February 21, 2020

The Honorable Sherrod Brown  
United States Senate  
503 Hart Senate Office Building  
Washington, DC 20510

Dear Senator Brown,

We appreciate the opportunity to discuss Amazon’s longstanding commitment to protect the health and safety of our workers. A copy of this response is being sent to the other Senators who also signed the February 7 letter.

Over the last decade, Amazon has created more U.S.-based jobs than any other company. These jobs include more than 8,500 in Ohio. Our growing workforce is the heart and soul of our company. Our employees drive Amazon’s success, and we believe we have a responsibility to protect and support each one of them.

We are also grateful for the chance to address some of the misrepresentations that recently have been made about our workplace culture and policies. We believe so strongly in our workplace safety environment and culture that we offer public tours of our fulfillment centers. In 2019, more than 300,000 people took tours of Amazon fulfillment centers around the world. We respectfully request that you tour an Amazon fulfillment center and see for yourself how we prioritize safety at our facilities. We have reached out to your staff to request dates to host you at a fulfillment center in Ohio, or one near Washington, D.C.

Before we address the specific points raised in your letter, we would like to address three issues: the safety culture at Amazon; our approach to protecting associates; and injury rates and reporting practices.

Safety Culture at Amazon

Safety is Amazon’s number one priority. To us, one injury is too many. We work hard to ensure that our associates return home safely after each shift. Safety training at Amazon starts on an employee’s first day and continues throughout their tenure with the company. We begin each day with a pre-shift meeting that includes stretching and a short safety briefing with line managers to ensure that safety is the focus at the start of the shift.

Amazon has one of the largest workplace health and safety (WHS) organizations in the world, with more than 2,500 WHS professionals globally and nearly 1,900 in North America. In 2019, we provided more than one million hours of safety training to associates and invested more than $55 million on safety improvement projects. Several key investments initiated in 2019 include: improving the safety of our facility parking lots, retrofitting pallet racking so employees have the newest equipment in dynamic areas of the fulfillment center, and improving powered industrial truck and pedestrian safety controls.

This year, we plan to increase our investment in safety improvement projects six-fold to more than $300 million. Several new safety investments, which we have planned or begun to implement, are focused on design changes and technological improvements. For example, to help reduce muscle fatigue, we are redesigning workstations where associates stand and pack boxes, so that they are adjustable to match an associate’s height and include ergonomic mats on which to stand. We are also upgrading digital sensors in our facilities to identify, in real-time, quality control defects that affect the safety of our associates. These
and other improvements will be piloted in several fulfillment centers around the U.S., and will hopefully be in all Amazon facilities by the end of the year.

Our safety culture is built on a philosophy of continuous improvement. We developed a Global Management EHS system that breaks down health and safety standards into auditable self-assessments. As part of that system, our ergonomics program is aligned to industry practices, and applicable Occupational Safety and Health Administration (OSHA) standards, with the core focus on eliminating manual material handling risks that are associated with musculoskeletal disorders. Our in-house industrial design ergonomics team trains our engineering teams in ergonomics design principles and specifications. This has resulted in new workstation designs, equipment, and job tasks that have addressed muscle fatigue. Our ergonomics team also partners with the operations team to identify, evaluate, and implement feasible control measures for existing workstations and tasks, as well as continually exploring how to improve administrative controls such as job rotation and training.

In addition, all of our Amazon robotics facilities employ Injury Prevention Specialists who are certified athletic trainers. They work directly with associates on ergonomic techniques to reduce the likelihood of soft tissue injuries and musculoskeletal disorders. In 2019, we partnered with industry-leading academic institutions that specialize in musculoskeletal disorders to further focus on the reduction of injuries. We also engage third-party ergonomists both for technical assessment and peer review.

While we are proud of the current investments and infrastructure that we have put in place, we know that additional resources will help to ensure that we provide the best work environment for our associates. This year, we are hiring additional ergonomists and further rolling out safety design ergonomics training for engineers and field staff.

To train and prepare our newly-hired associates for the job, we recently developed the WorkingWell program. The program uses academic research and certified athletic trainers to educate our associates and leadership on healthy work practices, including: a ramp-up schedule to prevent over-training and the risk of musculoskeletal disorders; classroom sessions that teach proper body movements, health, and wellness; and ongoing safety training engagements. Early results from the pilot program show a significant improvement in injury reduction outcomes for our associates. Based on this initial success, Amazon has committed to continue and expand the program throughout our network this year. This will be the standard by which we on-board new associates moving forward.

### Amazon’s Comprehensive Approach to Protecting and Supporting Workers

In addition to a safe work environment, we provide our workers with industry-leading wages and benefits on day one. In 2018, we announced that all Amazon associates will earn at least $15 per hour. Our benefits package includes: medical, vision, and dental insurance; generous parental leave, including five months of maternity leave; and a network of support programs. Full-time, hourly employees have the same benefits as corporate employees, ensuring every Amazonian has access to the best health care and insurance programs.

In addition, we provide new career training opportunities to our associates. We offer Career Choice, in which Amazon pays up to 95% of tuition and fees towards a certificate or diploma in qualified fields of study, leading to in-demand jobs. Since launching Career Choice in 2012, more than 25,000 Amazonians have received training for high-demand occupations, including aircraft maintenance, computer-aided design technician, commercial driving, and nursing. We also announced an upskilling initiative that will see a $700 million investment to provide training for 100,000 U.S. employees by 2025, for skills related to machine learning, IT jobs, software engineering, and Amazon Web Services training and certification.
Beyond investing in our own workforce, Amazon is proud to have created billions of dollars of investments in local communities around the country. Since 2010, Amazon has invested more than $270 billion in infrastructure and compensation to our associates. We have indirectly supported more than 680,000 jobs in areas like construction, logistics, and other professional services. Almost one-third of the investment and jobs came from the states represented by signatories on this letter. Amazon also supports more than 1.9 million businesses, courier companies, content creators, and developers in the U.S.

We are proud of the jobs we have created in Ohio and the positive impact Amazon has had on your local economy.

**Amazon’s Injury Rates and Reporting Practices**

As noted in several published studies, safety incidents across all industries are underreported from 20% to as high as 70%. At Amazon, however, our illness and injury rates reflect our commitment to fully reporting and making sure we have the clearest possible picture of any potential safety risks. The nuances in OSHA’s recordkeeping definitions draw lines between injuries that are recordable and those that are not, and they create ambiguity when determining if an injury is a result of work or home activities. In 2016, we decided to change our approach to recordkeeping and design a system that reported all injuries—no matter the severity—to remove elements of subjectivity and provide the data needed to drive comprehensive safety improvements.

If an associate is injured and given work restrictions that do not match the positions available in our fulfillment centers, we have taken steps to ensure that their compensation is not negatively impacted. It is a common practice at other workplaces that when an injured employee has work restrictions that cannot be met by the employer, he or she is placed on leave and given partial pay through workers’ compensation. To reduce the financial impact of an injury on our associates, Amazon has created the Amazon Community Together (ACT) Program. In locations where ACT has been implemented, associates who agree to participate in the program receive their full wages and benefits by working at local non-profit organizations while focusing on their recovery. The positions available through the ACT program typically meet even the most stringent work restrictions and also provide a valuable resource to the community. Amazon has partnered with over 750 local and national non-profit organizations such as Habitat for Humanity, Goodwill, and the American Red Cross. Through ACT, not only do our associates maintain full compensation while injured, but data has also shown that recovery times have improved by nearly 40 days compared to associates that are placed on a leave of absence. This program rolled out to select fulfillment centers in North America in 2019, with plans to expand in 2020.

In addition to the response above, we would like to respond below to the specific actions you requested.

**“Reduce workers’ quotas and speed requirements, schedule frequent rest breaks during high production shifts, and eliminate the policy of terminating workers who do not meet their quotas three times”**

Amazon does not use quotas and does not have a policy that terminates associates after they fail to meet their target performance expectations three times. Our target performance expectations, however, are based on the performance, aggregated over time, across the network and each individual facility’s performance. We have dedicated teams that collect data on performance expectations and study their

---

effectiveness. Their goal is to ensure the performance expectations are attainable, while prioritizing safety. When expectations are not met, managers provide coaching and training to individual associates.

All associates are required to take breaks throughout their shifts. Associates, however, may take additional breaks outside of their traditional break times. There are ample bathrooms throughout our fulfillment centers, as well as multiple breakrooms or break areas with seating, vending machines, refrigerators, microwaves, and entertainment or leisure activities such as TVs and games like basketball or foosball tables. In addition to our break policies, we have programs in place to help associates achieve their performance targets, such as the previously mentioned WorkingWell program.

“Cease including bathroom breaks as ‘time off task’ and ensure workers are allowed and encouraged to hydrate and use the bathroom as needed”

Please see the above answer. Associates are allowed and encouraged to take breaks as needed, in addition to their traditional breaks during a shift. These additional short breaks—including time spent using the restroom—are paid.

If there are instances where our leaders cannot account for the whereabouts of an associate for a significant amount of time (“time off task”), managers speak with the associate to understand if there are any issues that can be addressed by the leadership team (such as defective equipment or process defects). If the reason behind the “time off task” is related to bathroom breaks, it is excused. Simply put, we do not reprimand employees, or take adverse actions, for bathroom breaks. Amazon has no policies governing the amount of time that an associate can use the restroom. If there is an underlying medical condition that requires an associate to use the restroom frequently, their leader will encourage them to seek medical advice and Amazon will accommodate any documented needs that they have.

“If Amazon provides worksite medical care, ensure it is staffed by licensed health care professionals operating within their legal scope of practice”

Amazon fulfillment centers have a program called AMCARE that ensures associates are given first-aid assistance for injuries and illnesses in a timely manner when they are in an Amazon facility. AMCARE uses Onsite Medical Representatives (OMRs) who all hold EMT-Basic Certifications. While our OMRs are certified to respond to medical emergencies, their base function is to provide first-aid care for both occupational and non-occupational injuries. The care protocols are based on clear, established company guidelines for first-aid care, and when to escalate care to outside medical treatment in accordance with local, state, and federal regulations. At any point, associates can choose to visit a doctor to seek medical assistance. Per our protocols, no associate should ever be discouraged from seeking additional care.

“Provide immediate referrals to a physician for workers who report to Amazon’s on-site medical care that their symptoms are not improving and for workers who request medical care from a physician so they can see the doctor or urgent care provider of their choice and receive adequate medical treatment”

We provide immediate referrals for associates. Under the protocols that we provide for our AMCARE OMRs, if an associate is receiving first-aid treatment for a work-related injury and their symptoms have not improved or worsened, OMRs are directed to refer the associate for outside medical treatment. If at any time an associate asks to see an outside medical provider, our OMRs will, of course, accommodate the associate’s request.

Additionally, Amazon has deployed telemedicine services and technology that allows for our OMRs to virtually contact licensed nurses and physicians 24 hours a day for non-life threatening medical situations. This guidance frequently results in our OMRs referring associates to outside medical care. While telemedicine
is not a replacement for a medical referral, it does assist in identifying when advanced medical care is needed. Beyond the interactions with OMRs, associates are able to see an outside medical provider of their choice because of their comprehensive medical benefits they receive on day one.

“Conduct a comprehensive ergonomic evaluation of all warehouse tasks involving manual material handling and implement changes to the physical workplace and to work practices that reduce or eliminate employee risk or ergonomic injuries”

We strive to establish an injury-free work environment through proactively eliminating risks, engaging associates, teaching safety and health principles, and holding leaders accountable for safety compliance. In accordance with our internal policies, the WHS team conducted a Job Hazard Assessment for every position in the fulfillment network in 2019 to understand the physical requirements, potential hazards, and safety controls needed for each job. Theses analyses are required to be completed at least annually at every site in our network, as well as any time a process changes. Our global WHS team is constantly reviewing and analyzing data in our fulfillment centers to improve, correct, or change processes and physical conditions to alleviate muscle fatigue. In 2019, we trained more than 400 WHS personnel to assess ergonomic risks, and we regularly engage with third-party ergonomics experts to audit our evaluations on how to improve the safety of our workplaces.

We are confident in our understanding of the hazards for every position through our Job Hazard Assessments, but we are also continuously improving these assessments, particularly those related to ergonomic risks. As previously stated, Amazon is investing in additional internal and external ergonomics and engineering resources to continuously review and improve on process and workstation design. Through the addition of these resources, we will use industry-leading techniques and technology to further identify opportunities for improvement.

“Implement a strong and enforceable company policy that prohibits supervisors and managers from discrimination or retaliation when workers report injuries or safety concerns”

Amazon has a strong company policy in place that prohibits discrimination and retaliation against associates who report injuries or safety concerns. It is important that associates are comfortable reporting any incidents that they feel make their workplace unsafe. We will promptly investigate concerns associates raise and will take corrective action.

We proactively seek feedback through an innovative tool that engages our associates to determine their sentiments about Amazon’s safety culture, called the Safety Leadership Index (SLI) program. In addition, associates have the ability to submit written questions to managers, email senior leadership, or participate in our Voice of the Associate board. Some of the opportunities to provide feedback are anonymous (e.g., SLI program), while others can be either public or anonymous (e.g., Voice of the Associate board). All of these programs are available to full-time, part-time, and temporary associates.

“Ensure workers, who know their jobs and working conditions best, have a guaranteed way to raise safety and health concerns and provide recommendations to correct identified hazards and keep workers apprised in a timely fashion of action taken by management regarding their concerns”

As described in the above response, Amazon has various methods to raise and report safety and health concerns directly to management, both publicly and anonymously. We feel engaging with our associates directly is the best way to receive real-time feedback on safety concerns in our facilities.

Through our SLI program, managers collect feedback from our associates in real-time to help improve the workplace environment and proactively manage risks associated with injuries and illnesses, including unsafe
work conditions or behaviors. We ask associates a series of safety questions each day as they log-in, such as, “Do you have everything that you need to perform your job safely?” We use the responses we receive to quickly spot potential problems by targeting certain sites for deliberate planning and execution of actions for improvement, and to create more avenues for partnerships with associates to increase our communication with them.

In addition to the SLI program, in 2019, we deployed a leadership-led safety engagement program called Digital Safety Circles (DSC). Under the DSC program, every leader in a fulfillment center engages with groups of four to five associates twice a week to discuss current safety opportunities. We collect this feedback to ensure that the results of these engagements are captured and resolved, and the program collects the feedback and findings through our internal tools that allow us to aggregate and deep dive on the results at multiple levels to better understand our opportunities and associate sentiment. Since the launch of the program, we have completed more than 1,000 DSCs.

“Make public Amazon’s summary record of serious injuries (OSHA 300 A) on Amazon’s website for all of the country’s worksites”

We are exploring the best way to make information about Amazon’s safety record public, while protecting employee privacy and confidential information. The OSHA injury logs contain private and sensitive information, such as names of injured workers and descriptions of their injuries. Amazon and OSHA treat these logs as confidential, and they are not shared publicly. We follow all relevant regulations to provide these records to current and former employees, or their authorized representatives, upon request.

In conclusion, we want to reiterate Amazon’s commitment to protecting the health and safety of our associates. This is, and will remain, our top priority. We hope that you can find time to visit one of our fulfillment centers and see firsthand how we keep safety at the forefront of all our activities and are constantly working to make improvements. We welcome your feedback and would be happy to answer any further questions.

Sincerely,

Brian Huseman,
Vice President, Public Policy