

# coming clean

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The Honorable Raul Grijalva  
House Natural Resources Committee  
1324 Longworth House Office Building  
Washington, DC 20515

The Honorable Donald McEachin  
314 Cannon House Office Building  
Washington, DC 20515

August 30, 2019

Dear Chairman Grijalva and Representative McEachin,

Coming Clean deeply appreciates and supports the Statement of Principles for Environmental Justice Legislation and your leadership in developing them. Thank you for this important set of draft principles and for the process to provide input.

Coming Clean is a nearly 20 year-old justice organization that designs and builds initiatives among our network of 200 national, state, technical, and grassroots organizational members. Coming Clean provides the infrastructure for movement organizing that demonstrates the urgent need to reduce fossil fuel and petrochemical emissions, and achieve solutions to the significant climate, petrochemical, industrial agriculture problems and threats to democracy that we face.

Since 2001, Coming Clean's work has been grounded in the interests and leadership of those most directly impacted by the problems we seek to solve, connecting leaders to impactful research and important state and national organizing campaigns, as well as supporting self-determined community priorities for local improvement and engagement. Through Coming Clean, groups populate a movement space and direct and align their interests and activities into campaigns that are achieving safer chemicals and safer communities, safer farms and safer food, and safer products and safer stores.

Coming Clean's focus at the intersection of chemicals, energy, health, justice, and the economy is central to addressing cumulative pollution hazards, which disproportionately affect people of color and low income people. Expert groups in Coming Clean and the Coming Clean affiliated national environmental justice network, The Environmental Justice Health Alliance for Chemical Policy Reform (EJHA), work collaboratively to address concerns through public policy initiatives, market campaigns, education, communications, and grassroots organizing. We support the development and adoption of principles for Environmental Justice Legislation and a participatory process that involves Coming Clean, EJHA, our affiliate members and others who can help advance specific policy initiatives at the national, state and local level that follow these Principles.

Our suggestions to the proposed Principles include:

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- Ensuring the inclusion of fair and just relocation when it is warranted by impacts and hazards from industrial petrochemical operations, existing and legacy pollution, and/or the effects or risks of climate change.
- Comprehensive and fair consultation with workers and communities closest to the sources of (and/or impacts from) petrochemical and energy operations, especially but not exclusively of indigenous communities.
- Ensuring local food production and local food access and control is included in the identification of cumulative impacts and solutions.
- "Target reduction" at Hazardous Facilities. We must seek to eliminate the use and emissions of hazardous chemicals by altering production processes, substituting safer chemicals, redesigning products and systems, rewarding innovation and re-examining product functions and consumption access. Elimination of the production and use of persistent, bioaccumulative toxic petrochemicals, or PBTs, is essential to environmental health and justice. These are any chemicals that are slow to degrade, accumulate in our bodies or living organisms, and/or are highly hazardous to humans or the environment. Importantly, we must also ensure that the toxic burden of chemicals eliminated in the United States are not exported to other countries.
- Shift the burden of proof to industry. Government and/or impacted populations currently shoulder the burden of proving harm after harm has occurred. Industry must bear the responsibility to prove the safety of its operations and products before any potentially harmful exposure can impact workers or the public.
- As stated in the "Louisville Charter for Safer Chemicals" - Act on Early Warnings. Prevent harm from new or existing chemicals or operations when credible evidence of harm exists, even when some uncertainty remains regarding the exact nature and magnitude of the harm. Blaming "lifestyles" of individual or groups of people over their exposure to chemicals known or suspected to present hazards to human and environmental health is an old and dirty trick; as is the claim that some people can stand more pollution or pain or risk than others. The roots of these theories - however deep or shallow those roots may be - are steeped in racism and must be rejected.
- Worker Protection and Just Transition. Protections for workers against physical harm in the workplace through policies that intentionally reduce or eliminate hazards, require disclosure of hazard information and adequate safety training, protect whistleblowers, provide appropriate protective gear, and fully involve workers in devising adequate solutions are overdue. Workers must have the right to know what chemicals they are working with, what the potential hazards are, and to participate in decision-making about plant safety and potential alternatives.

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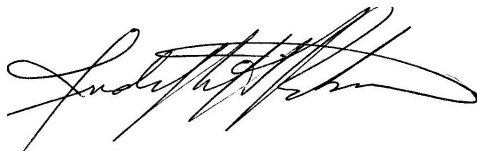
In addition to protections from bodily harm, workers must be guaranteed protection from wage and job loss. Some jobs in these outdated industries that put workers, communities, the environment and climate in harm's way will change or be lost to new, safer industries. A just transition ensures that workers are offered the necessary resources and training to continue to provide for their families and transition into new fields that pay as well or better than their old jobs and maintain the right to collectively bargain.

Thank you for the opportunity to submit this feedback and input. Coming Clean appreciates and supports the Statement of Principles for Environmental Justice Legislation. Thank you, again for your leadership in developing them.

These Principles for Environmental Justice Legislation and the opportunity to provide input and to engage in a participatory process to help advance specific national, state and local policy initiatives that adhere to them is both long over due and exactly right on time.

With deep thanks and interest in next steps,

Sincerely,

A handwritten signature in black ink, appearing to read 'Judith Robinson', with a large, sweeping flourish at the end.

Judith Robinson  
Executive Director