

Congress of the United States
House of Representatives

COMMITTEE ON SCIENCE, SPACE, AND TECHNOLOGY

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May 8, 2026

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. N.W.
Washington, D.C. 20460

Dear Administrator Zeldin,

The House Committee on Science, Space, and Technology writes to express serious concerns regarding the influence of foreign-originated environmental frameworks on domestic industry—and the resulting economic, infrastructure, and scientific consequences for the American people. The Committee identified a troubling pattern in which international protocols, though not legally binding under United States law, have been leveraged to shape private-sector standards and global market expectations in ways that impose significant compliance burdens on American industry, constrain commercial flexibility, and risk excluding U.S. firms from key international markets. These dynamics raise concerns not only about federal regulatory development but also about the broader competitive position of American manufacturers operating in a global economy where emissions rules are becoming more standardized.

The Committee's review is focused on the role of the Greenhouse Gas Protocol (GHG Protocol), the most widely used global emissions accounting framework.¹ While it carries no force of domestic law, it has become a widely adopted standard in corporate and international emissions accounting and has operated alongside the development of federal greenhouse gas reporting and regulatory programs.² EPA's Greenhouse Gas Reporting Program (GHGRP), established in 2009, and subsequent vehicle emissions regulations under the Clean Air Act reflect parallel methodological approaches to emissions measurement and reporting that are broadly consistent with international accounting practices, including those embodied in the GHG

¹ See Greenhouse Gas Protocol, About Us, <https://ghgprotocol.org/about-us> (describing the GHG Protocol as a partnership between the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD), launched in 1998, that provides the world's most widely used international standard for measuring and managing greenhouse gas emissions).

² *Id.*

Protocol.³ These developments have certainly contributed to compliance obligations and infrastructure costs for regulated entities across the United States.⁴ Given that EPA has since rescinded the 2009 Greenhouse Gas Endangerment Finding and that the agency lacks statutory authority under Section 202(a) of the Clean Air Act to prescribe greenhouse gas standards, it is urgent that the Committee assess the full scope of foreign influence embedded in prior regulatory actions and determine whether corrective measures are warranted.⁵

This investigation extends a pattern of Committee oversight. In the 118th Congress, the Committee conducted an extensive investigation into the Biden Administration's proposed Federal Acquisition Regulation rule that would have required U.S. government contractors to disclose greenhouse gas emissions and set targets validated by the London-based Science Based Targets initiative (SBTi)—a private foreign entity selected without competition and rife with conflicts of interest.⁶ Through two hearings and a detailed staff memorandum, the Committee documented how the Council on Environmental Quality bypassed competitive processes, misled Members of Congress, and withheld documents from investigators—ultimately subordinating federal contracting to an unaccountable foreign body.⁷ The present investigation is a direct continuation of that work: both involve the systematic transfer of American regulatory authority to international frameworks operating outside the bounds of U.S. law and democratic accountability.

The dangers of embedding the GHG Protocol and similar mandates into domestic industrial policy are being demonstrated in real time abroad. Europe's aggressive electrification targets, modeled on the same international frameworks that are influencing U.S. policy, have encountered severe practical and economic resistance.⁸ European automakers have declared the

³ U.S. Env'tl. Prot. Agency, *Greenhouse Gas Reporting Program* (2009), <https://www.epa.gov/ghgreporting>; see also 75 Fed. Reg. 25324 (May 7, 2010) (establishing EPA vehicle greenhouse gas standards under the Clean Air Act) (both frameworks use standardized emissions measurement, reporting, and aggregation methodologies that align in structure with widely used international greenhouse gas accounting systems, including the GHG Protocol, though they arise under distinct legal authorities and purposes).

⁴ Competitive Enter. Inst., *Climate Disclosure's Triple Threat* (Dec. 5, 2024), <https://cei.org/studies/climate-disclosures-triple-threat/> (detailing how overlapping domestic and international climate disclosure regimes impose millions of dollars in compliance costs and new infrastructure burdens on U.S. companies for carbon footprint documentation and supplier data collection).

⁵ U.S. ENV'T PROT. AGENCY, *Final Rule: Rescission of the Greenhouse Gas Endangerment Finding and Motor Vehicle Greenhouse Gas Emission Standards Under the Clean Air Act* (Feb. 18, 2026), <https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-rescission-greenhouse-gas-endangerment>.

⁶ Press Release, H. Comm. on Sci., Space, & Tech., *Science Committee Finds Evidence of Inappropriate Influence in Biden Administration Contracting Rulemaking* (Jan. 22, 2024), <https://science.house.gov/2024/1/science-committee-finds-evidence-of-inappropriate-influence-in-biden-administration-contracting-rulemaking>.

⁷ *Id.*

⁸ The New York Times, *Europe May Roll Back Combustion Engine Ban* (Dec. 16, 2025), <https://www.nytimes.com/2025/12/16/business/economy/europe-auto-emissions-ban.html> (reporting on the European Commission's proposal to revise the 2035 zero-emission target to a 90% reduction in response to intense lobbying and practical/economic difficulties faced by European automakers).

continent's 2035 combustion engine ban technically and commercially unworkable, and the European Commission has moved to formally propose abolishing that ban, describing the prior policy as "a serious industrial policy mistake."⁹ German Chancellor Friedrich Merz stated plainly that the 2035 deadline "cannot be a hard deadline" and that the emissions reduction plan must be reconsidered to protect European industrial competitiveness.¹⁰ The United States must not repeat Europe's errors by embedding similarly derived targets into the bedrock of American law.

Beyond formal regulation and international market alignment, these emissions accounting frameworks are increasingly being embedded into private-sector requirements.¹¹ Large manufacturers, financial institutions, and global purchasers are incorporating standardized emissions reporting into contracts, lending decisions, and supplier qualifications.¹² As a result, U.S. companies may be required to follow GHG Protocol-aligned reporting practices not because of federal regulation, but because it is necessary to remain eligible for contracts and financing in global supply chains.¹³ This creates a cascading effect in which international standards influence domestic industry through private-sector enforcement, even in the absence of formal government mandates.

These considerations compel the Committee to undertake a rigorous assessment of the extent to which the GHG Protocol and related international frameworks have been incorporated into U.S. federal rulemaking, and to evaluate whether corrective legislative or administrative action is required. American environmental policy must be determined by elected representatives accountable to the American people—not by foreign entities operating outside U.S. law.

Thus, the Committee respectfully requests a briefing on EPA's procedures for evaluating and insulating domestic rulemaking from undue international influence, to be scheduled no later than May 22, 2026. The Committee looks forward to working with the Agency to ensure that federal environmental policy is grounded in sound, domestically validated science, transparent

⁹ See Reuters, EU Yields to Pressure from Automakers as It Rethinks 2035 Combustion Car Ban (Dec. 15, 2025), <https://www.reuters.com/sustainability/climate-energy/eu-yields-pressure-automakers-it-rethinks-2035-combustion-car-ban-2025-12-15/>.

¹⁰ Reuters, Germany's Merz Opposes EU's Hard Cut-Off for Combustion Cars from 2035 (Oct. 9, 2025), <https://www.reuters.com/sustainability/climate-energy/germanys-merz-heads-auto-execs-meeting-without-unified-stance-eus-2035-target-2025-10-09/> (quoting German Chancellor Friedrich Merz: "If I have my way, and I will do everything I can to achieve this, there will be no such hard cut in 2035").

¹¹ Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (World Res. Inst. & World Bus. Council for Sustainable Dev. 2011), <https://www.wri.org/publication/greenhouse-gas-protocol-corporate-value-chain-scope-3-accounting-and-reporting-standard>.

¹² Greenhouse Gas Protocol, Corporate Value Chain (Scope 3) Standard, <https://ghgprotocol.org/standards/scope-3-standard> (providing the methodology for companies to measure and report indirect value chain emissions across 15 categories).

¹³ Certivo, Scope 3 Emissions Compliance Software | GHG Protocol Reporting & Supplier Data, <https://www.certivo.com/frameworks/ghg-protocol-scope3-compliance>.

governance, and a firm commitment to the economic vitality and energy security of the United States. Please direct any questions to the Committee's majority staff at (202) 225-6371.

Sincerely,



Brian Babin
Chairman
Committee on
Science, Space, and Technology



Rich McCormick
Chairman
Subcommittee on Investigations
and Oversight
Committee on
Science, Space, and Technology

cc: Zoe Lofgren, Ranking Member, House Committee on Science, Space, and Technology;
Emelia Sykes, Ranking Member, Subcommittee on Investigations and Oversight, House
Committee on Science, Space, and Technology