



Senate Natural Resources and Energy

April 9, 2026

Julie Moore, Secretary, Agency of Natural Resources
Jane Lazorchak, Climate Action Office, Agency of Natural Resources

Vermont's Climate Action Plan (CAP)

**Global Warming
Solutions Act
Passed; Climate
Council established**

2020

**Initial Climate Action
Plan Adopted**

December 2021

**On-going
implementation and
update plan every
four years**

Updated
July, 2025



Implementation

- **CAP recommendations require a combination of legislative and administrative action**
 - Implementation of the CAP requires the Legislature to pass significant legislation, as well as allocate the necessary resources to advance the recommendations.
 - The GWSA requires ANR adopt rules consistent with the Climate Action Plan, on or before July 1, 2026; *the current CAP does not direct any rules under that timeline.*
- **Additionally, the Council will work to further efforts in several key areas:**
 - Monitoring and tracking the progress of implementation of the Update to the Climate Action Plan
 - Considering additional resources to make the Plan actionable
 - Working in partnership with State government and the Legislature
 - Convening Climate Council meetings on a quarterly basis to engage with the public
 - Bringing Subcommittees together as needed to support the work of the Climate Council

Greenhouse Gas Reporting

The CAP Update included the following request to ANR:

Develop a framework for the reporting of greenhouse gas emissions data from fuel suppliers and other significant emitters of climate pollution. ANR will work expeditiously to put a reporting framework in place and recommend to the Legislature by December 15, 2025, statutory changes and funding needed to support streamlined reporting requirements and a stepped implementation plan.

Rationale

Builds on recommendations in the Treasurer's February 18, 2025, report to the Vermont General Assembly on approaches to a cap-and-invest program:

A comprehensive greenhouse gas (GHG) reporting program is foundational for any sector-wide or multi-sectoral policy or regulatory approach to reduce GHG emissions.

Treasurer Pieciak identified the development of a framework for reporting GHG emissions data as a foundational step.

Specifically, ***Treasurer Pieciak concludes that there is no viable cap-and-invest program to join and recommends further evaluation of the benefits and impacts of joining such a program in future, including studying whether and when to establish a GHG emissions reporting program.***

Approach

ANR analyzed two reporting frameworks:

Harmonization

ANR staff compiling and reconciling various types of data already being collected by other departments (DMV and Tax).

Standalone Reporting Rule

Covered entities reporting GHG emissions data directly to ANR.

Recommendation

A standalone reporting rule would best support the goals of the CAP, allowing ANR to:

- Define, collect, and analyze sufficient data to develop a robust estimate of statewide emissions from covered sectors.
- Adjust the scope of the reporting program, if necessary, for future mitigation activities.
- Decrease reliance on federal datasets, as federal data reporting requirements are rolled back.

Were a reporting rule to move forward, it is important that the General Assembly **specifically authorize ANR to create a comprehensive GHG reporting program** that covers all sources of emissions and **ensure adequate resourcing.**

Resources

Adequately resourcing this work is essential.

A high-quality dataset is critical to Vermont's ability to fully understand and evaluate the costs and benefits of emissions reduction efforts, inform future policy discussions, and to ensure program design is truly able to meet the needs of low- and middle-income Vermonters.

Resources are needed to both create the program and support compliance, ensuring all covered entities are reporting.

If some covered entities are reporting while others are not, there is not only incomplete data, but also an inequitable system.

In the Public Utility Commission's (PUC) January 15, 2025, report to the Legislature on the Clean Heat Standard, Chair McNamara cites the challenges of standing up their reporting program as a result of inadequate funding.

Estimates in the PUC's report showed that roughly only **55% of entities were reporting**.

Resource Needs

Task	Program Establishment & Management	Platform Development & Maintenance	Data Analysis & Verification	Compliance & Enforcement	Totals
Staff Time (FTEs)	1 FTE	0.25 FTE	0.25 FTE	0.5 FTE	2 FTEs = \$300,000 Base funding increase
One-time Costs	N/A	\$300,000 for platform development	N/A	N/A	\$300,000 One-time
Ongoing Annual Costs	N/A	\$100,000 for platform maintenance each reporting year	\$100,000 for third-party verification each reporting year	N/A	\$200,000 Base funding increase

Program Scope

At minimum, the program should cover the transportation and the residential, commercial, and industrial (RCI) sectors.

- Together, transportation and RCI represent 70% of statewide GHG emissions.
 - Covered entities would be suppliers of transportation and heating fuels.
- Open questions include whether to incorporate non-energy industrial process emissions and/or voluntary reporting in other sectors.

Approach in H740

Amending §582 and adding a new Section (2) to provide clear authorization for a reporting program offers needed clarity

Rulemaking and database components are contingent on funding and would need to remain that way if no resources are given to Agency

Additional Resources

Appendix A: Supplemental Tables

- State GHG Reporting Programs
- Vermont GHG Emissions by Sector
- Proposed Program: Sectors and Scope
- Existing Reporting Requirements for VT Entities

Appendix B: Comparison of Data Collection Strategies

Questions?

