TO: U.S. Environmental Protection Agency (EPA)
FROM: Dianna Cohen (CEO), Julia Cohen (Managing Director), Jen Fela (VP, Programs & Communications), Erica Cirino (Communications Manager), & Jackie Nuñez (Advocacy & Engagement Manager)
Organization: Plastic Pollution Coalition
Address: 4401A Connecticut Avenue NW #143, Washington, DC 20008
Phone: (323) 936-3010 x1
Contact Email: press@plasticpollutioncoalition.org

Subject: Comments on *Interim Framework for Advancing Consideration of Cumulative Impacts*
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Plastic Pollution Coalition (PPC) appreciates the opportunity to offer our comments on the Environmental Protection Agency's (EPA) *Interim Framework for Advancing Consideration of Cumulative Impacts.* Across the United States, environmental justice communities on the frontlines and fencelines of the plastic, fossil fuel, and petrochemical industries have long awaited recognition of and federal regulatory action to reduce the cumulative impacts of plastic pollution harming their health and communities. Accordingly, we welcome this Framework to consider cumulative impacts across a broad array of EPA decision making.

However, we emphasize the critical need to ensure equitable community involvement and strengthen the systems-based assessment of cumulative impacts, particularly in the context of plastic pollution.

1. **Streamline community involvement**

PPC is a U.S.-based non-profit communications and advocacy organization that collaborates with an expansive global alliance of organizations, businesses, and individuals to create a more just, equitable, regenerative world free of plastic pollution and its toxic impacts.

As such, PPC works as an ally to environmental justice communities, and has staff that have been born and lived within impacted communities. Additionally, many of our coalition's members are Americans who live in or have lived in communities across the nation that are harmed by environmental injustices, largely driven by the fossil fuel, petrochemical, and plastics industries. The serious consequences of these injustices include exposure to environmental pollutants, reduced

life span, increased risk of physical and mental health problems, and overall diminished quality of life.

We appreciate the inclusion of meaningful community engagement as part of the assessment process. However, we have heard from overburdened communities that they have previously encountered time-consuming processes or barriers to fully engage with the EPA. Therefore, we stress the importance of prioritizing and streamlining how environmental justice communities participate. Impacted communities should be consulted early and throughout the process to identify and address cumulative impacts, ensuring they remain centered in decision making when implementing solutions.

Further, we believe that additional guiding principles should be included to inform an equitable approach, including principles of transparency, ease of communication, building trust, and accessibility. The Framework should prioritize racial justice, provide translation services in community languages, and ensure that widespread and varying methods of outreach are utilized to maximize participation, reducing as many barriers as possible.[1]

2. Measure cumulative impacts in context

We appreciate the Framework's recognition of a systems-based One-Health approach to assessing community exposure to combinations of chemical and non-chemical stressors. In the context of plastic pollution, it is critical to assess the full life-cycle of plastics within environmental justice communities, including from plastic production to end pollution, and the varying pathways humans are exposed to plastic additive chemicals and microplastics via polluted air, water, soil, food, contact with plastic products, and elsewhere throughout plastic's endless toxic existence.[2] Assessing and mitigating the interrelationships of how plastic pollution harms communities and individuals within wider contexts such as access to nourishing food and healthcare, and cross-cutting issues with climate change, is critical to addressing environmental injustices.

For example, low-income, rural, Black, Indigenous, and People of Color communities bear the brunt of the harms associated with plastic pollution. The extraction of plastic's fossil fuel ingredients, as well as its production; transportation and storage; use; and disposal in landfills, incinerators, and the environment are unjustly concentrated in these overburdened neighborhoods and communities.[3]

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[1] WE ACT. *Community Engagement Brief*. https://www.weact.org/wp-content/uploads/2022/10/Community-Engagement-Brief-092322-FINAL.pdf; First National People of Color Environmental Leadership Summit. (1991). *The Principles of Environmental Justice (EJ)*.

[2] Tulve, N. S., Geller, A. M., Hagerthey, S., Julius, S. H., Lavoie, E. T., Mazur, S. L., Paul, S. J., & Frey, H. C. (2024). Challenges and opportunities for research supporting cumulative impact assessments at the United States environmental protection agency's office of research and development. *The Lancet Regional Health - Americas*, *30*, 100666. https://doi.org/10.1016/j.lana.2023.100666.

[3] Larson, H. & Sierra Club. (2021, November). *The Deep Injustice of Plastic Pollution*. https://www.sierraclub.org/articles/2021/11/deep-injustice-plastic-pollution; Environmental Protection Agency. (2024). *Facts and Figures about Materials, Waste and Recycling,*. https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling; CIEL. (2017). *Fueling Plastics: Fossils, Plastics, & Petrochemical Feedstocks*.

All Americans are harmed by plastic pollution, but some are harmed worse than others and the health problems caused by plastics are numerous and compounding. Context is necessary to understand a community's exposures to pollution. For example, legacy pollution, such as PCBs (polychlorinated biphenyls), which are now-restricted chemicals once used in plastics that are still present in the environment, may not be actively added to the environment but continue to pollute and expose people—causing adverse health effects.[4] Assessing adverse health effects from cumulative impacts needs to include current and historical multiple channels of exposure that may increase individual or population-level hazards. A systems approach across the full lifecycle of plastics aligns with the EPA *National Strategy to Prevent Plastic Pollution*.

More than 16,000 chemicals are found in plastics, with at least 4,200 of which are already known to be hazardous to people and nature.[5] Health problems caused by plastic chemicals cost the US healthcare system $250 billion in 2018 alone. Many of the chemicals in plastic are known to disrupt healthy function of the body's endocrine, or hormone, system, leading to disease, infertility,[6] and poor health.[7]

The fossil fuel, petrochemical, and plastics industries have caused serious harm to communities across the U.S., and directly threaten the lives of millions of Americans living on the frontlines of these industries and their pollution and wastes—and threaten the health of our entire nation. The plastic pollution crisis will inevitably grow worse unless urgent action is taken. We implore the EPA to streamline community involvement, ensure equitable participation and transparency, and implement the framework in the context of plastic pollution, comprehensively across all the stages it disproportionately harms human and environmental health. These assessments are a first critical step to redressing a legacy of unjust pollution in often overlooked and overburdened communities.

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https://www.ciel.org/wp-content/uploads/2017/09/Fueling-Plastics-Fossils-Plastics-Petrochemical-Feedstocks.pdf; UNEP. (2021). *Neglected: Environmental Justice Impacts of Marine Litter and Plastic Pollution*. https://wedocs.unep.org/bitstream/handle/20.500.11822/35417/EJIPP.pdf

[4] Saktrakulkla, P., Li, X., Martinez, A., Lehmler, H.-J., & Hornbuckle, K. C. (2022). Hydroxylated Polychlorinated Biphenyls Are Emerging Legacy Pollutants in Contaminated Sediments. *Environmental Science & Technology*, *56*(4), 2269–2278. https://doi.org/10.1021/acs.est.1c04780.

[5] Plastic Pollution Coalition. (2024, March 20). *New Report: Plastic Chemicals Are More Numerous and Hazardous Than Previously Thought*. https://www.plasticpollutioncoalition.org/blog/2024/3/20/new-report-plastic-chemicals-are-numerous-and-hazardous?_thumbnail_id=145724.

[6] Plastic Pollution Coalition. (2022, July 12) *Plastic "Tox" Episode 1: Plastics & Health - Are Phthalates Making Us Infertile? With Dr. Shanna Swan.* https://www.plasticpollutioncoalition.org/blog/2022/07/12/plastic-tox-shanna-swan.

[7] Trasande, L., Krithivasan, R., Park, K., Obsekov, V., & Belliveau, M. (2024). Chemicals Used in Plastic Materials: An Estimate of the Attributable Disease Burden and Costs in the United States. *Journal of the Endocrine Society*, *8*(2), bvad163. https://doi.org/10.1210/jendso/bvad163.