Incorporating health equity into alternatives assessment frameworks
Perspectives from pilot interviews

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No conflicts to disclose
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Regrettable substitutions have harmed vulnerable populations

- Diacetyl $\rightarrow$ 2,3-pentanedione: Workers
- Chlorinated solvents $\rightarrow$ n-hexane: Workers

- When we choose a replacement for a toxic chemical, how do we protect the health of the most vulnerable?
Two types of elements that influence decisions in an AA

1. **Data driven**, i.e., data on hazards/endpoint

   “What is deemed safer... ultimately reflects a set of personal, corporate, legislative, or other values.”

2. **Based on value judgements**

   1. How to consider data gaps
   2. How to consider trade-offs
   3. Degree of disclosure/transparency
   4. Process of stakeholder engagement

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Values not explicated in AA frameworks

“Many frameworks also do not consider the decision-making process or decision rules used for resolving trade-offs...or the values that underlie such trade-offs.”
How can values from environmental justice and public health inform AA decisions?

- Overarching principle: health equity
Our key informants for interviews

- **Ogonnaya Dotson-Newman**
  JPB Foundation

- **Jose Bravo**
  Just Transition Alliance

- **Ernie Pacheco**
  Communication Workers of America

- **Catherine Porter**
  Healthy Nail Salon Collaborative

- **Vi Waghiyi**
  Alaska Community Action on Toxics
Key themes

- Access to information/information quality
- Genuine stakeholder engagement
- Explicit accounting of the consequences of trade-off decisions
Commons Principles for AA through an equity lens

- Developed 2013 by environmental health scientists, advocates, funders, and policy makers

**EXAMPLE**

2. MINIMIZE EXPOSURE

Assess use patterns and exposure pathways to limit exposure to alternatives that may also present risks.

Draft additions:
- Identify vulnerable populations currently impacted by the toxic chemical and those that may be impacted by potential alternatives; understand each chemical's use patterns and exposure pathways.
Recommendations for AA

- Stakeholder engagement
  - All stages: scoping > post-implementation
  - Decision making on trade-offs
  - Information gathering: chemical uses & exposures; social and economic impacts
- Commons Principles for AA with equity language
- Ensure PBT chemicals not selected as alternatives
- Ensure chemicals with chronic health hazards not selected as alternatives
Recommendations for AA, cont.

- Define minimum data set needed to evaluate alternatives
- Understand complete product life cycle
- Promote public communication of information on chemicals in products
- Require social and economic impact analysis
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