

## The Home Depot Inc (HD)

### Vote Yes: Item # 7 – Report on Packaging Policies for Plastics

Annual Meeting: May 21, 2026

CONTACT: Conrad MacKerron | [mack@asyousow.org](mailto:mack@asyousow.org)

#### THE RESOLUTION

Shareholders request the Board issue a report, at reasonable expense and excluding proprietary information, describing how the Company could match its peers by committing to make all its packaging curbside recyclable, reusable, or compostable.

The report should, at Board discretion:

- Quantify the weight of total plastic packaging used by the Company;
- Set a time-bound goal to make all its packaging curbside recyclable, reusable, or compostable; and
- Describe planned reduction strategies or goals, materials redesign, transition to reusables, substitution, or reductions in Company use of plastic packaging.

#### SUMMARY

Plastic pollution has reached crisis levels. An estimated 24-34 million metric tons of plastic end up in the world's waterways annually, causing serious harm to human health and the environment; the level of plastic pollution entering waterways could hit 53 million metric tons by 2030.<sup>1</sup>

The growing plastic pollution crisis poses increasing risk to the Company and its shareholders. Corporations could face an annual financial risk of approximately \$100 billion should governments require them to cover the waste management costs of the packaging they produce.<sup>2</sup> Governments around the world are increasingly taxing corporations for single-use plastic (SUP) packaging, including new laws in the states of Maine, Maryland, Washington, Minnesota, Oregon, Colorado, and California where the Company does business.<sup>3</sup> The European Union has banned ten SUP products commonly found in ocean pollution and imposed a tax on non-recycled plastic packaging waste.<sup>4</sup>

Pew Charitable Trusts' groundbreaking study, *Breaking the Plastic Wave*, concluded that improved recycling alone is insufficient to address plastic pollution – instead, recycling must be coupled with reductions in use, materials redesign, and substitution.

---

<sup>1</sup> <https://www.sciencedaily.com/releases/2020/09/200917181303.htm>

<sup>2</sup> [https://www.pewtrusts.org/-/media/assets/2020/10/breakingtheplasticwave\\_mainreport.pdf](https://www.pewtrusts.org/-/media/assets/2020/10/breakingtheplasticwave_mainreport.pdf)

<sup>3</sup> <https://productstewardship.us/products/packaging/>

<sup>4</sup> [https://environment.ec.europa.eu/topics/plastics/single-use-plastics\\_en](https://environment.ec.europa.eu/topics/plastics/single-use-plastics_en)



At least one-third of plastic use must be reduced to cut 80% of ocean plastic pollution by 2040, and reduction is the most viable solution from environmental, economic, and social perspectives.<sup>5</sup> Competitors Walmart and Target have adopted goals to make their private brand plastic packaging recyclable, reusable, or compostable by 2025, and Lowe's has agreed to do the same by 2030.

The Home Depot has not adopted such goals. Further, the Company is not a participant in the largest precompetitive corporate initiative to address plastic pollution, the New Plastics Economy Global Commitment. The Company should match its peers by setting a goal to make its packaging curbside recyclable, reusable, or compostable by a date certain, make a clear commitment to plastic use reduction, and disclose total plastic packaging volume so the goal can be properly evaluated.

## RATIONALE FOR A YES VOTE

- 1. The Home Depot is exposed to potential economic and environmental risk as global leaders and scientists call for drastic global reductions in plastic pollution.**
- 2. The Company has not aligned its packaging targets with key initiatives, such as the Pew Report and the Global Commitment.**
- 3. Competitors have done more than The Home Depot to reduce plastic use.**

## DISCUSSION

- 1. The Home Depot is exposed to potential economic and environmental risk as global leaders and scientists call for drastic global reductions in plastic pollution.**

Consumers and governments across the globe are increasingly holding producers accountable for plastic packaging pollution and its wide range of negative effects on human and environmental health. Global leaders from nearly 200 U.N. Member States are in the process of negotiating a global treaty to end plastic pollution. Mandates are being considered for legally binding plastic use reductions, recyclability, and transitions away from disposable single use packaging.<sup>6</sup> Adoption of the agreement to negotiate a treaty was supported by a vast array of businesses and investors united in recognizing plastic pollution as a severe threat to business' social license to operate.<sup>7</sup> Twelve national and regional global Plastics Pacts have formed in the last few years to uphold and accelerate corporate responsibility and a circular economy for plastics.<sup>8</sup>

Extended Producer Responsibility (EPR) is a system in which brand producers are held responsible for all or most of the costs of managing disposable packaging at its end of life. More than 60 EPR laws for packaging have been enacted in countries and jurisdictions around the world.<sup>9</sup> Corporations could face

---

<sup>5</sup> [https://www.pew.org/-/media/assets/2020/10/breakingtheplasticwave\\_mainreport.pdf](https://www.pew.org/-/media/assets/2020/10/breakingtheplasticwave_mainreport.pdf)

<sup>6</sup> <https://www.unep.org/news-and-stories/story/plastic-treaty-progress-puts-spotlight-circular-economy>

<sup>7</sup> <https://www.businessforplastictreaty.org/>

<sup>8</sup> <https://www.ellenmacarthurfoundation.org/the-plastics-pact-network>

<sup>9</sup> <https://www.bsigroup.com/en-US/insights-and-media/insights/blogs/extended-producer-responsibility-epr-around-the-world>



an annual collective financial risk of approximately \$100 billion should governments continue, as expected, to require them to cover the waste management costs of the packaging they produce.<sup>10</sup> Seven U.S. states have recently passed EPR for packaging laws.<sup>11</sup> EPR laws often encompass reducing virgin plastic use, making all packaging recyclable, and transitioning from disposable to reusable packaging.

The Home Depot in its statement of opposition to this proposal states that it has an established, comprehensive approach to addressing plastics in its packaging and products, rendering our proposal superfluous. This is not accurate. The Company says it has encouraged supplier innovation in packaging design with a goal of reducing or converting 200 million pounds (100,000 tons) of virgin plastic by 2028. However, as a blended goal of reduction and conversion, the actual reduction level is unknown. A specific reduction goal would deter initial generation of plastic. Without disclosing total plastic use, it is not possible for investors to evaluate the size of potential reduction relevant to peers. Further, it does not represent a commitment to make all packaging recyclable, reusable or compostable as peers have done.

## **2. The Company has not aligned its packaging targets with key initiatives, such as the Pew Report and the Global Commitment.**

The original Pew Report (2020) stated that corporate commitments to date are insufficient to tackle ocean plastic pollution and that all corporations must reduce their virgin plastic use, redesign packaging to be recyclable, and replace single-use packaging, including with reusables.<sup>12</sup> The updated 2025 Pew Report calls for a 44% reduction in the production and use of plastic to be able to reduce annual plastic pollution by 83% by 2040.<sup>13</sup> Accordingly, a gradual 44% reduction in its plastic packaging use by 2040 would align the Company with this global goal. Since the Company does not disclose its total plastic packaging usage, it is not possible to determine if its stated commitment to a 100,000-ton reduction (or conversion) is anywhere close to 44% of its plastic usage.

The Company is notably absent from the largest pre-competitive corporate movement to address plastic pollution, the Ellen MacArthur Foundation New Plastics Economy Global Commitment. In contrast, nearly 100 consumer goods and retail companies have joined the Commitment, pledging to make all packaging reusable, recyclable, or compostable by 2025.<sup>14</sup> These companies have also set additional targeted goals to significantly reduce plastic flows into the ocean, including taking meaningful action on the Pew Report recommendations above.

## **3. Competitors have done more than The Home Depot to reduce plastic use.**

---

<sup>10</sup> [https://www.pew.org/-/media/assets/2020/07/breakingtheplasticwave\\_report.pdf](https://www.pew.org/-/media/assets/2020/07/breakingtheplasticwave_report.pdf)

<sup>11</sup> <https://h2compliance.com/us-states-with-packaging-epr-laws-what-businesses-need-to-know-in-2025>

<sup>12</sup> [https://www.pew.org/-/media/assets/2020/10/breakingtheplasticwave\\_mainreport.pdf](https://www.pew.org/-/media/assets/2020/10/breakingtheplasticwave_mainreport.pdf)

<sup>13</sup> <https://www.pew.org/en/research-and-analysis/reports/2025/12/breaking-the-plastic-wave-2025>

<sup>14</sup> <https://gc-data.emf.org/2024/list/>



Direct competitor Lowe's has set a goal to make all its private brand packaging recyclable, reusable, or compostable by 2030.<sup>15</sup> Competitors Target and Walmart have set goals to make packaging recyclable, reusable, or compostable by 2025 and in addition, have disclosed total plastic usage and set public plastic reduction goals. Following engagement with *As You Sow*, Walmart agreed to reduce its total virgin plastic use by 15% (180,000 tons throughout its plastic packaging footprint by 2025).<sup>16</sup> Target also agreed to reduce annual total virgin plastic in its private brand packaging by 20% by 2025, following engagement with *As You Sow*.<sup>17</sup> Both competitor companies also disclose the total volume of plastic packaging they use, whereas The Home Depot does not.

## RESPONSE TO THE HOME DEPOT'S BOARD OF DIRECTORS' STATEMENT IN OPPOSITION

The Company says in its statement of opposition to this proposal that it has an established, comprehensive approach to addressing plastics in its packaging and products, rendering our proposal superfluous. As noted above, this is not the case. The Company's policy cannot be viewed as comprehensive when it lacks disclosure of the most basic data such as the amount of plastic packaging the Company uses annually. It cannot be viewed as comprehensive when it does not contain a commitment to a specific percentage reduction of plastic packaging use over time, or a goal to make all packaging recyclable, reusable or compostable by a certain date as competitors have done.

The Company touts its efforts to remove harmful PVC from its private branded consumer packaging, which is laudable. It states that it plans to partner with suppliers to keep these materials out of future private-brand packaging, but contains no specific details of these efforts or whether suppliers have actually been engaged and notified to make plans to remove PVC packaging by a date certain.<sup>18</sup>

The statement discusses its intent to reduce or convert 200 million pounds (100,000 tons) of virgin plastic by 2028. However, blended goals such as these sound good but obscure the fact that the Company may continue using the same amount of plastic for its product packaging, while converting collected in-store packaging to other uses. Without disclosing total plastic use, it is not possible for investors to evaluate the size of the Company's potential reduction relevant to peers. Further, it does not represent a commitment to make all post-consumer packaging recyclable, reusable or compostable as peers have done.

The plastics crisis has such severe implications that The Home Depot needs to immediately join its peers and set a goal to make its packaging recyclable, reusable, or compostable by a specific date. Further, investors will benefit by The Home Depot setting a plastic packaging reduction goal and disclosing its total plastic packaging volume so the goal can be properly evaluated.

---

<sup>15</sup> [https://corporate.lowes.com/sites/lowes-corp/files/2024-09/Lowes\\_2023\\_CRR\\_9.30.24.pdf](https://corporate.lowes.com/sites/lowes-corp/files/2024-09/Lowes_2023_CRR_9.30.24.pdf)

<sup>16</sup> <https://www.asyousow.org/press-releases/2021/10/6/walmart-commits-plastic-reduction-goal>

<sup>17</sup> <https://www.asyousow.org/press-releases/2021/6/22/target-commits-plastic-reduction-goal>

<sup>18</sup> <https://www.ecocenter.org/plastic-pollution-and-zero-waste/poison-plastic-toxic-life-cycle-pvc>



## CONCLUSION

**Vote “Yes” on Shareholder Proposal Item #7.**

--

*For questions, please contact Conrad MacKerron, As You Sow, [mack@asyousow.org](mailto:mack@asyousow.org)*

THE FOREGOING INFORMATION MAY BE DISSEMINATED TO SHAREHOLDERS VIA TELEPHONE, U.S. MAIL, E-MAIL, CERTAIN WEBSITES AND CERTAIN SOCIAL MEDIA VENUES, AND SHOULD NOT BE CONSTRUED AS INVESTMENT ADVICE OR AS A SOLICITATION OF AUTHORITY TO VOTE YOUR PROXY. THE COST OF DISSEMINATING THE FOREGOING INFORMATION TO SHAREHOLDERS IS BEING BORNE ENTIRELY BY ONE OR MORE OF THE CO-FILERS. PROXY CARDS WILL NOT BE ACCEPTED BY ANY CO-FILER. PLEASE DO NOT SEND YOUR PROXY TO ANY CO-FILER. TO VOTE YOUR PROXY, PLEASE FOLLOW THE INSTRUCTIONS ON YOUR PROXY CARD.