

## NEJAC RECOMMENDATIONS SUMMARY

# Incorporating Colonialism, Racism, and Other Structural Drivers into Cumulative Impact Assessments and Implementation

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### ABOUT THIS SUMMARY

*In October 2024, the National Environmental Justice Advisory Council Cumulative Impacts Workgroup published a report of recommendations to the EPA, [Reducing Cumulative and Disproportionate Impacts and Burdens in Environmental Justice Communities](#). To improve environmental health protections by reaching a larger audience, the Union of Concerned Scientists prepared eight fact sheets summarizing the workgroup's recommendations. Natalie Gehred, a doctoral student in molecular biology at the University of California, Los Angeles, and Dr. Kristie Ellickson, a senior scientist at the Union of Concerned Scientists, prepared the summaries.*

*This document summarizes Theme 7 of the report: [The EPA should incorporate structural drivers, such as colonialism and racism, into its cumulative impacts practice and framework for implementation](#).*

*For additional summaries, please visit [act.ucsusa.org/NEJAC](https://act.ucsusa.org/NEJAC). For the full report, please visit [act.ucsusa.org/NEJAC-report](https://act.ucsusa.org/NEJAC-report).*

In 2021, the Centers for Disease Control and Prevention identified racism as a public health threat, given the evidence identifying it as significantly affecting the health of millions of Americans (CDC 2021). Racism has interpersonal dynamics—both overt and implicit—as well as structural and systemic drivers that pose barriers to services and protections. Because environmental pollution disproportionately affects low-income communities and communities of color, environmental regulations and decisionmaking must consider systemic and structural barriers (e.g., racism, colonialism) that affect marginalized communities (University of Michigan 2024).

### **Acknowledge and evaluate the root causes and structural drivers of disproportionate and cumulative impacts.**

Root-cause analyses of disproportionate and cumulative impacts involve understanding how and why low-income communities and communities of color are located close to sources of pollution and what perpetuates this situation. Usually, there is no single cause of disproportionate impacts, which tend to result from compounding practices and policies. The proximity of low-income and communities of color and pollution sources happened not by chance but rather through lawful programs and policies with intentional and unintentional motivations related to colonialism, racism, and economic disinvestment. Including measures

of racism in cumulative impact assessments is necessary for reducing disproportionate outcomes.

Assessing cumulative impacts often uncovers a variety of stressors and burdens, with many contributing factors that differing agencies regulate or control. Tools for determining root causes, as well as for understanding which departments, offices, or programs could modify their practices to dismantle structural barriers, include fishbone diagrams, driver diagrams, system improvement maps, and “Investigating the Whys,” among others (Cox and Sandberg 2018; State of Michigan n.d.).

### **Incorporate the root causes and structural drivers of injustice into programmatic and strategic planning.**

Programmatic and strategic planning that acknowledges and accounts for systemic barriers in assessments and decisionmaking empowers communities. Through organizational and cultural change, regulators must identify, address, and avoid internal systems and structural drivers of injustice. There are also likely structural drivers outside the authority and control of environmental regulators (e.g., access to high-quality, culturally competent healthcare). Cumulative impacts planning should include investigations to identify, acknowledge, and ultimately consider external structural drivers in decisionmaking.

### **Incorporate root causes and structural drivers of inequality into cumulative impact assessments, and support the development of indices of social adversity.**

Because environmental burdens and impacts concentrate in low-income communities and communities of color, cumulative impact assessments must not be conducted in a “race-neutral” manner (University of Michigan 2024). Many cumulative impact analysis tools are geographic and based on quantitative indicators for environmental, health, and social stressors. Some, but not all, of the tools consider race and ethnicity as proxies for the marginalization of communities. Rather than using proxies, researchers can include factors of marginalization more directly (e.g., degree of segregation; levels of affordable housing, material hardship, access to healthy food, voter turnout, and tree canopy cover) (Payne-Sturges, Gee, and Cory-Slechta 2021; Mesic et al. 2018; Alvarez 2023). Incorporating indices of social adversity will lead more directly to changes in policy and practice, rather than potentially blaming the people themselves. State governments should support and participate in researching and developing direct indices of structural drivers and root causes.

### **Apply an antiracist lens to cumulative impacts work, and support recruitment and retention related to DEIA (diversity, equity, inclusion, and accessibility).**

Regulators should seek representation from overburdened communities through inclusive job training, recruiting and hiring practices, and staff-retention efforts. Given the strong connection between cumulative and disproportionate impacts, activities that increase equity

are part of the solution. Because a narrow perspective has historically dominated science, this is especially important for government science.

## Acknowledge and address power imbalances in cumulative impacts work.

There will always be a power imbalance between those who work in government and those who do not. Government regulators should not allow such imbalances to increase gaps between the protected and the unprotected, those who enjoy clean air and those who breathe unhealthy air. Cultural competency training for government staff and supportive policies and structures are valuable tools for addressing these imbalances.

## Avoid erecting barriers to laws and policies that seek to repair past harm and injustice.

Undoing the harm from disproportionate and cumulative impacts requires new and updated direct policy actions. As executive agencies, environmental regulators cannot actively advocate for legislation to promote environmental justice. On the other hand, they should not raise barriers to legislation or actions addressing structural drivers of cumulative impacts. The NEJAC observes that it is important for the EPA to support state and local government activities in rulemaking and in enacting laws around environmental justice and cumulative impacts.

## References

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