

**TO:** Ray Goforth, SPEEA Executive Director

**FROM:** Rich Plunkett, Director of Strategic Development  
Brandon Anderson, Legislative Director

**DATE:** April 15, 2024

**RE:** Status report: Union involvement in promoting safety culture at Boeing

### **Executive Summary**

This report provides an update on the current status of safety culture issues at Boeing in light of recent directives from the Federal Aviation Administration (FAA), Department of Justice and other ongoing investigations.

On Feb. 29, the FAA gave Boeing 90 days to implement a variety of safety recommendations. To date, Boeing has failed to engage in meaningful engagement with SPEEA on these issues despite multiple attempts.

This report outlines key recommendations and actions taken by SPEEA, the current status of Boeing engagement with SPEEA as a labor representative and the longstanding impact of Boeing's union containment policies on safety culture.

### **SPEEA actions/recommendations**

- **Establishing ASAP:** On Jan. 31, SPEEA proposed a tri-party Aviation Safety Action Program (ASAP) to Boeing. The ASAP program would include SPEEA, Boeing and the FAA in a structure that would protect unionized engineers, professionals, pilots and technical employees who speak out about potential problems they see at work. Boeing's counterproposal would severely restrict the program and limit union and regulatory oversight of the company's current "Speak Up" safety reporting system. By responding to our ASAP proposal with union containment language, Boeing representatives contradict their stated goal of encouraging employee reporting of safety issues without fear of retaliation.
- **Ensuring confidentiality in reporting processes:** Represented employees tell SPEEA leaders they continue to be skeptical of the anonymity in Boeing's internal reporting processes. Others are not sure where to report their concerns anonymously. In addition to ASAP, SPEEA has again proposed a partnership between our union and Boeing to help alleviate skepticism and ensure employee concerns are properly investigated and employees are protected from retaliation. We are still waiting for a response from Boeing. Alternatively, we are looking into SPEEA-led whistleblower training.
- **Ensuring pilot input:** In response to the FAA expert panel's findings regarding inconsistent elevation of pilot inputs, SPEEA emphasized the importance of maintaining expertise within the SPEEA Pilots and Instructors Unit (SPIU) to provide valuable advice to Boeing's airline customers. Instead, Boeing continues to "systemically hollow out" union-represented SPIU employees through layoffs backfilled by contractors. On March 22, 2024, an Administrative Law Judge found

Boeing guilty of numerous labor law violations, stating in a decision on SPEEA's Unfair Labor Practice charge against Boeing:

*"I find that Boeing was motivated by anti-union animus and was punishing its (Flight Training Airplane) pilots for their union activity in April 2020. No other rational explanation exists."* Administrative Law Judge **Gerald M. Etchingham**

- **Protecting employees from retaliation:** SPEEA continues to address complaints and concerns from represented employees about management retaliation when expressing safety concerns. SPEEA has raised concerns about fear of retaliation for years. Boeing has declined our offer of a Letter of Understanding (LOU) to protect represented employees who speak up. Boeing last told SPEEA it had retaliation under control in the summer of 2022.
- **Leveraging labor organizations:** SPEEA has communicated our intent to partner with Boeing in response to safety-related activities and planning at all levels of the organization. Boeing leaders have made clear they do not believe union involvement is required by the FAA or necessary at this time.

### **Impact of union containment policies on safety**

SPEEA has raised repeated alarms about the safety implications of decisions aligned with Boeing's union containment policies, including:

- Movement of Boeing Headquarters out of the Puget Sound
- Relocation of the customer flight training simulators to Miami
- Movement of customer aviation services from the Puget Sound to Southern California
- Risk-Sharing Partnership Model for the 787—i.e. outsourcing
- Movement of 787 production to South Carolina for the purpose of attacking the IAM
- Relocation of work associated with the aircraft build process to other countries

For the past 10 years, Boeing has relocated or eliminated more than 60% of SPEEA-represented Manufacturing Engineering (ME) Planner positions. This is a critical workforce responsible for the creation and maintenance of the build plans to ensure quality and product safety.

All of these decisions align with Boeing's published union containment policies and result in the FAA expert panel's determination:

*"The reliance on dispersed engineering experience, expertise and guidance does not appear to be coordinated or consistently monitored for sufficiency in numbers, experience, expertise or communication channels."*

### **Conclusion**

The current status of safety culture issues at Boeing underscores the need for collaboration between the company and its labor unions. This collaboration is necessary to elevate an unfiltered voice for safety experts who have been ignored and employees who have been silenced.