

# United States Senate

WASHINGTON, DC 20510

November 29, 2023

The Honorable John Kerry  
Special Presidential Envoy  
The White House  
1600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20500

Dear Secretary Kerry,

As you prepare for the 28th Conference of the Parties (COP28) to the United Nation's Framework Convention on Climate Change (UNFCCC) in Dubai it is frighteningly clear that even if countries make good on their commitments in their existing national action plans the world is severely off path to meet its goal of keeping warming below 1.5 degrees Celsius (°C).<sup>1</sup> The world's failure to fully monitor and account for the methane emissions from oil and gas production means that the situation is almost surely even direr than the reports portray. Methane emissions also erode any climate benefits that liquefied fossil gas (LNG) might provide.<sup>2</sup> As you head into COP28 it is important that the U.S. stops its expansion of LNG exports that will worsen the climate crisis, harm the transparency and accountability that are essential to an ambitious agreement, and weakens U.S. credibility globally.

### *Worsening the Climate Crisis*

The science is clear, if we don't take dramatic action now the Paris Agreements goals will be lost. A recent study showed that at the current pace, the world will use up the planet's climate budget for 1.5 °C in just 6 years.<sup>3</sup> Unfortunately, transitioning from coal to fossil gas, especially LNG, locks in climate chaos. A study from Brown University found that in the near-term methane leakage rates of just .2% put fossil gas on par with coal even without accounting for the emissions from liquefaction for LNG.<sup>4</sup> We know from multiple studies that methane leakage rates in the U.S. are far higher than .2%.<sup>5 6 7 8 9 10</sup> When liquefaction, transport and re-gasification is accounted for, LNG is almost surely worse for the climate in the near term than coal.

---

<sup>1</sup> <https://unfccc.int/documents/632334>

<sup>2</sup> [https://iea.blob.core.windows.net/assets/48ea967f-ff56-40c6-a85d-29294357d1f1/GlobalMethaneTracker\\_Documentation.pdf](https://iea.blob.core.windows.net/assets/48ea967f-ff56-40c6-a85d-29294357d1f1/GlobalMethaneTracker_Documentation.pdf)

<sup>3</sup> <https://www.nature.com/articles/s41558-023-01848-5>

<sup>4</sup> <https://iopscience.iop.org/article/10.1088/1748-9326/ace3db>

<sup>5</sup> <https://www.pnas.org/doi/10.1073/pnas.2217900120>,

<sup>6</sup> [https://iea.blob.core.windows.net/assets/48ea967f-ff56-40c6-a85d-29294357d1f1/GlobalMethaneTracker\\_Documentation.pdf](https://iea.blob.core.windows.net/assets/48ea967f-ff56-40c6-a85d-29294357d1f1/GlobalMethaneTracker_Documentation.pdf)

<sup>7</sup> <https://www.pnas.org/doi/full/10.1073/pnas.2215275120>,

<sup>8</sup> <https://pubs.acs.org/doi/10.1021/acs.est.1c06458#>,

<sup>9</sup> <https://www.pnas.org/doi/10.1073/pnas.1202407109>

<sup>10</sup> <https://www.science.org/content/article/natural-gas-could-warm-planet-much-coal-short-term>

While Europe is working on adopting a methane standard for its natural gas imports, a standard is only proposed to take effect starting in 2030, after the world's remaining carbon budget is likely to be depleted. Plus, it is unlikely that any standard would limit leakage to the .2% that would put fossil gas on par with coal in the near term. The International Energy Agency (IEA) said that almost half of methane emissions from oil and gas operations can be eliminated with measures that have no net cost, and 70% can be avoided with existing technology. Given current leakage rates found in the U.S., even in this best-case scenario, the resultant methane leakage doesn't come down to anywhere near .2%. Furthermore, expanding fossil gas export infrastructure now will lock those exports in place for decades, long past when the upstream emissions alone are sufficient to blow past climate goals.

### *Undermines Transparency*

The U.S. has been a champion for accountability and transparency at the UNFCCC but the undercounting of emissions from LNG threatens to derail these efforts. Methane accounts for 30% of the world's GHG emissions and yet, as the IEA said in its Global Methane Tracker 2023 Report, "there are large differences between data based on measurement campaigns and scientific studies, and the emissions levels reported by official public bodies, such as to the UN Framework Convention on Climate Change (UNFCCC), that rarely make use of direct measured data." The U.S.'s Environmental Protection Agency (EPA) continues to use a methane emissions leakage rate of just 1.4% derived from bottom-up modeling despite numerous studies using direct measurements that find U.S. leakage rates to be many times higher.<sup>11 12 13 14 15 16</sup>

There are also questions about how upstream methane emissions from fossil gas production are tracked and accounted for in the UNFCCC framework, including the Global Stocktake. To ensure that methane emissions don't slip through the cracks, the U.S. should push the UNFCCC to adopt standards that provides clarity about what parties are responsible for reporting methane emissions from fossil fuel production, liquefaction and transportation and for ensuring that high quality data based measurements are used. Anything less threatens to undermine the integrity of the accounting and the entire UNFCCC process.

### *Undermining U.S. and Global Credibility*

As the world's largest historic emitter of greenhouse gas emissions, it is essential that the U.S. leads the way on climate action and that means transitioning away from fossil fuels. At a time when science is showing that LNG exports are on par with, or even worse than, coal we cannot credibly ask other countries to forgo their domestic fossil fuels at the same time that we are expanding our fossil gas production.

In 2023 the U.S. became the world's largest exporter of LNG globally. U.S. LNG exports have doubled over the past four years, and projects currently under development are set to almost

<sup>11</sup> <https://www.pnas.org/doi/10.1073/pnas.2217900120>,

<sup>12</sup> [https://iea.blob.core.windows.net/assets/48ea967f-ff56-40c6-a85d-29294357d1f1/GlobalMethaneTracker\\_Documentation.pdf](https://iea.blob.core.windows.net/assets/48ea967f-ff56-40c6-a85d-29294357d1f1/GlobalMethaneTracker_Documentation.pdf)

<sup>13</sup> <https://www.pnas.org/doi/full/10.1073/pnas.2215275120>,

<sup>14</sup> <https://pubs.acs.org/doi/10.1021/acs.est.1c06458#>,

<sup>15</sup> <https://www.pnas.org/doi/10.1073/pnas.1202407109>

<sup>16</sup> <https://www.science.org/content/article/natural-gas-could-warm-planet-much-coal-short-term>

double exports again.<sup>17 18 19</sup> According to the IEA the U.S. "accounts for over 90% of LNG export projects approved since the start of 2022."<sup>20</sup>

It is sometimes argued that supply side policies don't matter, it's only demand side policy that has impact, but a growing body of literature shows that reducing supply is an important component of achieving global GHG emissions reductions.<sup>21 22</sup> The IEA said, "A productive debate about the oil and gas industry in transitions needs to avoid two common misconceptions. The first is that transitions can only be led by changes in demand."<sup>23</sup> This is especially true when the U.S. is actively using its resources and influence across the globe to expand the market for LNG, including by building the false narrative that LNG is better for the climate than coal.

The push for LNG exports not only damages U.S. credibility, but also risks delegitimizing the entire UNFCCC process. This year, the COP President is the head of the Abu Dhabi National Oil Company and it has been reported that the United Arab Emirates is planning to use its role as host to push for new oil and LNG deals.<sup>24</sup> The COP is at risk of appearing to be co-opted by oil and gas interests and fossil fuel countries attempting to greenwash their dirty energy projects. To counter this threat the U.S. should be strong in advocating for language in the final text to phase out all fossil fuels and not just coal.

### *Conclusion*

The world is in a sprint to avoid the worst impacts of climate chaos and every choice that we make now will have consequence for generations. It has become clear that LNG exports are not a climate solution, and that they in fact threaten to worsen the crisis. COP28 is a critical moment where political leaders have to decide once and for all whether they are going to treat climate chaos like a true emergency or if they are happy to just kick the can down the road. Perhaps no issue at this COP will have a bigger impact on the climate crisis than how the world proceeds with LNG exports.

Sincerely,

---

<sup>17</sup> <https://www.eia.gov/dnav/ng/hist/n9133us2A.htm>

<sup>18</sup> <https://www.eia.gov/todayinenergy/detail.php?id=42575>

<sup>19</sup> <https://www.energy.gov/fecm/life-cycle-greenhouse-gas-perspective-exporting-liquefied-natural-gas-united-states>

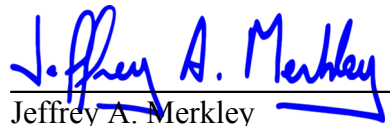
<sup>20</sup> <https://iea.blob.core.windows.net/assets/26ca51d0-4a42-4649-a7c0-552d75ddf9b2/WorldEnergyOutlook2023.pdf>

<sup>21</sup> <https://www.rff.org/publications/reports/partners-not-rivals-the-power-of-parallel-supply-side-and-demand-side-climate-policy/>

<sup>22</sup> <https://www.sei.org/publications/supply-side-climate-policy-the-road-less-taken/>

<sup>23</sup> <https://www.iea.org/news/oil-and-gas-industry-faces-moment-of-truth-and-opportunity-to-adapt-as-clean-energy-transitions-advance>

<sup>24</sup> <https://www.bbc.com/news/science-environment-67508331>

  
Jeffrey A. Merkley  
United States Senator