

**Amazon.com (AMZN)
Vote Yes on Item #8
Proposal to Report on Use of Plastic Packaging
Annual Meeting: May 25, 2022**

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Oceana, the largest international ocean advocacy organization, recommends that shareholders vote yes to have Amazon report on its plastic footprint.

During the annual Amazon Meeting on May 25th, shareholders will vote on a resolution to require the company's board of directors to **issue a report, at reasonable expense and excluding proprietary information, on the company's plastic packaging use and how it could reduce this use (and plastic pollution)**. Amazon does not report on its plastic footprint and has not committed to specific company-wide plastic reduction goals. This resolution reflects growing concern about the company's plastic footprint, increased regulatory and ESG pressure for plastic reduction, and the growing need to formally address the plastic pollution crisis.

[Oceana](#), founded in 2001, is the largest international advocacy organization focused solely on ocean conservation and which campaigns globally to protect the oceans from marine plastic pollution that increasingly threatens ocean ecosystems. **Oceana recommends that Amazon shareholders vote yes on Item 8.**

Oceana's report on Amazon's plastic footprint is a source for the figures cited in Item 8. This report has been updated and now estimates that Amazon generated 599 million pounds of plastic packaging waste in 2020. This is a 29% increase of Oceana's 2019 estimate of 465 million pounds. Amazon has disputed Oceana's estimate saying it is 300% greater than its footprint but has not responded to Oceana's repeated requests to provide alternative data and details about what baseline the company has referenced.¹ When calculating its own plastic footprint, is Amazon only referring to products it manufactures, that it sells, that it fulfills, or everything sold through its platform?

Additionally, Amazon has stated that Oceana, in its report, "use[s] outdated assumptions about the sources of plastic waste entering our oceans." In fact, Oceana referenced the

¹ Amazon Statement and Oceana response Available: <https://oceana.org/wp-content/uploads/sites/18/Amazon-statement-and-Oceana-response-December-2021.pdf>

most recent peer reviewed study, Borrelle, et al², that provides country level plastic pollution data (needed for this kind of analysis). Amazon, in its response, cites a study³ which does not provide country level data and, according to its lead author⁴, and contrary to the company's statement, finds that "plastic covers/wrappers, bags, strapping bands & packaging contribute 27% of the litter we find in the aquatic environment." This study validates Oceana's findings that this type of plastic waste created by Amazon is a significant problem for the oceans. Oceana is a science-based organization a will update its findings when and if the company shares or reports on its data. **It is time for Amazon to be transparent with its data.**

Amazon is asking its shareholders to vote against this proposal to issue a report on its plastic footprint because, as the company [writes in its 2022 proxy statement](#), "In contrast to consumer-packaged goods companies, Amazon's greatest impact comes from helping other manufacturers reduce their use of plastic in packaging and reducing our own use of plastic for products repackaged for delivery." The company goes on to say that "we have reduced the weight of outbound packaging by 36% and eliminated more than one million tons of packaging material since 2015."

The shareholder proposal is focused on plastic packaging. Amazon, according to Oceana's estimate, generates hundreds of millions of pounds of plastic packaging each year.⁵ Citing figures about overall packaging weight reduction is not relevant (as this could reflect an increase in the use of plastic packaging in place of other forms of packaging).

Investors should support this resolution that simply requires the company to issue a report that details its plastic packaging pollution footprint and explores options for reducing its plastic packaging use.

Shareholders should vote yes for Item 8 because:

- The company faces growing concern and demand to formally measure and take action to reduce its plastic footprint.

² Borrelle, S.B., Ringma, J., Law, K.L., et al. (2020) Predicted growth in plastic waste exceeds efforts to mitigate plastic pollution, *Science*, Vol.369, No.6510, pp.1515–1518, DOI: 10.1126/science.aba3656

³ Morales-Caselles C, Viejo J, Marti E, et al. (2021) An inshore–offshore sorting system revealed from global classification of ocean litter. *Nature Sustainability* Nature Publishing Group.4: 484–493.
<https://doi.org/10.1038/s41893-021-00720-8>

⁴ Tweet: Carmen Morales Caselles 12/16/21. Available :
https://twitter.com/padina_/status/1471434265296519170

⁵ Amazon 2022 Shareholder Letter – page 5. Available:
https://www.ezodproxy.com/amazon/2022/proxy/images/Amazon_ShareholderLetter2021.pdf

- Policymakers in the U.S.⁶, European Union,⁷ and elsewhere are pushing for companies to be transparent about and to take steps to reduce plastic packaging.
- The type of plastic used for plastic packaging, plastic film, is – as the company itself notes⁸ – not accepted by municipal recycling programs and can be deadly to ocean animals.⁹
- The company is unnecessarily incurring damage to its reputation. Amazon can easily, and with limited cost, comply with the resolution.
- The company has stated that it is already tracking its plastic use (as referenced in its reply to Oceana).¹⁰
- The company has developed plastic-free alternatives that it is now using on a wide scale.¹¹
- The company has committed to eliminating single-use packaging in Germany (its second largest market).¹²
- The company can and should be a leader in plastic use transparency and innovation.
- Plastic is made from petroleum and is a significant contributor to climate change. Amazon has stated that reducing its climate change impact is a priority for the company.

Five reasons to vote yes on Item 8:

Why Amazon needs to report on its plastic footprint.

1. Amazon is a major generator of plastic packaging waste.

- In December 2021, [Oceana analyzed e-commerce packaging data](#) and found that Amazon generated 599 million pounds of plastic packaging waste in 2020. This is a 29% increase of Oceana’s 2019 estimate of 465 million pounds. The report also found that Amazon’s estimated plastic packaging

⁶ Calpirg Press Release “ASSEMBLYMEMBER FRIEDMAN RENEWS EFFORT TO TACKLE SINGLE-USE PLASTIC PACKAGING FROM E-COMMERCE. Available: <https://calpirg.org/news/cap/assemblymember-friedman-renews-effort-tackle-single-use-plastic-packaging-e-commerce>

⁷ EU Representative Service, “European Union’s plastic ban has been implemented, and e-commerce sellers are on the potential “blacklist” Available: <https://www.eu-rep-service.de/european-unions-plastic-ban-has-been-implemented-and-e-commerce-sellers-are-on-the-potential-blacklist.html>

⁸ Amazon: Sustainability report, 'Further and Faster Together (2020). Available: <https://sustainability.aboutamazon.com/pdfBuilderDownload?name=amazon-sustainability-2020-report> – page 47

⁹ Roman L, Schuyler Q, Wilcox C, and Hardesty BD (2020) Plastic pollution is killing marine megafauna, but how do we prioritize policies to reduce mortality? *Conservation Letters* doi: [10.1111/conl.12781](https://doi.org/10.1111/conl.12781). Accessed: 2021-10-07

¹⁰ Amazon Statement and Oceana response Available: <https://oceana.org/wp-content/uploads/sites/18/Amazon-statement-and-Oceana-response-December-2021.pdf>

¹¹ Amazon 2022 Proxy Statement – page 43. Available: https://www.ezodproxy.com/amazon/2022/proxy/images/Amazon_Proxy2022.pdf

¹² Amazon reply to Oceana. Available: <https://oceana.org/wp-content/uploads/sites/18/Amazon-Operational-Note-Germany-and-Single-Use-Plastics-11-30-21-c.pdf>

waste, in the form of air pillows alone, would circle the Earth more than 600 times.

- By [combining the e-commerce packaging data with findings](#) from a recent study published in *Science*, Oceana estimates that up to 23.5 million pounds of Amazon's plastic packaging waste entered and polluted the world's waterways and oceans in 2020, the equivalent of dumping a delivery van payload of plastic into the oceans every 67 minutes.
- Amazon has exceeded Walmart's total sales and is now the largest retailer in the world outside of China. The company is now defining how products are packaged.¹³

2. The company's response to its plastic problem does not yet adequately address the issue.

- Amazon has neither published its plastic footprint, nor made any type of commitment to reducing the overall use of plastic packaging in its operations, in contrast to [other large consumer goods and retail companies](#).
- In response to Oceana's report, Amazon spokespeople [said](#) that Oceana "overestimated our plastics usage by more than 300%." That would amount to an Amazon plastic footprint of 150 million pounds of plastic in 2020 and still qualify them as major plastic [packaging user](#) and waste producer (given the very low recycling rates for most of Amazon's plastic packaging).
- Oceana and members of the media [have requested](#) that the company publicly publish data about its plastic footprint, but the company has not – as of this writing – done so.

3. The plastic used by the company is often not accepted by local recycling programs, is hard to recycle through the company's Second Chance website and can be deadly for animals in the oceans.

- Amazon asserts that recycling can help solve its plastic packaging pollution problem, but Oceana's report found otherwise. Amazon plastic packaging falls into the category of 'plastic film,' a material that is extremely difficult to recycle and is not accepted at most curbside recycling programs in the U.S., the UK, and other large markets for Amazon.¹⁴ Most often, it is landfilled, burned, or pollutes the environment, including the oceans.
- To address this, Amazon directs customers who want to recycle their packaging to stores with designated drop-off locations through its Second Chance website. Oceana sent secret shoppers into 186 of these stores in 25 cities in the U.S. and the UK. Representatives from more than 40% of the stores visited told the secret shoppers they would not accept their Amazon plastic packaging and managers at more than 80% of stores visited did not know Amazon customers were being directed to their stores.

¹³ New York Times, People now spend more at Amazon, than at Walmart (2021-08-17). Available. <https://www.nytimes.com/2021/08/17/technology/amazon-walmart.html> . Accessed: 2021-10-07

¹⁴ Amazon: Sustainability report, 'Further and Faster Together (2020). Available: <https://sustainability.aboutamazon.com/pdfBuilderDownload?name=amazon-sustainability-2020-report> – page 47

- Plastic is a major source of pollution and is devastating the world's oceans. Studies have found that plastic film is one of the deadliest forms of plastic for marine life.¹⁵

4. The plastic crisis in the oceans requires urgent action by corporate leaders like Amazon.

- Globally, scientists now estimate about two garbage trucks' worth of plastic enters the ocean every minute.¹⁶ That is 33 billion pounds every year.
- The plastics industry expects annual production will more than triple by 2050.... If nothing changes, the amount of plastic entering the ocean is projected to triple by 2040.¹⁷
- [Recycling will not solve this crisis](#). Only 9% of all plastic ever produced has been recycled.
- Studies estimate that 90% of all seabirds and more than half of all sea turtles – [52% to be exact](#) – have ingested plastic. A recent report by Oceana found nearly [1,800 cases](#) of plastic ingestion and entanglement by sea turtles and marine mammals from 2009 to 2020 in a survey of 13 different U.S. government agencies and marine life organizations. Eighty-eight percent of the affected animals were species listed as threatened or endangered by extinction under U.S. law.
- The examples are everywhere:
 - i. In South Carolina, a sea turtle center found almost sixty pieces of plastic that a loggerhead sea turtle defecated during its rehabilitation.
 - ii. In Florida, a Kemp's Ridley Sea turtle was found entangled in a plastic bag that had become filled with sand. The turtle was dead, likely drowned from the weight of the bag.
 - iii. In New Jersey, a plastic bag was the only item found in the stomach of a dead pygmy sperm whale. A beaked whale died in 2019 after ingesting 88 pounds of plastic.

5. Plastic is made from fossil fuels and is a significant contributor to climate change.

- If [plastic was a country](#), it would be the planet's fifth-largest emitter of greenhouse gases.
- Studies have shown that the plastic industry contributes to climate change by [using fossil fuels, including petroleum and natural gas, to create plastic](#),

¹⁵ Roman L, Schuyler Q, Wilcox C, and Hardesty BD (2020) Plastic pollution is killing marine megafauna, but how do we prioritize policies to reduce mortality? *Conservation Letters* [doi: 10.1111/conl.12781](https://doi.org/10.1111/conl.12781). Accessed: 2021-10-07

¹⁶ Forrest A, Giacobazzi L, Dunlop S et.al Eliminating Plastic Pollution: How a Voluntary Contribution from Industry Will Drive the Circular Plastics Economy, *Frontiers in Marine Science* 6 (2019), 627.

¹⁷ Lau WWY, Shiran Y, Bailey RM, et al. (2020) Evaluating scenarios toward zero plastic pollution. *Science* : eaba9475. doi: 10.1126/science.aba9475

which emits greenhouse gases at every stage of its lifecycle, from production and transportation to disposal.

- Plastic production is forecasted to increase as are plastic's effects on our climate. By 2050 plastic related greenhouse gas emissions are expected to reach 13-15% of the global carbon budget designed to keep global warming below 1.5° C.¹⁸¹⁹
- A recent report found that CO₂ emissions from the disposal of plastic through the open burning of plastic waste from a leading consumer goods company in low-income countries were as high as three-quarters of its global transport and distribution emissions.²⁰

¹⁸ Hamilton L, Veit S (2019) Plastic & Climate. The hidden costs of a plastic planet. Available: <https://www.ciel.org/wp-content/uploads/2019/05/Plastic-and-Climate-FINAL-2019.pdf>

¹⁹ Zheng J and Suh S (2019) Strategies to reduce the global carbon footprint of plastics. *Nature Climate Change* 9: 374–378. doi: 10.1038/s41558-019-0459-z

²⁰ -- (2020) Tearfund the burning question. Tearfund. Available: <https://learn.tearfund.org/-/media/learn/resources/reports/2020-tearfund-the-burning-question-en.pdf>. Calculations are based on: Guendehou S et al (2006) 2006 IPCC guidelines for national greenhouse gas inventories, Chapter 5: 'Incineration and open burning of waste', https://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/5_Volume5/V5_5_Ch5_IOB.pdf and Towprayoon S (2019) 2019 refinement to the 2006 IPCC guidelines for national greenhouse gas inventories, Chapter 5: 'Incineration and open burning of waste', https://www.ipcc.ch/site/assets/uploads/2019/12/19R_V0_01_Overview.pdf