

Action in the Backlash Era: The Accountability Challenges of Greenhushing



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Research Design

Longitudinal analysis of corporate sustainability under sustained political pressure

Primary Market	Industry	Country	Board Diversity		CEO Tenure	Inception	Posture Coding		
			% Female	% Diverse			Sustainability / Climate	Inception	DEI
Commercial	Healthcare	US	> 33%	> 10%	~11 - 20	2015	No change to existing commitments or programs	NA	No change to existing commitments or programs
Consumer	Insurance	Germany	> 33%	At least 1	~7 - 10	1998	Increased commitments (action)	2021	No change to existing commitments or programs
Consumer	Technology	US	> 10%	> 45%	~3 - 6	2007	Increased commitments (action)	2009	Significant commitment / program elimination
Consumer	Technology	US	> 33%	> 10%	~3 - 6	2015	Increased commitments (action)	2014	Significant commitment / program elimination
Consumer	Food & Beverage	Belgium	> 45%	At least 1	~3 - 6	2018	No change to existing commitments or programs	2018	No change to existing commitments or programs
Consumer	Technology	US	> 45%	> 10%	~11 - 20	2012	Increased commitments (action)	2014	Increased commitments (action)
Commercial	Healthcare	UK	> 45%	> 10%	~11 - 20	2015	Increased commitments (action)	2014	Active re-affirmation (language)
Consumer	Banks	US	> 33%	At least 1	<3	2005	Coalition withdrawal - programs and commitments intact	2004	Reduced commitments / program reductions
Commercial	Chemicals	Germany	> 33%	> 10%	~11 - 20	1994	No change to existing commitments or programs	2017	No change to existing commitments or programs
Commercial	Chemicals	Germany	> 33%	At least 1	~7 - 10	2018	Active re-affirmation (language)	2019	Active re-affirmation (language)
Consumer	Banks	Spain	> 45%	At least 1	~7 - 10	2019	Active re-affirmation (language)	2019	Active re-affirmation (language)
Consumer	Insurance	US	> 10%	> 10%	>30	NA	No prior commitments	2020	No prior commitments
Commercial	Industrials	Germany	> 10%	None	<3	1920	Increased commitments (action)	2007	No change to existing commitments or programs
Consumer	Oil & Gas	UK	> 45%	> 10%	<3	2020	Reduced commitments / program reductions	2011	No change to existing commitments or programs
Commercial	Personal & Household	UK	> 45%	> 10%	~3 - 6	2020	No change to existing commitments or programs	2015	Increased commitments (action)

- 75 public and private companies analyzed longitudinally x2 periods of study
- Diverse cross-sector exposure across US, EU (Europe + UK)
- Multi-year observation from Apr '24 – Apr '25 (Tranche 1) & May '25 – Jan '26 (Tranche 2)

- 7 posture codes used to establish 4 cohorts examining ESG commitments vs execution
- Publicly available governance, policy & communication signals tracked
- Institutional reactions to political & reputational pressures, public narratives examined

Source material: Cooper, K. & Hawkins, N. (2025, September). [Are Companies Actually Scaling Back Their Climate Commitments?](#) Harvard Business Review.

Tranche 1: The Headlines Have it Wrong

Observed corporate behavior diverges materially from dominant narratives of climate retreat

Cohort	Definition	Signals Observed	% of Companies
Retreating	Reduced sustainability efforts; Public retractions or internal dismantling	Program cuts, coalition exits, reduction or removal of quantitative commitments, language modifications, shifting leadership rhetoric	13%
Holding Pattern	No change, but no active public reaffirmation; Neutral positioning	Static program levels, muted language, reduced external engagement, absence of sustainability PR	40%
Reaffirming	Public affirmation of commitments; Strategy remains stable under pressure	Consistent messaging, board affirmation, program continuity	13%
Accelerating	Active, public expansion of strategy	New targets, increased investment, deeper operational integration, investor engagement	32%

Public Narrative:

- Corporate climate ambition is in broad decline
- Silence signals disengagement from sustainability goals
- Political pressure is forcing companies to pull back
- ESG commitments are becoming unsustainable

Data-Backed Findings:

- 6% of companies eliminated real commitments
- 85% maintained or expanded
- Retrenchment higher in U.S. than EU (18% v. 12%)
- Volatility higher in public versus privately-held firms
- Consumer markets more susceptible to external pressure

Tranche 2: Stability Has Become Misleading

Public commitments appear stable, but firm-level behavior is increasingly volatile

Aggregate commitments remained broadly stable

- Reinforcement: +4%
- Retrenchment: -3%
- Neutral unchanged +3%

Disclosure became more selective, inconsistent, and context-dependent

- 69.3% shifted posture code
- 47% shifted between cohorts

Divergence increased across markets

- Reinforcement: U.S. +12%, EU -6%
- Volatility: U.S. 56%, EU 81%

Signal reliability declined

- Coalition participation changes (+ / -) ~4x more common among neutral/retrenching firms
- Industry affiliations produced conflicting signals across firms

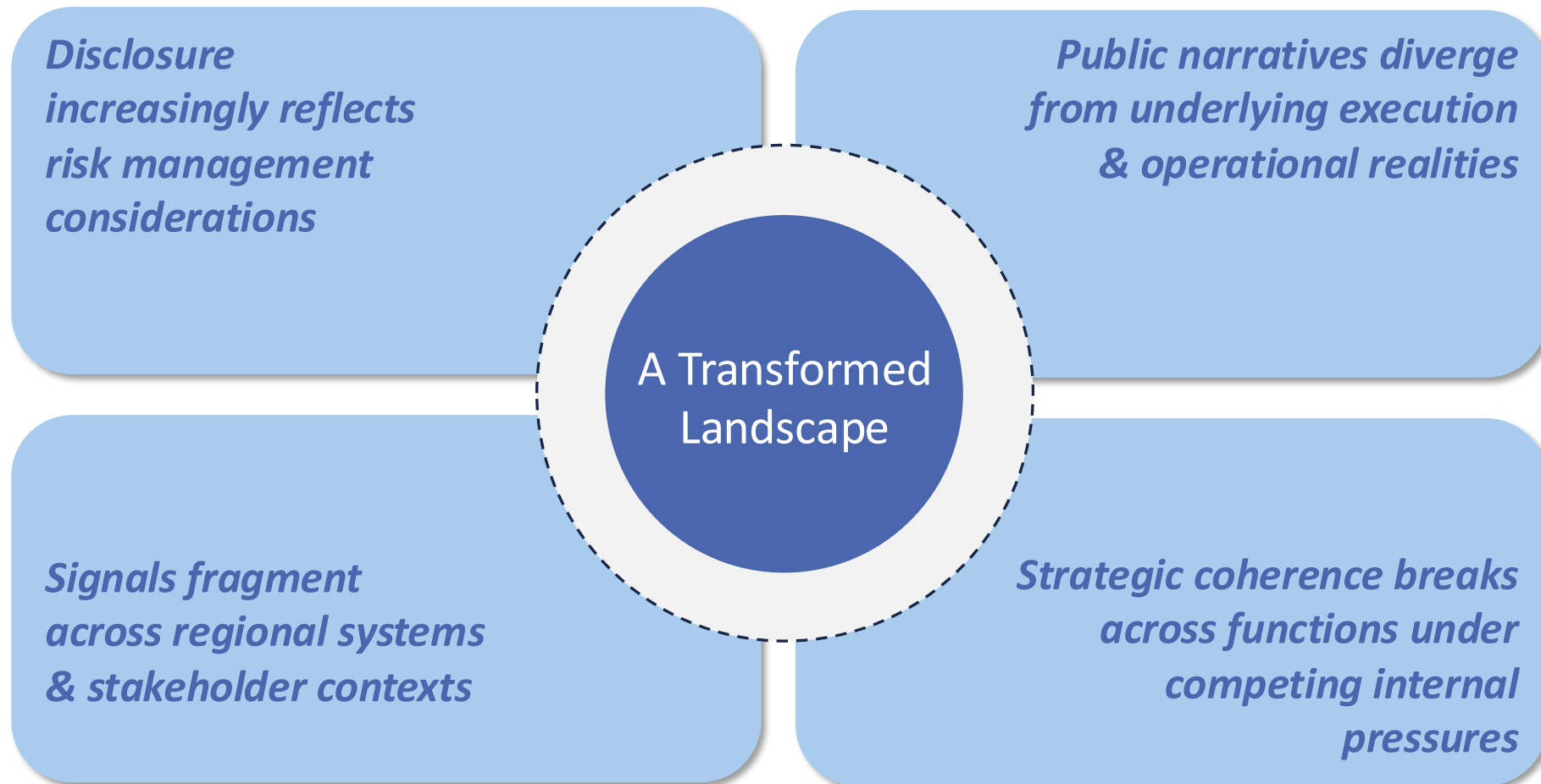
Negative transition pathways exhibit clear trends

- Policy opposition observed only in neutral & retrenching firms
- Governance narrowing concentrated among retrenching firms

Stability in commitments masks a system becoming harder to interpret

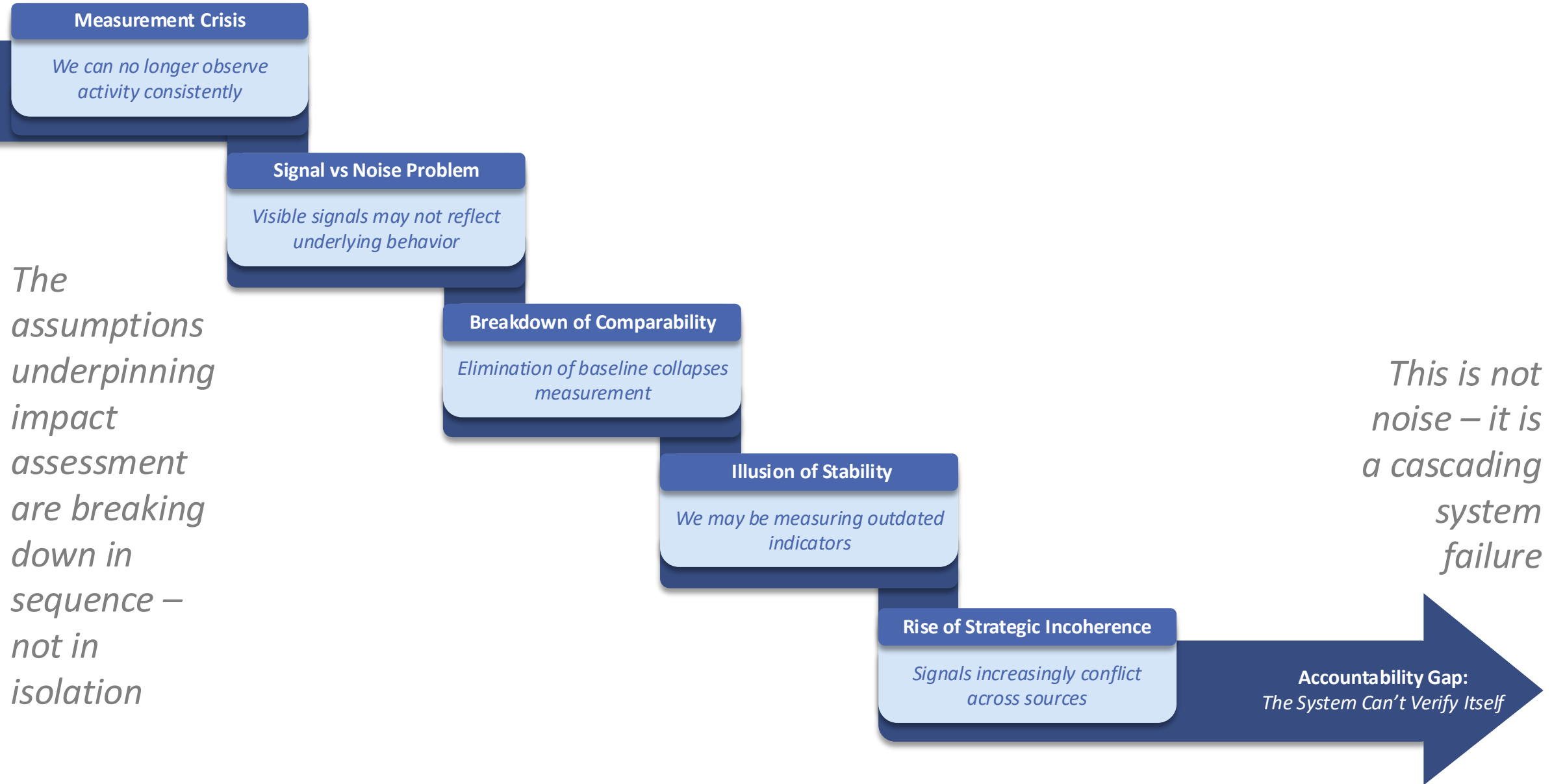
The Post-Transparency Era

Markets are shifting; visibility, coherence, and trust can no longer be assumed



When visibility is no longer reliable, interpretation becomes essential

There Are Six Shifts Unraveling the System

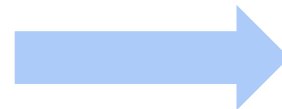
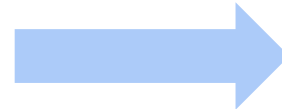
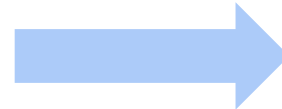
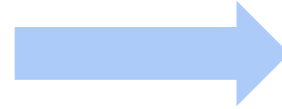


Deep-Dive 1: Disclosure is Strategy

Disclosure increasingly reflects risk management, not just performance

LEGACY ASSUMPTION

- Disclosure reflects underlying performance
- More disclosure increases transparency
- Silence indicates limited activity
- Reporting systems provide reliable signals



OBSERVED REALITY

- Disclosure optimized for risk exposure, not completeness
- Firms increasingly reduce visibility in sensitive contexts
- Silence is a strategic decision to manage scrutiny and liability
- Signals vary across audiences & jurisdictions

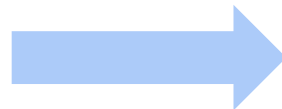
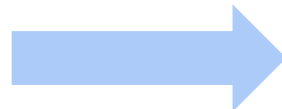
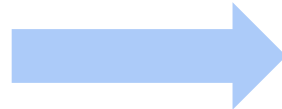
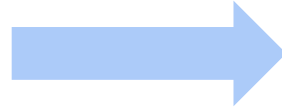
Visibility is managed – not given

Deep-Dive 2: Incoherence is Adaptation

What appears as inconsistency may reflect how firms adapt to competing system pressures

LEGACY ASSUMPTION

- Inconsistency signals weak strategy or execution
- Misalignment reflects governance or leadership failure
- Conflicting signals indicate lack of coordination
- Coherence is required for credibility and trust



OBSERVED REALITY

- Firms balance incompatible regulatory demands
- Internal functions pursue divergent strategic priorities
- Communication tailored to audience-specific risk exposure
- Alignment may signal simplification, not strategic reality

Inconsistency often reflects adaptation rather than failure

What Practitioners Can Do Now

In a system with incomplete, uneven signals, practitioners must change how they interpret, not just what they measure

1

Track directional movement —

not stated commitments



2

Compare within systems —

not across assumed baselines



3

Treat silence as signal —

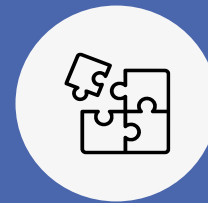
not absence



4

Diagnose inconsistency —

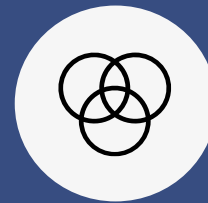
not default to failure



5

Infer behavior from patterns —

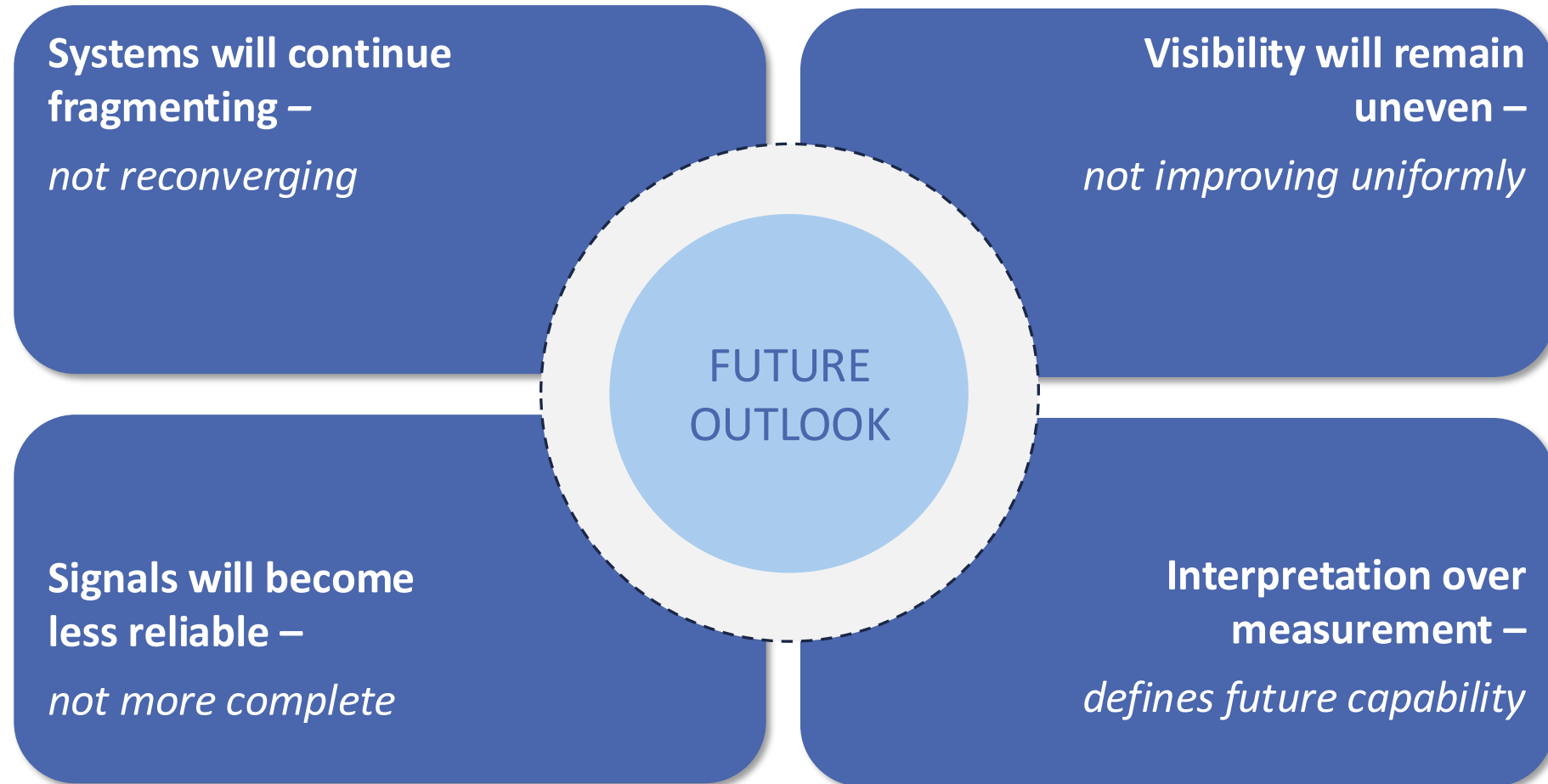
not narratives



These immediate shifts build toward longer term, future capabilities

The Field is Shifting

As systems fragment and visibility declines, impact assessment must evolve to remain relevant



Measuring better will not solve this – thinking differently will



Let's continue the conversation!

Message me your questions or comments in the IAIA26 app.

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