

To whom it may concern:

The Citizen Lab, an interdisciplinary laboratory based at the Munk School of Global Affairs & Public Policy, University of Toronto, has done extensive analysis on Amazon's restriction of product shipments to different regions. In this letter, we summarize our research findings, provide a list of questions to Amazon related to this research, and offer a set of recommendations for how Amazon could address the concerns we have raised.

Our research findings

We summarize our findings as follows:

- We analyze the system Amazon deploys on the United States "amazon.com" storefront for restricting shipments of certain products to specific regions. We found 17,050 products that Amazon restricted from being shipped to at least one world region.
- While many of the shipping restrictions are related to regulations involving WiFi, car seats, and other heavily regulated product categories, the most common product category restricted by Amazon in our study was books.
- Banned books were largely related to LGBTIQ, the occult, erotica, Christianity, and health and wellness. The regions affected by this censorship were the UAE, Saudi Arabia, and many other Middle Eastern countries as well as Brunei Darussalam, Papua New Guinea, Seychelles, and Zambia. In our test sample, Amazon censored over 1.1% of the books sold on amazon.com in at least one of these regions.
- We identified three major censorship blocklists which Amazon assigns to different regions. In numerous cases, the resulting censorship is either overly broad or miscategorized. Examples include the restriction of books relating to breast cancer, recipe books invoking "food porn" euphemisms, Nietzsche's *Gay Science*, and "rainbow" Mentos candy.
- Moreover, Amazon uses varying error messages to justify why restricted products cannot be shipped such as by conveying that the item is temporarily out of stock. By misleading its customers, Amazon is failing to act in its customers' best interest and is treating its customers as means, not as ends.

Questions to Amazon

We would appreciate your timely response to the following questions:

1. On amazon.com, on which categories of books does Amazon impose shipping restrictions to certain regions? To which regions does Amazon restrict the shipment of these categories of books?

2. To which world regions does Amazon restrict the shipment of LGBTIQ books and other products?
3. Why does Amazon restrict LGBTIQ books from being shipped to Seychelles?
4. Which laws, regulations, or policies (internal to Amazon or external to Amazon) govern or apply to the restriction of the shipment of LGBTIQ books and other products on amazon.com?
5. Are there public-facing documents published by Amazon that explain how Amazon restricts shipments of LGBTIQ books and other LGBTIQ products sold on amazon.com? If so, where? If not, why not?
6. What entities—within or outside Amazon—were involved in developing the rules used by Amazon to restrict shipments of LGBTIQ books and other LGBTIQ products sold on amazon.com?
7. Has Amazon received directives on what books or other products to restrict from specific government agencies or individuals? If so, from which agencies and individuals, and how often? Were they followed and why?
8. What steps does Amazon take to ensure that books or other products are not mistakenly captured by a shipping restriction rule?
9. If books or other products are mistakenly captured by shipment restrictions, does Amazon provide clear and accessible mechanisms for authors, publishers, or customers to appeal the decision?

Recommendations to Amazon

We make the following recommendations to Amazon to address concerns raised by our work:

1. **Provide transparent and accurate notifications to customers when products are unavailable due to legal restrictions of the destination region.** Users should not be given misleading messages that misconvey why their products cannot be shipped.
2. **Inform users of the relevant law(s) applying to the restriction.** Users that are advised of laws restricting their purchase can make better informed decisions regarding products that the filter failed to restrict and to identify products that have been incorrectly filtered.
3. **Provide customers a mechanism to flag products that have been improperly classified as being illegal in the destination region.** Users should be enabled to flag products that have been erroneously restricted so that Amazon can review and, when appropriate, remove restrictions from them.
4. **Review the regions to which each category of censorship is applied.** Regions should not be pigeonholed into one of only a few large censorship blocklists, and each censorship category should be regularly reviewed for relevance in each region to which it is applied (e.g., LGBTIQ censorship in Seychelles).

We plan to publish a report reflecting our research. We would appreciate a response to this letter from your company as soon as possible, which we commit to publish in full alongside our research report provided this correspondence is received before Wednesday, October 30, 2024.

Sincerely,



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