



February 14th, 2022

Sent via email to james.davis@mail.house.gov

The Honorable Raul Grijalva
Chairman
Natural Resources Committee
United States House of Representatives
Washington, DC 20515

The Honorable Bruce Westerman
Ranking Member
Natural Resources Committee
United States House of Representatives
Washington, DC 20515

Dear Chairman Grijalva and Ranking Member Westerman:

We are writing on behalf of Silent Spring Institute to provide comments on the Environmental Justice for All Act (H.R. 2021) and detail the need for action on issues of environmental racism and disparate exposure burdens to toxic chemicals across axes of race, class, and geographic location.

Silent Spring Institute is a non-profit research organization that studies the links between environmental chemicals and disease, with a focus on breast cancer. As one of the fundamental principles of environmental justice underscores, we believe that **every American has a right to live, work, and play in a safe and healthy environment regardless of race, color, national origin, or income.**¹ We have several research projects focused on environmental justice, including a study that explores the influence of lead hazard control programs at reducing other chemical hazards,² an investigation of endocrine disrupting chemicals in personal care products used by Black and Latina women,^{3,4} and research on whether low-income and communities of color in the U.S. have higher levels of contaminants in their drinking water.^{5,6} We have also researched indoor and outdoor air quality for environmental justice communities living near industrial facilities and major transportation corridors.^{7,8}

World War II, over 80,000 new chemicals have been released onto the market, very few of which are tested for safety or are subject to regulations.⁹ For breast cancer alone, **more than 200 chemicals have been associated with mammary gland tumors** in animal studies,¹⁰ and about half of these are chemicals that people are routinely exposed to in their everyday lives.¹¹ These chemicals are found in furniture, food packaging, cleaning products, personal care products, and numerous household items. Significantly, exposure to these chemicals are higher among low-income communities of color. Our research shows that water systems with higher levels of nitrate tend to serve predominantly Latinx communities.⁵ Exposure to nitrate itself is shown to be associated with cancers^{12,13} as well as birth defects,^{12,14} and high nitrate levels are also a good indicator of other drinking water contaminants present.⁶ Our studies have also found that beauty products marketed to women of color contain higher concentrations of toxic chemicals,^{3,4} which may contribute to the trend of women of color having higher chemical body burdens than white women.¹⁵

The disparate exposures we have studied are only small parts of a disturbing national trend. More than half the people in the US who live within 3km of a toxic waste site are people of color.¹⁶ Low-income communities of color are disproportionately exposed to air pollution,^{17,18,19} and 40% more likely to be serviced by water systems that continually violate the Safe Drinking Water Act.²⁰ All of these trends of disparate exposure contribute to a myriad of health and social wellbeing disparities between minority and white communities,²¹ including disparate rates of asthma,²² lead poisoning,²³ adverse birth outcomes,²⁴ pesticide exposure,²⁵ and Covid-19 mortality.^{26,27}

The Environmental Justice for All Act contains several measures that could greatly alleviate these exposure and health inequities,²⁸ including:

- Requiring permits under Clean Water Act and the Clean Air Act to consider cumulative impacts and only be issued when the project can demonstrate no harm to human health within reasonable certainty.
- Additional funding for research grants that study chemicals of exposure concern in personal and childcare products; funding for research into safer alternatives for cosmetic product chemical, specifically for those product-containing chemicals marketed specifically to people of color; requirements for transparent and accurate disclosure of ingredients in personal care products' labels.
- \$75 million annually in grants to support research, outreach, development, education, and projects on environmental and public health issues in environmental justice communities.
- Requiring federal agencies to implement environment justice strategies and engage with diverse communities, as proposed by Executive Order 12898.
- Expanding and improving genuine and meaningful opportunities for community engagement and influence under the National Environmental Policy Act (NEPA), and specific strengthening of Tribal representation and consultation in projects affecting Tribal land or even sacred sites off-reservation.

These key measures of the Act represent a long-awaited addressment of the hazards and inequities posed by toxic chemicals, insufficient regulations, and the resulting harms for communities of color, low-income communities, and Native/Indigenous communities. We hope the peer-reviewed scientific information we have provided can help inform your decision to support this Act. We greatly appreciate the opportunity to submit comments.

Sincerely,



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