

# Summary of “EPA Needs to Conduct Environmental Justice Reviews of its Programs, Policies, and Activities”

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Executive Order 12898 “requires EPA to review all of its programs, policies and activities in order to identify and address the disproportionately high and adverse human health or environmental effects ... on minority populations and low-income populations. This mandate is based on the plain language of the Executive Order and is supported by the accompanying Presidential Memorandum.”

The EPA has twice committed itself to environmental justice under the Bush Administration, once in August 2001 and most recently in November, 2005, on the heels of criticism of its proposal to remove race and income from the definition of environmental justice. Yet contrary to the executive order, neither commitment included direction to assess whether any of the EPA programs, policies or activities had disproportionately high and adverse human health or environmental effects on minority and low-income populations.

The IG asked 3 questions:

1. Has there been clear direction from Agency senior management to perform environmental justice reviews of EPA programs, policies and activities?
2. Has the Agency performed environmental justice reviews?
3. Does the Agency have adequate guidance to conduct these reviews or is there a need for additional directions or protocols?

**Major Finding: “Until these program and regional offices perform environmental justice reviews, the Agency cannot determine whether its programs cause disproportionately high and adverse human health or environmental effects on minority and low-income populations.”**

## Results of Survey

EPA program and regional offices have not performed environmental justice reviews in accordance with Executive Order 12898.

- 60 percent of respondents said they had not performed reviews.
- 87 percent of respondents said EPA had not requested them to perform reviews.
- Others said they did not know how to do an assessment. 80 percent stated protocols, framework or additional direction useful.

## Recommendations

1. Require EPA’s program and regional offices to identify which programs, policies, and activities need environmental justice reviews and require these offices to establish a plan to complete the necessary reviews.
2. Ensure these reviews determine whether the programs, policies, and activities may have a disproportionately high and adverse health or environmental impact on minority and low-income populations.

3. Require each program and regional office to develop specific environmental justice review guidance for conducting environmental justice reviews.
4. Designate a responsible office to compile results of environmental justice reviews and recommend appropriate actions.

EPA agreed with the recommendations.