



(UBS)

The beginning of climate change pushback?

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The first 100 days of the Trump 2.0 administration have been highly dynamic as the US president has worked to sign more executive orders in this period than any other president in the past 50 years.

These executive orders and other policies have brought major layoffs, spending freezes, deregulation efforts, and a strong shift in priorities and status quo. In our Executive Order Tracker, we note about 70% of the executive orders signed as of 29 April have some environmental and/or social impact. These initiatives contributed to a global high in sustainability policy uncertainty in 1Q25.

While a shake-up is evident, we do not know where the dust will settle. A judge ruled the EPA must unfreeze over USD 10bn in grants to nonprofits such as Climate United and Coalition for Green Capital, but a higher court issued a stay, ultimately meaning the funds remain frozen as of now. Following a review period, the US Treasury Secretary alluded to continued collaboration with institutions like the IMF and World Bank but suggested reforms. Finally, while some Executive Orders, like closing the Department of Education, require legislation passed by Congress to be fully implemented, DOGE and department layoffs have helped stifle these and other department offices. These layoffs are also being challenged in court.

Looking past the first 100 days, we anticipate further actions from the government may continue to challenge climate change efforts. Government offices supporting emerging renewable energy technologies with financial and technical assistance may be next on the chopping block, which may challenge venture investments toward innovative solutions. Circling back from Trump 1.0 initiatives, we imagine there could be an interest to prohibit 401(k) ERISA funds from including sustainability-focused funds in their offering. Presently, only 6.2% of 401(k) plans include sustainable investment options, so any limitations should only limit any further industry upside. The current rule allowing this is based on a court

ruling; however, there may be efforts to codify the removal into law. We note that state pension plans and private investors would not be impacted by this.

Ultimately, implementation will be the defining factor on the lasting impacts of Trump's policy agenda.

Investor takeaways:

- Current policies do not stop private investors or companies from investing in sustainability, so investors should continue to allocate towards their long-term investment objectives.
- We anticipate changing disclosures could alter some investable universes. However, there may be a lag based on the timing of data reporting, opportunities for engagement, and methodology reviews.
- We anticipate the US will continue to participate in multilateral institutions like the World Bank, and expect little long-term impact to multilateral development bank bonds.

Original report - [100 days of Trump 2.0, climate alliances reposition, and annual proxy season preview, 6 May 2025.](#)

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