, the CWG Draft Report and the Proposed Rule downplay the role of fossil fuels in causing the deadly destabilization of Earth's climate. The fact that all of the CWG authors have directly or indirectly received money from the industry most likely to benefit from their report makes clear that the report was not prepared "without conflicts of interest" as required by EO 14303.

In fact, the CWG Draft Report appears tailor-made for the Administration's policy agenda. Administration officials signaled their intent to reverse EPA's Endangerment Finding long before DOE even convened the CWG. For example, Project 2025, which was authored by several top Administration officials, called for an "update" to the Endangerment Finding.¹⁹ On the first day of his current term, President Trump issued an executive order instructing EPA to review the "legality and continued applicability" of the Endangerment Finding.²⁰ EPA Administrator Zeldin then

¹⁷ Stanford University (no date). Stanford Profiles: Steven E. Koonin. <https://profiles.stanford.edu/steven-koonin>

¹⁸ Parenteau, P. (2025). Pseudo-Science and Bad Law: The Trump Administration's Proposed Repeal of the Endangerment Finding. *Vermont Journal of Environmental Law, EcoPerspectives Blog*. https://vjel.vermontlaw.edu/news/2025/09/pseudo-science-and-bad-law/#_ftnref32

¹⁹ An "update" to an Endangerment Finding is clearly a euphemism for reversing the finding, given that there would be no need to update the finding if it were still valid. The Heritage Foundation. 2023. *Mandate For Leadership: The Conservative Promise 2025*. Washington, D.C.: The Heritage Foundation, at 425. https://static.heritage.org/project2025/2025_MandateForLeadership_FULL.pdf

²⁰ Executive Office of the President. (2025). Unleashing American Energy: Executive Order 14154 of January 20, 2025. *Federal Register*, 90 FR 8353.

privately urged the White House to strike down the Endangerment Finding.²¹ This history casts significant doubt on the integrity of the legal and scientific assessment underpinning the Proposed Rule. Rulemaking, and the science on which it is based, must be done through a reasoned assessment of statutorily relevant information. Conclusions should be reached through this unbiased process, not beforehand. The fact that the CWG Draft Report uniformly aligns with the Administration’s long stated policy goals—while disregarding the assessment of thousands of scientists and individual studies—indicates that the report was prepared specifically to advance these goals. In this way, the CWG Draft Report serves as a political tool rather than a scientific assessment. There is simply no indication that the Report, a key foundation of the Proposed Rule, was prepared in an unbiased manner that was accepting of any outcome, as EO 14303 requires.

B. The Proposed Rule Fails to Accurately Assess and Weigh the Scientific Evidence

In relying solely on the CWG Draft Report, the Proposed Rule effectively adopts the Report’s errors as its own. Throughout the Proposed Rule, EPA accepts the conclusions of the CWG Draft Report without any skepticism or attempts to consider alternative explanations. In doing so, EPA rests the Proposed Rule on a biased, inaccurate, and misleading report. This plainly violates EO 14303, which requires scientific integrity in agency decision-making.

Despite claiming to consider the IPCC and NCA reports alongside the CWG Draft Report, EPA offers no evidence that it meaningfully considered these highly regarded assessments. The assessments are merely mentioned in passing, with no citations or substantive discussion. In fact, the Proposed Rule dismisses these highly regarded assessments with sweeping, unsourced claims of “process and quality” concerns. EPA claims that “several public watchdog organizations” raised concerns about the Fifth NCA, “which shares the underlying assumptions and conclusions of prior NCAs and IPCC reports.” According to these unnamed organizations, the Fifth NCA purportedly “does not meet the requirements under Executive Order 14303.”

This supposed concern about meeting the requirements of EO 14303 is highly suspect, given the Proposed Rule’s flagrant disregard for these same requirements. Not only does the Proposed Rule exclusively rely on a report that was not prepared in a transparent, unbiased, peer reviewed, collaborative manner—as EO 14303 requires—but it also fails to employ the “weight of evidence”

²¹ Joselow, M. (2025). EPA urges White House to strike down landmark climate finding. *Washington Post*, February 26, 2025. <https://www.washingtonpost.com/climate-environment/2025/02/26/epa-endangerment-finding-trump-climate/>

approach required by EO 14303. The Proposed Rule offers no comprehensive or balanced assessment of the available scientific evidence. It simply relies on one report by a handful of like-minded scientists without any consideration of competing evidence.

The Proposed Rule also fails to publicly identify the evidence that EPA used to reach its conclusions, as EO 14303 requires. To the extent that EPA genuinely relied on critiques of the NCA and IPCC reports, EPA must identify these critiques. If EPA identifies the source of this information in response to public comments, it will be too late for compliance with EO 14303. The entire purpose of scientific transparency is to allow the public an opportunity to evaluate and engage with the science underpinning agency decision-making. EPA is legally obligated to offer the public an opportunity to comment on a rule that is transparent about *all* of the information that underpins its scientific conclusions. The public deserves the opportunity to evaluate the claims of the unnamed “watchdogs” that the EPA relied on.

Furthermore, unlike the CWG Draft Report, the NCA and IPCC reports were produced in a highly transparent, collaborative, and peer-reviewed manner. By synthesizing thousands of studies, these assessments provide complex, detailed analysis and numerous conclusions. The Fifth NCA was so thoroughly sourced that it went well beyond the minimum reporting requirements established by law.²² However, the Administration recently removed this information from government websites,²³ making federal science less transparent.

II. The Proposed Rule Reflects a Broader Anti-Science Pattern

Despite EO 14303’s acknowledgment of the importance of conducting high-quality science with integrity, actions and statements from the first and second Trump Administration exhibit consistent disregard for scientific evidence and processes.

During the first Trump Administration, over 350 separate attacks on science—defined as government attempts to restrict or prohibit scientific research, education or discussion, or the publication or use of scientific information—were documented by the Silencing Science Tracker, a

²² Crimmins, A.R., A.D. Lamb, T.K. Maycock, and D.R. Easterling, D.R. (2024). *Implementation of Federal Guidelines and Best Practices for Highly Influential Scientific Assessments in the Fifth National Climate Assessment*. U.S. Global Change Research Program, Washington, DC, USA.

https://toolkit.climate.gov/sites/default/files/2025-07/NCA5_HISA_Implementation.pdf

²³ The Associated Press. (2025). The Trump administration reverses its promise to publish key climate reports online. *NPR*, July 15, 2025. <https://www.npr.org/2025/07/15/g-s1-77661/the-trump-administration-reverses-its-promise-to-publish-key-climate-reports-online>

joint initiative of the Sabin Center for Climate Change Law and the Climate Science Legal Defense Fund. Political appointees instructed scientists to alter their work and mischaracterized or suppressed findings that did not align with the Administration's preferred course of action. In one striking example, the Secretary of Commerce failed to renew the charter of the Advisory Committee for the Sustained National Climate Assessment after hearing complaints that it contained only a single member from industry.²⁴ In another, a senior scientist at the U.S. Geological Survey suffered retaliation, including a demotion, after resisting political pressure to substantively alter the summary findings of the 4th National Climate Assessment.²⁵ In 2018, the Trump Administration actively suppressed an EPA report that warned that many American citizens were exposed to enough formaldehyde vapor to put them at risk of developing leukemia.²⁶ During the 2019 hurricane season, after President Trump inaccurately asserted that Hurricane Dorian was predicted to impact Alabama, NOAA political appointees later doubled down publicly on the President's claim in direct contradiction to scientific evidence.²⁷

During the first eight months of the second Trump Administration, the Silencing Science Tracker has already documented over 100 attacks on science. Federal Advisory Committees, tasked with providing objective and expert advice to the executive branch, have been disbanded.²⁸ Federal scientists serving as apolitical career civil servants were suspended and placed on leave by EPA head Lee Zeldin after signing an open letter warning of serious consequences if the agency under his leadership continued "undermining public trust" and "ignoring scientific consensus to benefit polluters."²⁹ Past National Climate Assessments have been removed from government agency websites.³⁰ In addition to cutting off avenues for receiving input from experts, EPA is moving to

²⁴ Eilperin, J. (2018). Trump officials faulted climate panel for having only 'one member from industry.' *Washington Post*, May 15, 2018. <https://perma.cc/U8GD-W4KB>

²⁵ Tollefson, J. (2024). Exclusive: the Trump administration demoted this climate scientist — now she wants reform. *Nature*, July 24, 2024. <https://www.nature.com/articles/d41586-024-02213-y>

²⁶ Snider, A. (2018). Sources: EPA blocks warnings on cancer-causing chemical. *Politico*, July 6, 2018. <https://www.politico.com/story/2018/07/06/epa-formaldehyde-warnings-blocked-696628>

²⁷ Feldscher, K. (2019). NOAA disavows National Weather Service tweet that refuted Trump's claim Dorian was headed toward Alabama. *CNN*, September 6, 2019. <https://www.cnn.com/2019/09/06/politics/noaa-tweet-nws-trump-alabama/index.html>

²⁸ McKenzie, L. (2025). Agencies Closing Science Advisory Committees. *FYI: Science Policy News*, March 20, 2025. <https://www.aip.org/fyi/agencies-closing-science-advisory-committees>

²⁹ Walker, J. (2025). EPA employees suspended for signing petition targeting Zeldin, organizers say. *The National News Desk*, July 7, 2025. <https://thenationaldesk.com/news/americas-news-now/epa-employees-suspended-for-signing-petition-targeting-administrator-zeldin-organizers-sa>

³⁰ Sabin Center for Climate Change Law. (no date). National Climate Assessments Removed from Federal Websites. Silencing Science Tracker. <https://climate.law.columbia.edu/content/national-climate-assessments-removed-federal-websites> and Sabin Center for Climate Change Law. (no date). National Climate Assessments Removed from NASA

reduce its own collection of data with a proposal to end greenhouse gas reporting by thousands of companies.³¹

The scientific community is nearly unanimous in its agreement that human activities are causing climate change.³² For the CWG to present its fringe view as reflecting evidence is appalling; for EPA to use the results of this biased, opaque, and wholly inadequate process to engage in rulemaking represents a complete breakdown in the scientific integrity principles this Administration claims to be advancing.

III. Conclusion

Upholding scientific integrity allows decision makers to base policy on the best available evidence. When ignoring and mischaracterizing science on climate change leads to a failure to reduce the greenhouse gas emissions that nearly all scientists agree are causing climate change, the consequences include loss of homes, crops, and lives to extreme temperatures and weather events made more destructive by a changing climate. We urge EPA to uphold scientific integrity and save lives by withdrawing this Proposed Rule and ensuring that future rules are based on thorough, transparent, unbiased processes that consider the best available science and consult scientists with appropriate expertise.

Sincerely,

Climate Science Legal Defense Fund
Jacobs Institute of Women's Health

Website. Silencing Science Tracker. <https://climate.law.columbia.edu/content/national-climate-assessments-removed-nasa-website>

³¹ Reuters. (2025). US EPA proposes end to mandatory greenhouse gas reporting. *Reuters*, September 12, 2025. <https://www.reuters.com/legal/litigation/us-epa-proposes-end-mandatory-greenhouse-gas-reporting-2025-09-12/>

³²Lynas, M., B.Z. Houlton, and S. Perry. (2021). Greater than 99% consensus on human caused climate change in the peer-reviewed scientific literature. *Environmental Research Letters*, 16: 114005. <https://iopscience.iop.org/article/10.1088/1748-9326/ac2966>