

THE WORST MILE

Production Pressure and the
Injury Crisis in Amazon's
Delivery System



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Introduction

Amazon's e-commerce business boomed during the COVID-19 pandemic, tripling the company's profits from \$11.6 billion in 2019 to \$33.4 billion in 2021.¹ To fulfill its promise of fast delivery, Amazon raced to expand its fulfillment and delivery operations in the U.S., doubling its capacity in 24 months.² The company's delivery arm, Amazon Logistics, became the third-largest parcel carrier in the U.S. by the end of 2021 and has continued to grow rapidly since then.³ According to the company's own estimates, Amazon is likely to become the largest parcel carrier in the U.S. in the first half of 2022, managing a higher parcel delivery volume than even the United States Postal Service.⁴ In the same year that Amazon's founder, Jeff Bezos, pledged to make the company "Earth's Safest Place to Work," Amazon's enormous profits have come at great cost to its delivery workers, many of whom have had to sacrifice their bodies to meet the company's aggressive production demands.⁵

As of 2021, Amazon changed the way that it classified its facilities for purposes of reporting injury data to distinguish between parts of its operations that it believes are part of the "General Warehousing and Storage" industry and those that are part of the "Couriers and Express Delivery Services" industry.⁶ In this report, SOC's analysis focuses on Amazon's delivery system, which this report defines as including both the facilities that Amazon classifies in the "Courier and Express Delivery Services" industry and the company's last mile delivery contractors. The workers in Amazon's delivery system work at one of its facilities as direct employees, deliver packages as gig workers via Amazon's Flex app, or drive for one of Amazon's delivery contractors, which Amazon calls Delivery Service Partners (DSPs).

Drivers hired by Amazon DSPs likely account for half of all Amazon delivery system workers in the U.S., yet the company does not include these drivers in its public reporting of injury rates.⁷ Amazon has designed its DSP program such that it can maintain extensive control over DSPs' operations and employees, yet dodge responsibility for the human toll of its intense productivity demands.⁸

SOC's analysis found that drivers for Amazon DSPs experienced one injury per five full-time-equivalent workers in 2021— a nearly 40 percent increase above the previous year's injury rate.



This report analyzes injury data that Amazon and its delivery contractors submitted to the Occupational Safety and Health Administration (OSHA) for 2020 and 2021. SOC's analysis found that drivers delivering packages for Amazon DSPs were injured at an astounding rate of nearly one injury per five full-time-equivalent workers in 2021 (18.3 per 100 workers) – a nearly 40 percent increase above the previous year's injury rate. Delivery stations, the facilities where Amazon workers prepare packages for delivery, continue to be the most dangerous type of Amazon facility, with average injury rates more than 40 percent higher than the company's already dangerous warehouses.⁹ Amazon's delivery system facilities overall, as reported without DSPs, remain more dangerous than the rest of the industry, with injury rates 13 percent higher than the non-Amazon industry average.¹⁰

SOC's analysis of Amazon's injury data raises major questions about the company's management of safety issues in its delivery operations, and about the company's public claims regarding its safety record. Recently, CEO Andy Jassy wrote to Amazon shareholders and claimed that Amazon's injury rates were "a little lower than the average of our courier and delivery peers."¹¹ This claim is misleading on multiple levels: it uses outdated data, a skewed industry comparison, and excludes Amazon's enormous contracted delivery driver workforce from the company's injury rate. (See Page 6)

Amazon workers must continue to organize for safe jobs, shareholders must demand accountability from the board and executives, and enforcement agencies must scrutinize the company's abject management failures -- until Amazon finally starts to put workers' safety before production and profits.



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Amazon's Delivery System

Amazon's delivery system is designed to ensure the fastest possible delivery while maintaining the company's control over every step of the process.

Amazon's delivery system includes air hubs, sortation centers, delivery stations, and DSPs, which employ the delivery drivers who transport packages to customers' homes. Amazon also hires drivers as "independent contractors" through its app, Amazon Flex.¹²

Although DSP operators are the employers of record for the DSP delivery drivers, Amazon maintains near-total control over every aspect of the delivery work. DSP drivers wear Amazon uniforms and drive Amazon-branded vehicles.¹³ They are required to utilize an Amazon-provided electronic device called the Rabbit that tracks drivers in real time and gives them turn-by-turn directions.¹⁴ Amazon also mandates that drivers use the company's Mentor app, which monitors and scores their driving behavior, including speeding and seat belt usage.¹⁵ Increasingly, Amazon requires the installation of AI cameras that record inside and outside a driver's van; these cameras track, among other things, drivers' yawns and eye-movement patterns, purportedly to detect distracted driving.¹⁶ A privacy policy provided to drivers notes that footage from these cameras is available to both Amazon and DSP management.¹⁷

Amazon is not serious about driver safety

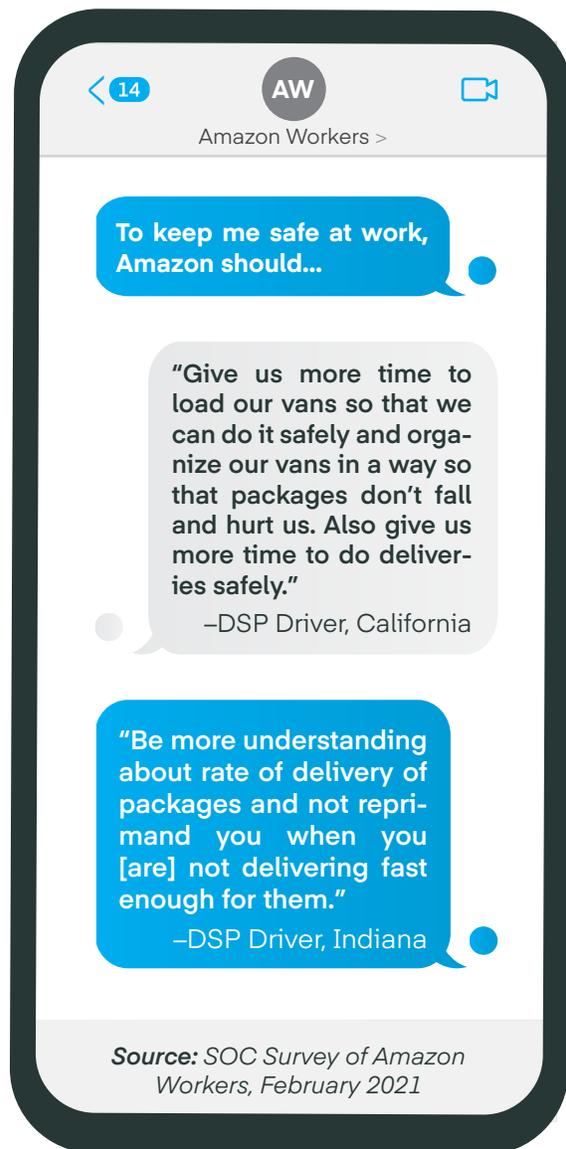
DSP operators, drivers, and a major workers' compensation insurer cite Amazon's delivery quotas as leading to unsafe work conditions. But Amazon has focused on monitoring driving behaviors through its Mentor app and AI cameras, ignoring evidence that production pressure is causing both dangerous driving and driver injuries.¹⁸

According to DSP operators and to lawsuits lodged by DSP owners across the U.S., Amazon sets unmanageably high quotas for delivery drivers. Claims in one lawsuit state that during peak times, Amazon expected a DSP operator in Sacramento to deliver 350-400 packages per day per van.¹⁹ To complete this number of deliveries in a 10-hour shift, drivers would need to park, sort, deliver, and document a delivery approximately once every 1 to 2 minutes—presuming they do not take any breaks.

The task of delivering such a high number of parcels per shift is something many drivers are finding impossible to achieve at all, let alone safely. Earlier in 2021, a DSP operator posted on a private Amazon forum that they had seen driver injuries triple, a pattern they believed was related to Amazon's increased production pressure.²⁰ The DSP operator elaborated that "asking a driver to do a stop every 36 seconds [...] is not sustainable nor safe."²¹ Nearly 20 other DSP operators replied, agreeing that drivers making more stops led to more worker compensation claims.²²

DSP drivers who fail to meet Amazon's production demands face termination. A driver in Indianapolis, IN interviewed in March 2022 reported that Amazon's production expectations are communicated through a system of scores that rank them against their co-workers in terms of delivery completion rates and delivery speed. The driver said that she had personally known at least 15 drivers who were terminated for low rankings since she had worked at an Amazon DSP.²³ This system of monitoring and discipline directly contributes to the pressure that drivers feel to move at unsafe speeds in order to complete their delivery quotas.

Drivers themselves report that they experience high rates of injury driven by intense production pressure. In February 2021, SOC conducted an online survey that included nearly 1,000 Amazon workers. Among survey respondents who worked in delivery stations or as drivers, nearly half (49%) reported missing work because of pain or injury. Of these workers, nearly nine in ten (89%) said their pain or injury was related to production pressure or speed.



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Former Amazon delivery driver John Bruglio spoke with a reporter in June 2021 and said, “during the pandemic, we were doing 400-plus packages a day . . . Amazon cares more about the package and the customer than how it gets there.”²⁴ His colleagues, he said, were “exhausted. They’re getting hurt, they’re having to work hurt, and if you don’t like it, you’re fired.”²⁵

The most common injuries among Amazon drivers, according to Colorado’s largest workers’ compensation insurer:

- #1 Slips, trips and falls**
- #2 Strains such as muscle twisting**
- #3 Dog bites**
- #4 Vehicle accidents**
- #5 Striking an object such as a fence post**

Ankles were the body part most likely to be injured followed by knees, lower backs, heads and feet.

Source: Pinnacol Assurance report on Amazon Delivery Partners, December 2020²⁹

In 2020, the largest workers’ compensation insurance carrier in Colorado, Pinnacol Assurance, found that Amazon DSP drivers experienced “slip and fall” and animal-related injuries more commonly than other delivery drivers in Colorado.²⁶ The insurance provider also saw a high incidence of strain injuries, which, it said, reflects the pace of the workload and weight of packages, and is expected among employees who handle as many packages per day as Amazon drivers.²⁷ A Pinnacol safety expert pointed to speed pressure as a key contributing factor to driver injuries, saying “feeling hurried and rushing is a hazard in any work environment but could be especially impactful among [DSP drivers] who must complete many stops every shift. Employers should balance their expectations of employees working quickly with expectations that they work at a pace that is safe and sustainable.”²⁸

Making matters worse, Amazon refuses basic accommodations that could help DSP drivers meet its exorbitant delivery quotas safely. For example, two Portland, Oregon-based DSPs who have sued Amazon claim that Amazon refused their request to use smaller vans in the narrow streets of Portland’s West Hills, which would have made it safer for drivers to navigate those streets.³⁰ Amazon also refused to allow the DSPs to modify their routes to account for terrain, density, traffic congestion, or construction.³¹ In an environment where many DSPs are operating on razor-thin margins, a DSP often cannot afford to fall short of Amazon’s delivery demands and sees sacrificing its drivers’ safety as the only path to profitability and survival, while drivers are forced to sacrifice their health and safety in order to keep their jobs.³²



Overview of Injury Data

Amazon claims to have spent \$300 million on worker safety initiatives in 2021, yet workers across its delivery system; at delivery stations, sortation centers, and DSPs, were injured at higher rates in 2021 than in 2020.³³ Further, SOC's analysis found that workers at Amazon DSPs and in Amazon delivery stations were injured at substantially higher rates and with greater severity than workers at non-Amazon delivery companies.³⁴ Moreover, the full scope of injuries is omitted from Amazon's own descriptions of its safety record as a result of Amazon's extensive use of purportedly independent contractors.

The SOC's analysis is based on internal injury reporting data that Amazon and other employers provided to OSHA in 2020 and 2021. All employers in the warehouse, delivery, grocery, or wholesale trade are legally required to submit their annual injury and illness reports to OSHA for any facility with 20 or more employees.

Since Amazon does not report injury information for its delivery drivers, the contracted DSP operators are separately obliged to report that data to OSHA. SOC was able to identify 201 DSPs that submitted injury records to OSHA in 2021, roughly 10 percent of Amazon's DSPs in the U.S., and based its analysis of DSP driver injury rates on this set of data.³⁵

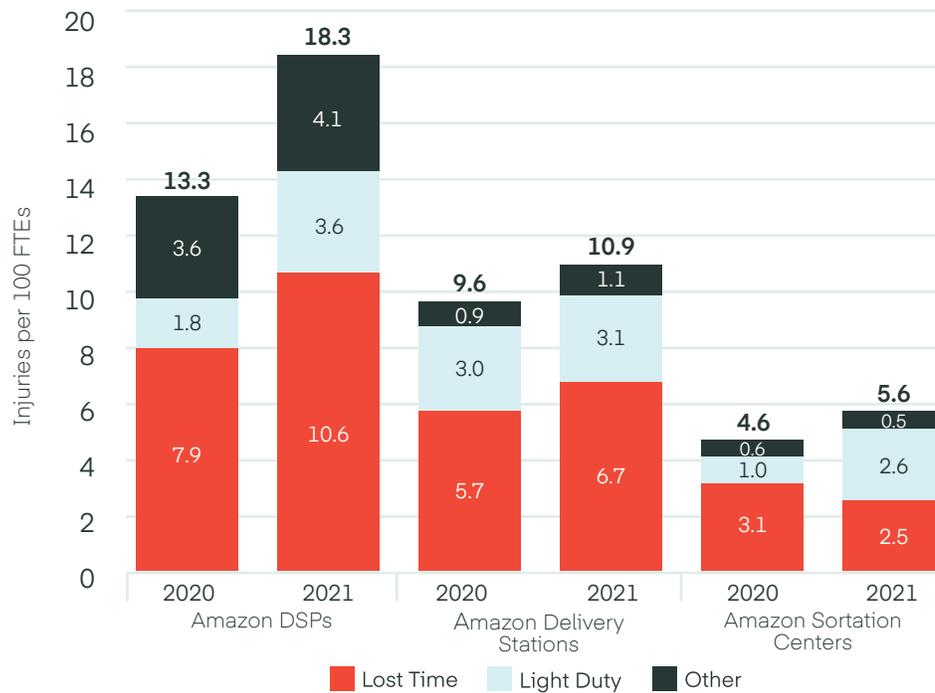
Year-over-year injury rates in the Amazon delivery system, 2020 and 2021

SOC's analysis found that contracted Amazon DSP drivers were injured at the shocking rate of 18.3 per 100 workers in 2021, nearly one injury per five workers—as shown in Figure 1.³⁶ This is a 38 percent increase over the 2020 rate. Amazon delivery station workers were also injured at a high rate in 2021: 10.9 injuries per 100 workers, almost 15 percent higher than the year prior.³⁷ Workers at Amazon's sortation centers, the least dangerous facilities within Amazon's delivery system, experienced 20 percent more injuries in 2021 than in 2020.

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FIGURE 1: Injury Rates at Amazon DSPs, Delivery Stations, and Sortation Centers by Injury Category, 2020 and 2021



The rate of serious injuries in Amazon's delivery system – defined as those in which workers are hurt so badly that they either cannot perform their regular job functions (light duty) or are forced to miss work entirely (lost time) – increased substantially from 2020 to 2021, outpacing the growth in the overall injury rate. In 2021 Amazon DSP drivers sustained serious injuries at a rate of one injury per seven workers (14.2 serious injuries per 100 workers), 47 percent higher than in 2020 (9.7 per 100 workers). Workers at sortation centers were seriously injured at a rate 24 percent higher than in the preceding year, and workers at delivery stations experienced 12 percent more serious injuries in 2021.

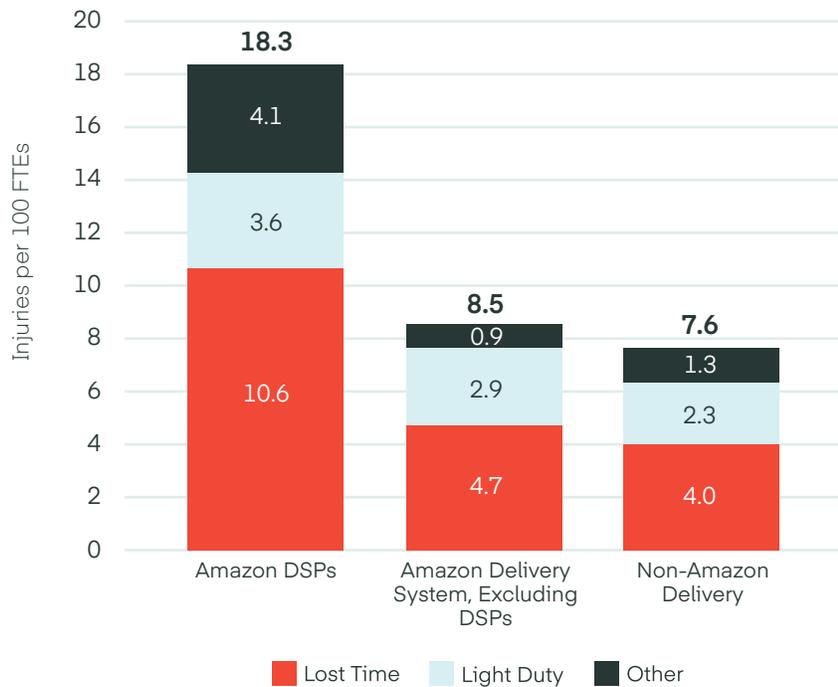
Comparing injury rates at Amazon vs. non-Amazon courier and delivery industry

For Amazon's directly employed delivery system workers, most of whom work in either delivery stations or sortation centers, the injury rate reported by Amazon for 2021 was 8.5 per 100 workers, 13 percent higher than the injury rate for the rest of the courier and delivery industry (7.6), as shown in Figure 2. SOC found an average injury rate for Amazon DSPs that submitted data to OSHA of 18.3 per 100 workers, nearly two-and-a-half times the rate of the non-Amazon delivery industry.



As of June 2021, an Amazon representative said that the company had 2,000 DSPs in the U.S. who had created 115,000 jobs.³⁸ This means that Amazon drivers could make up half (49 percent) of the workforce in Amazon’s delivery system and outnumber its other last-mile delivery workers, those in delivery stations, by nearly two-to-one.³⁹ Amazon does not, however, report injury data for its DSP drivers. Amazon’s choice not to disclose injury data for a large and dangerous segment of its delivery system artificially lowers its injury rates and obscures an apples-to-apples comparison of the company’s performance with those of its industry peers.

FIGURE 2: Injury Rates by Injury Category for Amazon Delivery System, Amazon DSPs, and Non-Amazon Delivery, 2021



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Amazon's Claims on Workplace Safety

In his first letter to shareholders published in April 2022, CEO Andy Jassy wrote "Our injury rates are sometimes misunderstood. . . In the last U.S. public numbers, our recordable incident rates were. . . a little lower than the average of our courier and delivery peers (7.6 vs. 9.1). . . but we don't seek to be average. We want to be best in class."⁴⁰ This claim is seriously misleading, in at least three ways:

First, Jassy is citing injury rates for 2020 in April 2022, after the company collected and reported an entire additional year of injury data to OSHA. SOC's analysis has shown that Amazon's injury rates in 2020 were substantially lower than in either 2019 or 2021, likely due to the company's decision to relax some production quotas as a result of the COVID-19 pandemic.⁴¹

Second, Jassy's letter claims to compare Amazon's "courier and delivery" operations with industry peers yet uses injury rates for Amazon that clearly exclude a massive segment of its delivery operations, its subcontracted delivery drivers. SOC's analysis found that these drivers made up about half of the workforce in Amazon's delivery system in 2021 and that DSP injury data submitted to OSHA shows shockingly high rates of injuries (18.3 per 100 workers) among Amazon drivers. Thus, Amazon is comparing a non-driver injury rate to an industry average that likely includes many delivery drivers employed by its competitors.⁴²

Third, Jassy's letter uses a cherry-picked industry comparison to make Amazon's injury rate look better. The actual industry average injury rate reported by the BLS for courier and delivery companies in 2020 was 7.5, yet Jassy and Amazon use a comparison figure of 9.1, which was the injury rate BLS reported for a subset of delivery establishments with employment between 250-999 employees.⁴³ Less than half of Amazon delivery system facilities fell in this category in 2020, but this was the only industry sub-category that had a higher injury rate than Amazon Logistics for the year.⁴⁴



Conclusion

Amazon's delivery quotas and production pressure are contributing to an escalating injury crisis among workers in every segment of Amazon's delivery system, from direct employees in sortation and delivery stations to contracted DSP drivers. Amazon claims to have taken several steps to promote safety, including increased surveillance of drivers.⁴⁵ Amazon has refused however, to address the core issue that fuels injuries in its delivery system: abusive delivery production demands. In fact, SOC analysis indicates injury rates for DSP drivers have gone up by 38 percent from 2020 to 2021 despite Amazon's introduction of additional surveillance in early 2021.⁴⁶ The real issue is Amazon's sky-high production pressure and delivery quotas which push Amazon workers to work too fast and DSP drivers to risk injury as they rush to hit delivery targets.

Rather than address the underlying issue that has led to Amazon DSP drivers getting injured at a rate more than twice the industry average in 2021, Amazon has structured its operations to insulate itself from responsibility for these workers' safety. Adding insult to injury, Amazon has made repeated public claims about injury rates in its delivery operations as if half of the workers who perform this work simply do not exist, misleading its workers, shareholders and the public about the true dangers that Amazon's operations create in communities across the nation.

Amazon does not lack the resources to make its workplaces safer. On the contrary, the company made record profits during the COVID-19 pandemic, \$21.3 billion in 2020 and \$33.4 billion in 2021, but its injury rates continued to climb.⁴⁷

Amazon's retail success was built on its ability to deliver packages fast. Amazon has shown that it is willing to ignore and deny the continuing and worsening injury crisis among its delivery system workers, despite their crucial role in the company's growth through the COVID-19 pandemic and beyond. Amazon will continue to squeeze its workers, and will continue to downplay its worker injuries, unless it is forced to take meaningful action to make its workplaces safer.

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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 ("DART") were calculated as aggregates, not simple averages, of the various rates at individual locations. Injury rates are reported as injuries per 100 "full-time-equivalent" employees. OSHA assumes that 2,000 employee-hours equals one full-time -equivalent 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 could include heat-related conditions, skin diseases, respiratory conditions, and poisoning, among others.

This analysis covers Amazon's delivery system, including establishments that Amazon reported to OSHA under NAICS Code 492110, Couriers and Express Delivery Service, and establishments that the SOC has identified as an Amazon DSP. The analysis does not include Amazon Flex drivers because they do not report injuries to OSHA.

To identify Amazon DSPs, the SOC started with a full list of delivery companies which had reported their injury data to OSHA then excluded large companies known to be independent of Amazon, such as DHL, from the list. The SOC examined the remaining companies one-by-one, identifying Amazon DSPs through 1) job listings on Fountain, a third-party job listing website to which Amazon directs drivers interested in working for one of its DSPs (accessible here <https://amazon-na.fountain.com/jobs/amazon-delivery-service-partner>), 2) job listings on Indeed or other job sites in which a company identified itself as a DSP, and 3) a DSP's website or social media. The SOC classified a company as an Amazon DSP only if it exclusively delivers for Amazon and has explicitly advertised itself as an Amazon DSP. SOC was able to identify 201 Amazon DSPs that submitted injury data to OSHA for 2021, a substantial increase over the 129 DSPs that SOC had identified as submitting injury data in a previous report, Primed for Pain.



Amazon does not breakdown its establishments by type when reporting to OSHA. To determine whether each establishment was a sortation center or delivery station, or another type of facility, the SOC matched the reported establishment code to a list maintained by the supply chain consulting firm MWPVL (accessible here https://www.mwpvl.com/html/amazon_com.html) which provides this information.

Establishments classified as part of Amazon's logistics operations by MWPVL but not reported by Amazon to OSHA in 2021 as operating under the 492110 NAICS code were not included.

The comparison illustrated in Figure 2, is between Amazon logistics establishments as reported to OSHA, Amazon DSPs as reported to OSHA and identified by the SOC, and all companies who reported to OSHA using the 492110 NAICS Code excluding Amazon and Amazon DSPs.

When reporting data to the OSHA for 2021, Amazon re-classified its logistics operations (sortation centers, delivery stations, and air hubs) under the Couriers and Express Delivery Services NAICS code (492110). Prior to 2021, Amazon had classified all its logistics and delivery operations as operating in the General Warehouse and Storage NAICS Code (493110). There was no discernable change in the work processes at these facilities, so Figure 1 includes all Amazon Delivery Stations that were classified in the General Warehouse and Storage industry in 2020.

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- 41 The injury rates Jassy's letter cites are identical to those presented in Amazon's "Delivered With Care" report, p. 11, which refer to 2020 data (<https://safety.aboutamazon.com/delivered-with-care>). OSHA announced that it had collected 2021 injury data and was releasing the data to the public as of April 5, 2022 (<https://www.osha.gov/news/newsreleases/trade/04052022>), SOC analysis of COVID-19 pandemic likely impact on temporarily lowering injury rates at Amazon in 2020: "Primed for Pain" pages 5, 12-13, (<https://thesoc.org/wp-content/uploads/2021/02/PrimedForPain.pdf>)
- 42 SOC analysis of Amazon injury data submitted to OSHA for 2021 under the "Courier and Delivery Services" NAICS Code, 492110.
- 43 BLS Incidence rates of total recordable cases of nonfatal occupational injuries and illnesses by distribution and employment size, 2020. Courier and Delivery Services, NAICS 492100. Accessed via: https://www.bls.gov/iif/oshwc/osh/os/20qrtl1_00.xlsx
- 44 SOC analysis of Amazon facility employment size as reported by Amazon to OSHA in 2020 OSHA 300A injury data.
- 45 "Amazon is using AI-equipped cameras in delivery vans and some drivers are concerned about privacy," CNBC, Feb. 3, 2021: <https://www.cnbc.com/2021/02/03/amazon-using-ai-equipped-cam->



46 Id.

47 2020 Figure: "Amazon.com Announces Financial Results and CEO Transition," Amazon, Feb. 2, 2021:
<https://ir.aboutamazon.com/news-release/news-release-details/2021/Amazon.com-Announces-Fourth-Quarter-Results>.

2021 Figure: "Amazon.com Announces Fourth Quarter Results," Amazon, Feb. 3, 2022:
<https://ir.aboutamazon.com/news-release/news-release-details/2022/Amazon.com-Announces-Fourth-Quarter-Results>.

48 <https://thesoc.org/wp-content/uploads/2021/02/PrimedForPain.pdf>

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