

## **Testimony of Laura Padin**

National Employment Law Project

# **In Support of Int. No. 0518-2026: Requiring the Licensing of Last- Mile Facilities**

---

## **Hearing before the New York City Council**

Committee on Consumer and Worker Protection

City Hall

New York, NY

April 9, 2026

### **Laura Padin**

Senior Director of Contracted Worker Justice

---

### **National Employment Law Project**

90 Broad Street, Suite 1100

New York, NY 10004

[lpadin@nelp.org](mailto:lpadin@nelp.org)

**Dear Chair Menin & Members of the Committee:**

My name is Laura Padin, and I am the Senior Director of Contracted Worker Justice with the National Employment Law Project (NELP), a New York-based national nonprofit with more than fifty-five years of experience advocating for the labor and employment rights of low-wage workers. NELP works extensively at the federal, state and local levels, and has regularly advised the New York City Council on protecting workers in the city. Relevant for the legislation that the Committee is considering today, NELP has worked with warehouse and delivery workers across the country to improve their pay and working conditions and to hold logistics corporations accountable to their workers and the public.

I am testifying today in strong support of Int. No. 0518, which would require last-mile warehouse and storage facilities in the city to obtain a business license that would be conditioned on complying with certain safety, training, and employment requirements. The bill is a strong first step in raising workplace standards in an industry rife with exploitation and ensuring last-mile delivery operators are accountable to their workers and the public.

**The Problems Created by the Rise of Last-Mile Delivery**

As detailed in a report last year by the New York City Comptroller's Office, the rise of e-commerce has led to an exponential increase in freight and package deliveries.<sup>1</sup> Corporations like Amazon and FedEx have established last-mile delivery warehouses across the city to package orders and deliver them. In 2021, more than 2.3 million packages were delivered every day across the city, up from 1.1 million in 2017—a 109% increase in just four years.<sup>2</sup>

The logistics of delivering millions of packages has profoundly impacted New York City's communities. The high volume of deliveries has increased congestion and vehicle accidents; truck-related crashes more than doubled after last-mile facilities opened.<sup>3</sup> Air quality has deteriorated as well, particularly in neighborhoods close to warehouses where residents are disproportionately low-income and people of color, including Sunset Park, Red Hook, and Hunts Point.<sup>4</sup>

The rise of last-mile facilities has also resulted in rapid growth in the last mile delivery workforce and a parallel transformation in these jobs due in substantial part to how Amazon, the industry leader and giant, has restructured the last mile delivery system. These facilities rely on thousands of warehouse and delivery workers to get packages from their facilities to customers' homes and businesses. This work includes receiving and sorting packages, moving packages onto delivery vehicles, maintaining warehouses and vehicles, and delivering packages to their final destinations.

Worker injuries are pervasive at last-mile facilities. According to the New York City Comptroller's Office, injury rates per 100 employees at last mile facilities are more than triple the national average for private employers.<sup>5</sup> Severe injuries are also common, with 85% of injuries leading to time away from work or reassignment.<sup>6</sup>

Vehicle accidents near last-mile facilities are increasing as well. Of the 18 last-mile facilities over 50,000 square feet that opened in the city between 2017 and 2022, 14 of the facilities saw an increase in injury-causing crashes in their neighborhoods after the facilities opened.<sup>7</sup>

These high worker injury and vehicle accident rates are not inevitable but partly the result of choices made by Amazon to operate its delivery systems in ways that put workers' health and safety at risk. The most problematic aspects of this system are: (1) Amazon's outsourcing of supervision of the last-mile delivery workforce through a complex system of sub-contracting; and (2) the intense time pressures under which the corporation forces workers in the last mile delivery system to operate.

Amazon uses two systems to deliver the majority of its packages: "Amazon Flex, a platform-like system that relies on independent contractors, and Amazon DSP, a franchise-like system that uses subcontractors to deliver products following Amazon's clearly defined specifications (including its logo and branded vehicles)."<sup>8</sup> Both of these systems rely entirely on contracted delivery drivers who are not directly employed by Amazon.

Amazon advertises its Delivery Service Partners (DSPs) program as a low-capital, start-up opportunity where entrepreneurs can start delivery companies to provide last-mile delivery services exclusively for Amazon.<sup>9</sup> An analysis of OSHA injury data found that Amazon DSP delivery drivers were injured at the shockingly high rate of nearly one injury per five full-time equivalent workers in 2021 (18.3 per 100 workers).<sup>10</sup> DSP delivery workers do not receive the same levels of safety training that established delivery providers like UPS provide.<sup>11</sup> DSPs also have elevated delivery driver turnover rates, with just under half of their workforce having less than one year tenure.<sup>12</sup> High turnover contributes to high injury rates, because new employees are much more likely to be injured on the job.<sup>13</sup>

Despite disclaiming responsibility as an employer for DSP delivery drivers, Amazon maintains near total control over every aspect of the delivery process. DSP drivers report to Amazon delivery stations to pick up packages for their route that has been set by Amazon employees.<sup>14</sup> Amazon uses apps for surveillance and speed tracking, which increases the pressure and pace of deliveries.<sup>15</sup> Amazon also increasingly requires the installation of AI cameras inside and outside of vans, which track everything from a driver's yawns to eye movements.<sup>16</sup>

The high injury rates among DSP delivery workers parallel conditions faced by Amazon warehouse workers, where extreme time demands implemented through automated algorithmic management systems are resulting in similarly elevated injury rates. Amazon's use of algorithmic management and automated decision-making systems, including technological surveillance, automated discipline and algorithmically-controlled quota systems, pressure workers to speed up the pace of their work and risk injury.<sup>17</sup> A 2024 analysis of OSHA data found that the injury rate at Amazon warehouse facilities (6.5 injuries per 100 full-time equivalent workers) was more than 1.5 times that of TJK Companies' warehouses (whose subsidiaries include TJ Maxx, Marshalls, and HomeGoods) and almost triple that of Walmart's warehouses.<sup>18</sup> Moreover, in 2024, the serious injury rate at Amazon warehouses was 5.9 per 100 workers—almost double the rate at non-Amazon warehouses (3.0

per 100).<sup>19</sup> Federal and state OSHA inspectors have cited Amazon for putting speed before safety, “including poor ergonomic job design, the failure to use standard warehouse engineering methods, heavy package weights, and excessive worktime without breaks—all of which increase the risk of serious back, shoulder, and other disabling injuries.”<sup>20</sup>

### **The Solution: Conditioning Last-Mile Business License on Compliance with Safety, Training, and Employment Standards**

Int. No. 0518 represents a strong first step in ensuring that last-mile facilities are accountable to their workers and their local communities. It would do that by establishing standards for licensing, training, and supervision for the delivery workforce in order to reduce the elevated rates of worker injuries, vehicle accidents, and other adverse community impacts under the current unregulated system.

First, it would require last-mile delivery operators to contract with organizations certified to provide health and safety training to the workforce. These organizations would properly train last-mile warehouse workers and delivery drivers to keep them and the public safe. Training elements must include: how to drive a delivery vehicle safely; where and how to make delivery stops along trafficked roads so as to avoid creating safety hazards for pedestrians, cyclists, and workers; best ergonomic practices for workers who handle, sort, and move packages; and how to identify potential injuries, heat stress, or repetitive stress, as well as means to find assistance for physical therapy or other practices to mitigate injuries. Education and training are important tools for informing workers of possible hazards and preventing them.

Second, and equally importantly, it would require last-mile delivery operators to directly employ nearly all of the warehouse and delivery workers that are central to their businesses to ensure adequate supervision of and accountability for the last-mile delivery workforce. This means that last-mile delivery operators will no longer be able to use subcontracted delivery systems—such as hiring workers as independent contractors or through DSPs—which result in the current unstable, high turn-over, poorly supervised workforce. Direct employment would mean that that last-mile delivery operators imposing onerous, high-pressure delivery quotas would be responsible for ensuring the safety of their workers and surrounding communities. Requiring the companies imposing the quotas to be responsible for training and injury and accident reduction is an important step towards making the last-mile system stable, safe, and accountable.<sup>21</sup>

Third, for the limited number of contracted delivery workers that would be permitted to remain, the last-mile delivery operators would be required to maintain information about each of these drivers, including proof of commercial auto insurance and their driving record. Last-mile delivery operators must also post a \$500,000 bond for each non-employee delivery driver to be held by the commissioner in a fund. The fund would be used to compensate individuals injured in road incidents involving delivery drivers.

Fourth, it would require last-mile facility operators to provide all employees with 30 days advance notice of termination of employment, except for cases of egregious misconduct. The notice must include the reason for the termination and all records relied upon to substantiate the termination. These basic notice requirements can help workers to prepare for or contest terminations that might otherwise be financially devastating for them and their families. These requirements would also help make last mile warehouse and delivery jobs more stable, long term positions that would increase the reliability of the system.

Finally, the bill has strong anti-retaliation protections for workers exercising their rights under the law and strong penalties for last-mile facility operators that violate the law. These provisions will ensure that workers feel protected in enforcing their rights.

## Conclusion

The fast-growing last-mile delivery system in its current form is endangering workers and communities. There is a pressing need for greater stability, training, and accountability in order to protect both the last mile delivery workforce and the public. NELP urges the City Council to pass Int. No. 0518-2026, which will provide critical regulation of this important new industry needs as it matures and grows.

---

<sup>1</sup> [Fast Shipping, Slow Justice: Traffic, Worker, and Climate Hazards in Last Mile Delivery](#), New York City Comptroller Brad Lander, Bureau of Policy and Research, Nov. 2025.

<sup>2</sup> *Id.* at 4.

<sup>3</sup> *Id.* at 5.

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> *Id.* at 6.

<sup>7</sup> *Id.* at 9.

<sup>8</sup> Daniel Schneider, David Weil, Julie Su & Kevin Bruey, *Amazon Drives Low Wages: The Unraveling of Workplace Protections for Delivery Drivers*, Shift Project, Oct. 2025, <https://clje.law.harvard.edu/app/uploads/2025/10/Amazon-Drives-Low-Wages-The-Unraveling-of-Workplace-Protections-for-Delivery-Drivers.pdf#:~:text=60%25%20of%20both%20Amazon%20drivers%20and%20fulfillment,UPS%20and%20FedEx%20workers%20are%20exposed%20to..>

<sup>9</sup> Primed for Pain: Amazon's Epidemic of Workplace Injuries, Strategic Organizing Center, May 2021, at 8, <https://thesoc.org/wp-content/uploads/sites/342/PrimedForPain.pdf>.

<sup>10</sup> The Worst Mile: Production Pressure and the Injury Crisis in Amazon's Delivery System, Strategic Organizing Center, May 2022, at 6, <https://thesoc.org/wp-content/uploads/sites/342/The-Worst-Mile-1.pdf>.

<sup>11</sup> Fast Shipping report, *supra* note 1, at 22.

<sup>12</sup> "While just 2% of UPS drivers have been with the firm for less than a year, that share is 46% at Amazon." *Amazon Drives Low Wages*, *supra* note 8, at 11.

<sup>13</sup> "Roughly 35% of work-related injuries and illnesses happened within the worker's first year on the job." Occupational Health and Safety Admin., *Work-Related Injury & Illness Summary*, 2023, at 5.

<sup>14</sup> Primed for Pain, *supra* note 9, at 8-9.

<sup>15</sup> *Amazon Drives Low Wages*, *supra* note 8, at 15-16.

<sup>16</sup> The Worst Mile, *supra* note 10, at 3.

<sup>17</sup> Irene Tung, Nicole Marquez & Paul Sonn, *Amazon's Outsized Role: The Injury Crisis in U.S. Warehouses and a Policy Roadmap to Protect Workers*, NATIONAL EMPLOYMENT LAW PROJECT,

---

May 1, 2024, at 10-11, <https://www.nelp.org/app/uploads/2024/05/Amazons-Outsized-Role-5-1-24.pdf>.

<sup>18</sup> *Id.* at 6.

<sup>19</sup> Failure to Deliver: Amazon Falls Short on Safety, Strategic Organizing Center, May 2025, at 1, <https://thesoc.org/wp-content/uploads/2025/05/May-2025-Strategic-Organizing-Center-Report-x-Failure-To-Deliver.pdf>.

<sup>20</sup> Amazon's Outsized Role, *supra* note 17, at 11.

<sup>21</sup> See The Last Mile in New York City, Teamsters Local 804 – Delivery and Warehouse Employees, March 2026, at 33, <https://assets.nationbuilder.com/teamsters804/pages/2017/attachments/original/1775246154/The-Last-Mile-In-New-York-City-v2FINAL.pdf?1775246154>.