

IN THE SOUTHPORT PUBLIC INQUIRY

CLOSING SUBMISSIONS ON BEHALF OF AMAZON

1. Amazon EU S.a.r.l. ('Amazon') appreciates the opportunity to provide these closing submissions to the Inquiry. Amazon acknowledges the importance of the Inquiry's thorough examination of all the issues arising during the course of the Inquiry, including AR's purchase history. These closing submissions are not intended to summarise or repeat the evidence given by John Boumphrey but seek to provide an update on Amazon's own consideration of the matters raised through his evidence, and through that of other relevant witnesses, with a view to assisting the Chair's deliberations as to appropriate recommendations. Amazon provides these closing submissions having regard to the need (as set out in the Inquiry's Terms of Reference) to ensure that any recommendations emanating from the Inquiry are practicable, with the necessary engagement with relevant practitioners to ensure that they are.
2. By way of overarching submission, Amazon notes the importance of ensuring that any recommendations maintain consistency of treatment not only between online retailers but also between online and physical retailers save where it is proportionate and justified to treat them differently by virtue of the inherent differences in digital versus physical operations. A unified approach to compliance across the industry is important to preserve fair competition in the marketplace, make standards clearer and easier for customers to understand and follow and prevent customers seeking to circumvent the law from exploiting variations in regulatory stringency between different retail channels.

Licensing

3. Although it was not asked of Mr Boumphrey, several witnesses from other online retailers were asked if they would support the licensing of online knife sellers to ensure good standards are kept and maintained,¹ and Amazon notes the indication from the Home Office (Nick Hunt) that it will be consulting on a scheme for the licensing or registration of the sale of knives later this year.²

¹ Day 15 p.9 lines 4-8 (Joseph Wheeler, Knife Warehouse), Day 15 p.139 lines 5-7 (Luke Bullock, Springfields)

² Day 23 p.145 lines 10-15.

4. Amazon supports the principle of a potential licensing regime, recognising the importance of good standards being maintained, but as with any such regime it would be important for it to be proportionate, practicable and capable of being complied with by responsible online knife sellers and for the scope of applicable products to be clearly defined. It would not, for example, be appropriate to impose different requirements on sellers based on size, nor to impose disproportionately cumbersome requirements for everyday household products such as cutlery knives or scissors.

Browsing the Amazon Store

5. Mr Boumphrey was asked about the ability of someone under-18 to browse content on the Amazon Store, having been shown images of a number of items that AR had looked at (but did not purchase), such as secateurs³.
6. Amazon does not require age verification to browse the Amazon Store. Any age restriction controls designated for specific products (such as kitchen knives or alcohol) are applied when a person attempts to purchase such a product. This is no different from other online retailers selling kitchen knives, such as John Lewis or Argos, physical stores where anyone can walk through the doors and look at the selection on display or indeed using search engines such as Google to browse products and related images.
7. Requiring age verification before allowing the browsing of an online store would be both impractical and disproportionate. It would create unnecessary barriers to legitimate shopping and create a significant competitive disadvantage for online retailers compared to physical stores where anyone can browse freely. Amazon, like other retailers, implements age verification controls when a customer attempts to acquire an age verified product.

Sale

Ricinus

8. Amazon notes the evidence given on behalf of the Home Office that it is currently undertaking a review of the potential for further regulation of the sale of ricinus seeds. In this context, the potential use of algorithms to detect patterns of purchasing of items alongside ricinus seeds was raised by CTI and the Home Office confirmed that it will look at the full range of options that it has as part of its current review.⁴

³ Transcript Day 17 p.54 line 8 to p.55 line 10.

⁴ Transcript Day 22 p.92 line 22 to p.94 line 11.

9. Amazon fully supports the Home Office's review. As Mr Boumphrey had earlier confirmed in his oral evidence, while Amazon has the technical ability to monitor purchase combinations of products which are legal to sell, it would not typically do so, the reason being that *"as a retailer, we would not be experts in law enforcement or, indeed, which combinations of products, and that is why we would work very closely with and seek guidance from the Home Office and Government as to which combinations of products may be of interest."*⁵
10. Since Mr Boumphrey provided his oral evidence, Amazon has reiterated in writing to the Home Office its openness to discuss any matters arising from the Inquiry, and its firm desire and commitment to collaborate with the Government. The Home Office has confirmed that it is happy to meet at a future date to discuss these topics.

Delivery

Packaging

11. Amazon notes CTI's acceptance that its packaging for bladed articles 'very clearly'⁶ identified the contents of the package as containing such an item,⁷ but Amazon is nevertheless continuing to review how its packaging of bladed items could be further improved.

Advice upon delivery of bladed item

12. Amazon is currently proposing to suggest to delivery service providers ('DSPs') that they advise their drivers to inform the recipient verbally that they are receiving a bladed item. This guidance will be integrated into Amazon's standard delivery workflow. Similar guidance will be sent to Flex drivers. The estimated date for rolling out this step is January 2026.

Signature / photo

13. Amazon has debated internally whether drivers should require a signature or photo at the point of delivery of a bladed item. Whilst some delivery services do require a signature and/or photo for at least some packages (not limited to bladed items), Amazon is not currently of the view that the addition of either or both of these steps would

⁵ Transcript Day 17 p.72 lines 3 to 16.

⁶ Transcript Day 34 p.45 lines 4 to 8.

⁷ That being one of the statutory conditions which must be satisfied to provide a defence to the otherwise applicable offence of selling a weapon to a person under 18 (Criminal Justice Act 1988 s.141C(6)).

enhance the robustness of age verification at the point of delivery for the reasons set out below.

14. So far as a signature is concerned, this is because a signature does not provide any verification of a recipient's age; many signatures are illegible, and a recipient could make any form of mark without any basis for challenge.
15. As for a photo, these are usually taken of a package in an open doorway or in their designated 'safe place'. Due to data protection issues, photos taken upon delivery cannot record any identifying features of the recipient. Whilst such a photo may be useful for delivery confirmation purposes, it would not be of any particular value for the age verification.

Consistency of instructions to drivers and refreshing of driver training

16. All DSPs must follow Amazon's mandated delivery standards as a minimum, including its age verified delivery ('AVD') process. However, as DSPs are independent businesses, Amazon recognises that some DSPs may wish to go further than Amazon's standards. For example, they could tell drivers to ask for ID even if the recipient looks over-25, as Condor Carriers' policy provided⁸. Amazon will, however, be proactively engaging with all DSPs early next year to recommend that DSPs prioritise the steps set out as part of Amazon's AVD process (rather than extra steps from the DSP) to avoid any confusion for drivers.
17. In addition, Amazon will be communicating with both DSPs and Flex drivers to share key insights gained from the Inquiry, outline best practices for the AVD process and explain the change referred to in paragraph 12 above.

Other

Law Enforcement Response

18. When a formal request is made by a law enforcement agency for the contact details of a DSP driver who has made an Amazon delivery, the requestor has to date been directed to the DSP identified by Amazon for that information. Amazon recognises that it could help expedite the requestor's investigation so has now updated its internal processes to provide its Law Enforcement Response teams with an escalation channel whereby they can access and provide contact details of the DSP driver (as well as the DSP) to the requestor directly.

⁸ COND000033

Conclusion

19. Following AR's ability to circumvent its previous Online Age Verification controls, Amazon took swift and comprehensive action on multiple levels to strengthen its age verification controls as set out in more detail in Mr Boumphrey's evidence. In addition, as detailed in these submissions, Amazon is actively implementing additional safeguards to its age verification processes. While recognising that no system can be completely infallible, Amazon maintains a rigorous programme of continuous evaluation and improvement of its age verification processes.
20. As Mr Boumphrey told the Inquiry, Amazon acknowledges the profound impact of the Southport murders, attempted murders and injuries on all those who have been forever affected by this tragedy. Amazon remains steadfastly committed to its responsibilities and is determined to be part of ensuring that such a tragedy can never happen again.
21. Amazon is grateful for the Inquiry for the opportunity to submit these closing submissions.

Amazon EU Sa.r.l.

24 November 2025