

What will Project 2025 mean for unions and working people?

[@DeGreat4](#) writes on the technical details and bigger political threat of Project 2025:

working-mass.com/2024/07/22/what-project-2025-means-for-labor/



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"The [@AFGENational](#) warns that Project 2025 calls for the termination of up to 1 million federal employees, [@IBEW2222](#) highlights the planned attack on overtime, and the [@wisaficio](#) issued a general warning about the far-right threat of Project 2025."

What Project 2025 Means For Labor

Project 2025 calls for a dramatic weakening of employment and labor law, as well as a counter-mobilization of the working and middle classes against the labor movement.

By Henry De Groot

The Threat of Project 2025

Much has been written in the last few weeks about Project 2025. But what does it mean for the labor movement?

As the increased threat of a second Trump term and what that entails fosters widespread concern about potential authoritarian measures, article after article points to the concerning content of the 900 page *Project 2025: Mandate for Leadership*.

Project 2025 outlines concrete steps which could be taken to overhaul the departments of the executive branch. The document is this presidential cycle's version of the Heritage Foundation's Mandate for Leadership; the first Mandate for Leadership was drafted prior to Reagan's 1980 election, and included many of the policies which typified his neoliberal assault on the working class. The Heritage Foundation is one of the original and central pillars of the neoliberal billionaire network, which includes other organizations including the Federalist Society, the Manhattan Institute, and the American Legislative Exchange Council. Founded in 1973 by right-wing activists Paul Weyrich and Edwin Feulner, as well as billionaire Joseph Coors of Coors Brewing, the foundation sought to implement the conservative strategy laid out in the notorious [Powell Memo](#).

Project 2025 is close to Trump and his entourage but shouldn't be seen as identical to Donald Trump himself. There is a clear contradiction and differentiation between the more traditionally neoliberal preferences of the right-wing billionaires represented by the Heritage Foundation and the more working and middle class elements of the MAGA movement which Trump mobilized as his own personal army. Project 2025 presents both but generally defers to MAGA orthodoxy.

While the Democrats have drummed up Project 2025 to energize their base, Trump claims that he knows "nothing about Project 2025." But Trump is a habitual liar, and the proximity is undeniable; [6 of his former cabinet advisors as well as more than 140 Trump Administration staffers](#) have contributed to the Project 2025 effort. Moreover the ideas very closely mirror the 2024 Republican Party platform which was more directly drafted by Donald Trump's team.

In terms of Project 2025's labor angle, Trump's former Secretary of Labor, Patrick Pizzella, was one of the senior Trump officials involved in drafting Project 2025. The chapter on the Department of Labor is written by Jonathan Berry, a frequent contributor to the Federalist Society on labor and employment law.

In just the last few days, labor has expressed growing concern about Project 2025. The Center for American Progress laid out Project 2025's attacks on the NLRB, *Labor Notes* recently published an article "[Project 2025: Eliminate Unions](#)," and several unions have come out with statements with concerns about its contents. The American Federation of Government Employees [warns](#) that Project 2025 calls for the termination of up to 1 million federal employees, IBEW Local 2222 [highlights](#) the planned attack on overtime, and the Wisconsin AFL-CIO issued a [general warning](#) about the far-right threat of Project 2025.

We should be careful neither to underestimate nor exaggerate the threat posed to labor by a second Trump term. There is nothing in Project 2025 which would "eliminate unions" in their entirety, and much of the hype around Project 2025 is part of the Democratic campaign narrative that Donald Trump is a threat to democracy and the constitutional order.

But we would also be remiss if we were to consider a 2024 Republican victory as simply a more open and honest version of the Democrats' pro-business agenda. There are elements in the Republican Party who absolutely would prefer a more typical Republican administration; but many of these forces rallied around Nikki Halley and were roundly rejected. If — and it is not clear which plans are serious and which are bluster — Trump carried out the full program of Project 2025, it would entail the mass deportation of 10 million undocumented Americans, massive expansion of presidential powers, deportation of Palestinian demonstrators, hundreds of thousands or more layoffs of civil servants and the politicization of others, and other policies that go beyond naked corporate interest.

Ultimately, only Trump knows what his plans are for a second term. How far he is willing to move past the pro-corporate agenda of his first term in taking on a dangerous authoritarian direction is known only to him.

To keep our movement's analysis sober we might approach our discussions on the threat of Project 2025 and a second Trump administration using these three questions:

1. What policies do they say they would carry out if elected?
2. Which of these policies are serious, which are superfluous?
3. What would it mean for our movement if

Based on these questions, we begin by investigating the specific Project 2025 proposals which target the labor movement.

The Corporate Wish-List for Employment and Labor Law

Jonathan Berry's chapter outlines a systematic attack on US employment and labor law.

In terms of employment law — the rules which affect all workers regardless of union status — Project 2025 lays out several damaging policies.

Berry calls for stripping many of the protections offered to marginalized groups under the law. Project 2025 would "Rescind regulations prohibiting discrimination on the basis of sexual orientation, gender identity, transgender status, and sex characteristics," including allowing for discrimination against trans people in hiring and firing. Project 2025 would also strip several important race-based protections from employment law. And the proposal would allow employers to deny abortion coverage.

The initiative would also erode overtime protections, expanding the overtime calculation period to 80 hours over two weeks instead of 40 hours over one week. And Project 2025 would allow employers to provide earned paid vacation instead of overtime pay.

Even more radically, Project 2025 undermines the very role of federal employment law as the national floor for workplace standards. One policy proposal would allow states to exempt themselves from federal employment law, allowing for lower state minimums to prevail. Another would allow for unions to accept work conditions below the federal minimums during collective bargaining.

Also in this vein, Berry calls for the NLRB to loosen rules on employee misclassification, allowing employers to deny workers rights by classifying them as “independent contractors,” and calls for “safe harbor” for any employer using independent contractors as long as they provide workers with benefits. This would allow for the expansion of the misclassification which allows Uber and Lyft to refuse basic worker rights to their drivers.

In terms of labor law — the rules covering union rights and collective bargaining which are generally enshrined in the National Labor Relations Act and enforced by the National Labor Relations Board — Project 2025 calls for several policy changes which would dramatically weaken the US labor movement.

Berry calls for several rule changes which would make it harder to unionize. This includes a return to the 2019 *Alstate Maintenance* precedent, which imposes an 8-part checklist on what counts as protected concerted activity. This means employers would have broader powers to fire employees for expressing concerns about and within the workplace. Berry would also eliminate the recent Board changes which expanded the role of “card check” elections.

The chapter also calls for a limited interpretation of “joint-employer” precedent. This means large companies could more easily use subcontractors or shell companies to frustrate union efforts by denying they employ the workers at all.

Berry also calls for the elimination of the NLRA’s Section 8(a)(2) prohibition on company unions, calling for the establishment of “Employee Involvement Organizations.” This would revive company union tactics which have long been illegal, but in recent years have nonetheless been taken up by Uber and Lyft.¹

Berry’s chapter also calls for an attack on common union strategies for building power for working people outside of direct unionization. This includes the expansion of “duty of fair representation” to allow for employees to argue that a union’s political contributions violate its duty of fair representation to its members. And Berry also calls for increased financial scrutiny of workers centers, the union-adjacent non-profits which the labor movement backs to run campaigns and support workers outside of the traditional sectors of the labor movement.

Employment and labor law are weak even under Democratic administrations. But they nonetheless codify decades of gains in working conditions and union rights which were won only through hardfought struggle. If enacted, Project 2025 would set us back by decades and

¹ <https://www.labornotes.org/blogs/2016/08/putting-con-gig-economy>

dramatically weaken the labor movement's ability to organize new workplaces, deliver strong contracts, and fight for working people in society as a whole.

Corporate Attacks, Sector by Sector

In addition to the specific attacks on the US labor relations system outlined by Berry's chapter and summarized in the section above, Project 2025 proposes various other policies which amount to a sector-by-sector attack on the labor movement. While these attacks don't go so far as to "eliminate unions" as *Labor Notes* describes Project 2025, they are still a serious threat.

Perhaps the sector most directly in the crosshairs of Project 2025 is the government sector. The plan proposes expanding by 10x the number of political appointees, from around 4,000 today to up to 50,000. This means that some 46,000 civil service jobs would lose protections given to 'neutral' civil servants and instead be subject to political calculations in hiring, firing, and promotions. As noted above, AFGE also warns that an additional 1 million federal workers could be laid off as part of drastic cuts to government departments.

Project 2025 would also dramatically undermine unions in all sectors which rely on federal contracts. This includes getting rid of the mandate for federal contractors to pay prevailing wages and enter into project labor agreements, which would open a "race to the bottom" in working conditions on infrastructure projects. This would especially affect the conditions in the construction sector.

The education sector is also a major focus of Project 2025. The document proposes bans on teaching critical race theory, gender studies, and other progressive curricula which could dramatically reverse the expansion of anti-establishment ideas over the last decade. And more materially, the plan to dissolve the Department of Education could mean more than \$80 billion in cuts to the department's federal programs, which help provide subsidized meals, fund schools in poor districts, and much more. Cuts to financial transfers from the federal government to poor school districts could result in mass layoffs of educators in these districts.

Although it isn't specifically listed in Project 2025, the 2024 Republican Party platform does call for the deportation of "pro-Hamas" radicals active on campuses. Carrying out such a deportation campaign would likely mean targeting graduate worker union activists, and actual deportations would likely just be the most extreme action of a larger campaign of harassment and intimidation of pro-Palestinian activists. This attempt to revive McCarthyism could conceivably be extended further to other unions outside the university sector. In the past, Republicans enforced an anti-communist oath in order for union leaders to access the NLRB, and Trump would have the power to revive similar mechanisms — like banning access to unions which are critical of Israel — to especially disenfranchise the left of the labor movement.

It is likely that the 900 pages of Project 2025 contains far more additional attacks on the various sectors of the US economy. More research is needed.

Attacks on employment law, labor law, and aggressive campaigns in at least several major sectors of the economy would all combine to be a tremendous assault on working people broadly and union power more specifically. Unions would immediately be thrown on the defensive — a posture which we have just broken out of with new organizing. Unions would have to devote tremendous resources just in fighting off legal cases and defending against cuts.

Although even if carried to its conclusion, Project 2025 would not entirely eliminate unions. But there is a potential for a broad elimination of bargaining units through the combined strengthening of decertification campaigns, legalization of company unions, and expansion of independent contractors.

Under such conditions it would be incredibly challenging to advance new organizing. Even after the modest improvements to the NLRB under Biden, it is still far too weak — but under Project 2025's plan it would be actively hostile against the labor movement.

The Labor Politics of MAGA

While the erosion of employment and labor law as well as the specific attacks on various sectors which are outlined above would be serious in their own right, they do not entail the totality of Project 2025's plans for and threats to labor.

In terms of labor, the threat we are facing cannot be reduced to legal changes to the technical mechanisms of labor law, nor cuts or policy changes to individual executive departments. We also face a political threat — the counter-mobilization of the working class by the right.

Trump's MAGA politics have their own working class angle which distinguishes them from more traditional pro-corporate politics, and are a key part of Trump's success.

Since the 2016 Republican primary, Trump has differentiated himself from the rest of the Republican Party through his anti-elitist appeal to economically dispossessed sections of the American working class, especially white workers and downwardly mobile middle class people in the 'Rust Belt' and other de-industrialized areas of the country. Promising pro-worker 'America First' trade policies and immigration policies which promise to protect the labor market for native-born workers, Trump was able to develop these sections into a loyal base.

And the appointment of J.D. Vance as Trump's running mate signals Trump is only further doubling down on the politics of economic nationalism in an attempt to increase his appeal to economically dispossessed layers of American society.

The Heritage Foundation did [not back Trump](#) in the 2016 Republican primaries. But over the last eight years the establishment of the conservative movement has had to accommodate itself to

Trump and his political vision. Project 2025 attempts to balance between corporate politics-as-usual and the economic nationalism of the MAGA movement, but largely defers to MAGA priorities, resigning its more traditional views to meager counterpoints sprinkled weakly throughout the 900-page document.

MAGA's political appeal to working people evolves from campaign rhetoric into an actual mobilization of certain sections of working and downwardly mobile middle class people.

In fact, the anti-union strategies of the more traditional conservatism have already for years relied on a certain degree of counter-mobilization of workers in order to block the labor movement. Appealing to workers is, after all, the goal of every anti-union drive and decertification campaign, and anti-union forces are always looking for useful anti-union stooges to develop into plaintiffs in the next anti-union lawsuit.

Project 2025 extends this more traditional approach of mobilizing working people against their own interests. The expansion of opportunities for decertification, challenges to duty of fair representation, and rules which empower union busting would all further empower the existing type of anti-union counter-mobilization.

And the legalization of company unions would go even further in terms of mobilization of working people against their own interests. These "Employee Involvement Organizations" could be stood up by corporations in order to block or otherwise cut across genuine union efforts. If these company unions are allowed to achieve exclusive bargaining representative status, they could even "negotiate" to adopt standards beneath federal minimums under the Project 2025 plan.

But MAGA goes further, by outlining an actual *mobilization* of certain sections of the working class and middle class beyond the workplace or the ballot box, developing them into a *countermobilization* directed against the organized masses of the labor movement and other social movements.

This countermobilization is growing within many unions, as many of their members are Trump supporters, especially in more blue collar fields. The influence of this wing of rightist forces *within* the labor movement was demonstrated by Teamster president Sean O'Brien's recent appearance at the Republican National Convention.

During the pandemic, the MAGA movement was able to make further inroads into the middle class through the development of parent groups opposed to or frustrated by COVID19 policies. The increased focus of parents on their childrens' education allowed for this energy to be transitioned into a movement against progressive educational curricula in general, with a new crop of right wing activists running for school boards in order to curtail critical race theory, gender studies, or other progressive topics from school curricula.

- Why does this matter?
 - Could lead to losses within union elections?
 - Infighting within labor - MAGA splits the labor movement
 - Sections of labor back racist and xenophobia policies
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And the MAGA movement envisions more than just the usual attacks by corporate America on organized labor and the wider working class. MAGA goes further, by outlining an actual *mobilization* of certain sections of the working class and middle class, developing them into a *countermobilization* directed against the organized masses of the labor movement and other social movements.

After his victory in 2016, Trump was able to expand this loyal MAGA base into more traditional sections of the middle class and upper-middle class. And most of all, he delivered reliably for the corporate elite.

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- We have seen this base mobilized in the education sector
- Also against trans rights, drag show library hours
- Also during protests - oathkeepers doing security
- January 6th of course

- Expansion of the base
- How is it actually mobilized beyond voting?
 - Organizational endorsements
 - Elections to school boards
 - Building support *within* unions
- Maybe the key is “mobilizations” in terms of active layers - but more symbolically

In fact, the anti-union movement has already for years relied on a certain degree of counter-mobilization of workers in order to block the labor movement. Workers, after all, are the target of every anti-union drive and decertification campaign, and anti-union forces are always looking for useful anti-union stooges to develop into plaintiffs in the next anti-union lawsuit.

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These layers, organized by criticizing Bidenomics and appealing to backwards-facing tendencies including Christian Nationalism, xenophobia, racism, and homophobia, are then

turned on the rest of the working class, especially to victimize its most marginal layers as well as its most progressive and well-organized elements.

In other words, and without over exaggerating this factor, Project 2025 organizes its own alternative labor movement of sorts in order to beat back the existing labor movement.

And even within the “labor movement proper,” MAGA seeks to expand inroads among existing unions. Trump has already received support from unions representing police and border patrol.

- Oil and gas industry
- National security industry

The broader economic basis which simultaneously enables and drives the MAGA pivot from a more traditional Republican-neoliberal approach to a

MAGA entails a partial embrace of economic nationalism, which privileges American industry through protectionist policies. This is part of an overall transition of the American capitalist class, which is pivoting away from some of the neoliberal policies it has embraced since Reagan in order to bolster itself against a rising China.

This shift towards economic nationalism in order to counter China has also been taken up in a different form by Biden, for example with the CHIPS act which entails massive investments into securing national production of computer processing chips.

Teamsters president Sean O’Brien perhaps more than anyone is at the midpoint of the tensions between left and right wing forces within the working class. Just two years ago O’Brien positioned himself as a champion of labor’s left wing, headlining Labor Notes and making the rounds with Senator Sanders and AFA-CWA president Sara Nelson.

Now O’Brien is providing working class cover to Trump, speaking at the Republican National Convention where he said J.D. Vance cares about working people and leveled attacks against the progressive left. In light of the thorough-going attacks on organized labor listed above, such equivocation of Trump is tantamount to scabbing on the labor movement as a whole. But this maneuver helps to relieve pressure on O’Brien from his own right wing members, many of

whom have been swept up by Trump's conservative weaponization of anti-elitist rhetoric or by the culture war.

Meanwhile out in the suburbs, the MAGA mobilization of parents represents a campaign to engage more middle-class layers of the population. Fueled by a poisonous combination of covid19 skepticism, homophobic fear mongering, and ignorance about the actual meaning of "critical race theory," networks of mobilized parents have increasingly clashed with teachers unions and taken over school committees.

- Donald trump isn't a fascist
- But his policies parallel the major factors of fascism
- Xenophobia, militarism, racism, anti communism
- Focus on national industry, protectionism, economic nationalism
- Mobizliation of the working class and petty bourgeoisie on a backwards basis (later betrayed)
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Teamsters - typical of the white working classs - SOB under pressure from the class war

- Parent mobiziliations -> engage more middle class layers
- Balancing an emphasis on industrial capital, with more traditional neoliberal interests.
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Labor Policies in Project 2025

- Labor Law
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 - Education
 - Mobilization of parents against teachers
 - Attacks on social justice curriculum and work rules
 - Government sector
 - Schedule f appointments means thousands of civil service jobs lose protections, union position possibly.
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- Project 2025 chapter: DEPARTMENT OF LABOR AND RELATED AGENCIES Jonathan Berry
 - Jonathan Berry is a lawyer and regular contributor to the Federalist Society on labor law.²
 - Christian nationalist labor messaging
 - “Despite significant progress by the Trump Administration, a massive administrative state now hangs over productive industry and labor organization, acting as a damper on social and economic life.”
 - Employment law
 - Reverse the DEI Revolution in Labor Policy.
 - Strip race-based protections from employment law
 - Free subcontractors from nondiscrimination
 - Allow for discrimination against trans people in hiring and firing.
 - “Rescind regulations prohibiting discrimination on the basis of sexual orientation, gender identity, transgender status, and sex characteristics”
 - Free employers to provide healthcare which excludes abortion
 - Free up overtime regulations -> paid vacation instead
 - Promotes Independent Contractor regime
 - “Congress should provide a safe harbor from employer-employee status for companies that offer independent workers access to earned benefits.”
 - Uber’s Third Way
 - Attacks on joint-employer precedent
 - Company unionism
 - “The next Administration should make new options available to workers and push Congress to pass labor reforms that create non-union “employee involvement organizations” as well as a mechanism for worker representation on corporate boards”
 - Section 8(a)(2) prohibition on formal worker–management cooperative organizations like works councils
 - Creates an “Employee Involvement Organization” (EIO) to facilitate voluntary cooperation on critical issues like working conditions, benefits, and productivity
 - Amends labor law to allow EIOs at large, publicly traded corporations to elect a non-voting, supervisory member of their company’s board of directors.
 - Aka fake representative
 - Duty of Fair Representation.
 - “Unions have a duty of fair representation to their members, yet they too often abuse that duty to use their members’ resources on left-wing culture-war issues that are unrelated, and in fact often harmful, to union members’ own interests.”

² <https://fedsoc.org/contributors/jonathan-berry>

- “The NLRB should take enforcement or amicus action advancing the position that political conflicts of interest by union leadership can support claims for breach of the duty of fair representation in a manner analogous to financial conflicts of interest and analogous to breaches of the fiduciary duty of loyalty in other areas of law.”
- Concerted activity
 - Limit concerted activity to 2019 Alstate Maintenance 8-factor checklist.
 - Radically limits what employees are free to talk about, including exemption from any personal complaints which are not framed as collective concerns.³
- Investigate worker centers and require financial disclosures.
- Discard “card check” elections
- Increase time period for union decertification
- Allow unions to negotiate less than federal regulations require by law.
- Allow state exemptions from federal labor law
- Visa
 - Cap agricultural worker visas

³ <https://www.jacksonlewis.com/insights/labor-board-narrows-what-may-be-considered-concerted-activity>