

Environmental Protection Agency
Washington, DC 20585

**In the Matter of Request for Comments for the Repeal of the 2009
Endangerment Finding and Greenhouse Gas Vehicle Standard Docket ID No.
EPA-HQ-OAR-2025-0194**

The American Consumer Institute (ACI) is a nonprofit 501(c)(3) education and research organization. Its mission is to identify, analyze, and protect the interests of consumers in legislative and rulemaking proceedings. ACI supports market-driven solutions that maximize economic growth and improve consumer welfare. A strong, robust economy benefits all individuals; energy is a pivotal piece of that equation. ACI promotes policies that bolster energy abundance, reliability, and affordability in order for households and businesses to not only live but thrive. ACI seeks to protect consumers from unnecessary government overreach that limits choice and raises costs.

ACI supports rescinding the 2009 Endangerment Finding (EF) and the repeal of all greenhouse gas (ghg) emissions standards for light-duty, medium-duty, and heavy-duty vehicles and engines established under the Clean Air Act (CAA) Section 202(a) since 2010.

The scientific rationale leading to the EF is faulty and the legal parameters used to validate its passage are problematic. The measure has been used to justify heavy-handed legislation regulating ghg emissions, specifically a de facto electric vehicle (EV) mandate, which forces industries to manufacture specific technology and consumers to purchase particular products. The results are astronomical costs for both automakers and car buyers with undetectable environmental benefits.

The EF and its subsequent legislation must be rescinded.

Endangerment Finding's Legal Problems

The EF is born from *Massachusetts v. EPA* (2007) in which the Court ruled with a 5–4 decision that the Environmental Protection Agency (EPA) has authority to regulate ghg emissions as air pollutants under the CAA.¹ The CAA requires EPA to regulate air pollutants if it finds that they “cause, or contribute to, air pollution which may reasonably be anticipated to endanger public health or welfare.” Carbon Dioxide (CO₂), however, should not be considered a pollutant.

Justice Scalia, who wrote one of the dissents for *Massachusetts* and was joined by Chief Justice Roberts and Justices Thomas and Alito, argued that the CAA is meant to address conventional, local air pollutants that harm human health directly through exposure, such as inhalation.² He maintained that the Act was not meant to address the broader issue of climate change, and that greenhouse gases therefore did not fall under the definition of “air pollutants.”

The new Department of Energy (DOE) climate report released in July aligns with Justice Scalia’s conclusions determining that CO₂ “differs in many ways from the so-called Criteria Air Pollutants. It does not affect local air quality and has no human toxicological implications at ambient levels.”³ The report distinguishes CO₂ from the other six designated air contaminants as defined by the CAA (particulate matter, ground-level ozone, sulfur dioxide, nitrogen dioxide, lead, and carbon monoxide) that are regulated by EPA and declares: CO₂ is odorless, does not affect visibility and has no toxicological effects at ambient levels.

Scalia concluded in his dissent that the Court's majority had overstepped its bounds, inserting itself into a political debate that should be resolved by the legislative and executive branches rather than the judiciary. He also noted that establishing U.S. ghg emissions standards for motor vehicles would be futile, since the U.S. motor vehicle fleet is just one of many sources of emissions both here and abroad.

Several legal developments have emerged since the 2009 EF which question EPA’s authority to regulate ghg emissions, especially to the degree agencies have issued. Recent Supreme Court cases, for instance, articulate the need to consider an action’s magnitude and restore legislative responsibility to Congress and interpretive authority to the judicial branch.

¹ *Massachusetts v. Environmental Protection Agency*, 549 U.S. 497, 529 (2007).

² *Massachusetts v. EPA*, 549 U.S. at 529. Scalia Dissent, April 2, 2007, <https://www.law.cornell.edu/supct/html/05-1120.ZD1.html>.

³ U.S. Department of Energy, “A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate,” July 23, 2025, [https://www.energy.gov/sites/default/files/2025-](https://www.energy.gov/sites/default/files/2025-07/DOE_Critical_Review_of_Impacts_of_GHG_Emissions_on_the_US_Climate_July_2025.pdf)

[07/DOE_Critical_Review_of_Impacts_of_GHG_Emissions_on_the_US_Climate_July_2025.pdf](https://www.energy.gov/sites/default/files/2025-07/DOE_Critical_Review_of_Impacts_of_GHG_Emissions_on_the_US_Climate_July_2025.pdf).

Michigan v. EPA (2015) centered on the EPA's regulation of hazardous air pollutants from power plants, in which the EPA argued that the CAA allowed them to regulate power plants based solely on public health concerns.⁴ Costs for the power plant regulation were estimated to be nearly \$10 billion a year while quantifiable benefits from the reduction in hazardous-air-pollutant emissions would be \$4-\$6 million a year. The Court ruled it not "appropriate and necessary" to impose significant economic costs in exchange for much smaller returns.

In *West Virginia v. EPA* (2022) the Supreme Court ruled the EPA exceeded its authority under the CAA to regulate greenhouse gas emissions from existing power plants.⁵ This decision limits the EPA's power to mandate broad systemic changes to emissions, requiring clear direction from Congress for such consequential regulatory actions. It clearly dictates under the "Major Questions Doctrine" that when an agency seeks to enact something of vast economic and political significance, the agency must point to clear Congressional authorization. Congress has not given EPA authorization to regulate ghg emissions. In fact, previous legislative attempts to regulate CO₂ have failed to garner sufficient Congressional support.⁶

In *Loper Bright Enterprises v. Raimondo* (2024) the U.S. Supreme Court overturned what's known as the *Chevron Doctrine*, a principle of judicial deference and a 40-year practice of requiring courts to defer to government agencies' interpretations of vague laws.⁷ It is believed that "*Chevron* fueled the growth of the modern administrative state, allowing bureaucrats to seize power without being properly checked by courts."

By ending *Chevron* deference and weakening agency authority through *West Virginia*, the Court has "helped to restore the separation of powers, strengthen judicial independence, and offer Congress a chance to reclaim its Article I authority," which grants legislative power to Congress.⁸ These court cases demonstrate that EPA lacks authority to interpret laws. From *Michigan* to *Loper Bright*, the courts have been clear about the limits of the EPA to regulate.

The EF has been used to justify heavy-handed public policy measures that do little to carry out the very goal they purport to accomplish (reduce climate change) yet impact consumers considerably by restricting choice and increasing costs. Most significantly, EF set the stage for expensive and unrealistic Corporate Average Fuel Economy (CAFE) standards. These standards have significant economic and political ramifications, and as such, are in violation of the Court's decision of *West Virginia* and *Michigan*.

⁴ *Michigan v. Environmental Protection Agency*, 576 U.S. 743 (2015).

⁵ *West Virginia v. Environmental Protection Agency*, 597 U.S. 697 (2022).

⁶ Center for Climate and Energy Solutions, "Congress Climate History," Accessed September 2025,

<https://www.c2es.org/content/congress-climate-history/#:~:text=2008%E2%80%932010:%20Cap%2Dand,system%20and%20critical%20complementary%20measures.>

⁷ *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369 (2024)

⁸ Americans for Prosperity Foundation, "Restoring the Constitution's Separation of Powers: Chevron's Demise and the Promise of Loper Bright," September 16, 2025.

The Science is Not Settled

The entire premise of the EF rests on the presumption that the earth's temperature is increasing at dangerous levels due to an unprecedented amount of CO₂ permeating the atmosphere. The United Nations Intergovernmental Panel on Climate Change (IPCC) has issued numerous statements declaring human-induced climate change as clear, unequivocal, and "settled science."⁹ Yet the science debate is still ongoing and far from resolved regarding global temperature changes. Closer analysis suggests the methods and procedures utilized by the IPCC have been limited and flawed, leading to overconfident warming proclamations.

The greatest concern involves the Urban Heat Island effect, a specific trend bias where weather stations surrounding urban areas erroneously inflate average temperatures.¹⁰ Urban areas tend to be warmer than rural areas due to a variety of factors. Most of the weather stations in the Global Historical Climate Network are in urban areas even though they occupy a small percentage of land area, which is believed to overestimate the IPCC's temperature assessments with up to 40 percent extra warming.

This and other data collection inaccuracies have prematurely attributed climate change to man-made activities. Plenty of evidence suggests it is more natural, perhaps significantly more so, than we are led to believe.¹¹ Therefore, attributing CO₂ as a polluter and warming agent inappropriately blames a critical environmental element for climate change, and its subsequent policy measures will do little to nothing to alter potential temperature rises.

Other analyses similarly assert more carbon dioxide cannot cause catastrophic global warming or more extreme weather.¹² CO₂ becomes a less effective greenhouse gas at higher concentrations: Each additional increase of CO₂ in the atmosphere causes a smaller change in temperature.

These findings create uncertainty surrounding the measurement accuracy of global temperatures. The alleged warming trends and their severity being advanced by countless institutions, politicians, world leaders, and talking heads are questionable. Climate science is a complex issue requiring further study.

⁹ Roy Spencer, "Global Warming: Observations Vs. Climate Models," Heritage Foundation, January 24, 2024, <https://www.heritage.org/environment/report/global-warming-observations-vs-climate-models>.

¹⁰ Ibid.

¹¹ Ibid.

¹² Richard Lindzen and William Happer, "More Carbon Dioxide Will Create More Food. Driving Greenhouse Gas Emissions to Net Zero and Eliminating Fossil Fuels Will Be Disastrous for People Worldwide," CO₂ Coalition, June 7, 2025, <https://co2coalition.org/wp-content/uploads/2025/06/Lindzen-Happer-GHGs-and-Fossil-Fuels-Climate-Physics-2025-06-07.pdf>.

Stringent Fuel Efficiency Standards and Their Astronomical Costs

When EPA announced new light- and medium-duty vehicle standards in 2024 and NHTSA finalized rulings for CAFE, the two sets of standards created the de facto electric vehicle (EV) mandate. Passenger cars would need to achieve 66.4 mpg by 2032, and trucks would need to achieve 54.4. To meet such rigorous requirements, nearly two-thirds of new cars sold would need to be electric.

Requiring consumers to purchase EVs imposes significant costs on household budgets.

The price differences between internal combustion engines (ICE) and EV ownership are readily apparent. According to current Kelly Blue Book figures, the average MSRP of a new EV is \$55,689 whereas the average MSRP of a new ICE vehicle is \$48,800.¹³ Aside from fuel, EVs are generally more expensive to buy and maintain. EVs cost \$14,690 more than ICE vehicles when accounting for MSRP, financing, insurance, fuel, repairs, maintenance, and depreciation.

Other not-so-obvious costs of EV ownership are “hidden through a web of subsidies, rebates, and credits . . . ultimately borne by taxpayers, ICEV buyers, and utility ratepayers.”¹⁴ The American Energy Institute’s recently published report reveals the unseen price tag embedded throughout the complex EV apparatus with the subsequent findings.

The 2021 Bipartisan Infrastructure Law and the Inflation Reduction Act (IRA) of 2022 extended billions in tax credits for charging stations, EVs, and EV supply chain industries. The IRA alone was slated to cost \$370 billion, but upon further analysis, estimates came closer to \$1.2 trillion over 10 years.¹⁵ Other researchers project a \$4.7 trillion price tag by 2050 because some tax credits will remain in perpetuity beyond the supposed expiration date.¹⁶ Individual states have also instituted regulations, subsidies, and tax credits to push EV adoption, adding to overall costs.

Regulators have forced the hand of ICE manufacturers to purchase credits from EV manufacturers (who have met or superseded CAFE and EPA standards), pay fines, or build their own EV production line to demonstrate compliance. ICE customers pay more for their vehicles to cover the penalties incurred by manufacturers. Ford, for example, raised prices on their 2024 F150 trucks by \$1,200 – \$10,200 to absorb the \$3 billion loss from their EV line.¹⁷

¹³ Renee Valdes, “How Much are Electric Cars?” Kelly Blue Book, August 15, 2025, <https://www.kbb.com/car-advice/how-much-electric-car-cost/>.

¹⁴ Jason Isaac, Brent Bennett, and Trevor Lewis, “Behind the Wheel: The Hidden Hands Driving the EV Mandate,” American Energy Institute, March 2025, <https://americanenergyinstitute.com/docs/2025-03-EV-Mandate-Isaac-Bennett-Lewis.pdf>.

¹⁵ Louis Casiano, “Inflation Reduction Act to cost US \$1.2 trillion, Goldman Sachs says,” Fox Business, March 24, 2023, <https://www.foxbusiness.com/energy/inflation-reduction-act-cost-us-1-2-trillion-goldman-sachs-says>.

¹⁶ Travis Fisher and Joshua Loucks, “The Budgetary Cost of the Inflation Reduction Act’s Energy Subsidies,” Cato Institute, March 11, 2025, <https://www.cato.org/policy-analysis/budgetary-cost-inflation-reduction-acts-energy-subsidies>.

¹⁷ Isaac, Bennett, and Lewis, “Behind the Wheel,” 2025.

Utility ratepayers are also subject to increased utility rates because of a rapid influx of EVs connecting to the power grid. Not only do public utilities offer rebates for EV adoption and in-home chargers, but private and public charging infrastructure requires significant upgrades to the power distribution systems to accommodate the new load. Utility companies are therefore eligible to seek higher utility rates. Base-rates are rising nationwide: State utility commissions approved nearly \$7 billion in base rate increases in 2021, \$5.3 billion in 2022, and a record \$9.7 billion in 2023.¹⁸

The American Energy Institute study estimates that over a 10-year time frame, each 2023 EV will cost society between \$94,000 and \$152,000 in hidden subsidies.¹⁹ These figures represent the costs automakers accrue to meet government mandates and the losses they bear from forced EV production.

Taxpayers, ratepayers, and ICE vehicle purchasers are subsidizing the costs of an EV mandate. The mandate is perhaps the largest and costliest government intervention the automotive industry and driving public have seen, especially for a populace whose majority does not want to own one.²⁰

Most telling is the letter sent by roughly 4,000 car dealers across the country, asking President Biden to “tap the brakes” on the “unrealistic government electric vehicle mandate.”²¹ They expressed deep concern regarding the supply of EVs stockpiling on their lots. As experts in automaking and consumer preferences they noted that “today’s current technology is not adequate to support the needs of the majority of our consumers.” People want to make their own choices about vehicle purchases.

Just a few months later, and after no response, a second letter was sent to the Biden administration by closer to 5,000 car dealers requesting they “hit the brakes” on the EV mandate.²² They contested that fewer tax incentives, a “woefully inadequate charging infrastructure,” and lack of consumer demand “makes the proposed electric vehicle mandate completely unrealistic.”

It was made abundantly clear that an EV mandate was hurting the auto industry. Forcing automakers to develop ideas or expedite their progress to meet nonexistent consumer demand distorts market realities and costs manufacturers more resources, which in turn costs consumers.

CAFE standards set in the name of climate change mitigation are not only creating unrealistic expectations but are being misused for public policy initiatives completely unrelated to their original purpose. CAFE was originally established as a national security measure to reduce America’s dependence on foreign oil, not as a tool for combatting global warming. These measures have become a weaponized mechanism to score political points and issue draconian regulations. They are costing automakers and consumers billions yet deliver meager results.

¹⁸ U.S. Energy Information Administration, “Trend Toward Electric Utility Rate Increases in Regulated Markets Continues in 2024,” September 9, 2024, <https://www.eia.gov/todayinenergy/detail.php?id=63024>.

¹⁹ Isaac, Bennett, and Lewis, “Behind the Wheel,” 2025.

²⁰ Jeffrey Jones, “EV Ownership Ticks Up, but Fewer Nonowners Want to Buy One,” Gallup News, April 8, 2024.

²¹ CarPro, “Nearly 4,000 Auto Dealers Send Letter To President Biden To Slow Down On EVs,” November 29, 2023, <https://www.carpro.com/blog/nearly-4000-auto-dealers-send-letter-to-president-biden-to-slow-down-on-evs>.

²² Thanos Pappas, “Nearly 5,000 Dealers Urge Biden To Delay ‘Unrealistic’ EV Mandate In Second Letter,” Car Scoops, January 26, 2024, <https://www.carscoops.com/2024/01/over-4700-us-dealerships-urge-president-biden-to-rethink-ev-plan-in-second-letter/>.

An EV Mandate Will Do Little to Affect Climate Change

Too many lawmakers are convinced that regulating CO₂ will stop global temperatures from rising or even reverse the warming currently occurring. This is not the case. Numerous analyses and modeling prove the opposite.

According to the National Highway Transportation Safety Administration, which conducted an environmental impact statement for proposed 2012–2016 CAFE standards, the standards do very little to thwart rising global temperatures with achieving a meager reduction of 0.007°C to 0.018°C by 2100.²³ Texas Public Policy Foundation recently determined that even by eliminating all U.S. CO₂ emissions from fossil fuels by 2030 would reduce worldwide CO₂ concentrations in 2050 by 2.3 percent, which would reduce the increase in average worldwide temperatures by a mere 0.052° C.²⁴

The DOE July climate report finds that U.S. emission cuts alone would have minimal global climate benefit while potentially imposing greater economic harm than climate change itself.²⁵ It notes, “U.S. policy actions are expected to have undetectably small direct impacts on the global climate.”

Renowned scientist Bjorn Lomborg, who writes extensively on climate issues, concludes that all climate policies by the US, China, the EU and the rest of the world, implemented from the early 2000s to 2030 and sustained through the century will likely reduce global temperature rise by only 0.17°C in 2100.²⁶ His analyses indicate that taking drastic climate measures has almost no impact on rising temperatures.

Science professors have concluded that all efforts to achieve Net Zero emissions—a state in which the greenhouse gases going into the atmosphere are balanced by removal out of the atmosphere—of CO₂, if fully implemented, will have a trivial effect on temperature.²⁷ In the U.S., Net Zero by 2050 only avoids a temperature increase of 0.02°F; worldwide, the effect only avoids a 0.13°F increase.

The assessments referenced above coincide with the negligible extent to which U.S. vehicles actually contribute to overall global ghg emissions. Passenger cars and light trucks account for approximately 16 percent of U.S. ghg emissions, which translates to less than 2.5 percent of total global emissions.²⁸

Even the most aggressive regulatory actions to cut ghg emissions from U.S. vehicles will not avert alleged climate dangers on any measurable scale.

²³ U.S. National Highway Traffic Safety Administration, “NHTSA and EPA Establish New National Program to Improve Fuel Economy and Reduce Greenhouse Gas Emissions for Passenger Cars and Light Trucks,” accessed August 25, 2025, https://www.nhtsa.gov/sites/nhtsa.gov/files/cape-ghg_fact_sheet.pdf.

²⁴ Brent Bennett, “The Materiality of U.S. CO₂ Emissions on Global Climate,” Texas Public Policy Foundation, June 2025.

²⁵ U.S. Department of Energy, “A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate,” July 23, 2025, https://www.energy.gov/sites/default/files/2025-07/DOE_Critical_Review_of_Impacts_of_GHG_Emissions_on_the_US_Climate_July_2025.pdf.

²⁶ Bjorn Lomborg, “Impact of Current Climate Proposals, Global Policy 7, no. 1 (2016).

²⁷ Lindzen and Happer, “Net Zero Will be Disastrous,” 2025.

²⁸ Light-duty vehicles account for 57 percent of energy used in U.S. transportation; since transportation contributes 29 percent of total U.S. ghg emissions, that puts them at 16 percent of the emissions. If the U.S. contributes 15 percent of total global emissions, passenger cars and trucks would be less than 2.5 percent.

Rising Global Temperatures Do Not Exacerbate Natural Disasters; They Come with Benefits

Many have argued that CO₂ emissions from fossil fuels both in the U.S. and globally are responsible for increases in various natural disasters and that government intervention is necessary to curtail future calamities. Neither assertion is accurate.

The frequency and severity of several major hurricanes over the last several decades have been attributed to climate change, but the U.S. has a long history of these violent windstorms wreaking havoc on its shores.²⁹ Indeed, the Jamestown Settlement experienced the Great Colonial Hurricane of 1635, with a storm surge of up to 20 feet. One of the worst recorded involves the Great New England Hurricane of 1938 with sustained winds of 121 mph, a peak gust of 186 mph, and up to 25 ft storm tides.

Research indicates that America has seen an average of 17 hurricanes per decade since the start of the 20th century with slightly more than a third of them exceeding Category 3 levels and roughly two at or exceeding Category 4 within each decade.³⁰ Despite increases in CO₂ emissions and global temperatures, there is no clear overall trend for the frequency or intensity of hurricanes. Any cyclical changes in hurricane activity is likely correlated with natural factors such as El Niño, La Niña, and other oscillation cycles that warm and cool oceanic temperatures.

Tornadoes are another common phenomenon in North America, and just like hurricanes, cannot be linked to increases in both CO₂ emissions and global temperatures.³¹ Again, El Niño and La Niña are the responsible parties for any increased tornado activity, and yet a long-term downward trend in strong and violent tornadoes has been in effect since 1990. El Niño and La Niña, which represent the warm and cool phases of climate cycles, alter the natural flow of weather systems across the U.S. Research indicates “a clear relationship between” variations in tornado activity and natural climate oscillations, not ghg emissions.

Instead of causing extreme weather conditions many scientists argue that additional CO₂ in the atmosphere is beneficial. Numerous experimental results demonstrate that more CO₂ usually increases the amount of food plants produce.³² One scientist found that a 30 percent increase in atmospheric CO₂ concentration increased agricultural production per unit land area for various crops anywhere from 28 to 70 percent. More CO₂ means more food.

²⁹ Joe D'Aleo and Keven Dayaratna, “Keeping an Eye on the Storms: An Analysis of Trends in Hurricanes Over Time,” Heritage Foundation, December 2, 2024, <https://www.heritage.org/energy/report/keeping-eye-the-storms-analysis-trends-hurricanes-over-time>.

³⁰ Ibid.

³¹ Joe D'Aleo and Roy Spencer, “Twisters and Trends: An Analysis of U.S. Tornado Activity and Climate Change,” Heritage Foundation, August 28, 2024, <https://www.heritage.org/environment/report/twisters-and-trends-analysis-us-tornado-activity-and-climate-change>.

³² Richard Lindzen and William Happer, Physics Demonstrates that Increasing Greenhouse Gases Cannot Cause Dangerous Warming, Extreme Weather, or Any Harm, CO₂ Coalition, June 7, 2025, <https://co2coalition.org/publications/physics-demonstrates-that-increasing-greenhouse-gases-cannot-cause-dangerous-warming-extreme-weather-or-any-harm/>.

An agricultural expert claims: “The rising level of atmospheric CO₂ could be the one global natural resource that is progressively increasing food production and total biological output. The effects know no boundaries, and both developing and developed countries are, and will be, sharing equally.”³³

Rising average temperatures currently mean fewer people die overall from heat and cold.³⁴ As global warming brings a reduction in cold temperatures, the risk of people dying from the cold decreases. The cold kills five to 15 times more people than heat. In the last two decades, rising temperatures have increased heat deaths by 0.21 percent but reduced cold deaths by 0.51 percent. Net global deaths have fallen by 0.3 percent.

An increase in CO₂ emissions does not worsen weather-related events but in fact creates favorable outcomes that enhance human welfare.

Conclusion

The 2009 Endangerment Finding has served as the legal and scientific foundation for expansive regulatory actions that have imposed significant economic burdens on consumers, manufacturers, and taxpayers—while delivering negligible environmental benefits. The legal basis for the Finding is tenuous, the scientific consensus remains unsettled, and the downstream policies—particularly the de facto electric vehicle mandate—have distorted market dynamics and undermined consumer choice.

Recent Supreme Court decisions reaffirm the constitutional limits of agency authority and underscore the need for clear Congressional direction before enacting regulations of major economic and political significance. The Endangerment Finding fails this test. Moreover, the cost-benefit imbalance of current fuel economy standards and EV mandates violates the principle of regulatory prudence.

Given the minimal impact of U.S. vehicle emissions on global climate trends, and the growing evidence that rising CO₂ levels may yield net benefits in agriculture and public health, it is both reasonable and necessary to rescind the Endangerment Finding. Doing so would restore regulatory integrity, protect consumers from unnecessary costs, and allow for a more balanced, evidence-based approach to environmental policy.

Thank you for the opportunity to submit these comments.

Respectfully,

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³³ Roger Bezdek, et al, “Climate Change Reconsidered II,” Nongovernmental International Panel on Climate Change (Heartland Institute, 2019), p. 322-323.

³⁴ Bjorn Lomborg, “Heat deaths are being hyped, while deaths from the cold are ignored,” Financial Times, March 4, 2025, <https://financialpost.com/opinion/bjorn-lomborg-heat-deaths-are-being-hyped-while-deaths-from-the-cold-are-ignored>.