

STRATEGIC ORGANIZING CENTER

POWER

AT WORK

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# Hidden Pandemic

AMAZON'S SECRECY AND OBSTRUCTION DURING THE COVID-19 CRISIS

## ABOUT THE STRATEGIC ORGANIZING CENTER

The Strategic Organizing Center (SOC) is a democratic coalition of four labor unions: Service Employees International Union (SEIU), International Brotherhood of Teamsters (IBT), Communications Workers of America (CWA) and United Farmworkers of America (UFW). Together, SOC-affiliated unions represent more than 4 million workers.

The SOC is a labor union innovation center dedicated to improving the lives of working people, partnering with its affiliates to develop effective strategies to support workers organizing for better lives for themselves and their families. We stand against structural racism and fight not only for jobs, but good jobs: safe, equitable workplaces where all employees are respected, paid living wages and have real power at work.

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## Introduction

Amazon's strategy during the COVID-19 pandemic has been to prioritize discipline and production to maximize profits while vigorously resisting efforts by authorities to monitor and regulate COVID-19 safety in its operations.<sup>1</sup> The company has repeatedly denied requests from workers, public health officials, and journalists for more information about COVID-19 outbreaks in its vast warehouse network.<sup>2</sup>

The Strategic Organizing Center (SOC) analyzed injury and illness data for 2020 that Amazon submitted to the Occupational Safety and Health Administration (OSHA), and found that the company systematically failed to record COVID-19

cases in its warehouses, recording only 27 work-related illnesses for all of 2020 in the category that includes COVID-19 infections, Respiratory Conditions.<sup>3</sup> To put this in perspective, Amazon published a report acknowledging that 19,816 Amazon workers had been infected with COVID-19 by September 19, 2020, before the second wave of the pandemic accelerated in the last guarter of 2020.<sup>4</sup> SOC's analysis of publicly-available data for workplace COVID-19 infections from local public health departments shows significant, ongoing outbreaks at Amazon facilities deep into the second wave of the pandemic. This means that Amazon is claiming to OSHA that almost none of the tens of thousands of COVID-19 infections among its workers were work-related, an accomplishment so extraordinary as to be unbelievable. Amazon's apparent failure to properly report COVID-19 cases to OSHA is not a minor "recordkeeping" issue. OSHA is the primary government agency responsible for monitoring workplaces for COVID-19 hazards and for enforcing

"Amazon's many failures to take reasonable and adequate measures to protect its employees from COVID-19 by following regulatory guidance were a deliberate effort to evade the particular measures that would have hindered increased sales volume... Amazon's extreme profits and exponential growth rate came at the expense of the lives, health, and safety of its frontline workers."

Allegation made by New York Attorney General James in New York v. Amazon.com, Inc.<sup>5</sup>

COVID-19 safety mandates. Amazon put workers' lives at risk by depriving OSHA of information about COVID-19 cases in its facilities, undermining the agency's ability to identify COVID safety problems and to hold the company accountable for fixing them. For these reasons, it is a criminal violation of federal law to file false reports with OSHA, as Amazon may have done in this case.

Since July 2021, the United States has been facing an alarming COVID-19 surge as the highly contagious Delta variant, nearly twice as transmissible as previous variants, has been spreading across the country.<sup>6</sup> Following media reports that Amazon announced it would discontinue COVID-19 testing in its warehouses even though it was contemporaneously notifying workers of rising infections in its facilities, the SOC conducted an online survey between August and September 2021 of 790 Amazon warehouse workers.<sup>7</sup> In the survey, workers reported that Amazon's prioritization of production rates (and thus profits) throughout the pandemic and its winding down of safety protocols during the Delta surge increased the COVID-19 risks for workers.<sup>8</sup> For example, workers reported that, throughout the pandemic, Amazon persistently failed to conduct proper contact tracing in its warehouses, pressured workers to work while sick, and created an atmosphere of fear of retaliation, and that, during the Delta surge, Amazon intensified pressure on workers to meet production requirements, eliminated temperature checks on arriving employees, and dismantled many of its so-called "safety patrols" – workers tasked with enforcing social distancing and mask-wearing.<sup>9</sup> A review of over 300 Amazon workers' complaints to OSHA about COVID-19 hazards also revealed widespread allegations of grave failures to respond to outbreaks or institute protective measures in the company's warehouses.

In mid-September 2021, Amazon announced plans to hire 125,000 additional warehouse and transportation workers in the U.S.<sup>10</sup> As we head into Amazon's holiday-time "peak" season with new variants of COVID-19 spreading rapidly, it is critical that workers and the public have access to real-time information about Amazon's impact on public health. Furthermore, it is high time for Amazon's leaders to take responsibility for their misconduct, misleading public messaging, and negligent response to both the dangers of workplace COVID-19 transmission and to its own workers' concerns and complaints.

## SOC's analysis of Amazon's illness data

In May 2020, OSHA issued detailed instructions to employers for recording work-related COVID-19 infections on OSHA's Form 300, on which employers are required to record workplace injuries and illnesses.<sup>11</sup> Under these instructions, work-related COVID-19 cases should be recorded as "Respiratory Conditions."<sup>12</sup> To determine the work-relatedness of an employee's confirmed COVID-19 infection, OSHA requires employers to conduct a reasonable and good faith contact

"They continue to lie about the numbers in regards to COVID-19... They are not being honest about the number of employees who have the virus."

Amazon worker from Whitestown, Indiana May 29, 2020<sup>16</sup> tracing inquiry.<sup>13</sup> Employers have the obligation (1) to ask the employees how they believe they contracted the COVID-19 illness; (2) discuss with employees their work and out-of-work activities that may have led to infection; and (3) review the employee's work environment for potential exposure, informed by other instances of workers in that environment contracting COVID-19.<sup>14</sup> In May 2021, California's Occupational Health and Safety Administration (CalOSHA) fined Amazon for failing to record any of the 284 COVID-19 infections among employees at two fulfillment centers.<sup>15</sup>

The SOC reviewed summaries of annual injury and illness reports that employers are legally required to submit to OSHA for any workplace with 20 or more employees.<sup>17</sup> Analysis of Amazon's data for 753 facilities, which appear to include to include every significantly-sized warehousing facility in its U.S. logistics network, shows that the company only recorded 27 cases of "Respiratory Conditions" in 2020.<sup>18</sup> In contrast to its reports to OSHA, Amazon published a

report acknowledging that 19,816 Amazon employees had already contracted COVID-19 as of September 19, 2020.<sup>19</sup> In its reports to OSHA, Amazon appears to claim that virtually none of the thousands of COVID-19 cases among its employees were acquired in the workplace, an extreme position that reasonable observers of the pandemic would find difficult to believe.

#### Table 1. Key figures regarding cases of Respiratory Conditions that Amazon reported to OSHA in 2020.20

Cases of Respiratory Conditions reported	27
Total Full-Time Equivalents (FTEs)	427,029
Amazon warehouses	753



# Amazon's failure to cooperate with regulators to control COVID-19

Government and health department officials have repeatedly asked Amazon to turn over information related to the number of COVID-19 cases at its facilities and to its pandemic protocols.<sup>22</sup> In every case reported, Amazon refused to release this information. Early in the pandemic, in May 2020, Amazon workers reported to the media that at least 32 employees had contracted COVID-19 in a Kenosha, Wisconsin warehouse in the previous two months.<sup>23</sup> Amazon reported zero Respiratory Conditions to OSHA in this warehouse for 2020.<sup>24</sup> Despite repeated requests by the Kenosha County Division of Health, Amazon failed to provide data about the total number of cases. Referring to the efforts to get Amazon to disclose this information, Kenosha County's health director described Amazon as "less than easy to work with," and said the company was not cooperating with public health workers trying to conduct contact tracing or complying with the implementation of safety measures.<sup>25</sup> She told reporters that she would consider attempting to shut down the Kenosha facilities if Amazon kept stonewalling health officials.<sup>26</sup>

In Shakopee, Minnesota, by May 2020, 45 workers at Amazon's MSP1 warehouse had tested positive for COVID-19. At the time, the infection rate in this warehouse was more than four times the rate of any county in the Minneapolis-St. Paul metropolitan area.<sup>27</sup> Despite increased scrutiny of Amazon's safety measures by the media and the Minnesota Department of Health, the number of infected workers quadrupled, with at least 186 COVID-19 cases by September 8, 2020.<sup>28</sup> According to Amazon's October 2020 COVID-19 data, the infection rate among its 6,500 workers in Minnesota was more than double the rate for the general population in the state.<sup>29</sup> Nonetheless, Amazon reported zero Respiratory Conditions at MSP1 and for the whole state in its 2020 annual submission to OSHA.<sup>30</sup>

In August 2020, the California Attorney General, following "months of informal communication," initiated legal action to compel Amazon to answer basic questions about its COVID-19 practices by issuing official investigative subpoenas to Amazon.<sup>31</sup> After Amazon failed to comply with even those subpoenas, the Attorney General was forced in December 2020 to request that the California Superior Court enforce the subpoenas.<sup>32</sup> As the Attorney General told the Superior Court at the time:

"... it has been nearly six months since the Attorney General's initial request to Amazon for information regarding its COVID-19 related data, policies, practices, and procedures for its California facilities and workers. The slow drip of information from Amazon is an insufficient response. Absent the requested data, the Attorney General is unable to adequately determine if Amazon is complying with applicable California law to protect its workers from COVID-19."

In a similarly aggressive stance, on February 12, 2021, Amazon filed a lawsuit attempting to block the New York Attorney General from suing the company after receiving the Attorney General's notice of intent to sue regarding COVID-19 compliance. On February 16, 2021, the Attorney General filed the lawsuit, alleging Amazon repeatedly and persistently failed "to comply with its obligation to institute reasonable and adequate measures to protect its workers from the spread of the virus," threatening "serious illness and grave harm to the thousands of workers" in the JFK8 fulfillment center in Staten Island and the DBK1 facility in Queens.<sup>34</sup> According to a New York Time's article, Amazon disclosed in a lawsuit that the JFK8 warehouse had at least 700 confirmed COVID-19 cases between March 2020 and March 2021; however, Amazon reported zero Respiratory Conditions to OSHA in this and the rest of its New York warehouses for 2020.<sup>35</sup>

According to the Attorney General's complaint, until at least late-June 2020, the company did not interview infected workers for the purpose of determining close contacts. On occasions when a worker reported having close contact with an infected co-worker, Amazon dismissed the worker's concerns and did not investigate or follow up on such information.<sup>36</sup> The complaint also alleges that Amazon violated the NY Department of Health (DOH) requirements on contact tracing, which require that employers maintain a log of every person who may have had close contact at the work site with individuals that tested positive for COVID-19, such that all contacts may be identified, traced, and notified.<sup>37</sup> As of September 27, 2021, this case is still pending.<sup>38</sup>

## Warehouse workers report Amazon's failure to provide a safe workplace in SOC survey

The SOC conducted an online survey of Amazon warehouse workers between August 31 and September 20, 2021.<sup>39</sup> A total of 790 Amazon warehouse workers responded to the survey.<sup>40</sup> Workers reported working at Amazon facilities in 40 different states, with the largest concentrations in Florida, California, and Texas.

### Amazon relaxed safety precautions, increased production pressure in face of Delta surge

Warehouse workers were asked to compare Amazon's COVID-safety practices during the latest surge in COVID-19 cases with earlier periods in the pandemic. Over half (53 percent) of workers said Amazon enforced social distancing rules less or much less than before, while over half (51 percent) said Amazon pressured workers to meet production requirements more or much more than in earlier periods. Seven in 10 (70 percent) workers said Amazon conducted less or much less temperature checks when entering the facility, and 56 percent said the company offered fewer or much fewer free on-site COVID-19 testing.

### Workers report pressure to work while sick during COVID-19 pandemic

Of the workers who responded to the SOC survey, one in four (26 percent) reported going to work even though they felt sick. Of these workers, more than six out of 10 reported the reason they went to work feeling sick was because Amazon does not provide enough paid sick leave (64 percent) or because they were afraid they would be disciplined, lose hours, or be penalized in another way by management for not showing up to their shifts (61 percent). Almost two-thirds (63 percent) of workers reported witnessing co-workers coming to work while sick.

#### Workers report Amazon notification and contact tracing procedures are insufficient

More than four in 10 (37 percent) workers reported being exposed to co-workers that tested positive for COVID-19. Of the exposed workers, only one in four (25 percent) were immediately notified by Amazon of their exposure. In a survey conducted earlier in February 2021, one worker stated Amazon should "stop lying about us not being exposed to others with COVID and [start] caring about employee health and mental wellness."<sup>41</sup> Other workers wrote that Amazon should "be more honest about the exposure of its employees to Covid-19" and notify workers "of all cases in a timely manner" or "within 24 hours of when there was a confirmed case, instead of waiting over a week."<sup>42</sup>

Workers who were exposed at work indicated which steps of an effective contact tracing program Amazon took; the table below shows these responses.<sup>43</sup> The most alarming finding is that nearly four in 10 (39 percent) exposed workers reported that Amazon failed to take any further step to conduct contact tracing.<sup>44</sup> Out of every 20 exposed workers, Amazon only interviewed one (five percent) to establish a list of possible contacts. Amazon provided free COVID testing to less than half of the exposed workers, and for the rest of the steps of the contact tracing program that Amazon should have conducted, the percentages are shockingly low.

Table 2.	Steps of contact tracing program % of respo	ndents
Respondents indicated which contact	Interviewed you to establish a list of possible contacts.	5%
tracing steps Amazon took after they	Immediately notified you that you were exposed.	25%
were exposed to co-workers with	Established follow-up procedures.	17%
COVID-19.	Provided you with information regarding COVID risks.	15%
	Required you to stay home under quarantine.	17%
	Paid you for any time you missed work under quarantine.	18%
	Provided you free COVID testing.	40%
	NONE OF THE ABOVE	39%



## Workers report atmosphere of fear, intense production pressure continues through COVID-19 pandemic<sup>45</sup>

According to almost six in ten (58 percent) workers, since the beginning of the COVID-19 pandemic, Amazon has terminated, disciplined, or threatened to discipline workers for failing to keep up with the pace of work, also known as the rate. Over four in 10 (42 percent) reported that the company terminated, disciplined, or threatened to discipline workers for missing work to care for themselves or others (including children out of school); almost one in three (31 percent) for refusing to work without necessary personal protective equipment (PPE) or other safety equipment; and almost one in four (23 percent) for speaking out for better safety protections.

## Amazon workers have filed over 300 OSHA complaints

From the start of the pandemic to May 21, 2021, Amazon workers filed 303 COVID-related complaints with OSHA.<sup>46</sup> An analysis of these complaints shows that at least 61 of the complaints include grave allegations that suggest Amazon critically failed in its response to outbreaks and in establishing procedures to protect workers, including the following:<sup>47</sup>

- Failing to conduct proper contact tracing, failing to notify workers about exposure to infected co-workers, or misleading workers about the severity of outbreaks in the workplace.<sup>48</sup> Several complaints reported that workers found out about co-workers testing positive in the worksite through media reports instead of being notified by Amazon.<sup>49</sup>
- Firing or threatening workers with termination or other forms of retaliation if they reported or expressed concerns about health and safety issues in the workplace.<sup>50</sup> According to a complaint alleging Amazon fired two Washington state workers for these reasons: "Apparently, Amazon has a firing policy for reporting concerns."<sup>51</sup> Another complaint reported that "employees are being warned if they report they will be fired."<sup>52</sup>
- According to complaints filed in 2020 and 2021, Amazon allowed and even pressured workers who had tested positive for COVID-19 or with symptoms to continue working, exposing other workers to the virus.<sup>53</sup>

Nearly all of these complaints were filed after April 2, 2020, when Amazon announced it would spend at least \$800 million on COVID-19 safety measures (which represents only 0.3% of Amazon's 2020 sales in North America), and that it had "made over 150 significant process changes to ensure the health and safety of Amazon teams."<sup>54</sup>



## Significant COVID outbreaks at Amazon deep into the pandemic

Amazon's failure to protect its workers is also evidenced by the fact that, in states or counties for which SOC was able to obtain COVID-19 infection numbers by workplace, Amazon is either the non-residential, non-healthcare employer with the largest number of workplace infections or ranks at the top of the lists. Furthermore, despite Amazon's claim to have spent at least \$800 million on COVID-19 safety measures and made significant process changes early in April 2020, SOC found evidence of disturbingly high infection rates in its facilities deep into the latter stages of the pandemic.<sup>55</sup>

### California

Amazon facilities in California have seen massive COVID-19 outbreaks, while government investigators have found the company has failed to comply with California law to protect its workers. Through public records requests, journalists obtained workplace outbreak data from 20 of the 58 counties in California.<sup>56</sup> According to these public records responses and other sources, since the start of the pandemic, more than 2,500 workers have tested positive for COVID-19 in Amazon facilities across six counties in California.<sup>57</sup> Table 3 shows the five Amazon facilities in California with the most reported COVID-19 infections. CalOSHA cited the Amazon Eastvale facility in October 2020 after investigators found that Amazon "did not ensure that all employees had access to, viewed, and understood all COVID-19 training materials, and employees were unaware of key elements in the training materials, including but not limited to sanitation of workstations and frequently touched objects in the workplace."<sup>58</sup>

Workplace	COVID-19 cases	
Amazon Stockton (SMF3)	385	
Amazon Eastvale (LGB3)	319	
Amazon Bakersfield (BFL1)	289	
Amazon Beaumont (PSP1)	242	
Amazon Rialto (LGB7)	217	

### Los Angeles County

The Los Angeles County Department of Public Health has been collecting workplace outbreak data since the beginning of the pandemic and continuously publishing them on its website. Los Angeles County data show that 474 workers in five Amazon warehouses and one Amazon Fresh location tested positive for COVID-19 from the start of the pandemic to March 1, 2021.<sup>60</sup> Table 4 shows a surge of 435 new infections during December 2020 and January 2021; from 22 cumulative cases in December 2020 to 457 cases at the beginning of February 2021. COVID-19 infections increased 20 times over in just two months.

Table 4. Amazon facilities with the most reported cumulative COVID-19 cases in Los Angeles County, as of
March 2021.61

Workplace	Cases through December 2, 2020	Cases through January 1, 2021	Cases through February 3, 2021	Cases through March 1, 2021
Amazon El Monte (DPS1)	22	66	127	127
Amazon Hawthorne (DLA8)	0	52	106	106
Amazon South Gate (DAX7)	0	51	91	96
Amazon Commerce (DLA3)	0	24	54	59
Amazon Culver City (DLX9)	0	12	43	43
Amazon Fresh (Northridge)	0	5	36	43
Total Amazon	22	210	457	474

In contrast to the thousands of cases the SOC identified in Amazon's California warehouses in 2020 from incomplete public records, Amazon reported only nine Respiratory Conditions to OSHA in its California warehouses for 2020.<sup>61</sup>

### Utah

In response to an SOC public records request, the Utah Department of Health disclosed the workplace outbreak data it has been collecting since the beginning of the pandemic. As of March 1, 2021, Amazon was the non-residential, non-healthcare employer with most workers cumulatively infected in Utah, with a total of 768 cases.<sup>62</sup> The Amazon SLC1 facility located in Salt Lake City had the company's largest outbreak in the state, with 476 cumulative cases of infected workers as of March 1, 2021.<sup>63</sup> The table below shows that the cumulative number of infected workers at the facility almost tripled in three months after November 2020. There were 155 cases reported from April through October 2020, or 22 cases per month. This rose to 114 cases in November 2020, 116 cases in December 2020, and 75 in January 2021. Amazon reported a total of zero Respiratory Conditions to OSHA in Utah warehouses for 2020.<sup>64</sup>

## Table 5. Cumulative COVID-19 cases in Amazon SLC1 facility inSalt Lake City, as of February 2021.65

Workplace	Cases through	Cases through	Cases through	Cases through
	November 1, 2020	December 1, 2021	January 1, 2021	February 1, 2021
Amazon Salt Lake City (SLC1)	155	269	385	460

#### Oregon

The Oregon Health Authority has been tracking workplace outbreaks since the beginning of the pandemic and publishing weekly reports on its website. As of March 3, 2021, Amazon was the non-residential, non-healthcare employer with the most cumulative cases of workers infected with COVID-19, with a total of 489 cases.<sup>66</sup> The Amazon facility with the most cases in Oregon was its fulfillment center in Troutdale. There have been active cases at Troutdale since mid-May 2020, and as of July 28, 2021, a total of 337 workers at that facility had been infected with COVID-19.<sup>67</sup> Workers in the Troutdale warehouse have filed 12 OSHA COVID-19 complaints since the beginning of the pandemic, eight of which OSHA classified as "serious."<sup>68</sup>

The table below shows that the cumulative number of infected workers at Troutdale increased 163 percent in three months after November 2020. There were 82 cases reported from April through October 2020, or 12 cases per month. This rose to 19 cases in November 2020, 79 cases in December 2020, and 36 in January 2021. Amazon reported zero Respiratory Conditions to OSHA in Oregon warehouses for 2020.<sup>69</sup>

## Table 6. Cumulative COVID-19 cases in Amazon Troutdale facility,as of February 202170

Workplace	Cases through	Cases through	Cases through	Cases through
	November 4, 2020	December 2, 2021	January 6, 2021	February 3, 2021
Amazon Troutdale (PDX9)	82	101	180	216

# Conclusion: Amazon needs to shift priorities from profits to health and safety

According to the lawsuit filed by the New York Attorney General, Amazon's response to COVID-19 prioritized profits at the expense of allowing employees to engage in hygiene, sanitation, social-distancing, and necessary cleaning practices.<sup>72</sup>

Amazon's failures to take reasonable and adequate measures to protect its employees were "a deliberate effort to evade the particular measures that would have hindered increased sales volume," according to the complaint.<sup>73</sup> In the SOC's online survey, workers were asked what they thought Amazon's priority had been since the start of the COVID-19 pandemic. Half (50 percent) of workers responded that Amazon's top priority had been production speed (33 percent) or profit (17 percent).

"We are going to be Earth's Best Employer and Earth's Safest Place to Work," Jeff Bezos, Amazon founder and chairman, wrote in his most recent letter to shareholders.<sup>74</sup> "We want [workers] to be healthy and safe and feel cared about and proud to work for Amazon," Heather MacDougall, Amazon's Vice President of Worldwide Workplace Health and Safety, said in May 2021.<sup>75</sup> She said employee health and wellness "is not just a talking point."<sup>76</sup>

Indeed, Amazon needs to shift its focus from productivity and profits to making sure workers are healthy and safe. Meaningful action is needed to protect workers from the Delta variant currently wreaking havoc in the country, not just talking points.

- See, for instance: State of California Department of Justice Office of the Attorney General, "Press release: Attorney General Becerra Petitions Court to Compel Amazon to Comply with Outstanding Investigative Subpoenas," December 14, 2020, https://oag.ca.gov/news/press-releases/attorney-general-becerra-petitions-court-compel-amazon-comply-outstanding; Karen Weise, "Amazon Sues New York Attorney General to Block Covid-19 Charges," New York Times, February 12, 2021, https://www.nytimes.com/2021/02/12/technology/amazon-letitia-james-coronavirus.html; April Glaser, Olivia Farivar Solon, Cyrus, Adiel Kaplan and Ezra Kaplan, "Lack of oversight and transparency leave Amazon employees in the dark on Covid-19," NBC News, September 30, 2020, https://www.nbcnews.com/tech/tech-news/lack-oversight-transparency-leave-amazon-employees-dark-covid-19-n1241549; See paragraphs 107-110 of AG Complaint, pp. 23: Attorney General of the State of New York v Amazon.com Inc, February 16, 2021, https://ag.ny.gov/sites/default/files/docket\_1\_-\_summons\_and\_complaint.pdf
   Id.
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- **19** Amazon staff, "Update on COVID-19 Testing," About Amazon, October 1, 2020, https://www.aboutamazon.com/news/operations/update-on-covid-19-testing
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- **39** SOC Survey of Amazon Workers, August 31 to September 20, 2021; the survey was conducted in Spanish and English and was advertised via Facebook.
- 40 This total includes workers who currently work at Amazon and those who no longer work there, but who worked at Amazon during the past six months. All of them reported working in one of the following segments of Amazon's operations: fulfillment centers (78 percent), inside delivery stations (12 percent), and sortation centers (11 percent).
- **41** SOC Survey of Amazon Workers, February 12-18 2021: Quote obtained from open-ended response made by Respondent ID 12407665818
- 42 SOC Survey of Amazon Workers, February 12-18 2021: Quote obtained from open-ended response made by Respondent ID 12407982612; Respondent ID 12407076529 ; Respondent ID 12406366318 ; Respondent ID 12412037023

43 The Centers for Disease Control and Prevention (CDC) and the World Health Organization (WHO) have issued guidance that an effective contact tracing program must include the following elements: contact interview, rapid notification of exposure, case follow-up and medical monitoring, implementation of quarantine, testing, and provision of education and support: CDC, "Case Investigation and Contact Tracing : Part of a Multipronged Approach to Fight the COVID-19 Pandemic," December 2020, https://www.cdc.gov/coronavirus/2019-ncov/php/principles-contact-tracing.html; WHO, "Contact Tracing in the Context of COVID-19," February 2021, https://apps.who.int/iris/rest/bitstreams/1332668/retrieve; CDC, "Investigating a COVID-19 Case," November 2020, https://www.cdc.gov/coronavirus/2019-ncov/php/contact-tracing/contact-tracing-plan/investigating-covid-19-case.html; CDC, "Contact Tracing for COVID-19," February 2021, https://www.cdc.gov/coronavirus/2019-ncov/php/contact-tracing/contact-tracing-plan/contact-tracing.html

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- 45 For workers surveyed regarding firing or other disciplining of workers during the COVID-19 pandemic, the analysis includes workers who responded "yes" or "no" and excludes workers who responded "not sure.
- 46 OSHA data set, "Closed Safety and Health Complaint Data (Through May 21, 2021)," Monthly OSHA COVID-19 Complaint Data, https://www.osha.gov/sites/default/files/Closed\_Federal\_State\_Plan\_Valid\_COVID-19\_Complaints\_Through\_0521\_2021.xlsx
- 47 The SOC analyzed the descriptions of the COVID-19 OSHA complaints filed against Amazon and categorized them. Sixty-one of the complaints analyzed included descriptions alleging that Amazon's response to the pandemic was extremely problematic and the SOC categorized these complaints as "grave." The descriptions of the complaints categorized as "grave" included at least one of the following type of allegations: Amazon (a) did not conduct contact tracing, (b) retaliated against workers who voiced concerns about COVID-19 safety, (c) pressured or allowed workers to continue working even though they were sick or presented COVID-19 symptoms, (d) did not disclose information to workers about their possible direct exposure to infected co-workers, (e) failed to implement at least four of the following basic safety pandemic protocols: training employees on COVID-safety protocols, enforcing social distancing, enforcing mask-wearing, providing adequate Personal Protective Equipment (PPE) or sanitizer, periodically sanitizing work areas, or disinfecting work areas after workers tested positive.
- 48 1) OSHA complaint: RID: 0551800; UPA # C-1604494; Establishment name: Amazon; Site Address: 900 Patrol Road, WATSON, IN, 47130; UPA receipt date: 06/04/2020

2) OSHA complaint: RID: 0419700; UPA # C-1558309; Establishment name: Amazon Logistics; Site Address: 12900 Pecan Park Road, JACKSONVILLE, FL, 32218; UPA receipt date: 03/25/2020

3) OSHA complaint: RID: 0953220; UPA # C-1585777; Establishment name: AMAZON.COM.KYDC LLC; Site Address: 3837 Bay Lake Trail, NORTH LAS VEGAS, NV, 89030; UPA receipt date: 05/08/2020

4) OSHA complaint: RID: 0551800; UPA # C-1602334; Establishment name: Amazon Fulfillment Center IND1; Site Address: 4255 Anson Boulevard, WHITESTOWN, IN, 46075; UPA receipt date: 05/29/2020

5) OSHA complaint: RID: 0111500; UPA # C-1584881; Establishment name: Amazon BDL3; Site Address: 409 Washington Avenue, NORTH HAVEN, CT, 06473; UPA receipt date: 05/06/2020

6) OSHA complaint: RID: 0111400; UPA # C-1575644; Establishment name: Amazon BOS5; Site Address: 1000 Technology Center Drive, STOUGHTON, MA, 02072; UPA receipt date: 4/21/2020

7) OSHA complaint: RID: 0950633; UPA # C-1563248; Establishment name: Amazon; Site Address: 24300 Nandina Avenue, MORENO VALLEY, CA, 92551; UPA receipt date: 3/26/2020

8) OSHA complaint: RID: 0950632; UPA # C-1727270; Establishment name: Amazon dba Prime LLC; Site Address: UCA6 - 2727 Kurtz Street, San Diego, CA, 92110; UPA receipt date: 1/27/2021

49 1) OSHA complaint: RID: 0419700; UPA # C-1558309; Establishment name: Amazon Logistics; Site Address: 12900 Pecan Park Road, JACKSONVILLE, FL, 32218; UPA receipt date: 03/25/2020
2) OSHA complaint: RID: 0953220; UPA # C-1585777; Establishment name: AMAZON.COM.KYDC LLC; Site Address: 3837 Bay Lake Trail, NORTH LAS VEGAS, NV, 89030; UPA receipt date: 05/08/2020

50 OSHA complaint: RID: 0452110; UPA # C-1603101; Establishment name: AMAZON; Site Address: 2285 LITTON LANE, HEBRON, KY, 41048; UPA receipt date: 06/03/2020

- 51 OSHA complaint: RID:1055320; UPA # C-1580334; Establishment name: AMAZON COM SERVICES LLC; Site Address: 440 Terry Avenue N, SEATTLE, WA, 98109; UPA receipt date: 04/24/2020
- 52 OSHA complaint: RID 1055330: ; UPA # C-1586259; Establishment name: AMAZON COM SERVICES LLC; Site Address: 2700 Center Drive, DUPONT, WA, 98327; UPA receipt date: 05/08/2020
- 53 1) OSHA complaint: RID: 0950625; UPA # C-1720665; Establishment name: Amazon Fulfillment Center; Site Address: 3575 S Orange Ave, FRESNO, CA, 93725; UPA receipt date: 01/13/2021
  2) OSHA complaint: RID: 0453710; UPA # C-1735526; Establishment name: Amazon Fulfillment Center; Site Address: 4851 Jones Sausage Road, GARNER, NC, 27529; UPA receipt date: 2/16/2021
  3) OSHA complaint: RID: 0453710; UPA # C-1733416; Establishment name: AMAZON, INC. RDU1; Site Address: 4851 Jones Sausage Road,
- GARNER, NC, 27529; UPA receipt date: 2/9/2021
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