The EPA sets the value of human life and health at zero: A further comment

Benjamin Mateus
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As the WSWS reported earlier this week, the Environmental Protection Agency (EPA), under the Trump administration, has made a fundamental change to how it evaluates air pollution regulations. According to internal agency emails and documents, the EPA plans to stop calculating the monetary value of health benefits—such as avoiding premature deaths, heart attacks and asthma attacks—when setting limits for fine particulate matter (PM2.5) and ground-level ozone. At the same time, the agency will continue to fully account for the compliance costs faced by industry. The result is a regulatory framework in which pollution controls are systematically framed as economically unjustified, regardless of their impact on public health.

This change is not a technical adjustment but part of a broader rollback of environmental regulation. The EPA has also moved to rescind the 2009 Endangerment Finding, which established that greenhouse gas emissions threaten public health and welfare and provided the legal basis for regulating climate pollution under the Clean Air Act. In addition, the administration has proposed eliminating the Greenhouse Gas Reporting Program (GHGRP) for most industrial sectors, removing a key source of facility-level emissions data relied upon by regulators, researchers, and the public.

These actions are taking place within a wider economic and political context. With U.S. national debt exceeding $38 trillion and corporate profit margins under pressure, the administration has emphasized reducing operating costs for major industries. Weakening environmental standards lowers production costs for U.S. exporters by several percentage points in emissions-intensive sectors, cutting regulatory compliance expenses by billions of dollars each year. As the European Union's Carbon Border Adjustment Mechanism came fully into force in January 2026, this approach is intended to ease near-term cost pressures on U.S. producers by reducing domestic regulatory obligations and deferring capital investment in cleaner production.

The health effects of these policy changes are well-documented. The EPA's own regulatory analyses have previously shown that stronger PM2.5 standards prevent tens of thousands of premature deaths each year. Rolling back these protections is therefore expected to result in thousands of additional deaths annually in the United States, with the greatest burden falling on Black and low-income communities located near highways, refineries, ports, and power plants. Over time, weaker air-quality standards, reduced emissions monitoring, and limits on climate regulation will contribute to higher greenhouse gas emissions and increased exposure to harmful pollutants across both entire urban and industrial regions.

Taken together, these measures mark a shift away from managing the health impacts of industrial pollution. The likely outcome is a steady increase in preventable illness and death in the United States, alongside a growing contribution to global health risks related to climate change. By mid-century, the cumulative effects of these policies are expected to add substantially to the global burden of disease, particularly among working-class populations and poorer countries that are least equipped to absorb the consequences.

From clean air to carbon: How capital tamed environmental regulation

The modern environmental regulatory system in the United States took shape in the 1970s under intense public pressure. Landmark laws such as the Clean Air Act directed the federal government to set pollution standards that would protect public health with an "ample margin of safety." The law's language was clear: protecting human health came first. From the beginning, however, these health-based mandates came into conflict with the economic interests of major industries whose profits depended on continued pollution.

To manage this conflict, federal regulators—particularly the Environmental Protection Agency—increasingly relied on cost-benefit analysis. This approach compares the financial costs imposed on industry by pollution controls with the economic value assigned to the health benefits of regulation, such as avoided illness and avoided premature death. Rather than eliminating pollution, cost-benefit analysis provided a way to justify how much harm would be allowed to continue. Pollution was no longer treated as a failure to protect public health, but as a trade-off that could be economically managed.

A central tool in this framework is the "Value of a Statistical Life," or VSL. The VSL is not the value of any individual life. It is a number derived from labor market data that estimates how much workers are paid, on average, to accept small increases in the risk of injury or death. Federal agencies use this figure to place a dollar value on lives saved by regulation. In practice, the VSL allows regulators to ask whether preventing deaths is "worth it" when weighed against the cost to industry. Mortality thus becomes a line item in economic calculations rather than an outcome to be prevented.

This regulatory logic expanded beyond traditional air pollution after a series of legal developments in the 2000s. In 2007, the Supreme Court accepted that greenhouse gases qualify as air pollutants under the Clean Air Act, obligating the EPA to assess whether they pose a danger to public health and welfare. That ruling led to the agency's 2009 Endangerment Finding, which concluded that greenhouse gas emissions do threaten human health and the environment. The finding served as the legal foundation for expanded federal regulation, extending a framework originally designed for local air pollution to the global problem of climate change.

To implement climate regulation within a cost-benefit framework, the Obama administration established an Interagency Working Group in 2009 to calculate the "social cost of carbon." This figure estimates the long-term economic damage caused by each additional ton of carbon dioxide

emissions, including impacts on health, agriculture, and infrastructure. While presented as a technical exercise, the calculation involved key policy choices—especially the discount rate used to estimate future harm. Higher discount rates sharply reduce the importance of future damage, favoring short-term economic gains, while lower rates give greater weight to long-term and global impacts.

Under the Obama and Biden administrations, this system produced a regulatory compromise. Emissions standards for vehicles and power plants were strengthened, and the social cost of carbon was used to justify those rules in economic terms. At the same time, regulations were designed to limit disruption to corporate profitability. Even when the Biden administration proposed increasing the social cost of carbon to reflect updated science, climate protection remained framed as a problem of economic optimization rather than a public health necessity.

During his first term, President Trump moved to weaken this framework by executive order, disbanding the Interagency Working Group and directing agencies to revise the social cost of carbon. The administration argued that climate damage outside U.S. borders should not be counted and that future harm should be heavily discounted. As a result, the estimated social cost of carbon was reduced from roughly $40 per ton to as little as $1 to $7 per ton. This change dramatically lowered the recognized economic damage of carbon emissions and made climate regulation appear economically unjustified.

This shift was not simply methodological. By sharply reducing the value assigned to future harm, the administration created a technical basis for rolling back fuel economy standards and power plant regulations. The immediate effect was to reduce compliance costs for energy and automotive companies. The longer-term costs such as rising illness, environmental damage, and climate disruption were excluded from the calculation, effectively transferring those burdens from corporate balance sheets to the public.

Pollution, climate, and class: The biological impact of a social crime

While the EPA's new regulatory approach treats the health effects of pollution as uncertain or assigns them a value of zero, it does not change the physical harm that pollution causes. What changes is how that harm is handled inside the regulatory system. By removing the monetary value of health benefits from cost-benefit analysis, the administration has made premature death and disease administratively invisible in rulemaking. The damage has not disappeared, but it is absent from the calculations that determine whether pollution controls are adopted or enforced.

Fine particulate matter, known as PM2.5, is among the most dangerous forms of air pollution regulated by the Environmental Protection Agency (EPA). These particles are smaller than 2.5 micrometers in diameter and are produced by coal-fired power plants, diesel engines, refineries, ports, freight corridors, and other industrial sources now targeted for deregulation. Because of their size, PM2.5 particles penetrate deep into the lungs, pass through the air–blood barrier, and enter the bloodstream. Once inside the body, they trigger inflammation and oxidative stress, damage blood vessels, and increase the risk of heart attacks, strokes, lung cancer, and chronic respiratory disease.

Large-scale epidemiological research has repeatedly shown that there is no safe level of exposure to PM2.5. Studies reviewed by the World Health Organization and incorporated into the Global Burden of Disease framework demonstrate that mortality risk rises even at concentrations previously considered acceptable under U.S. standards. Air pollution is consistently identified as one of the leading risk factors for death worldwide, contributing to millions of premature deaths each year through cardiovascular and respiratory disease.

Exposure to this pollution is structured by class. Industrial facilities, highways, ports, and logistics hubs are disproportionately located in or near working-class neighborhoods, where lower land values, housing insecurity, and long-standing patterns of disinvestment have made these areas sites for industrial siting. Research cited by the Harvard T.H. Chan School of Public Health shows that older adults living in areas with higher soot concentrations face sharply elevated mortality risk, underscoring how proximity to pollution sources translates directly into reduced life expectancy.

As a result, the economic savings produced by deregulation are paid for in reduced life expectancy and increased illness among those least able to avoid exposure. In daily life, this burden appears as higher rates of asthma, cardiovascular disease, missed workdays, and mounting medical costs in communities already strained by insecure employment and limited access to healthcare. The removal of pollution controls does not eliminate these costs; it shifts them away from regulated industries and onto workers and their families.

Climate deregulation compounds these harms. Rising temperatures intensify air pollution by accelerating the formation of ground-level ozone, a respiratory pollutant linked to asthma and chronic obstructive pulmonary disease. Hotter conditions also worsen the effects of PM2.5 by increasing the frequency and severity of wildfires, which release large quantities of fine particles into the air. Research incorporated into the Global Burden of Disease framework shows that climate-driven increases in heat exposure, food insecurity, and infectious diseases fall most heavily on working populations in low-income regions.

Treating these outcomes as externalities valued at zero is not a neutral policy choice. It reflects a decision to prioritize lower production costs over the biological well-being of the working class. The COVID-19 pandemic established this hierarchy clearly, demonstrating that the financial system would embrace mass illness and death so long as profits and market stability were preserved. The health damage does not disappear when it is excluded from regulatory analysis. It accumulates in bodies, workplaces, communities, and healthcare systems, producing long-term consequences that extend far beyond the short-term savings claimed by deregulation.

Dismantling the climate regime: What comes next

The changes now underway at the EPA are aimed not at refining environmental policy, but at redefining the agency's role altogether. Internal planning documents and public rulemaking proposals show an agency preparing to step back from climate regulation by narrowing its legal authority and dismantling the tools required to exercise oversight. The objective is not to resolve scientific uncertainty, but to remove climate regulation from the EPA's mandate entirely.

The legal centerpiece of this effort is the proposed withdrawal of the 2009 Endangerment Finding, which established that greenhouse gas emissions endanger public health and welfare. That finding provides the statutory basis for regulating carbon pollution under the Clean Air Act. By seeking to rescind it, the EPA is asserting that climate change does not fall within the category of harm Congress intended the agency to regulate.

This position draws support from a series of Supreme Court decisions that have narrowed the scope of federal regulatory authority. In *West Virginia v. EPA* (2022), the Court ruled that the agency could not impose broad, system-wide changes on the power sector without clear and explicit authorization from Congress, introducing the "major questions doctrine." Under this framework, issues deemed to have significant economic or

political consequences—such as climate change—are presumed to lie beyond agency authority unless Congress has spoken with exceptional clarity.

That constraint was reinforced by *Loper Bright Enterprises v. Raimondo* (2024), which overturned the *Chevron* doctrine. For decades, *Chevron* required courts to defer to reasonable agency interpretations of loosely worded statutes, particularly on technical and scientific matters. Its removal shifts interpretive authority from expert agencies to the courts, making climate regulation more vulnerable to judicial challenges regardless of scientific evidence.

Earlier decisions are also being folded into this rationale. In *Utility Air Regulatory Group v. EPA* (2014), the Court cautioned against interpretations of the Clean Air Act that would significantly expand the agency's reach without explicit congressional approval. In *Michigan v. EPA* (2015), the Court held that the agency must consider industry compliance costs when determining whether regulation is appropriate. Together, these rulings provide the legal framework the EPA now invokes to argue that regulating greenhouse gas emissions exceeds its statutory authority.

If the Endangerment Finding is withdrawn, the consequences are direct. The EPA would no longer claim authority to regulate greenhouse gas emissions under existing law. Current climate rules would become vulnerable to repeal, and future administrations would be unable to issue new standards without new legislation from Congress. Federal climate regulation would effectively come to a halt, regardless of scientific evidence or public health need.

Taken together, these actions redefine the function of the EPA itself. By relinquishing its authority to regulate climate pollution and dismantling the capacity to do so, the agency is positioning itself to assert that it cannot be held responsible for climate regulation. Responsibility is shifted to Congress, where action has long been stalled. The result is not simply deregulation, but the deliberate hollowing out of the EPA as a governing institution capable of responding to climate-related environmental and health harm.

Conclusion

The past five decades of environmental regulation in the United States were not the product of benevolent governance or abstract concern for social welfare. It emerged from sustained worker struggles, mass opposition to industrial pollution, and popular pressure that forced limits on corporate activity. These regulations represented concessions—hard-won and contested—that constrained profit-making to blunt its most destructive effects on health and social life.

What is now taking place at the EPA marks the abandonment of even this constrained settlement. The agency's current trajectory means the discarding of gains wrested from earlier struggles. The EPA will not "balance" health impacts against economic costs; it will remove them from consideration. It will renounce its own regulatory authority, dismantle oversight capacity, and evade responsibility. Profitability is no longer even partially offset by social constraint—it stands alone as the sole organizing principle of policy.

This shift coincides with a broader erosion of democratic norms and public accountability. As decision-making is insulated from popular pressure and concentrated within executive and judicial authority, protections that once reflected social resistance are recast as obstacles to be eliminated. Environmental regulation is being aligned with a wider pattern of rule in which democratic claims on the state—whether for health, safety, or basic social functioning—are dismissed as illegitimate.

In the context of climate change, the consequences are profound. Climate-related harm is cumulative, irreversible in key respects, and inseparable from the conditions of work, health, and survival for large sections of the population. Abandoning regulation in this domain is not a neutral retreat; it is an assertion that the social costs of environmental breakdown are acceptable so long as short-term profitability is preserved.

What is being dismantled is not merely a regulatory framework, but the legacy of struggles that once imposed limits on capital in the name of human survival. The EPA's retreat signals a turn toward authoritarian governance in which those limits are no longer recognized, and in which the defense of public health and environmental stability is treated as incompatible with the priorities of the financial system. Reversing this course will require not technical adjustments but renewed social and political resistance capable of reasserting those limits under conditions that are now far more dangerous than when they were first won.