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SAFEGUARDS

# What's at Stake: Examples of Public Harm, Corporate Favors in Trump's Spring 2025 Unified Agenda

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## **ABOUT THE COALITION**

The Coalition for Sensible Safeguards is an alliance of more than 220 consumer, labor, scientific, research, faith, community, environmental, small business, good government, public health, and public interest groups — representing millions of Americans.

We are joined in the belief that our country's system of regulatory safeguards should secure our quality of life, pave the way for a sound economy, and benefit us all.

The coalition is led by an executive committee co-chaired by Public Citizen and Consumer Federation of America. The committee also includes the AFL-CIO, the Center for Progressive Reform, the Economic Policy Institute, the Natural Resources Defense Council, and the Union of Concerned Scientists.

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## What's at Stake: Examples of Public Harm, Corporate Favors in Trump's Spring 2025 Unified Agenda

Since day one, the Trump administration has undertaken a broad and aggressive agenda of rolling back vital safeguards that protect the public. This report focuses on several key deregulatory rollbacks that demonstrate both the breadth of what the public stands to lose as well as the harmful impacts from these specific rollbacks.

To name just a few protections lost, the Trump administration is eliminating rules that prevent manufacturers from emitting dirty pollution into our communities, stop predatory lenders from reckless practices that result in excessive bank fees, and require airlines to cover the cost when they can't deliver on their services.

The report is based on an analysis of the Trump administration's first "Unified Regulatory Agenda,"<sup>1</sup> which was released in September 2025 and is the official list of the regulatory and deregulatory actions that the administration plans to issue in the next six months to a year. The Unified Agenda provides the public with the most comprehensive list of the Trump administration's planned deregulatory agenda across all federal agencies.

This report profiles examples of critical rollbacks that will make workplaces less safe, weaken food safety standards, stall action on climate change, increase pollution, and worsen the affordability crisis for consumers. Yet these examples only scratch the surface of the damage that will result from the Trump administration's broad deregulatory agenda to roll back hundreds of rules and decimate the rulemaking process.

In November of 2025, the Trump administration exemplified its deregulatory fervor by announcing<sup>2</sup> that it would roll back a proposed U.S. Department of Transportation (DOT) regulation from the Biden administration<sup>3</sup> that would have required airlines to compensate passengers for delayed flights. This is a commonsense consumer protection to address the increasing delays and deteriorating service that consumers face when flying. If the regulation had been put in place, American consumers would have the same protections and rights as travelers in Canada and the European Union, where strict regulations require airlines to pay consumers when their flights are delayed.<sup>4</sup> But the airline industry lobbyists won the day at huge cost to American consumers.<sup>5</sup>

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<sup>1</sup> Office of Information and Regulatory Affairs, Office of Management and Budget, Spring 2025 Unified Regulatory Agenda, available at <https://www.reginfo.gov/public/do/eAgendaMain>.

<sup>2</sup> Office of Information and Regulatory Affairs, Office of Management and Budget, [Reginfo.gov](https://www.reginfo.gov), U.S. Department of Transportation, Airline Passenger Rights, in Spring 2025 Unified Regulatory Agenda, available at <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=2105-AF20>.

<sup>3</sup> Federal Register, Proposed Rule, U.S. Department of Transportation, Proposed Rule, Airline Passenger Rights, 2024-28930 (89 FR 99760) available at <https://www.federalregister.gov/documents/2024/12/11/2024-28930/airline-passenger-rights>.

<sup>4</sup> *See Id.*

<sup>5</sup> Associated Press, "Trump administration ditches Biden-era plan to make airlines pay compensation for flight disruptions," September 4, 2025, available at <https://www.nbcnews.com/politics/trump-administration/trump-admin-ditches-biden-plan-make-airlines-pay-compensation-flight-d-rcna229258>.

The rollback of the airline compensation regulation is just one example of the enormous damage that will result from the Trump administration’s deregulatory agenda. The impacts will be extremely broad and will be felt by the public in their daily lives. Consumers will lose safeguards and rights that will directly hurt their pocketbooks. Increased air and water pollution will endanger all Americans and lead to avoidable illnesses and premature deaths. Workers will be exposed to more risks on the job, resulting in injuries. Many protections ensuring the public’s health and safety will be weakened if not repealed entirely.

### **Rolling Back Key Protections Through Executive Orders**

Within the first days of his second term, President Trump launched an unprecedented attack on the regulatory safeguards that protect us all, more radical and aggressive than his first term, which will leave us with fewer consumer protections, less safe workplaces, more pollution and more threats to the public's health and safety. While Trump’s deregulatory agenda has received less attention than other more high-profile actions, such as mass firings of government employees or refusal to spend funds appropriated by Congress, the effects on the public will be just as broad and consequential.

On January 31, 2025, President Trump announced Executive Order 14192, “Unleashing Prosperity Through Deregulation,”<sup>6</sup> which imposes two requirements on federal agencies. First, federal agencies must repeal 10 existing regulations for every new regulation that is put in place. Second, federal agencies must fully offset the costs to corporations of any new regulations by providing the same amount of cost savings to corporations through the repeal or weakening of existing regulations. This is an even more extreme and radical version of Executive Order 13771<sup>7</sup> from Trump’s first term which required agencies to repeal two regulations for every new regulation issued.

On February 19, 2025, President Trump issued Executive Order 14219<sup>8</sup> empowering the Department of Government Efficiency (DOGE) to identify, review, and potentially modify or rescind “unlawful” regulations. The Executive Order directs agencies to base the determination on a number of factors, including whether existing regulations violate recent anti-regulatory Supreme Court decisions such as *Loper Bright* where the Court struck down the longstanding precedent of *Chevron* deference.

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<sup>6</sup> Executive Order, “Unleashing Prosperity Through Deregulation,” 90 FR 9065, January 31, 2025, available at <https://www.whitehouse.gov/presidential-actions/2025/01/unleashing-prosperity-through-deregulation/>.

<sup>7</sup> Executive Order 13771, “Reducing Regulation and Controlling Regulatory Costs,” 82 FR 9339, February 3, 2017, available at <https://www.federalregister.gov/documents/2017/02/03/2017-02451/reducing-regulation-and-controlling-regulatory-costs>.

<sup>8</sup> Executive Order 14219, “Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative,” 90 FR 10583, February 19, 2025, available at <https://www.whitehouse.gov/presidential-actions/2025/02/ensuring-lawful-governance-and-implementing-the-presidents-department-of-government-efficiency-regulatory-initiative/>.

While DOGE has since disbanded, the Office of Management and Budget (OMB) announced in a memo<sup>9</sup> that it is continuing to implement Executive Order 14219 by directing agencies to immediately finalize the rollback of those regulations without giving the public any chance to comment before finalizing the rollbacks. This is both unprecedented and potentially an unlawful violation of the Administrative Procedure Act.

No prior administration has attempted to block the public from participating in the regulatory process on such a large scale and without any legal basis. And no court has ever ruled that when a federal agency believes a regulation is unlawful, it can simply repeal the regulation without giving the public a chance to comment first.

### **Regulatory Rollbacks that Hurt Consumers and Make the Affordability Crisis Worse**

The American public is increasingly concerned about the ability to pay rising mortgages, rent, utilities, and healthcare, purchase or lease a car, feed their families, and take care of basic needs, all without additional pay or job security. The Trump administration promises to fix these challenges, yet in action and practice, the administration is doing the exact opposite – making consumers much worse off by rolling back consumer protections and exploiting American taxpayers in favor of helping corporations increase their wealth.

#### **CFPB Payday Rule**

The U.S. Consumer Financial Protection Bureau (CFPB) has proposed in the Unified Agenda to repeal its Payday, Vehicle Title, and Certain High-Cost Installment Loans Regulation, first finalized in 2017.<sup>10</sup> The rule was challenged in court, and as a result, a requirement that lenders consider ability to repay was invalidated and repealed in 2020. But a critical portion of the rule was upheld – referred to as the “Bounced Payment” rule.<sup>11</sup>

The “Bounced Payment” rule protected consumers by prohibiting more than two bounced payment fees on loans with an annual percentage rate (APR) exceeding 36%. The rule required the lender to request updated permission to debit the account rather than making numerous attempts after the first failure. These attempts to collect payment were causing consumers to incur multiple insufficient fund fees and significant financial harm.<sup>12</sup> Consumers have no way of

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<sup>9</sup> Coalition for Sensible Safeguards, “OMB’s Streamlining of Regulation,” October, 28, 2025, available at <https://sensible safeguards.org/factsheets/ombs-streamlining-of-deregulation/>.

<sup>10</sup> Office of Information and Regulatory Affairs, Office of Management and Budget, [Reginfo.gov](https://www.reginfo.gov), Consumer Financial Protection Bureau, Payday, Vehicle, Title, and Certain High-Cost Installment Loans Reconsideration, in Spring 2025 Unified Regulatory Agenda, available at <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=3170-AB38>.

<sup>11</sup> Consumer Financial Protection Bureau, “Executive Summary of the July 2020 Amendments to the 2017 Payday Lending Rule,” July 7, 2020, available at [https://files.consumerfinance.gov/f/documents/cfpb\\_executive-summary\\_payday-revocation-final-rule\\_2020-07.pdf](https://files.consumerfinance.gov/f/documents/cfpb_executive-summary_payday-revocation-final-rule_2020-07.pdf).

<sup>12</sup> Zixta Martinez, Consumer Financial Protection Board, “New protections for payday and installment loans slated to take effect next year,” June 14, 2024, available at <https://wayback.archive-it.org/23481/20250318102801/https://www.consumerfinance.gov/about-us/blog/new-protections-for-payday-and-installment-loans-slated-to-take-effect-next-year/>.

preventing these numerous attempts, putting them further in debt and owing more fees, a cycle that can be impossible to break free from.<sup>13</sup>

Before announcing its plans for a full repeal, in early 2025, CFPB issued a release<sup>14</sup> stating that it would no longer enforce its rule that aimed to protect consumers against nonsufficient funds and overdraft fees on predatory loans – a move criticized by consumer rights advocates<sup>15</sup> and applauded by payday lenders. The CFPB’s announcement came just days before the rule was to take effect on March 30, 2025. Because the proposed repeal has not yet been finalized, the rule remains in effect, but as noted above, the CFPB has no intention of enforcing it, which in practice means there are no protections for consumers if payday lenders violate the rule. As one consumer advocate put it, “It’s unconscionable to have greater protections for payday lenders than for people struggling to afford basic necessities.”<sup>16</sup>

### **Food Safety Delay**

The ostensible mission of the Trump administration’s Department of Health and Human Services (HHS), headed by Secretary Robert Kennedy, is to “Make America Healthy Again.” Yet, one of the first regulatory actions that HHS issued after President Trump took office was to push back the food industry’s compliance with a key safety regulation called the “Food Traceability Rule.” This critical food safety regulation was originally set to take effect on January 20, 2026, but has been delayed by the Food and Drug Administration (FDA) for two and half years until July 2028.<sup>17</sup> The delay means that the benefits of the food safety rule for American consumers in preventing future untainted and contaminated food outbreaks will be lost until FDA allows it to take effect.

Ensuring food safety is one of HHS’ most important duties. Yet contaminated food outbreaks, particularly related to certain foods such as fresh produce and seafood, are pervasive. After several high-profile contaminated food crises, Congress passed the Food Safety Modernization Act (FSMA) in 2011,<sup>18</sup> which re-oriented the government’s food safety system from reacting to foodborne illnesses to proactive prevention of outbreaks. Key to implementation of the law was the Food Traceability Rule.

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<sup>13</sup> See Id.

<sup>14</sup> Consumer Financial Protection Bureau, “CFPB Offers Regulatory Relief for Small Loan Providers,” March 28, 2025, available at <https://www.consumerfinance.gov/about-us/newsroom/cfpb-offers-regulatory-relief-for-small-loan-providers/>.

<sup>15</sup> Adam Rust, Consumer Federation of America, “CFA Statement in Response to CFPB’s Deprioritization of the Payday Lending Rule,” March 31, 2025, available at [https://consumerfed.org/press\\_release/cfa-statement-in-response-to-cfpbs-deprioritization-of-the-payday-lending-rule/](https://consumerfed.org/press_release/cfa-statement-in-response-to-cfpbs-deprioritization-of-the-payday-lending-rule/).

<sup>16</sup> National Consumer Law Center, “CFPB Allows Payday Lenders to Inflict Multiple NSF and Overdraft Fees on Struggling Consumers,” March 28, 2025, available at <https://www.nclc.org/cfpb-allows-payday-lenders-to-inflict-multiple-nsf-and-overdraft-fees-on-struggling-consumers/>.

<sup>17</sup> U.S. Food and Drug Administration, “FDA Intends to Extend Compliance Date for Food Traceability Rule,” Constituent Update, March 20, 2025, available at <https://www.fda.gov/food/hfp-constituent-updates/fda-intends-extend-compliance-date-food-traceability-rule>.

<sup>18</sup> U.S. Food and Drug Administration, Food Safety Modernization Act, Pub. L. No. 111-353, 124 Stat. 3885 (2011), available at <https://www.fda.gov/food/food-safety-modernization-act-fsma/full-text-food-safety-modernization-act-fsma>.

The rule is designed to trace a food contamination outbreak back to its source by requiring, for the first time, all entities involved in the food supply chain to track high-risk foods at every stage from harvesting to transformation at food processing facilities to the point of sale at retail food establishments or restaurants.<sup>19</sup>

Unfortunately, the FDA took 11 years to develop and finalize the Food Traceability Rule. In the meantime, contaminated food outbreaks continued to occur. According to the CDC, foodborne disease outbreaks linked just to leafy greens were associated with a total of 2,028 illnesses, 477 hospitalizations, and 18 deaths from 2014 through 2021.<sup>20</sup>

The rule was finally put into effect in late 2022, yet the FDA gave the food industry until January 2026 to comply with the rule.<sup>21</sup> This gave the Trump administration time to delay the rule as urged by big food industry manufacturers that aggressively lobbied for the compliance delay.<sup>22</sup> By shelving this food safety measure, consumers will pay the price for this big step backward in food safety.

### **Trump Rollback Will Make Airline Travel More Expensive for Consumers**

One of the biggest problems facing consumers when they fly is the prevalence of hidden or surprise fees when booking air travel. Airline consumers lose more than half a billion dollars in such fees every year. A Senate report in 2024<sup>23</sup> found that airlines had made \$12.4 billion in profits due to seat fees alone from 2018 to 2023.

Airline companies are able to reap these profits due to the lack of any government regulations forcing them to be transparent about fees charged when consumers book flights, carry-on and checked baggage fees, and change or cancellation fees. This lack of transparency prevents consumers from knowing the true cost of the flights they are looking to purchase and comparing prices between airlines and travel options. Price transparency is a basic requirement of a functioning market.

In April 2024, the Biden administration took a critical step to protect airline consumers by finalizing a new regulation that would require airline companies to disclose hidden or surprise

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<sup>19</sup> U.S. Government Accountability Office, “Food Safety: FDA Should Finalize Plans to Implement Its Rule to Help Trace Source of Outbreaks,” GAO-24-106563, January 18, 2024, available at <https://www.gao.gov/products/gao-24-106563>.

<sup>20</sup> *See Id.*

<sup>21</sup> U.S. Food and Drug Administration, “Requirements for Additional Traceability Records for Certain Foods,” 87 Fed. Reg. 70,910 (Nov. 21, 2022) (codified at 21 C.F.R pt. 1, subpt. S), available at <https://www.federalregister.gov/documents/2022/11/21/2022-24417/requirements-for-additional-traceability-records-for-certain-foods>.

<sup>22</sup> Sarah Sorcher, Center for Science in the Public Interest, “FDA’s delay of traceability rule is a step backwards on transparency, food safety,” March 20, 2025, available at <https://www.cspi.org/statement/fdas-delay-traceability-rule-step-backwards-transparency-food-safety>.

<sup>23</sup> Senator Richard Blumenthal, Permanent Subcommittee on Investigations, “The Sky’s the Limit: The Rise of Junk Fees in American Travel,” Majority Report, November 26, 2024, available at <https://www.hsgac.senate.gov/wp-content/uploads/2024.11.25-Majority-Staff-Report-The-Skys-the-Limit-T>

fees. The Department of Transportation (DOT) issued a final rule titled “Enhancing Transparency of Ancillary Airline Fees”<sup>24</sup> that would require airlines to disclose baggage, change, and cancellation fees to consumers at the point of booking, as well as clearly explain fee policies before ticket purchase.

Now the Trump administration is revisiting and potentially rolling back this commonsense consumer protection. In its 2025 Spring Agenda, the DOT included a deregulatory action entitled “Increasing Flexibility on Disclosure of Airline Ancillary Fees” which would “examine rescinding the ancillary fee disclosure and other miscellaneous requirements promulgated in the Department’s 2024 Final Rule,<sup>25</sup> Enhancing Transparency of Airline Ancillary Fees.” DOT will likely roll back the Biden administration’s regulation protecting consumers from undisclosed airline fees. So far in 2026, major airlines and their trade associations have spent \$23.7 million lobbying the Trump administration and Congress.<sup>26</sup> The rollback of the airline fee transparency regulation will allow airlines to continue taking advantage of consumers through undisclosed, hidden fees.

### **Regulatory Rollbacks that Increase Pollution and Make Climate Change Worse**

The mission of the U.S. Environmental Protection Agency (EPA) is to protect both the environment and the American public from being exposed to toxic air and water pollution. Under the Trump administration, the EPA has done the opposite, putting corporate polluters before protecting the public by rolling back key regulations that keep our air and water clean and stop polluters from accelerating climate change.

#### **Endangerment Finding**

One prime example of harm that will be inflicted on the public through Trump’s deregulatory agenda is its repeal of the EPA’s Endangerment Finding.

One of the most critical tools our government has to fight both climate change and keep our air clean is the Endangerment Finding. The EPA issued the Endangerment Finding in 2009<sup>27</sup> in response to the Supreme Court’s decision in *Massachusetts v. EPA*<sup>28</sup> where the Court found that

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<sup>24</sup> U. S. Department of Transportation, “Enhancing Transparency of Airline Ancillary Service Fees,” 89 FR 34620, April 30, 2024, available at <https://www.transportation.gov/briefing-room/biden-harris-administration-announces-final-rule-requiring-automatic-refunds-airline>, and <https://www.federalregister.gov/documents/2024/04/30/2024-08609/enhancing-transparency-of-airline-ancillary-service-fees>.

<sup>25</sup> Office of Information and Regulatory Affairs, Office of Management and Budget, [Reginfo.gov](https://www.reginfo.gov), U.S. Department of Transportation, “Airline Passenger Rights,” in Spring 2025 Unified Regulatory Agenda, available at <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=2105-AF20>.

<sup>26</sup> Democratic National Committee, “ICYMI: Trump and Duffy Make Airline Travel More Expensive for Passengers,” November 19, 2025, available at <https://democrats.org/news/icymi-trump-and-duffy-make-airline-travel-more-expensive-for-passengers/>.

<sup>27</sup> U.S. Environmental Protection Agency, “Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act,” 74 FR 66496 (Dec. 15, 2009), available at <https://www.federalregister.gov/documents/2009/12/15/E9-29537/endangerment-and-cause-or-contribute-findings-for-greenhouse-gases-under-section-202a-of-the-clean>.

<sup>28</sup> *Massachusetts v. EPA*, 549 U.S. 497, 528-529 (2007).

the EPA must issue regulations to limit greenhouse gases if it finds that those greenhouse gases cause or contribute to air pollution that endangers public health. Since 2009, the EPA’s Endangerment Finding has served as the scientific and legal foundation for the most important regulations EPA has issued to make our air cleaner and stop polluters from making climate change even worse. In July 2025, the EPA took the radical and unprecedented step of proposing to repeal the Endangerment Finding<sup>29</sup> and on February 12, 2026, the EPA finalized the repeal.<sup>30</sup>

The science proving that greenhouse gases endanger human health and public welfare has grown stronger since the Endangerment Finding was issued in 2009.<sup>31</sup> In 2015, the EPA updated the Endangerment Finding with new scientific evidence that fossil-fueled power plants “contribute significantly” to dangerous atmospheric levels of greenhouse gases.<sup>32</sup> In 2016, the EPA made similar findings regarding oil and gas emissions of methane, and a year later determined that aircraft engine emissions also contribute to accelerating climate change.<sup>33</sup> Through each of these actions, the EPA strengthened the science supporting the Endangerment Finding.

The EPA’s rollback of the Endangerment Finding contradicts the overwhelming scientific proof that greenhouse gas emissions contribute directly and significantly to climate change. It will also be difficult for the EPA to defend its rollback of the Endangerment Finding in court given that courts have repeatedly upheld it as lawful when it has been challenged.<sup>34</sup> Nonetheless, the Endangerment Finding repeal is the key building block in the Trump administration’s broader strategy to gut regulations that limit the major sources of greenhouse gases including motor vehicles, coal-fired and gas-fired power plants, and methane leaks from oil and gas sources. Rolling back progress on climate change is significant, and if the Trump administration’s EPA succeeds in repealing the Endangerment Finding, it will lead to an increase in air pollution such as smog and result in more chronic respiratory illnesses and premature deaths.

### **Weakened Clean Water Protections**

One of the core functions of the EPA, as authorized by the Clean Water Act, is to ensure that the water in the United States is free from pollution. The American public depends upon the EPA to stop polluters from emitting discharges that pollute the nation’s waterways. Yet, in November

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<sup>29</sup> U.S. Environmental Protection Agency, “EPA Releases Proposal to Rescind Obama-Era Endangerment Finding, Regulations that Paved the Way for Electric Vehicle Mandates,” July 29, 2025, available at <https://www.epa.gov/newsreleases/epa-releases-proposal-rescind-obama-era-endangerment-finding-regulations-paved-way>.

<sup>30</sup> U.S. Environmental Protection Agency, “Final Rule: Rescission of the Greenhouse Gas Endangerment Finding and Motor Vehicle Greenhouse Gas Emission Standards Under the Clean Air Act,” 91 FR 7686, February 12, 2026, available at <https://www.federalregister.gov/documents/2026/02/18/2026-03157/rescission-of-the-greenhouse-gas-endangerment-finding-and-motor-vehicle-greenhouse-gas-emission>.

<sup>31</sup> National Resources Defense Council, “EPA’s Endangerment Finding: The Legal and Scientific Foundation for Cutting Climate-Changing Pollution,” Fact Sheet, August 2025, available at <https://www.nrdc.org/sites/default/files/epa-endangerment-finding-fs.pdf>.

<sup>32</sup> See Id.

<sup>33</sup> See Id.

<sup>34</sup> See Id.

2025, the EPA issued a proposal<sup>35</sup> to weaken the Clean Water Rule (as first previewed in the Spring 2025 Unified Agenda),<sup>36</sup> following Supreme Court decisions that also weakened the Act. Given how important the Clean Water Rule is to protecting our nation’s waters, this will result in many waterways being more vulnerable to pollution and destruction with major public health risks.

According to the Natural Resources Defense Council, the EPA’s weakening of the Clean Water Rule will lead to 38 million to 70 million acres of wetlands being at risk of pollution or destruction<sup>37</sup> by significantly narrowing the definition of what types of waterways are protected under the Clean Water Act. Wetlands are crucial to improving water quality, as are so-called “non-perennial” streams, both of which will no longer be protected by EPA if the rollback is finalized. If the EPA follows through in weakening the Clean Water Rule, it will lead to more discharge and runoff into waterways from agriculture, mining, and petrochemicals.<sup>38</sup>

The EPA estimates that more than 117 million people rely on drinking water sources that are supplied at least in part by streams that are intermittent or ephemeral, all of which are under serious threat from the weakening of the Clean Water Rule.<sup>39</sup>

The EPA’s weakening of the Clean Water Rule, which NRDC has more accurately nicknamed the “Polluted Water” rule, ignores overwhelming evidence that streams and wetlands are critical to maintaining water quality and clean drinking water. While polluters will reap the benefits, the American public will suffer the consequences of dirty and unsafe water.

### **Greenhouse Gas Emissions Rollback**

One of the most important sources of greenhouse gas emissions that pollute the air and accelerate climate change comes from fossil-fuel fired power plants. In fact, according to the EPA, a quarter of all greenhouse gas emissions in the U.S. come from the electric power sector, 60% of which come from fossil fuels.<sup>40</sup> Thus, it is imperative for the EPA to use its authority under the Clean Air Act to regulate and limit greenhouse gas emissions from fossil fuel sources to keep our air clean and fight climate change.

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<sup>35</sup> U.S. Environmental Protection Agency, “Updated Definition of “Waters of the United States,”” 90 FR 52498, November 20, 2025, available at <https://www.federalregister.gov/documents/2025/11/20/2025-20402/updated-definition-of-waters-of-the-united-states>.

<sup>36</sup> Office of Information and Regulatory Affairs, Office of Management and Budget, [Reginfo.gov](https://www.reginfo.gov), U.S. Environmental Protection Agency, “Final Clarifying Definition of “Waters of the United States,”” in Spring 2025 Unified Regulatory Agenda, available at <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=2040-AG44>.

<sup>37</sup> National Resources Defense Council, “Trump Administration Plans to Gut Water Protections Nationwide,” November 17 2025, available at <https://www.nrdc.org/press-releases/trump-administration-plans-gut-water-protections-nationwide-0>.

<sup>38</sup> Clean Water Action, “Putting Drinking Water First: Clean Water Act Protections for Streams and Wetlands are Essential for Safeguarding Drinking Water,” April 15, 2025, available at <https://cleanwater.org/publications/putting-drinking-water-first-clean-water-act>.

<sup>39</sup> See Id.

<sup>40</sup> Environmental Protection Agency, “Sources of Greenhouse Gas Emissions,” October 22, 2024, available at <https://perma.cc/CZ89-62JY>.

Instead, the EPA under the Trump administration is going in exactly the opposite direction by announcing in June of 2025 that it would no longer regulate any greenhouse gas emissions from fossil-fuel fired power plants.<sup>41</sup> In order to justify this rollback, the EPA argued that greenhouse gas emissions from fossil fuels do not “significantly” contribute to climate change. In reality, the overwhelming scientific evidence completely undercuts the EPA’s argument.

In 2024, fossilfuel-fired power plants emitted more than 1.4 million metric tons of carbon dioxide, the second largest source behind the transportation sector, which exceeded the combined economywide emissions of France, Germany, and the United Kingdom.<sup>42</sup> The EPA’s claim that fossil-fuel fired power plants do not "significantly" contribute to climate change falls flat on its face.

The big winner will be the dirtiest of the fossil fuel sources, coal-fired power plants, which will likely see an increase of 4.8 to 8.7 times the amount of electricity generation than would have been the case if the greenhouse gas emission regulations were not removed. In addition, the rollback will likely increase prices for American consumers around 2.1-3.3% annually from now until 2050.<sup>43</sup> All told, the EPA’s rollback of greenhouse gas regulations on fossil-fuel fired power plants will lead to more carbon emissions, particularly from dirty coal power plants, and higher electricity bills.

### **Regulatory Rollbacks that Strip Away Worker Protections and Rights**

In August 2025, President Trump claimed that “every policy of the Trump Administration is designed to lift up the American worker.”<sup>44</sup> Nothing could be further from the truth. The Trump Administration is repealing worker protections, which will make workers less safe in their workplaces and weaken their rights vis a vis their employers.

### **Rolling Back the Ban on Non-Compete Clauses**

A significant reform to protect workers and increase competition in the American economy is the Federal Trade Commission's (FTC) regulation to ban non-compete clauses in employment

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<sup>41</sup> Environmental Protection Agency, “Greenhouse Gas Standards and Guidelines for Fossil Fuel-Fired Power Plants,” 90 FR 25752, June 17, 2025, available at <https://www.federalregister.gov/documents/2025/06/17/2025-10991/repeal-of-greenhouse-gas-emissions-standards-for-fossil-fuel-fired-electric-generating-units> and <https://www.epa.gov/stationary-sources-air-pollution/greenhouse-gas-standards-and-guidelines-fossil-fuel-fired-power>.

<sup>42</sup> Center for Climate and Energy Solutions, “Far from insignificant: the miscalculation of power plant standards repeal,” Blog, August 13, 2025, available at <https://www.c2es.org/2025/08/far-from-insignificant-the-miscalculation-of-power-plant-standards-repeal/>.

<sup>43</sup> Nicholas Roy and Karen Palmer, Resources of the Future, “Hidden Costs of Repealing EPA’s Carbon Pollution Standards: Consequences for the Environment, Households, and Society, Issue Brief 25-10, August 2025, available at [https://media.rff.org/documents/IB\\_25-10.pdf](https://media.rff.org/documents/IB_25-10.pdf).

<sup>44</sup> Brittney Melton, Up First Newsletter, National Public Radio, “Has Trump kept his campaign promises to American workers? Here’s what some say.,” September 1, 2025, available at <https://www.npr.org/2025/09/01/g-s1-86336/labor-day-trump-administration-policies>.

contracts. Issued in 2024,<sup>45</sup> the FTC rule targeted the use of non-compete clauses by employers, which prevent workers from working for a competitor, or starting a business that competes with the employer, for a period of time after they have stopped working for that company. Non-compete clauses fundamentally undermine the freedom and economic liberty of workers by making it harder to freely switch jobs. One out of every five workers in the United States is subject to a non-compete clause.

Yet, at the behest of corporate interests that oppose the FTC non-compete ban, the Trump administration announced in the 2025 Spring Unified Agenda that the regulation would be “under review.” In September 2025 the FTC, under new Chair Andrew Ferguson, refused to defend the non-compete ban in court, which amounts to repealing of the regulation. Ferguson announced that the FTC may bring enforcement actions against certain employers that use non-compete bans, but that is vastly more limited and weaker than a regulation that protects all workers across the nation as the original non-compete ban would have accomplished.

According to the agency, the non-compete ban would have increased worker earnings by almost \$300 billion per year.<sup>46</sup> Non-compete clauses are bad for workers by keeping them trapped in their jobs, and fundamentally anticompetitive. Non-compete clauses prevent startups and new entrants into the marketplace and limit the pool of talent available for startups to hire. In highly concentrated markets, non-compete clauses block the entry and expansion of rival firms by making it harder for them to find qualified employees.

When the FTC proposed the ban on non-compete clauses, the public submitted an astonishing 26,000 comments, most of which expressed support. Many of those comments detailed personal stories of workers harmed by non-compete clauses, demonstrating the consequences of these clauses and the large well of support for banning them.<sup>47</sup>

### **Disregarding Worker Injuries from Increased Plant Line Speeds**

Workers at pork and poultry slaughter and processing facilities perform one of the most dangerous jobs in the country. These jobs are about to get even more dangerous. That’s because the U.S. Department of Agriculture (USDA) announced in March 2025 that it would allow pork and poultry facilities to increase line speeds for processing pork and poultry.<sup>48</sup> In other words,

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<sup>45</sup> Federal Trade Commission, “Non-Compete Clause Rule,” 89 FR 38342, May 7, 2024, available at <https://www.federalregister.gov/documents/2024/05/07/2024-09171/non-compete-clause-rule> and [https://www.ftc.gov/system/files/ftc\\_gov/pdf/noncompete-rule.pdf](https://www.ftc.gov/system/files/ftc_gov/pdf/noncompete-rule.pdf).

<sup>46</sup> Federal Trade Commission, Statement of Chair, Lina M. Khan, Joined by Commissioner Rebecca Kelly Slaughter and Commissioner Alvaro M. Bedoya Regarding the Notice of Proposed Rulemaking to Restrict Employers’ Use of Noncompete Clauses, Commission File No. P201200,” January 5, 2023, available at [https://www.ftc.gov/system/files/ftc\\_gov/pdf/statement-of-chair-lina-m-khan-joined-by-commrs-slaughter-and-bedoya-on-noncompete-nprm.pdf](https://www.ftc.gov/system/files/ftc_gov/pdf/statement-of-chair-lina-m-khan-joined-by-commrs-slaughter-and-bedoya-on-noncompete-nprm.pdf).

<sup>47</sup> Federal Trade Commission, “Non-Compete Clause Rule,” 89 FR 38342, May 7, 2024, available at <https://www.federalregister.gov/documents/2024/05/07/2024-09171/non-compete-clause-rule> and [https://www.ftc.gov/system/files/ftc\\_gov/pdf/noncompete-rule.pdf](https://www.ftc.gov/system/files/ftc_gov/pdf/noncompete-rule.pdf).

<sup>48</sup> U.S. Department of Agriculture, “Secretary Rollins Takes Action to Streamline U.S. Pork and Poultry Processing,” March 17, 2025, available at <https://www.usda.gov/about-usda/news/press-releases/2025/03/17/secretary-rollins-takes-action-streamline-us-pork-and-poultry-processing>.

workers will be exposed to even higher risks of serious injury while pork and poultry companies reap higher profits from increased production.

In the meatpacking industry, line speed is a term for how quickly animals are moved through the process of slaughtering, butchering, or processing. In general, meatpacking companies want to speed it up in order to increase production as much as possible, whereas workers who must use dangerous equipment like sharp knives and saws, want to slow it down for safety purposes. According to the Government Accountability Office (GAO), meat and poultry processing has some of the highest rates of severe injuries of any industry<sup>49</sup> – higher than the overall injury rates in all U.S. manufacturing<sup>50</sup> – despite injuries still being underreported. The risks that workers face in meat and poultry plants include not only traumatic injuries from dangerous equipment, but exposure to chemicals used to treat processed pork and poultry and, most commonly, musculoskeletal disorders from repetitive motions.<sup>51</sup>

It's no surprise that the largest union representing meat workers, the United Food and Commercial Workers (UFCW), immediately denounced USDA's announcement rolling back line speed protections: "Increased line speeds will hurt workers – it's not a maybe, it's a definite – and increased production speeds will jeopardize the health and safety of every American that eats chicken."<sup>52</sup> On the other hand, the National Pork Producers Council, a trade association representing some of the largest meatpackers in the country, applauded the decision to place workers at risk by increasing line speeds, saying that it "will provide financial security and more stability for pork producers."<sup>53</sup>

### **Rolling Back Respiratory Protections**

The Occupational Safety and Health Administration (OSHA) has also proposed significant rollbacks that threaten workers' health and safety, in direct contradiction to its mission. For example, in the Spring 2025 Unified Agenda, OSHA proposed to weaken its existing Respiratory Protection Standard<sup>54</sup> by removing the requirement for medical evaluations for employees using filtering facepiece respirators (FFRs) and loose-fitting powered air-purifying respirators (PAPRs).<sup>55</sup>

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<sup>49</sup> U.S. Governmental Accountability Office, "Workplace Safety and Health: Additional Data Needed to Address Continued Hazards in the Meat and Poultry Industry," GAO-16-337, May 25, 2016, available at <https://www.gao.gov/products/gao-16-337>.

<sup>50</sup> *See Id.*

<sup>51</sup> *See Id.*

<sup>52</sup> Retail, Wholesale and Department Store Union, "Statement: USDA Line Speeds Waivers Will Harm Workers," March 17, 2025, available at <https://www.rwdsu.org/news/statement-usda-line-speed-waivers>.

<sup>53</sup> National Pork Producers Council, "NPPC Commends Sec. Rollins' Announcement to Make Permanent Pork Plant Line Speeds Program," March 17, 2025, available at <https://nppc.org/press-releases/nppc-commends-sec-rollins-announcement-to-make-permanent-pork-plant-line-speeds-program/>.

<sup>54</sup> Office of Information and Regulatory Affairs, Office of Management and Budget, [Reginfo.gov](https://www.reginfo.gov), Department of Labor, Occupational Safety & Health Admin, "Updates to Respiratory Protection Standard Medical Evaluation Requirements," in Spring 2025 Unified Regulatory Agenda, available at <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=1218-AD48>.

<sup>55</sup> Occupational Safety & Health Admin, Proposed Rule, Amending the Medical Evaluation Requirements in the Respiratory Protection Standard for Certain Types of Respirators, 90 FR 28463 (July 01, 2025),

The existing rule was designed to prevent workers from breathing in contaminants, including “dusts, fumes, mists, gases, smokes, sprays, and vapors” from improperly fitted respirators.<sup>56</sup> The medical evaluations help determine whether a worker is capable of wearing a respirator, such as by assessing preexisting medical conditions that could make respirator use unwise. Now, OSHA claims there is a lack of evidence that medical evaluations prevent adverse health effects related to FFRs and PAPRs and that many workers already use these respirators without evaluations.

As a result, if finalized, OSHA would no longer require medical evaluations to determine whether workers have medical conditions that would make it difficult or impossible to safely wear a respirator.<sup>57</sup> AFL-CIO vigorously opposes this proposal, “object[ing] to the removal of initial and *any* followup medical evaluations for *any* worker, for *any* respirator.”<sup>58</sup> As AFL-CIO notes in its comment to OSHA, “this proposal totally eliminates protections that workers have relied on for decades and that are necessary to keep workers safe on the job.”<sup>59</sup>

## **Conclusion**

The Trump administration’s deregulatory agenda is designed to benefit corporations and boost their profits by rolling back or weakening protections that benefit consumers, workers, our environment, and public health and safety. The key protections that have been rolled back following the Trump administration’s first Unified Agenda are only the beginning.

These rollbacks, and the harms they will cause, often do not get the attention or exposure of many other damaging Trump administration policies. The Coalition for Sensible Safeguards will continue to track and monitor the regulatory protections that the Trump administration is targeting for repeal. It is essential that the public be fully informed of what it stands to lose.

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<https://www.federalregister.gov/documents/2025/07/01/2025-12235/amending-the-medical-evaluation-requirements-in-the-respiratory-protection-standard-for-certain>.

<sup>56</sup> *Id.*

<sup>57</sup> See Letter from Senator Elizabeth Warren et al., to Sec’y of Labor Lori Chavez De-Remer and Assistant Secretary of Labor for Occupational Safety & Health, David Keeling, at 3 (Feb. 18, 2026), available at [https://www.warren.senate.gov/imo/media/doc/letter\\_from\\_warren\\_senators\\_to\\_department\\_of\\_labor\\_and\\_occupational\\_safety\\_and\\_health\\_administration\\_on\\_workplace\\_safety\\_inspections.pdf](https://www.warren.senate.gov/imo/media/doc/letter_from_warren_senators_to_department_of_labor_and_occupational_safety_and_health_administration_on_workplace_safety_inspections.pdf).

<sup>58</sup> AFL-CIO, Comment on OSHA-2025-0006-0013 (Oct. 31, 2025), available at <https://www.regulations.gov/comment/OSHA-2025-0006-0316>.

<sup>59</sup> *Id.*