

EPA'S CLIMATE ENFORCEMENT AND COMPLIANCE STRATEGY

Internal deliberative pre-decisional - FOR USE BY 2024 PRESIDENT-ELECT TRANSITION TEAM MEMBERS ONLY

ISSUE SUMMARY:

- OECA plays a unique and essential role in mitigating climate change impacts through enforcement of laws and rules that result in the reduction of greenhouse gas (GHG) emissions and other harmful pollutants, and the integration of climate adaptation principles into our compliance and enforcement work to enhance communities' resilience to climate change.
- OECA is prioritizing enforcement and compliance actions that mitigate climate change and is including climate adaptation and resilience measures in enforcement and compliance activities when appropriate.
- OECA's Mitigating Climate Change NECI, which began in FY 2024, utilizes EPA's criminal and civil enforcement authorities to address three separate and significant contributors to climate change: (1) methane emissions from oil and gas facilities; (2) methane emissions from landfills; and (3) the use, importation, and production of hydrofluorocarbons (HFCs).

KEY POINTS:

- OECA is taking actions to reduce emissions of GHGs and other harmful pollutants to help mitigate climate change impacts under several laws.
- OECA is building climate resilience into our case resolutions, as appropriate, by accounting for present and anticipated climate change impacts as companies return to and maintain compliance in the future.
- In FY24, EPA initiated work under the Mitigating Climate Change National Enforcement and Compliance Initiative (NECI), which targets major sources of methane and HFCs, and directly supports implementation of EPA's Climate Enforcement and Compliance Strategy.
- OECA's HFC enforcement program continues to expand its scope and focus, in accordance with new regulations implementing the American Innovation and Manufacturing (AIM) Act requiring EPA to phase down the production and consumption of HFCs, a potent class of climate super pollutants.
- OECA is working to raise awareness with external stakeholders through the issuance of enforcement alerts. EPA issued an [HFC enforcement alert](#) on September 6, 2024, and [two landfill enforcement alerts](#) on September 25, 2024.
- OECA continues to build and expand on the [OECA Climate Adaptation Implementation Plan](#) announced in October 2022, supplemented by FY 2024 Addendum [*Add link once available*], and recently updated again with designation of the FY 2025 Priority Actions. The FY 2025 Priority Actions are specific actions OECA will take to integrate climate adaptation and resilience across all enforcement and compliance efforts.

ONGOING/UPCOMING REVIEWS FOR FY2025:

KEY EXTERNAL STAKEHOLDERS:

☐ Congress ☐ Industry ☐ States ☐ Tribes ☒ Media ☐ Other Federal Agency
☐ NGO ☐ Local Governments ☐ Public

MOVING FORWARD:

