

IN DENIAL:

AMAZON'S CONTINUING FAILURE TO FIX ITS INJURY CRISIS

APRIL 2023



STRATEGIC
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The Strategic Organizing Center (SOC) is a democratic coalition of three labor unions: Service Employees International Union (SEIU), Communications Workers of America (CWA) and United Farmworkers of America (UFW). Together, SOC-affiliated unions represent 2.5 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 is a company that prides itself on doing big, ambitious things, fast. The company's internal values, inculcated by founder and Executive Chair Jeff Bezos, praise "high quality, high velocity decisions," "embrace[ing] failures" and "nimble organization structures."¹ Amazon's recent growth shows that the company has the capacity to make massive change in a short period of time when it wants to; from 2017 to 2022, it added more than 800 new facilities and more than 500,000 workers to its e-commerce and logistics operations.² Yet, during the same period, as the failures of the company's safety management system became public knowledge and corporate leadership promised improvements, Amazon has failed to make meaningful progress on worker safety.

The Strategic Organizing Center (SOC) analyzed the injury data that Amazon submitted to the Occupational Safety and Health Administration (OSHA) for 2022 and found that Amazon's operations continue to be dramatically more dangerous for workers than the rest of the warehouse industry. In 2022, the serious injury rate at Amazon warehouses was 6.6 per 100 workers—more than double the rate at non-Amazon warehouses (3.2 per 100).³ Workers at Amazon facilities sustained nearly 39,000 injuries in 2022. While Amazon employed 36 percent of all U.S. warehouse workers in 2022, the company was responsible for more than half (53 percent) of all serious injuries in the industry.

Amazon's high injury rates are not news. As two previous SOC reports documented, from 2017-2021, Amazon warehouses consistently had overall injury rates that were dramatically higher than those of its competitors.⁴ The company's obsession with speed has played a role in driving its injury rates higher. Amazon uses extensive productivity and monitoring systems to increase pressure on workers to move at dangerous speeds.⁵

Nine separate federal- and state-level OSHA investigations in the last three years have found that the high level of injury risk in Amazon's operations violated the law.⁶ Washington State OSHA (WISHA) has cited Amazon facilities near Seattle for violating the Occupational Safety and Health Act (OSHAct), and directly linked the company's high pace of work and monitoring and discipline systems with the facilities' high rates of injuries. WISHA also found that Amazon's failure to fix the hazards was "willful," because Amazon "is demonstrating plain indifference in that they have been made aware of the hazards and increased injury rates yet are making no effort to take corrective action."⁷ In stark contrast to these findings by OSHA investigators, Amazon's executives have continued to deny that the company's production quotas pose a risk to worker safety.⁸

Amazon's response to heightened scrutiny of its safety record has been to resist accountability for its failures and to use cherry-picked data to mislead the public about its record. The company claims to have invested one billion dollars between 2019 and 2022 in initiatives intended to improve safety.⁹ Yet, the SOC's analysis of Amazon's injury data for 2022 finds that the company has failed to even match its own performance from two years earlier, and has not come close to parity with its warehouse industry peers. For a corporation that prides itself on moving quickly and decisively informed by sophisticated data analysis, Amazon's ongoing failure to provide safe working conditions raises major questions about whether the company's management is serious about becoming "earth's safest place to work," or whether it continues to put profits before the safety of the very people responsible for its success.

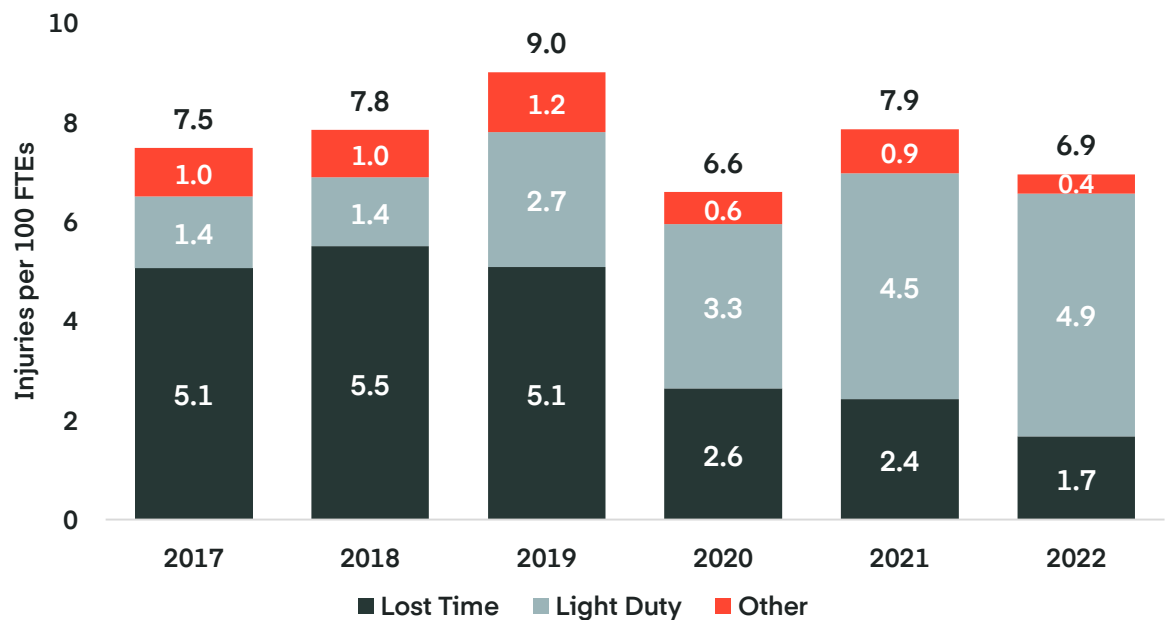


OVERVIEW OF AMAZON'S INJURY DATA

SOC's analysis is based on data that Amazon and other employers provided to OSHA annually from 2017 to 2022. All employers are legally required to submit annual injury and illness reports to OSHA for any warehouse, delivery, grocery, or wholesale trade facility with 20 or more employees. Amazon reported injury and illness information for 1,034 warehouse, logistics and delivery facilities in 2022.¹⁰ Those reports covered an average annual workforce that grew from 200,828 employees in 2017 to 716,688 in 2022.

These reports show that each year, tens of thousands of Amazon workers are injured on the job. In 2022, there were 38,609 total recordable injuries—defined as those requiring medical treatment beyond first aid or requiring time off a worker's regular job—at Amazon facilities. The vast majority of these were serious: 36,487, or 95 percent, of the injuries were categorized as either light duty or lost time injuries—that is, injuries where workers were hurt so badly that they were either unable to perform their regular job functions (light duty) or forced to miss work entirely (lost time). The methodology used to analyze the data and the number of cases and injuries by type are presented in Appendices A and B, respectively.

FIGURE 1: INJURY RATES AT AMAZON FACILITIES BY CASE TYPE, 2017 TO 2022



As shown in **Figure 1**, Amazon has not made meaningful progress on its total rate of injuries or serious injuries over the six-year period for which we have data, 2017-2022. Amazon's total injury rate in 2022, 6.9 injuries per 100 full-time equivalent workers (FTEs), is still higher than its injury rate from just two years earlier (6.6/100). Further, the company's rate of serious injuries in 2022—those that required light duty or lost time—6.6 per 100 workers, was 12 percent higher than the same rate in 2020 (5.9/100).¹¹

The inadequacy of Amazon's safety efforts is illustrated by the dramatic improvements to injury rates that the company experienced during the first year of the COVID-19 pandemic, when its overall injury rate decreased by nearly 27 percent in one year. In March 2020, Amazon temporarily eased its work speed pressures as part of its response to the COVID-19 pandemic by suspending its disciplinary action against workers for underperformance on productivity metrics.¹² However, in October 2020—just ahead of Prime Day—Amazon reimplemented its work rate, claiming to have “revised” its algorithms to accommodate COVID-related safety measures.¹³ Yet workers reported that the productivity pressures returned.¹⁴ In June 2021, Amazon claimed to be changing the way it monitored workers' “Time off Task,” but experts called the tweak “tiny”

and insufficient.¹⁵ Not surprisingly, injury rates increased in 2021 alongside the return of Amazon’s immense production pressures on workers.

This episode indicates that Amazon has the capacity to dramatically improve injury rates by reducing production pressures, and its subsequent failure to sustain these improvements should raise questions about whether the company is placing other corporate priorities ahead of worker safety.

SERIOUS INJURIES, LIGHT DUTY: **AMAZON’S EFFORTS TO REDUCE COSTS BY KEEPING INJURED WORKERS ON THE JOB**

When workers are seriously injured, Amazon has a strategy to push them to keep working while they are recovering—a policy that is designed to reduce the number of lost time cases and save the company money on workers’ compensation program costs. In 2018, Amazon rolled out a “temporary light duty” program, which created additional positions for workers who were hurt too badly to perform their normal jobs.¹⁶ Amazon now calls this program “Return to Work,” and credits the program for reducing the time that workers are off work while recovering from injuries.¹⁷ This program also may contribute to pressuring injured workers to return to work before they are ready; in a survey of Amazon workers by the SOC in 2021, 37 percent of workers surveyed who had been injured reported that management pressured them to return to work before they felt ready to do so.¹⁸ The push for light duty assignments also allows Amazon to reduce the number of injuries that it must report in the most severe injury category, lost time, which it has proudly cited as evidence of safety improvements.¹⁹

LIGHT DUTY INJURIES:

Injuries that require workers to be placed on light or restricted duty relative to their normal job responsibilities

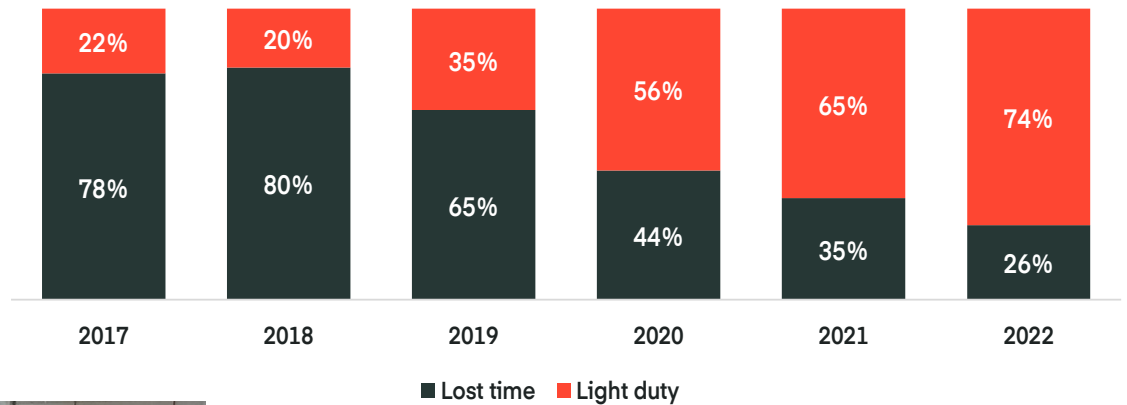
LOST TIME INJURIES:

Injuries that require workers to miss work entirely

SERIOUS INJURIES:

Light duty and lost time injuries combined

FIGURE 2: SHARE OF AMAZON SERIOUS INJURY CASES CLASSIFIED AS LOST TIME OR LIGHT DUTY, 2017 TO 2022



As shown in **Figure 2**, the share of lost time injuries decreased from 80 percent of all serious injuries in 2018, to 26 percent in 2022. Lost time injuries are more expensive for the company than light duty cases in terms of workers' compensation costs.

Amazon has faced cost pressures from workers compensation insurance as the scope of its injury problems has become clearer. Washington state officials announced that beginning in 2021, Amazon's workers' compensation premiums would increase by 15 percent after state officials determined the company's facilities were more dangerous than other warehouses and that Amazon's high injury rate was driving up costs for the entire warehouse industry.²⁰

Amazon has internally acknowledged that its policy of shifting more injured workers into light duty will help the company lower costs. As *Reveal* reported in its 2020 exposé, the safety director for Amazon's robotic warehouses stated in an internal email that if the temporary light duty policy were rolled out across all fulfillment centers, it had "the potential to reduce Lost Time Injuries and workers compensation costs by 70%."²¹

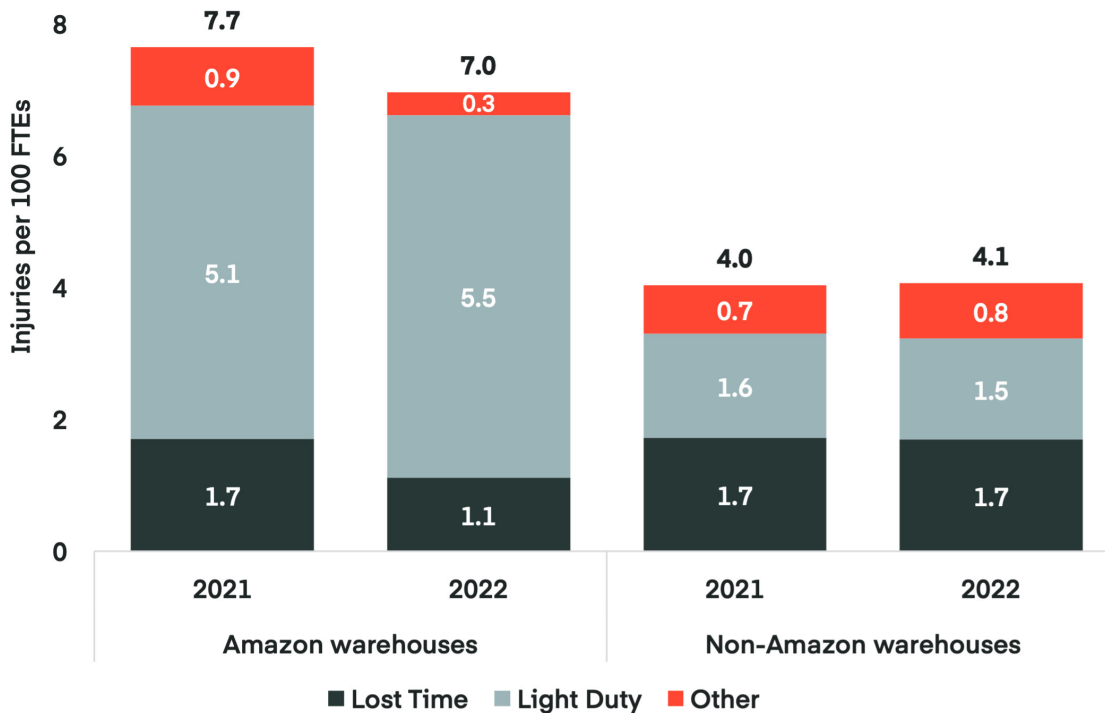
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AMAZON'S WAREHOUSE INJURY RATE IS STILL FAR HIGHER THAN INDUSTRY

SOC also analyzed injury rates at the subset of 352 facilities that Amazon classified as belonging to the “General Warehouse and Storage” industry in its reports to OSHA for 2022, and compared the company’s performance with all non-Amazon warehouse facilities reported to OSHA in the same year. SOC’s analysis found that Amazon’s injury rate at its warehouses remains 70 percent higher than the rate at non-Amazon warehouses, and its rate of serious injuries is even worse—more than *twice as high* as the rate for non-Amazon warehouses.²²

In fact, Amazon’s injury data suggests that the injuries experienced by Amazon warehouse workers are both more frequent

FIGURE 3: INJURY RATES BY CASE TYPE AT AMAZON AND NON-AMAZON WAREHOUSES, 2021-2022





and more severe than other warehouse workers. As shown in **Figure 3**, in 2022, there were 7.0 injuries per 100 Amazon warehouse workers as compared to 4.1 injuries per 100 workers at all other warehouses. Further, Amazon’s rate of serious injuries—light duty and lost time injuries—at its warehouses was 6.6 per 100 workers, as compared to 3.2 for all other employers in the warehouse industry.

In addition, an analysis of the average length of time that injured workers at Amazon took away from their previous jobs following their injuries exceeded those of non-Amazon warehouses. In 2022, Amazon warehouse workers who were seriously injured needed 22 percent more time to recover from their injuries than non-Amazon workers—55 days at Amazon versus 45 days at all other warehouse employers.²³

OSHA ENFORCEMENT: AMAZON’S HIGH PACE OF WORK AND ‘WILLFUL’ VIOLATION OF FEDERAL HEALTH AND SAFETY RULES

As recent worker organizing and national media attention focused intensely on health and safety issues at Amazon, state and federal enforcement agencies have begun to pay serious attention to these issues as well. In stark contrast to Amazon’s professed commitment to the safety of its workers, the corporation has sought to obstruct, delay, and oppose any accountability for its longstanding and ongoing worker safety failures.

For example, starting in 2020, the Washington State OSHA program (“WISHA”) took the lead on investigating Amazon, and as a result of its investigation of a warehouse in Dupont, Washington, WISHA issued multiple citations in 2021 and 2022.²⁴ WISHA specifically ordered Amazon to reduce its pace of work to improve worker safety.²⁵ Rather than reduce its dangerous production pressure and quotas, Amazon doubled down, appealing the citations.²⁶ Amazon also interfered with follow-up investigations, including by barring state inspectors from entering warehouses and refusing to provide WISHA with necessary information.²⁷ A court had to intervene and order Amazon to stop interfering with WISHA’s safety investigations.²⁸

In March 2022, another WISHA investigation found additional violations at another Amazon warehouse in Kent, Washington. And in this case, they determined that the violations were “Willful”, the most serious safety violation designation that OSHA can issue, and which are issued when companies are found to be “knowingly fail[ing] to comply with a legal requirement” or operating with “plain indifference to employee safety.” Inspectors indicated that the “willful” determination in this Kent warehouse was made because the company “is demonstrating plain indifference in that they have been made aware of the hazards and increased injury rates yet are making no effort to take corrective action.”²⁹ Only 0.4% of citations in OSHA’s 50-year history have been categorized as willful.³⁰

Building on WISHA’s work, in July and August 2022, the US Department of Labor decided to open its own parallel investigations at seven Amazon warehouses in five states across the nation.³¹ As in the Washington state investigations, federal OSHA later issued citations which found that the working conditions in all seven warehouses were violating the OSHAct because of the documented ergonomic hazards. The violations covered 22 separate illegal job tasks involving almost 1,600 individual workers. And as both the Federal OSHA and WISHA investigations noted, Amazon’s own internal Ergonomics Program has the “important elements” which would have identified and fixed these hazards if Amazon had only chosen to apply this important resource itself.³²



[Amazon management] is demonstrating plain indifference in that they have been made aware of the hazards and increased injury rates yet are making no effort to take corrective action.”

— Washington OSHA



SDNY is investigating potential worker safety hazards at Amazon warehouses across the country, as well as possible fraudulent conduct designed to hide injuries from OSHA and others.”

— U.S. Attorney’s Office for the Southern District of New York

In response to this multitude of systemic hazards, OSHA mandated a variety of well-known methods for reducing ergonomic hazards widely used in the logistics industry – but routinely ignored by Amazon.³³ To combat the safety hazards, OSHA directed Amazon to provide reduced repetition, more frequent rest breaks and shorter working hours where necessary to reduce the risks of serious back and other injuries.³⁴

On the day that OSHA initiated the inspections, the US Attorney for the Southern District of New York (SDNY) revealed the unprecedented news that it was “investigating potential worker safety hazards at Amazon warehouses across the country, as well as possible fraudulent conduct designed to hide injuries from OSHA and others.”³⁵ The SDNY also appealed to Amazon workers nationally to provide detailed descriptions of the working conditions as well as injuries “resulting from workplace hazards, worker rate requirements and the pace of work....”³⁶

The joint investigation shortly thereafter led to nationwide subpoenas by OSHA and SDNY for detailed information about the potential hazards as well as potential financial fraud and included demands for documents and emails from all levels of the corporation up to the executive suite and the Board of Directors.³⁷

This collaboration between OSHA and the Department of Justice – covering both intense worksite investigations as well as top-level potential misconduct by executives and the Board of Directors – is unique in the 52-year history of the OSHAct.



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AMAZON'S HISTORY OF INCOMPLETE SAFETY RECORDS

In addition to shining a light on serious ergonomic hazards confronting Amazon workers, federal OSHA's investigations at Amazon have repeatedly found that Amazon facility managers have failed to keep the full records of their workers' injuries. As long ago as 2015, OSHA cited Amazon's Robbinsville, NJ warehouse for failing to record 26 separate cases over a 10-week period, or the equivalent of roughly 135 additional cases annually.³⁸ In 2017, the first year for which records are available, this facility reported a total of 214 cases.

Despite having received this 2015 citation regarding record-keeping violations as well as an explicit warning from OSHA regarding inadequate medical service, Amazon continued to have problems in these areas.³⁹ In 2022, Federal OSHA cited Amazon for violations at its facility outside Albany, NY (ALB1), which in 2021 already had the highest rate of serious injuries in the entire US Amazon warehouse network (19.8/100 workers).⁴⁰ OSHA found that Amazon managers at ALB1 had failed to record 11 injury cases over a 6-week period – the equivalent of nearly 100 additional cases annually.

These cases reveal the weaknesses in the company's management of its basic worker safety functions, and raise questions about whether injury rates at Amazon may be even higher than the data the company reports to OSHA suggests. Moreover, as described above, OSHA and the Department of Justice have subpoenaed extensive details about the company's internal recordkeeping, reporting and analyses of worker injuries. As these investigations are ongoing, stakeholders with an interest in full transparency should be especially skeptical of Amazon's claims.

In 2022, OSHA found that Amazon had failed to record the equivalent of nearly 100 additional injury cases annually at a facility outside Albany, NY (ALB1).

ELECTED OFFICIALS SCRUTINIZE SAFETY ISSUES AT AMAZON

Federal and state elected officials have reacted to the ongoing safety crisis at Amazon by seeking more information, encouraging enforcement agency oversight, and drafting new legislation to protect workers. The US House Committee on Education and Labor held an oversight hearing in November 2022 regarding the “Unsafe and Untenable” working conditions in the warehouse industry, and heard testimony from Eric Frumin of the Strategic Organizing Center and other critics of Amazon’s high injury rates.⁴¹ House Subcommittee Chair Alma Adams specifically pointed to Amazon’s high injury rates as evidence of the company’s safety crisis and the need for continued intervention by OSHA:



This injury rate has a direct impact on workers. At the Amazon warehouse in Staten Island, workers face backbreaking work, 60-hour plus workweeks, 10-hour shifts with mandatory overtime, and dehumanizing working conditions... Clearly, something is wrong....Department of Labor must continue oversight of unsafe working conditions in warehouses...”⁴⁴

— Workforce Protections Subcommittee Chair, Rep. Alma Adams

State legislators have also been taking increasing notice of how Amazon’s abusive production system injures workers. In September 2021, California passed AB 701, a bill regulating the use of production quotas in warehouses. Proponents of this bill have pointed specifically to Amazon’s unsafe work speed as a key motivator for the legislation.⁴² A very similar bill later passed in New York, and others have been introduced in other states, including Minnesota, Washington, Connecticut, Massachusetts, Nebraska, Montana, Illinois and Rhode Island.⁴³

AMAZON'S SPIN ON SAFETY

Despite the scrutiny by federal and state regulators and elected officials, Amazon's response has been to minimize the problem, deflect responsibility and misinform stakeholders. SOC spotlighted these patterns in a July 2022 complaint to the SEC regarding the company's repeated false and misleading statements about worker safety.⁴⁵

In March 2023 Amazon released another public report meant to burnish its image on safety, in which it deployed many of the same strategies highlighted in SOC's 2022 SEC complaint to cherry-pick and distort data to give readers the misleading impression that Amazon's dangerous warehouses are becoming safer and are nearly as safe as competitors' warehouses.

Amazon again chose to compare its injury rates against skewed, outdated and misleading industry averages. The company's safety report uses warehouse industry injury data from the Bureau of Labor Statistics (BLS), which is an inappropriate benchmark for at least three reasons. First, BLS's data is released nine months after the end of the year that it is based on, meaning that Amazon is comparing its own performance in 2022 to industry performance data from 2021.

Second, Amazon chose not to compare its performance with the lower overall BLS warehouse injury rate (5.5/100) but to instead benchmark its performance against the substantially higher rate BLS reports for establishments (individual locations) with more than 1,000 employees (6.7/100). This comparison is inappropriate because more than half (54%) of Amazon's own warehouse facilities reported fewer than 1,000 average annual employees in 2022.⁴⁶

Third, Amazon is comparing its performance against BLS industry averages that are warped by Amazon's own high injury rates. In 2021, the year the most recent BLS injury data is based on, Amazon employed 33 percent of warehouse workers in the U.S. and was responsible for 49 percent of all warehouse worker

injuries.⁴⁷ Therefore, using an industry average that includes Amazon's own data obscures the degree to which Amazon is a dangerous outlier from its peers. SOC's apples-to-apples comparison using appropriate industry benchmarks found that Amazon's serious injury rate in its warehouses remained more than double that of the rest of the warehouse sector in 2022, a fact that the company has entirely refused to acknowledge.

In addition to the BLS data issues, Amazon also chose to omit significant data points from its report that did not suit its preferred narrative. The company proudly touted a 35 percent reduction in the lost-time injury rate for its warehouses from 2021 to 2022, but fails to mention that its overall rate of serious injuries in warehouses only decreased by 3 percent during the same period (6.8 to 6.6/100), presumably because many injured workers were given light duty assignments instead of time off work to recover.⁴⁸ This is likely the outcome of the company's longstanding strategy, discussed earlier in this report, to discourage workers from taking time off work to recover in order to reduce its workers compensation costs, and does not necessarily mean that the injuries are becoming less severe.

Amazon's latest safety report is part of the company's ongoing effort to give a false impression of transparency and seriousness about addressing its pervasive failures on worker safety. Based on its past record and ongoing behavior, stakeholders should seek independent data and analysis to assess the company's claims about safety.



CONCLUSION

Amazon has spent years promising to improve safety in its operations, its founder Jeff Bezos declaring that the company's goal is to become "Earth's Safest Place to Work."⁴⁹ In 2021, it set a goal of halving its total injury rate by 2025.⁵⁰ In the last three years (2019 to 2022) it claims to have spent \$1 billion on safety initiatives unrelated to Covid-19, and that the company plans to invest \$550 million in safety initiatives in 2023.⁵¹

After all its public proclamations and claims about safety spending, Amazon somehow failed to match its own recent safety benchmark, with 2022's serious injury rate still 12 percent higher than the equivalent rate in 2020. Amazon also failed to come anywhere close to parity with its warehouse peers in 2022, reporting a serious injury rate in its warehouses that was more than double the rest of the warehouse industry. In total, workers sustained nearly 39,000 injuries across Amazon's network of facilities in 2022.

The facts show that for all its public relations efforts, Amazon is doing far too little to keep workers safe. Authorities have stepped in to attempt to force Amazon to protect workers—from OSHA investigations and citations at nine locations in six different states to new laws on production quotas in California and New York. However, instead of fixing hazards, Amazon is contesting the violations cited by both federal and Washington OSHA detailed investigations, and

stating it will not slow the pace of work that is leading to its high injury rates.

As safety investigators have repeatedly found, Amazon has the in-house expertise to identify the dangers that its engineers have created in designing warehouses and jobs – but simply fails repeatedly to use that expertise to put workers' safety first.⁵² OSHA has directed Amazon to make many common-sense changes that are already widely adopted in the warehouse industry, but Amazon's response is to appeal these orders for years while workers continue to suffer disabling injuries. Amazon could also choose to simply slow the pace of work or ease the pressures of its oppressive monitoring systems. But after doing so in 2020 to accommodate pandemic safety precautions, the company largely went back to its old systems of surveillance and pressure in 2021, as reflected by the injury data ever since.

Amazon's very high rate of worker injuries reflects a management which is unwilling to make real improvements to protect workers. Those rates will remain alarmingly high unless workers, regulators, shareholders and consumers force Amazon to take meaningful action to make its workplaces safer.

APPENDIX A

METHODOLOGY

Unless otherwise noted, all data on hours worked, injury numbers, and injury types are based on records submitted by Amazon to OSHA through OSHA's Injury Tracking Application ("ITA"). They are available in full at <https://www.osha.gov/Establishment-Specific-Injury-and-Illness-Data>. Injury rates including Total Recordable Injury Rate ("TRIR" or "Case Rate") and Serious Injury Rate (Days Away, Restricted, and Transferred or DART) were calculated as aggregates, not simple averages, of the various rates at individual locations. Injury rates are reported as injuries per 100 employees. OSHA assumes that 2,000 employee-hours equals one full-time annual employee (FTE).

Injury counts and hours worked were summed before calculating rates to ensure that rates were properly weighted and not skewed by smaller facilities. We use the term "injuries" to include both those cases recorded by Amazon as "injuries" and those recorded by Amazon as meeting OSHA's definition of work-related "illnesses." Work-related "illnesses" account for less than three percent of cases during the period covered by this analysis and include heat-related conditions, skin diseases, respiratory conditions and poisoning, among others.

In the 2016 data set, only three Amazon facilities reported injury information through the OSHA's public Injury Tracking Application (ITA). Based on a database compiled by the supply chain consulting firm MWPVL, there appear to have been as many as 176 Amazon facilities in operation that year (https://www.mwpvl.com/html/amazon_com.html). Because Amazon failed to report for the vast majority of its facilities in 2016, we are unable to include that data in this analysis. Amazon's reports for 2017-2021, however, appear to be largely consistent with the list maintained by MWPVL.

This analysis is limited to Amazon's warehousing and logistics operation, so facilities that Amazon reported operated under manufacturing NAICS codes (323117, 333992, and 334111)

and retail trade NAICS codes (445110 and 455219) are not included in the analysis.

When reporting data to the ITA for 2021, Amazon re-classified 393 facilities it had previously reported as operating in the General Warehouse and Storage NAICS Code (493110) as operating in the Couriers and Express Delivery Service NAICS Code (492110). Because there was no discernable change in the work processes at these facilities and because this reclassification would make year-over-year comparisons of Amazon's safety performance challenging, for the purposes of this analysis, all Amazon warehouse and logistics operations that were classified in previous years as in the General Warehouse and Storage industry (NAICS 493110) were included in the 2021 and 2022 analyses of Amazon's overall injury rates. Comparison between Amazon's injury rates and those of all other employers in the warehousing industry was done between the facilities that Amazon categorized in NAICS 493110 and all other employers reporting facilities under that NAICS code.

ITA data includes annual average employment and hours worked by all employees at each facility per year. In its data validation and documentation instructions, OSHA states that each establishment's "total hours worked" divided by "annual average employment" should not exceed 8,760 hours.⁵³ This analysis excludes any facility record that exceeded the threshold.⁵⁴



APPENDIX B

AMAZON INJURY DATA

Table 1, below, includes a summary of injury, facility and employment data reported by Amazon to OSHA regarding its warehouse and logistics facilities for the years 2017 through 2022. Warehouse and logistics facilities are defined for the purpose of this analysis as those the company categorized in the General Warehouse and Storage NAICS Code (493110) and the Couriers and Express Delivery Service NAICS Code (492110).

TABLE 1: TOTAL INJURIES REPORTED BY AMAZON FACILITIES BY TYPE, 2017-2022

Year	Annual Average Employees	Full-time Equivalents	Lost Time Cases	Lost Time Days	Light Duty Cases	Light Duty Days	Total Other Cases	Total Cases
2017	200,828	150,684	7,626	480,045	2,171	199,417	1,476	11,273
2018	221,951	171,470	9,432	492,911	2,389	233,354	1,632	13,453
2019	630,048	236,013	11,995	630,106	6,429	466,498	2,834	21,258
2020	583,223	420,125	11,084	510,701	13,905	904,625	2,708	27,697
2021	566,736	487,848	11,839	586,732	22,162	1,509,145	4,333	38,334
2022	716,688	555,644	9,326	387,425	27,161	1,640,422	2,122	38,609

Endnotes

- 1 Daniel Slater. "Elements of Amazon's Day 1 Culture." Amazon Web Services. Available at: <https://aws.amazon.com/executive-insights/content/how-amazon-defines-and-operationalizes-a-day-1-culture/>
- 2 SOC analysis of Amazon facility and employment data submitted by the company to OSHA for the years 2017-2022.
- 3 See methodology in Appendix A.
- 4 "Primed for Pain," The Strategic Organizing Center. May 2021. Available at: <https://thesoc.org/wp-content/uploads/2021/02/PrimedForPain.pdf>; "The Injury Machine," The Strategic Organizing Center. April 2022. Available at: http://thesoc.org/wp-content/uploads/2022/04/The-Injury-Machine_How-Amazons-Production-System-Hurts-Workers.pdf
- 5 Colin Lecher. "How Amazon Automatically Tracks and Fires Warehouse Workers for 'Productivity.'" The Verge. April 25, 2019. Available at: <https://www.theverge.com/2019/4/25/18516004/amazon-warehouse-fulfillment-centers-productivity-firing-terminations>. See also: Katherine Long. "Amazon fined \$60,000 after 'willfully' violating safety rules at a Seattle-area warehouse, regulators say." Business Insider. Mar. 21, 2022. Available at: <https://www.businessinsider.com/amazon-fined-serious-violation-washington-state-warehouse-worker-safety-2022-3>
- 6 OSHA Inspections: 317961850, Dupont WA, May 4, 2021; 317965723, Kent WA, March 9, 2022; 1608898, Waukegan, IL, 1/17/23; 1608788, Deltona, FL, 1/17/23; 1607234, New Windsor, NY, 1/17/23; 1611861, Nampa, ID, 1/31/23; 1611567, Aurora, CO, 1/31/23; 1610874, Castleton, NY, 1/31/23; 1615182, Colorado Springs, CO, 2/15/23.
- 7 Enforcement Case File Information, Washington State Department of Labor and Industries, inspection number 317965723, Mar. 9, 2022 (obtained in response to public records request). It states that "This violation is being classified a willful since this is our fourth recent inspection with Amazon, where pace of work and WMSD risk factors have been an issue. All three of the previous warehouse inspections (317965157 Dupont warehouse, 317964648 Sumner warehouse and 317961850 Dupont warehouse) were based on similar complaints regarding injuries resulting from these factors ... They have all been appealed before the BIIA, with Amazon arguing that they are not doing anything unsafe. Amazon is demonstrating plain indifference in that they have been made aware of the hazards and increased injury rates yet are making no effort to take corrective action."
- 8 Katherine Long. "Amazon to maintain pace of warehouse work despite regulator's citation." Seattle Times, June 10, 2021. Available at: <https://www.seattletimes.com/business/amazon/amazon-to-maintain-pace-of-warehouse-work-despite-regulators-citation/>
- 9 "Delivered with Care," Amazon, March 14, 2023, p.4. Available at: <https://cdn-safety.aboutamazon.com/ea/c3/d72d03394d0db22e336048031ec8/amazon-safety-report-2022-v41.pdf>
- 10 The number of facilities is based on the number of establishment-specific records that Amazon reported to OSHA for 2017 through 2022.
- 11 SOC Analysis, Amazon ITA data submitted to OSHA for 2022.
- 12 AMAZON.COM, INC. v. ATTORNEY GENERAL LETITIA JAMES, Case 1:21-cv-00767, Complaint, paragraphs 87-88.
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POWER AT WORK



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