



Justice-Oriented Ethical Impact Assessment for AI: Institutionalizing Cultural Diversity in Global AI Governance

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I. Objective Statement

This proposal seeks to institutionalize cultural diversity and difference-sensitive justice into AI ethical governance. It introduces a Difference-Sensitive AI Governance Structure, grounded in Charles Taylor's theory of the politics of recognition and Iris Marion Young's justice as difference, which reorients fairness from distributive equality to institutional inclusion, participatory parity, and the dismantling of systemic oppression.

Central to this proposal is the integration of the Justice-Oriented Ethical Impact Assessment Toolkit (J-EIA) evaluation matrix into the UNESCO RAM and EIA process and national-level response strategies. This framework promotes the structural embedding of cultural diversity within AI governance across multiple dimensions, including policymaking, institutional design, algorithm development, and ethical evaluation. We aim to move beyond algorithmic inclusion towards structural justice and ethical integrity, systematically embedding cultural difference into the foundations of AI policy, regulation, and design. The overarching objective is to ensure AI value alignment, cultural justice, and the ethical implementation of the UN SDGs through culturally responsive and justice-oriented AI systems.

II. Background and Problem Framing

A persistent ethical gap in the implementation of the UNESCO Recommendation lies in the insufficient structural recognition of cultural diversity as a foundational value in AI governance. Institutional diagnostics and critical policy analyses suggest that, although the Recommendation emphasizes fairness, inclusivity, and non-discrimination, current implementation often reduces cultural diversity to symbolic inclusion or data tokenism. Policy actions remain largely confined to the preservation of language and the digitization of cultural resources—reflecting a utilitarian and instrumental approach to culture. The dominance of monolingual and monocultural paradigms within AI systems contributes to epistemic injustice, cultural silencing, and the marginalization of indigenous and non-dominant knowledge systems. The failure to acknowledge cultural diversity as an as a foundational ethical value, an epistemic paradigm, and an expression of collective subjectivity gives rise to deep structural risks: erasure of identity, exclusion from public reasoning, and the weakening of civilizational ecosystems. There is an urgent need to bridge the gap between normative commitments and institutional mechanisms by operationalizing culture-sensitive justice across all levels of AI governance. (See Appendix 1)

III. Theoretical Foundation: Integrating “Politics of Recognition” and “Structural Justice”

Dimension—Charles Taylor: Politics of Recognition— Iris Marion Young: Justice as Difference
Value Orientation—Respect for identity, culture, and self-understanding—Resistance to institutional oppression and structural inequality

Normative Focus—Subjectivity and spiritual integrity—Structural participation and expressive rights
Application to AI—AI systems must embed mechanisms of cultural recognition—AI governance structures must dismantle marginalization and empower plural cultures

Key Risks—Cultural standardization, loss of identity—Absence of voice, exclusion from political representation

Paradigm Shift: From Bias Mitigation to Structural Cultural Justice

This proposal calls for a governance transformation from “algorithmic bias correction” to structural cultural justice, guided by three key principles:

- Diversity as Justice: Cultural pluralism must be protected as an indicator of structural justice.
- Expression as Governance: Voice and representation across AI life cycles are essential.
- De-Technologizing Homogenization Design: Resist assimilationist design logics embedded in global technology standards and counter the risks of cultural colonialism and digital techno-hegemony.

IV. Policy Architecture: A Justice-Oriented Ethical Impact Assessment Toolkit (J-EIA)

Building on UNESCO’s RAM and EIA frameworks, this proposal systematically constructs the Justice-Oriented Ethical Impact Assessment Toolkit (J-EIA)—an evaluation matrix encompassing seven key dimensions: cultural expression rights, language risks, content visibility, community consultation, structural oppression, cultural adaptability, and knowledge systems (See Appendix 2).

It proposes actionable assessment questions, quantitative indicators, and evaluation procedures. It is designed for formal institutional adoption as a threshold standard within national ethical evaluation systems under the EIA. The objective is to translate cultural diversity, expressive rights, and epistemic justice into measurable governance mechanisms that foster culturally inclusive AI development.

Recommended national-level actions include:

1. Formal recognition of J-EIA within national AI ethics guidelines
2. Integration into regulatory review and ethical approval procedures
3. Capacity-building for cultural auditors and impact assessors
4. Inclusion of cultural representatives in AI ethics and oversight bodies
5. Biennial reporting to UNESCO on cultural justice performance metrics

Strategic Goals of the Initiative:

1. Institutionalize cultural diversity as a foundational principle of AI governance
2. Operationalize J-EIA in alignment with UNESCO’s RAM and EIA
3. Prevent cultural harm through multi-layered, proactive risk evaluation
4. Empower collective subjectivity through rights of expression and participation
5. Embed non-dominant knowledge systems across the AI lifecycle

V. Concluding Statement

The United Nations has laid a critical foundation for fairness and inclusion in AI governance. To fully realize ethical AI, we must now move beyond algorithmic equality toward structural cultural justice. Embedding cultural expression rights, refining ethical assessment, and empowering marginalized communities are essential to building an AI ecosystem where technology, cultural diversity, and human dignity are harmoniously aligned.